
Mass. Gen. Laws ch. 93A and the Defense of In Pari Delicto

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On June 22, 2006, the United States Court of Appeals for the First Circuit decided *Baena v. KPMG LLP*, holding that the *in pari delicto* doctrine barred claims under Mass. Gen. Laws ch. 93A §§ 1-11 (2002) brought by a litigation trustee against a bankrupt company's outside auditors.

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