Moshe Spinowitz

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Tax



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Education

J.D., Harvard Law School, 2006 (*magna cum laude*; Articles Editor, *Harvard Law Review*)

B.A., Harvard College, 2002 (*summa cum laude*)

Bar Admissions

Massachusetts
District of Columbia

Experience

Law Clerk to Judge Michael Boudin, U.S. Court of Appeals for the First Circuit

Law Clerk to Associate Justice Antonin Scalia, U.S. Supreme Court

Moshe Spinowitz is head of Skadden's Boston office. His tax practice focuses on advising multinational companies in connection with cross-border mergers and acquisitions, and post-acquisition restructuring and integration transactions.

Mr. Spinowitz regularly advises multinational companies on the restructuring of their operations, including integration following large cross-border acquisitions. He also counsels pharmaceutical and technology companies in connection with the structuring of their intellectual property holdings, as well as a variety of companies in connection with U.S. and international tax law developments.

Select representations include:

- **Vertex Pharmaceuticals** in its $4.9 billion acquisition of Alpine Immune Sciences
- **Mirati Therapeutics** in its $4.8 billion acquisition by Bristol Myers Squibb
- **Ambrx Biopharma** in its redomiciliation to the U.S. and its $2 billion acquisition by Johnson & Johnson
- **Dicerna Pharmaceuticals** in its $3.3 billion acquisition by Novo Nordisk
- **L'Occitane International** in its acquisition of Sol de Janeiro Holdings
- **ArQule, Inc.** in its $2.7 billion acquisition by a subsidiary of Merck & Co., Inc.
- **Juno Therapeutics** in its $9 billion acquisition by Celgene
- **Gilead Sciences, Inc.** in its $11.9 billion acquisition of Kite Pharma, its acquisition of Cell Design Labs for up to $567 million, and its research and development collaboration with, and equity investment in, Galapagos NV
- **Biogen Inc.** in the spin-off of its hemophilia business as an independent public company called Bioverativ
- **Konecranes plc** in its acquisition of Terex Corporation's material handling and port solutions unit for $1.28 billion
- **Spectra Energy Corp** in its combination with Enbridge Inc. for $28 billion
- **Morphosys** in its $2.9 billion acquisition by Novartis and simultaneous disposition of Monjuvi to Incyte
- **EyeBio** in its acquisition by Merck for a $1.3 billion upfront payment and up to $1.7 billion in future milestone payments equaling a potential value of $3 billion
- **CureVac** in its pending $1.25 billion acquisition by BioNTech
- **SiteOne** in its pending $1 billion acquisition by Eli Lilly
- **Chimerix** in its $935 million acquisition by Jazz Pharmaceuticals
- **Evergreen Theragnostics** in its acquisition by Lantheus Holdings for $250 million upfront and up to $753 million in future milestone payments
- **BioCryst** in the sale of its European ORLADEYO business to Neopharmed Gentili for $250 million upfront and up to $14 million in future milestone payments

In recognition of his work, Mr. Spinowitz has been named one of *Massachusetts Lawyers Weekly*'s Go To Lawyers for Taxation and repeatedly selected for inclusion in *Chambers USA*. Additionally, he has been recognized as one of *Lawdragon*'s 500 Leading Global Tax Lawyers and in *Best Lawyers in America* in the Tax Law category. He also was named as a recipient of *Bloomberg*'s Tax Portfolio Author of the Year Award for his work on the *Bloomberg Tax* portfolio "Outbound Tax Planning for U.S. Multinational Corporations (Portfolio 6380)." Prior to joining Skadden, he served as a law clerk to Judge Michael Boudin on the U.S. Court of Appeals for the First Circuit, and Justice Antonin Scalia on the U.S. Supreme Court.

Recent Publications

"Senate Finance Committee Proposes Key Departures From House Provisions for the One Big Beautiful Bill Act," *Skadden Publication*, June 25, 2025

"The One Big Beautiful Bill Act: An Initial Analysis of Key Tax Proposals," *Skadden Publication*, May 29, 2025

"Possible Tax Reforms Could Run Up Against Deficit and Debt Concerns," *Skadden's 2025 Insights*, January 19, 2025

"Outbound Tax Planning for U.S. Multinational Corporations (Portfolio 6380)" *Bloomberg Tax Portfolio*, 2023

"Observations on Notice 2023-80: The Treasury Department and IRS' Preliminary Guidance on the Interaction of Foreign Tax Credit and Dual Consolidated Loss Rules With Pillar Two Taxes and the Extension of Notice 2023-55 Relief Period," *Skadden Publication*, December 19, 2023

"The 2024 Green Book and Tax Implications: A Primer," *Skadden Publication*, March 20, 2023

"Senate Passes Landm"ark Bill With Climate, Tax, Energy and Health Care Implications," *Skadden Insights*, September 2022

"Biden Signs Landmark Bill With Corporate Tax Implications," *Westlaw Today*, August 23, 2022

"Senate Passes Landmark Bill With Climate, Tax, Energy and Health Care Implications," *Skadden Publication*, August 7, 2022

"USA" chapter, *The Inward Investment and International Taxation Review*, 2022

"Biden Administration's Green Book Proposes Significant Changes to Tax Regime," *Skadden Insights*, June 2021

"Is Tax Competition Dead?" *Skadden's The Informed Board*, June 16, 2021

"Biden Administration's Green Book Proposes Significant Changes to Tax Regime," *Skadden Publication*, June 15, 2021

"A Closer Look at Biden's Tax Proposals," *Skadden Publication*, September 24, 2020

"Why Treasury Got It Right: R&D Should Not Be Allocated To GILTI," *Tax Notes International*, September 14, 2020

"CARES Act Tax Considerations," *Skadden Publication*, April 2, 2020

"The Role of Tax Treaties in a Pillar I World," *TAXES – The Tax Magazine*, March 2020