

Friday

12:00PM – 1:30PM

Corporate Tax and Affiliated and Related Corporations Luncheon (*Ticketed Event*)

Saturday

8:30AM – 11:30AM

Corporate Tax

Chair: Rose Williams, Ernst & Young LLP, New York, NY

8:30am

Recent Section 382 Guidance. Discussion of recent guidance under section 382 as part of the Government's response to the financial crisis. Topics will include recently issued Notices concerning section 382(l)(1), built-in losses of banks, testing dates of corporations owned by the U. *Moderator:* Jonathan Forrest, Deloitte Tax LLP, Washington, DC. *Panelists:* William Alexander, Associate Chief Counsel (Corporate), Chief Counsel, IRS, Washington, DC; Mark Hoffenberg, KPMG LLP, Washington, DC; Lisa Joire, Ernst & Young LLP, Washington, DC; Lee Kelley, Deputy Associate Chief Counsel (Corporate), Chief Counsel, IRS, Washington, DC.

10:15am

Current Developments and What is This Transaction? Discussion of recently issued guidance, other than 382. In addition, the panel will discuss transactions with multiple characterizations and tough questions causing frustration between tax advisors, especially for financial statement reporting purposes. *Moderator:* Derek Cain, PricewaterhouseCoopers LLP, Washington, DC. *Panelists:* Lee Kelley, Deputy Associate Chief Counsel (Corporate), Chief Counsel, IRS, Washington, DC; Brian Peabody, Ernst & Young LLP, Washington, DC; Eric Solomon, Assistant Secretary (Tax Policy), Tax Policy, Department of Treasury, Washington, DC; Gary Wilcox, Morgan Lewis, Philadelphia, PA; Darin Zywan, KPMG LLP, Washington, DC.