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Education

J.D., Harvard Law School, 2015
A.B., Dartmouth College, 2010
(*magna cum laude*; Phi Beta Kappa;
With High Honors in Mathematics)

Bar Admissions

California

Yilan Bryant focuses her practice on tax controversy matters and has extensive experience handling the tax aspects of sophisticated M&A deals and other transactions.

Ms. Bryant advises multinational corporations, domestic companies and individuals at various stages of federal income tax controversy, focusing on audits and administrative appeals. Her substantive experience covers a wide range of complex tax issues, including tax treatment of employee benefits, executive compensation, tax accounting issues, transfer pricing, and compliance with information reporting and withholding rules, across a variety of industries including technology, pharmaceutical, financial institutions, health care and entertainment.

Ms. Bryant also counsels nonprofit and tax-exempt organizations on issues such as formation and exemption applications, corporate governance, lobbying and advocacy issues, and charitable giving.

Her representative controversy matters include:

- Microsoft Corporation in connection with the IRS audit of two qualified cost-sharing arrangements relating to the development of Microsoft products, which was among the largest transfer pricing cases to appear before the IRS;
- a medical technology company in an appeal before the IRS regarding tax accounting issues;
- a pharmaceutical company in an IRS audit in connection with a challenge to the characterization and valuation of acquired intellectual property;
- tax advice to a fund offering a novel non-correlated investment; and
- a technology company in an IRS audit and appeal in connection with employee benefits issues.

Her transactional tax representations include:

- SolarCity Corporation in its \$2.6 billion acquisition by Tesla Motors, Inc.;
- Boral Limited in its \$2.6 billion acquisition of Headwaters Incorporated;
- WL Ross Holding Corp. in its \$1.7 billion acquisition of Nexeo Solutions Holdings, LLC;
- XIO Group in its \$1.1 billion acquisition of J.D. Power and Associates from McGraw Hill Financial, Inc.;
- Tessera Technologies, Inc. in its \$850 million acquisition of DTS, Inc.;
- Didi Chuxing in its merger with Uber China;
- ZTO Express in connection with its \$1.4 billion IPO on the New York Stock Exchange; and
- Sinopec Group Overseas Development (2016) Limited, a subsidiary of China Petrochemical Corporation, in connection with its \$3 billion Rule 144A/Regulation S offering of senior notes.