

Counsel, Houston

Tax; Tax Controversy and Litigation



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Education

J.D., Stanford Law School, 2010
B.A., Rice University, 2007
B.Mus., Rice University, 2007

Bar Admissions

Texas

Juliana Hunter represents corporations, partnerships and individuals in all phases of tax controversy and pre-controversy.

Ms. Hunter advises clients on a wide array of complex tax disputes involving issues such as international tax, consolidated returns, transfer pricing, valuation, bankruptcy, executive compensation and benefits, validity of regulations, partnerships and other matters. Her experience ranges from counseling on risk assessments and audits to all aspects of litigation.

Matters on which Ms. Hunter advised prior to joining Skadden include:

- *Estate of Elkins v. Commissioner*, a victory resulting in valuation discounts ranging from 52% to 80% on fractional interests in artwork
- *Anadarko Petroleum Corp. v. United States*, involving a complex Section 267(f) issue
- *Marathon Petroleum Company, LP v. Commissioner*, involving IRS' attempted recast of partnership transactions
- *Lone Star Partners V, LP v. Commissioner*, involving Section 1446 withholding issues
- *The Williams Companies, Inc. v. Energy Transfer Equity, L.P.*, victory for Energy Transfer in the Delaware Court of Chancery in high-profile expedited litigation; affirmed by the Delaware Supreme Court
- *In re Wyly*, involving complex tax issues in the context of a bankruptcy
- *EZCORP, Inc. v. Commissioner*, involving appropriateness of accounting method
- *Petty Group, LLP v. Commissioner*, involving Section 183
- *Lazy K Livestock LLC v. Commissioner*, involving Section 183
- *Schubach v. Commissioner*, involving valuation issues
- *Estate of Barnhart v. Commissioner*, involving valuation issues
- *Barnhart v. Commissioner*, involving valuation issues
- *Otay Project LP v. Commissioner*, involving the partnership anti-abuse rule
- *Woodside Partners v. Commissioner*, involving complex TEFRA issues
- *BCP Trading & Investments, LLC v. Commissioner*, involving statute of limitations issues
- a favorable settlement at IRS Appeals of a factually and legally complex Section 409A issue
- obtaining Section 1341 relief for an independent power producer at IRS Appeals
- a multinational oil field services company at IRS Appeals in a case involving Section 162(f)
- resolving a three-way dispute between an individual client, a public company and a private service provider involving Section 409A and ERISA issues, resulting in a settlement agreement providing full payment of disputed amount to client
- a private company against a public acquiror in an arbitration regarding transfer pricing issues in pre-closing tax returns
- a favorable settlement of a production tax credit issue through the IRS Fast Track Settlement program

In recognition of her work, *Chambers USA* has recognized Ms. Hunter as an “up and coming” practitioner who regularly handles tax disputes.