

# Tax

We advise Fortune 50 financial, energy, hi-tech, pharmaceutical, industrial and other companies on the range of U.S. federal income tax issues involved in the planning and executing of complex, high-value transactions, both domestic and international, including:

- mergers and acquisitions;
- dispositions;
- joint ventures;
- financings, including Islamic finance;
- restructurings; and
- investment fund formations.

We also assist companies in managing the tax aspects of employee benefits and executive compensation related to business transactions and post-transaction integration. Our tax advice and solutions are informed by high-level government experience and relationships. Former senior government officials are part of our tax team, and current senior staffers at both the U.S. Treasury and the Internal Revenue Service are Tax practice alumni.

Beyond advice, we partner with clients to develop innovative, practical solutions to complex tax challenges. Working with our Corporate Governance, Finance and Real Estate teams as needed, we ensure that all legal services necessary to successfully close a transaction or resolve a tax controversy are brought to bear.

Our team helps companies resolve tax controversies as favorably as possible, whether through examinations, administrative appeals, trial or alternative dispute resolution (ADR). In the process, we assist companies in managing critical privilege and discovery needs related to cases in the U.S. Tax Court, the Court of Federal Claims and federal district courts, as well as with appeals from these courts.

#### **Tax-Exempt Organizations**

Our Tax team also helps nonprofit, tax-exempt organizations, including private foundations, with compliance with all applicable federal, state and local tax

# Capability Lawyers



Abraham N.M. Shashy, Jr. (Hap) *Washington, D.C.* 



Aurelia de Viry Paris



Dr. Axel J. Schilder Frankfurt

# Recognition

Hap Shashy Named Lawyer of the Year for Tax Law in Washington, D.C.

**BEST LAWYERS 2021** 

Wayne Pressgrove Ranked Band 3 Tax in Georgia

CHAMBERS USA, 2020

Hap Shashy Ranked Band 3 Tax in D.C.

CHAMBERS USA, 2020

Team is ranked Band 1 Tax in Georgia

CHAMBERS USA, 2020

Tax Practice Recognized as a Leading Firm

LEGAL 500 EMEA GUIDE, 2017 laws. These include laws related to private foundation rules, unrelated-business taxable income, lobbying and political activities, and intermediate sanctions.

We regularly help new nonprofits form and obtain exempt status, and existing organizations to execute mergers, joint ventures, partnerships, and for-profit subsidiaries and other business ventures.

Directors and managers of nonprofits must master fiduciary duties, corporate governance, management of endowments, development of gift policies and compliance with charitable solicitation requirements. In addition to advising on these matters, we draw from cross-firm corporate resources to assist with the drafting and revision of bylaws and other governing documents, affiliation agreements, fiscal sponsorship arrangements and gift agreements.

Cases & Deals September 5, 2023 King & Spalding Acts For SERMA on Acquisition of Microtech Laboratories

August 1, 2023
Mativ Holdings Announces Proposed Sale of its
Engineered Papers Business for \$620 Million

May 25, 2023 ConocoPhillips Completes \$1.1 Billion Notes Offering and Tender Offer

#### VIEW ALL

### Insights

# ARTICLE

March 13, 2024

The 45V Hydrogen Tax Credit: Defining Controversy in Clean Energy Policy

#### **CLIENT ALERT**

March 12, 2024

A Brief Overview of the Federal Rulemaking Process in the United States

#### **ARTICLE**

February 20, 2024

Using Investment Treaties to Prevent Pillar 2's Revocation of Promised Tax Incentives

# **VIEW ALL**

**Events** 

#### SPEAKING ENGAGEMENT

June 19, 2023

German Tax Practice Ranked Among Leading Firms

JUVE TAX, 2019

Tax Practice and
Practitioners Ranked Among
Leading Firms

CHAMBERS USA, 2017

U.S. and German Tax Practitioners Recognized as Leading Lawyers

CHAMBERS EUROPE, 2017

Axel Schilder, Martin Wolff to Speak at 9th Tax Summit

#### CONFERENCE

June 13, 2023 Monetizing Hydrogen

# SPEAKING ENGAGEMENT

May 31, 2023

Javier Rubinstein to Speak at Pillar Two & International Investment Law Program

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News

#### PRESS RELEASE

March 18, 2024

King & Spalding Adds Tax Partner Craig Phillips in New York

# IN THE NEWS

March 18, 2024

Tax partner Craig Phillips joins the firm's Corporate practice group in New York

#### IN THE NEWS

February 8, 2024

John Taylor discusses the Clean Energy requirements included in guidance for the 45V clean hydrogen tax credit program

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