## David G. Levere



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Tax



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## **Education**

J.D., Harvard Law School, 1977

B.A. Harvard College, 1974 (cum laude)

## **Bar Admissions**

New York

## **Publications**

"Remote Continuity of Interest: The Problem Persists," 49 *Tax Lawyer* 795 (1996)

"A Proposal for Applying Section 704(c) to Securities Partnerships," 59 *Tax Notes* 249 (1993)

"Net Operating Losses Subject to Section 382 May Be Available Without Restriction in Certain Cases," 60 *Tax Notes* 349 (1993) David Levere represents both U.S. and international multinational corporations on a broad range of issues in the international tax realm. His practice covers international M&A, post-merger restructuring and integration, Subpart F, foreign tax credit, repatriation, inbound financing, permanent establishment, capital markets and tax treaty matters. He has particular experience with planning for joint ventures and partnerships in the cross-border context. Mr. Levere also has a working knowledge of the tax systems of most of the major countries in Europe, Asia and Latin America, which he has gained through more than 15 years of representation of clients in a large number of transactions that included local country planning, cross-border M&A, restructuring, repatriation and other planning.

Prior to joining Skadden in 2013, Mr. Levere represented clients in a wide range of third-party transactions and internal restructurings, including the following:

- the integration of the international operations of Exxon and Mobil following their merger;
- InBev N.V./S.A. in its acquisition of Anheuser-Busch, along with post-acquisition restructuring and other planning;
- General Mills Inc. in its acquisition of a majority interest in Yoplait and the stock of the Brazilian company Yoki Alimentos SA; the disposition of its European joint venture interest with Pepsi; and a variety of restructuring and other transactions; and
- international restructurings for, among others, The Walt Disney Company, DuPont, Nike, Bristol-Myers Squibb, Avery-Dennison and Ecolab.