

Skadden's Tax Group, comprising more than 100 attorneys in eight offices worldwide, is experienced in virtually every type of matter that presents significant tax issues. In addition to handling all aspects of tax law in corporate transactions, we represent clients at every level, and in most types, of disputes with taxing authorities.

With extensive experience at Department of the Treasury, IRS and Department of Justice, as well as in congressional tax writing committees, our tax professionals are highly skilled in handling intricate tax issues with the goal of reaching creative and value-added solutions tailored to each client's specific needs. Our Tax Group also closely coordinates its efforts with Skadden lawyers in other disciplines to provide a one-team approach to each matter. As an integrated firm with 50-plus practices across 21 offices worldwide, we are uniquely positioned to serve clients in every industry and on any tax matter.

For decades, the unique breadth of our transactional tax practice and our geographical reach have allowed us to represent a broad array of public and private companies in connection with mergers and acquisitions, post-acquisition integration transactions, cross-border and global internal restructuring transactions, spin-offs and joint ventures. Our transactional tax work includes extensive experience with:

- tax-free and taxable acquisitions, leveraged buyouts, spin-offs and dispositions, often with cross-border components;
- international tax planning, including transfer pricing and advance pricing agreements; subpart F, global intangible low-taxed income (GILTI), foreign-derived intangible income (FDII), and base erosion and anti-abuse tax (BEAT) planning; intellectual property and supply chain planning; and foreign tax credit utilization;
- real estate investment trusts (REITs) and regulated investment companies (RICs);
- partnerships, LLCs, joint ventures and disregarded entities in a variety of unique contexts and in virtually every industry sector;

- corporate finance and funding transactions, recapitalizations, project finance, tax equity transactions and leasing transactions;
- Chapter 11 reorganization cases, nonjudicial restructurings and other troubled company workouts; and
- private equity and hedge fund transactions.

As one of the nation's leading tax controversy practices, clients also turn to us to resolve large, complex and global tax controversy and litigation matters. We represent corporations, partnerships, estates, individuals and government entities facing every kind of tax liability including income tax, estate tax and excise tax. We regularly work with our clients to resolve their disputes quickly and privately, through the administrative process. In addition, our highly regarded tax litigators have experience representing clients in many of the most significant tax cases in the United States. Our tax controversy work includes:

- audit, administrative appeal, mediation and arbitration, deficiency and refund litigation, and international matters involving competent authority disputes (APMA);
- global settlements, fast-track appeals settlements, pre-filing agreements and similar expedited resolution strategies;
- tax litigation, both at trial and on appeal, in all jurisdictions — U.S. Tax Court, the federal district courts, the U.S. Court of Federal Claims, federal courts of appeals and the U.S. Supreme Court; and
- congressional investigations, as third parties under subpoena, in criminal investigations and under criminal indictment.

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Our Tax Group also provides advice regarding:

- obtaining private letter rulings and other guidance from the IRS and the U.S. Department of the Treasury;
- tax accounting, including capitalization, cost recovery, mark-to-market and accounting method change questions;
- tax-exempt and nonprofit organizations, including formation and structuring, mergers and acquisitions, joint ventures and other transactions, and obtaining exemption determinations from the IRS; and
- state tax planning and controversy.

Skadden has been named *Law360's* Tax Group of the Year every year since 2015, as well as No. 1 in *Vault's* Best Law Firm for tax every year since 2010. We also were recently named 2023 Tax Law Firm of the Year in *U.S. News — Best Lawyers* as part of the publication's 13th edition of the Best Law Firms rankings. Our tax practice and its members are repeatedly recognized at the *International Tax Review's* Americas Awards and in the highest bands of *Chambers USA*, *Chambers Global*, *Chambers High Net Worth*, *The Legal 500* and *Tax Directors Handbook*.

## **Tax-related Administrative and Policy Experience**

Former positions held by our tax professionals include:

### **Internal Revenue Service**

- Commissioner
- Chief counsel
- Associate chief counsel, Corporate
- Area counsel for financial services, Office of Chief Counsel
- Commissioner of the Small Business/Self-Employed Operating Division
- Team Leader, Advance Pricing and Mutual Agreement (APMA)

### **US Department of the Treasury**

- Assistant secretary for tax policy

### **Joint Committee on Taxation**

- Legislative counsel experience

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“Leading firm with outstanding bench strength and renowned expertise spanning the full spectrum of domestic and international tax matters.”  
— *Chambers USA 2022*