

CAHILL

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Tax

Our tax lawyers develop creative and informed tax solutions for domestic and cross-border transactions.

We regularly advise some of the world's largest companies on efficient tax structures for mergers and acquisitions, spin-offs (and other corporate reorganizations), debt and equity financings, bankruptcies and restructurings, partnerships and joint ventures, investment companies and financial products, insurance products, employee compensation, leveraged leases and other real estate ventures. We have played a significant role in the formation of offshore investment companies and insurance vehicles, cross-border acquisitions and financings.

Over the past three decades, Cahill has provided tax advice and representation to General Electric and its subsidiaries in numerous acquisitions, dispositions and securities offerings, including its \$10.9 billion sale of GE Insurance Solutions to Swiss Re and affiliates as well as its \$2.4+ billion IPO of stock of Genworth Financial, Inc. We regularly represent AIG and JP Morgan in tax issues. We advised Coca-Cola Enterprises, Inc. in connection with its split-off from The Coca-Cola Company, Elan Corporation plc in its joint venture with Biogen and have advised many of our insurance clients on the taxation issues and opportunities associated with formation, corporate structure, capitalization, operations, and financings.

Our clients demand creativity, imagination and skill. We are frequently retained by clients to provide independent tax advice in transactions where the firm is not otherwise representing a party.

Our tax partners have extensive experience in government positions which give them unique insights into tax policy issues, such as previous service in the Office of the Chief Counsel of the Internal Revenue Service and the Office of Tax Legislative Counsel of the U.S. Department of the Treasury.

CAHILL GORDON & REINDEL LLP