

Friday

8:30AM – 11:30PM

Investment Management

Chair: Deanna Flores, KPMG LLP, San Diego, CA

- 8:30am** **Foreign Investors in Distressed Debt and Distressed Debt Funds.** This panel will discuss current tax issues concerning the restructuring of distressed debt. *Moderator:* John Lutz, McDermott Will & Emery LLP, New York, NY. *Panelists:* Peter A. Furci, Debevoise & Plimpton LLP, New York, NY; Stuart E. Leblang, Akin Gump Straus Hauer & Feld LLP, New York, NY.
- 9:30am** **Selected Tax Issues Arising from the Debt Crisis and the Bailout.** Topics to be discussed will include classification of "Fannie/Freddie" debt, the adjustable rate preferred settlements and the taxation of capital contributions. *Moderator:* Dale Collinson, KPMG LLP, Washington, DC. *Panelists:* Rebecca Lee, PricewaterhouseCoopers LLP, Washington, DC; Jeffrey Van Hove, Deputy Tax Legislative Counsel (Tax Regulation), Office of Tax Policy, Department of Treasury, Washington, DC.
- 10:30am** **Performance Anxiety: How a Counterparty's Performance can Complicate Your Tax Life.** This panel will focus on the problems created by defaults of a counterparty, and the extent to which these problems have been relieved by recent guidance. *Moderator:* Steven M. Rosenthal, Ropes & Gray LLP, Washington, DC. *Panelists:* Richard Larkins, Ernst & Young LLP, Washington, DC; Michael Novey, Associate Tax Legislative Counsel, Office of Tax Policy, Department of Treasury, Washington, DC.

Friday

12:30PM – 1:30PM

Banking & Savings Institutions, Financial Transactions, Insurance Companies, Investment Management and Tax Exempt Financing Luncheon (*Ticketed Event*)