Tax

Skadden

Skadden's Tax Group, comprising more than 140 attorneys in nine offices worldwide, is experienced in virtually every type of matter that presents significant tax issues. We represent clients in all aspects of tax law, including in corporate transactions and in most types of disputes with taxing authorities.

With extensive experience at the IRS, Department of the Treasury and White House, as well as in congressional tax writing committees, our tax professionals are highly skilled in handling intricate tax issues with the goal of reaching creative and value-added solutions tailored to each client's specific needs. Our Tax Group also closely coordinates its efforts with Skadden lawyers in other disciplines to provide a one-team approach to each matter. As an integrated firm with 50-plus practices across 21 offices worldwide, we are uniquely positioned to serve clients in every industry and on any tax matter.

Transactions/Tax Planning

For decades, the unique breadth of our tax practice has allowed us to represent a broad array of public and private companies in connection with mergers and acquisitions, post-acquisition integration transactions, cross-border and global internal restructuring transactions, spin-offs and joint ventures. Our transactional tax work includes extensive experience with:

- tax-free and taxable acquisitions, leveraged buyouts, spin-offs and dispositions, often with cross-border components;
- complex capital markets transactions, including initial public offerings and cross-border financings;
- real estate investment trusts (REITs) and regulated investment companies (RICs);
- partnerships, LLCs, joint ventures and disregarded entities in a variety of unique contexts and in virtually every industry sector;
- corporate finance and funding transactions, recapitalizations, project finance, tax equity transactions and leasing transactions;
- Chapter 11 reorganization cases, nonjudicial restructurings and other troubled company workouts;
- private equity and hedge fund transactions; and
- international tax planning, including inbound structuring and related issues, transfer pricing and advance pricing agreements; subpart F, net CFC tested income (NCTI), foreign-derived deduction eligible income (FDDEI), and base erosion and anti-abuse tax (BEAT) planning; intellectual property and supply chain planning; and foreign tax credit utilization.

Tax Controversy/Litigation

As one of the nation's leading tax controversy practices, clients also turn to us to resolve large, complex and global tax controversy and litigation matters. We represent corporations, partnerships, estates, individuals and government entities facing every kind of tax liability including income tax, estate tax and excise tax. We regularly work with our clients to resolve their disputes quickly and privately, through the administrative process. In addition, our highly regarded tax litigators have experience representing clients in many of the most significant tax cases in the United States. Our tax controversy work includes:

- audit, administrative appeal, mediation and arbitration, deficiency and refund litigation, and international matters involving competent authority disputes;
- global settlements, fast-track appeals settlements, prefiling agreements and similar expedited resolution strategies;
- tax litigation, both at trial and on appeal, in all jurisdictions — U.S. Tax Court, the federal district courts, the U.S. Court of Federal Claims, federal courts of appeals and the U.S. Supreme Court; and
- congressional investigations, as third parties under subpoena, in criminal investigations and under criminal indictment.

Tax
Continued

Additional Areas of Focus

Our Tax Group also provides advice regarding:

- obtaining private letter rulings and other guidance from the IRS and the U.S. Department of the Treasury;
- tax accounting, including capitalization, cost recovery, mark-to-market and accounting method change questions;
- tax-exempt and nonprofit organizations, including formation and structuring, mergers and acquisitions, joint ventures and other transactions, and obtaining exemption determinations from the IRS; and
- state tax planning and controversy.

Rankings and Recognition

Skadden's tax practice and attorneys have been repeatedly recognized by leading industry outlets, including:

- *Law360* as a Tax Group of the Year since 2015.
- *Chambers USA* as one of the top tax practices in Nationwide Corporate Tax, Nationwide Tax Controversy, Nationwide REITs, New York Tax, District of Columbia Tax, California Tax and Illinois Tax.
- *ITR World Tax* as a Tier 1 tax practice in the U.S., U.K., France and Germany.
- *International Tax Review*'s Annual Awards, including as:
  - North America Tax Law Firm of the Year, North America Tax Litigation Law Firm of the Year, Tax Court Firm of the Year, Washington DC Tax Firm of the Year, Northern California Tax Firm of the Year and Washington DC Transfer Pricing Firm of the Year at the 2026 Americas Tax Awards;
  - Impact Deals of the Year for our representations of Mars, Incorporated in its $35.9 billion acquisition of Kellanova and DuPont de Nemours in its separation into two publicly traded companies through the $21 billion tax-free spin-off of Qnity Electronics at the 2026 Americas Tax Awards; and
  - UK Tax Law Firm of the Year and Germany Tax Litigation Law Firm of the Year at the 2026 Europe Tax Awards.
- *Lexology Index* as its 2025 Corporate Tax Team of the Year.
- *Vault* as Best Law Firm for tax every year since 2010.
- *Chambers Global*, *Chambers High Net Worth*, *The Legal 500*, *International Tax Review*'s annual World Tax guide and *Best Lawyers*' Best Law Firms.

Tax-Related Administrative and Policy Experience

Former positions held by our tax professionals include:

Internal Revenue Service
- Commissioner
- Chief Counsel
- Chief, Independent Office of Appeals
- Associate Chief Counsel, Corporate
- Associate Chief Counsel, Income Tax and Accounting
- Area Counsel for Financial Services
- Assistant Deputy Commissioner, Large Business & International
- Division Counsel, Large Business & International
- Director, Independent Office of Appeals
- Team Leader, Advance Pricing and Mutual Agreement (APMA)
- Special Counsel, Office of Chief Counsel (International)

U.S. Department of the Treasury
- Assistant Secretary for Tax Policy
- Attorney-Adviser, Office of Tax Policy

White House
- Special Assistant to the President for Budget and Tax Policy, National Economic Council

U.S. House Committee on Ways and Means
- Majority Tax Counsel

U.S. Congress Joint Committee on Taxation
- Legislative Counsel

"Trusted to handle some of the most significant matters in the corporate tax sphere, from large M&A to headlining transfer pricing litigation."
— Chambers USA 2026