

Thursday

6:30PM – 9:30PM

Partnerships and LLCs and Real Estate Dinner \* *(Reservations Required)*

Friday

8:30AM – 11:30AM

Partnerships & LLCs

Chair: R. Brent Clifton, Locke Lord Bissell & Liddell LLP, Dallas, TX

8:30am

Opening Remarks by the Chair.

8:35am

**It's Harvest Time: The Many Ways to Reap the Losses Your Clients Have Sown.** \* This panel will discuss the tax issues that confront partnerships that seek to utilize the economic losses incurred in the current market. *Moderator:* Eric Sloan, Deloitte Tax LLP, New York, NY. *Panelists:* Jennifer H. Alexander, Deloitte Tax LLP, Washington, DC; William P. Wasserman, Ernst & Young LLP, Los Angeles, CA.

9:20am

**Diamonds in the Rough: Tax Planning for the Acquisition, Management and Disposition of Distressed Assets.** \* This panel will discuss acquisitions of distressed assets by partnerships and the tax issues arising from those acquisitions. *Moderator:* Martin D. Pollack, Weil Gotshal & Manges LLP, New York, NY. *Panelists:* Ossie Borosh, Goulston & Storrs PC, Washington, DC; Michael Hirschfeld, Dechert LLP, New York, NY.

10:05am

**Tax Credit Partnerships with an Emphasis on Low-Income and Energy Credit Deals.** \* This panel will discuss partnership tax issues that arise in partnerships that invest in properties giving rise to tax credits, with emphasis on the low-income housing tax credit and the energy tax credits. Particular focus will be devoted to how these partnerships are structured. *Moderator:* Forrest David Milder, Nixon Peabody LLP, Boston, MA. *Panelists:* Jeffrey G. Davis, McKee Nelson LLP, Washington DC; Christopher Kelley, Special Counsel to the Associate Chief Counsel (Passthroughs & Special Industries), Office of Chief Counsel, IRS, Washington, DC.

10:50am

**Don't Forget to SALT: State and Local Tax Planning for Partnerships.** \* This panel will discuss the various state and local specific issues that give rise to specific partnership structures that are utilized in those jurisdictions. *Moderator:* Carolyn Joy Lee, Jones Day, New York, NY. *Panelists:* Bruce P. Ely, Bradley Arant Rose & White LLP, Birmingham, AL; Dennis Rimkunas, Jones Day, New York, NY.

Friday

12:30PM – 1:30PM

Partnerships and LLCs and Real Estate Luncheon \* *(Ticketed Event)*

Speaker: Steve Frost, Special Assistant to the Assistant Secretary of Treasury (Tax Policy), Department of Treasury, Washington, DC

Saturday

7:15AM – 8:30AM

Partnerships & LLCs/Real Estate/S Corporations "Shop Talking" Breakfast *(Ticketed Event)*

Members of the Partnerships & LLCs, Real Estate and S Corporations Committees will gather for the traditional "open mic" breakfast to share ideas and war stories and to seek input on technical issues.

Saturday

**8:30AM – 10:30AM**

**LLC Subcommittee of Partnerships and LLCs**

*Chair:* Thomas Yearout, Holme Roberts & Owen LLP, Denver, CO

**\*This Program is Appropriate for Young Lawyers**