



Dewey & LeBoeuf

Global Tax



About Dewey & LeBoeuf

Dewey & LeBoeuf is a full-service law firm providing counsel throughout the Americas, Europe, Russia/CIS, the Middle East, Asia and Africa. With more than 1,100 lawyers in major financial and commercial centers, the firm represents national and global corporations, financial institutions and government agencies in their most complex legal matters.

For additional information, please visit www.dl.com.

Global Tax

Dewey & LeBoeuf has approximately 100 lawyers around the world providing a full spectrum of corporate tax advice in our global offices. Through our European offices, we advise on tax matters under UK, Polish, German, Spanish, Italian, French and Russian law. Our tax lawyers are actively involved in all major matters handled by the firm and have considerable experience in developing creative solutions to the complex tax issues confronted by our clients.

Our core practice areas include transactional and general corporate tax planning, international tax, restructuring, capital markets, financial products, private equity, taxation of insurance companies, lease financing, tax-exempt financing, tax controversy and litigation, legislative matters and compensation and benefits.

Our clients represent a broad range of industries, including life sciences and healthcare, power and energy, financial services, insurance, manufacturing, retail, entertainment, technology and telecommunications.

We work closely with our clients and with members of our Corporate practice in a broad array of mergers and acquisitions, corporate finance, structured products and derivatives, private equity, real estate and restructuring matters to provide in-depth pre- and post-transaction tax planning tailored to achieve the business and financial objectives of our clients.

A major part of our Global Tax practice involves large-case tax controversy examinations, tax litigation matters and government investigations. We represent US and global corporate taxpayers at the audit and appeals stages before the Internal Revenue Service and other taxing authorities, and in tax litigation in federal courts ranging from the United States Tax Court to the Supreme Court of the United States. We also advise clients on strategies to prepare for or avoid potential tax disputes through development of tax policies and procedures relating to tax accrual workpapers, privileged communications and reportable transactions.



Global Tax Experience

We regularly counsel clients in M&A transactions, spin-offs and other divestitures, internal restructurings, consolidated return matters and workouts, as well as transactions involving REITs, partnerships and other pass-through entities. We also advise clients on a broad range of global tax matters, and all types of debt and equity offerings. Our clients include both public and private, domestic and multinational companies. We represent acquiring and acquired corporations and their shareholders, investors and their investment vehicles, underwriters and all categories of lenders.

In our Tax Controversy and Litigation practice, we represent clients in all stages of the audit and appeals process. The firm also represents several major professional service firms and financial institutions in connection with civil litigation and government investigations regarding alleged tax shelters.

Dewey & LeBoeuf has always placed a special emphasis on tax law. Throughout the years, members of the firm have served in various high-level positions with the Internal Revenue Service, Treasury Department and Congressional tax-writing committees. Our tax lawyers frequently lecture at conferences across the United States and Europe, author articles on tax issues, teach in masters-of-law programs, and actively participate in professional organizations such as the Tax Sections of the New York State and American Bar Associations, the Federal Bar Association and the American Tax Institute in Europe.

Representative Clients

Accredited Home Lenders, Inc.

Aegon N.V.

Allstate Corporation

American International Group, Inc.

AmeriCredit Financial Services, Inc.

Ameriquest Mortgage Company

Archer Daniels Midland Company

Aspen Insurance Holdings Limited

Automatic Data Processing, Inc.

AXA Financial, Inc.

Babcock & Brown Limited

The Bank of New York

Mellon Corporation

Bertelsmann, Inc.

The Blackstone Group

Burlington Northern

Santa Fe Corporation

Capmark Financial Group Inc.

Chevy Chase Bank, F.S.B.

Citigroup Inc.

CIT Group Inc.

The Clorox Company

CSX Corporation

Deutsche Bank AG

Deutsche Bank Securities, Inc.

Dresdner Kleinwort Securities LLC

EnCana Corporation

General Electric Company

General Electric Capital Corporation

Genworth Financial, Inc.

Fannie Mae

Ford Motor Credit Company

HCA Inc.

HSBC Bank

Intel Corp.

JPMorgan Chase & Co.

KeyBank National Association

Key Equipment Finance

Lancashire Holdings Limited

LifePoint Hospitals, Inc.

Lockheed Martin

Louis Dreyfus Corporation

Macquarie Bank

Merrill Lynch & Co., Inc.

Metropolitan Life Insurance

Company, Inc.

Nationwide Financial Services, Inc.

Norfolk Southern Corporation

Northwestern Mutual Life Insurance

Company

Omnicare, Inc.

Pacific Gas and Electric

Riverdeep Group plc

The Royal Bank of Scotland

Safeway Inc.

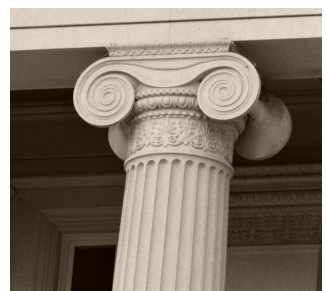
Société Générale

Southern Company

Sumitomo Corporation of America

Union Bank of California, N.A.

Union Pacific Corporation



Awards and Recognition

Firm Recognition

- *Chambers USA*: Recognized among the “Leading Law Firms in Tax in DC” (2006–2010) and “Leading Law Firms in Tax in New York” (2008–2010)
- *Chambers USA*: Recognized among the “Leading Law Firms in Tax: Controversy in the US” and “Leading Law Firms in Tax: Corporate and Finance in the US” (2009–2010)
- *Chambers Europe*: Recognized among the “Leading Law Firms in Tax in Poland,” “Leading Law Firms in Tax in Germany” and “Leading Law Firms in Tax in Italy” (2007–2010)
- *Chambers Global*: Recognized within Band 1 in a list of “Leading Law Firms in Tax in Poland” (2006–2008), as one of the “Leading Tax Practices in Italy” (2006–2008) and as one of the “Leading Tax Practices in Germany” (2006, 2007)
- *Legal 500 US*: Recognized among the “Leading Law Firms in Tax Controversy in the US” (2007, 2009–2010)
- *Legal 500 US*: Recognized among the “Leading Law Firms in Tax: Domestic Tax in the East Coast” (2007–2010)
- *Legal 500 UK*: Recognized among the “Leading Law Firms in Corporate Tax in the UK” (2008, 2009)
- *Legal 500 EMEA*: Recognized among the “Leading Law Firms in Tax in Poland,” “Leading Law Firms in Tax in Germany,” “Leading Law Firms in Tax in Italy,” “Leading Law Firms in Corporate Tax in the UK” (2008–2010)
- *PLC Which Lawyer?*: “Highly recommended in Tax in Poland” (2008), “Recognized in Tax in Germany” (2008) and “Recommended in Tax in Italy” (2007, 2008)
- *JUVE*: Recognized among the “Leading Tax Practices in Germany” (2008)
- *International Tax Review*: Shortlisted for the 2009 European Tax Awards for “Best US Law Firm in Europe,” “European Capital Markets Tax Team of the Year” and “Germany Tax Firm of the Year” (2009)
- *Chambers USA*: Lawrence Hill was recognized among the “Leading Individuals in Tax: Controversy in the US” (2008–2010) and “Leading Individuals in Tax: Litigation in the US” (2006, 2007)
- *Chambers USA*: Seth Farber was recognized among the “Leading Individuals in Tax: Fraud in the US” (2007–2010)
- *Chambers Europe*: Dr. Bernulph von Crailsheim (2009–2010) was recognized among the “Leading Individuals in Tax in Germany”
- *Chambers Europe*: Tomasz Kacymirow was recognized among the “Leading Individuals in Tax in Poland” and Lucca Dezzani was recognized among the “Leading Individuals in Tax in Italy” (2007–2010)
- *Chambers Europe*: Fred Gander was recognized among the “Leading Individuals in Tax in the UK” (2008)
- *Chambers UK*: Judith Harger was recognized in Tax in the UK (2009)
- *Chambers Global*: Tomasz Kacymirow was recognized among the “The World’s Leading Lawyers for Business in Tax in Poland” (2006–2008)
- *Chambers Global*: Fred Gander was recognized among the “The

Lawyer Recognition

- *Chambers USA*: Gordon Warnke was recognized among the “Leading Individuals in Tax in New York” (2009–2010)
- *Chambers USA*: Joseph Pari (2006–2010) was recognized among the “Leading Individuals in Tax in DC”

World's Leading Lawyers for Business in Tax in the UK" and Luca Dezzani was recognized among the "The World's Leading Lawyers for Business in Tax in Italy" (2008)

- *Legal 500 US*: Felix Laughlin, Joseph Pari and Gordon Warnke were recognized among the "Leading Individuals in Tax in the US" (2007)

- *Legal 500 US*: Lawrence Hill was recognized as one of the "Leading Lawyers in Tax Controversy in the US" (2009–2010) and was selected among the "Leading Individuals in Tax Controversy in the US" (2007)

- *Legal 500 US*: Mark Allison (2007, 2009–2010) and Felix Laughlin (2007) were selected among the "Leading Individuals in Tax Controversy in the US"

- *Legal 500 US*: Joseph Pari (2008–2010), Gordon Warnke (2008–2010) and George Abramowitz (2009) were recognized among the "Leading Individuals in Tax: Domestic Tax – East Coast"

- *Legal 500 UK*: Recommended Lawyers in Corporate Tax: Fred Gander (2008), Judith Harger (2009) and Julio Castro (2009)

- *Super Lawyers*: Gordon Warnke, Stuart Odell and Joseph Pari

were selected for inclusion in the *Corporate Counsel Edition* (2009)

- *Super Lawyers*: Gordon Warnke (2006–2009), Lawrence Hill (2006–2009), Stuart Odell (2007–2009) and Hershel Wein (2007, 2009) were selected for inclusion in *New York Super Lawyers* and Joseph Pari (2007–2009) and Felix Laughlin (2007) were selected for inclusion in *Washington, DC Super Lawyers*

- *Who's Who Legal*: Joseph Pari was selected for inclusion in *The International Who's Who of Corporate Tax Lawyers* (2009)

- *Best Lawyers in America*: Gordon Warnke, Lawrence Hill, Stuart Odell, Felix Laughlin and Joseph Pari were selected for inclusion in the 2010 edition of *The Best Lawyers in America®* in Tax Law. Felix Laughlin and Joseph Pari have been listed in *Best Lawyers* for at least ten years

- *Washington Post Best Lawyers*: Felix Laughlin and Joseph Pari were recognized among "Washington, DC's Best Lawyers in Tax" (2008)

- *American Bar Association Section of Taxation*: Lawrence Hill is the retiring chair of the Court Procedure and Practice Committee of the ABA Section of Taxation (2007)

- *PLC Which Lawyer?*: "Recommended Lawyers: Luca Dezzani, Tax"

- *Legal Media Group Expert Guides*: Fred Gander was recognized among the "World's Leading Tax Advisers" (2008)

- *JUVE*: Dr. Bernulph von Crailsheim was also mentioned as recommended lawyer (2008)

Dewey & LeBoeuf LLP

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