



SAMPLE BULLET POINTS BY PRACTICE AREA: TAX

- Represent clients in connection with state and local tax audits, administrative proceedings, judicial appeals and serve in all aspects of litigation.
- Analyze and research issues presented, draft legal memoranda, pleadings, motions, briefs in multi-jurisdiction tax cases involving sales and use taxes and federal and constitutional questions.
- Analyze business structures and transactions to identify state tax consequences and tax efficiency, prepare legal memoranda detailing such analysis.
- Participate in state and local tax planning projects involving energy trading transactions.
- Conduct legal research and draft legal memoranda in all areas of state and local taxation.
- Draft opinion letters, protests and private letter ruling requests.
- Evaluate and advise senior corporate executives on a wide range of tax matters in connection with ongoing operations, federal and state tax audits and controversies, investments, legislative and regulatory issues and business transactions such as tax-free and taxable reorganizations, spin-offs, acquisitions and dispositions, recapitalizations and joint ventures.
- Defend companies in federal and state tax controversies, including business valuation and intangible holding company matters and manage related efforts of the firm's state and local tax specialist team.
- Draft, negotiate and review, with an emphasis on tax provisions, various strategic and complex commercial and corporate agreements and business transactions, including like-kind exchanges of businesses valued in excess of \$1 billion, structured partnerships, mergers, acquisitions and dispositions.