

# COURSE SELECTOR

NAME \_\_\_\_\_ CA STATE BAR # \_\_\_\_\_

Please check the appropriate boxes below for the program you wish to attend. Retain a copy for your records.

## FRIDAY, NOVEMBER 9, 2001

### 1:30 p.m. – 2:30 p.m.

- [1] Restricted Stock in Reorganizations
- [9] Current Developments in Cost-Sharing

### 1:30 p.m. – 3:30 p.m.

- [4] Current Developments in Transfer Tax Laws
- [7] Legislative and Judicial Updates in Bankruptcy
- [3] Wiring Dotcoms – Tax Issues for IP Partnerships

### 2:30 p.m. – 3:30 p.m.

- [2] Merger, Acquisition, and Growth Integration: A Tax Director's Perspective
- [39] The Extraterritorial Income Regime: Overview and Update

### 3:45 p.m. – 4:45 p.m.

- [5] What to Advise Your Clients in Light of the Changes to the Estate and Gift Tax
- [10] Taxing International E-commerce Profits: Servers, Profit Attribution and Tax Planning
- [12] Section 7430(g): "Advantage Taxpayer"

### 3:45 p.m. – 5:15 p.m.

- [8] Intellectual Property Taxation & License Structuring

### 5:00 p.m. – 6:00 p.m.

- [6] Planned Giving Hot Topics: How the Estate Tax Repeal Legislation Will Affect Planned Giving and Other Recent Developments
- [11] Tax Planning and Traps for Non-residents Temporarily in the U.S.
- [13] Innocent Spouse Update

## SATURDAY, NOVEMBER 10, 2001

### 8:45 a.m. – 9:45 a.m.

- [14] Economic Substance in Corporate Tax Shelters
- [15] International Wealth Transfer: A New Ballgame?!?
- [16] Tax Aspects of Litigation Recoveries
- [17] Current Problems in Handling California Income Tax and Franchise Tax Audits

### 10:00 a.m. – 12:00 p.m.

- [18] FLP/LLC Planning Directions in Light of Recent Developments in Estate & Gift Tax Audits and Controversies

- [19] The Road to Client Representation—Ethical Curves and Compliance Speed Bumps
- [20] A Critique of Subpart F: Workable Solution or Unwieldy Problem?
- [21] State & Local Tax Roundtable

### 2:15 p.m. – 3:45 p.m.

- [22] Federal Legislative Roundtable Discussion
- [23] Life and Death Planning for the Unmarried Couple
- [24] Partnership Demolition – Drawing and Quartering “Exploding” Nonrecourse Debt
- [25] Defining Business Income of the Multistate Taxpayer: Update on Rules for Determining Business vs. Nonbusiness Income

### 4:00 p.m. – 5:00 p.m.

- [26] Introduction to International Tax Considerations in M&A
- [27] Recurring Issues With Changes in Ownership Real Property Transactions
- [28] S Corp. Potpourri with a Dash of Mania
- [29] Practical Advocacy: Mock Argument on Petitioner's Motion to Shift the Burden of Proof

### 4:00 p.m. – 6:15 p.m.

- [30] Estate Planning with the Family Business

### 5:15 p.m. – 6:15 p.m.

- [31] Disregarded Entities in Corporate Transactions
- [32] Current Issues and Opportunities Regarding Sales and Use Taxation of Transfers of Intangible Property

## SUNDAY, NOVEMBER 11, 2001

### 9:00 a.m. – 10:30 a.m.

- [33] A New Day for Stock Options: Examining Current Trends and Planning Techniques

### 9:00 a.m. – 11:00 a.m.

- [34] Federal Procedural Roundtable Discussion
- [35] The New ABCs of MRDs: The New Rules on Retirement Plan Distributions
- [36] In or Out – U.S. Tax Issues of International Partnerships and Partners

### 11:15 a.m. – 12:15 p.m.

- [37] Elimination of Bias
- [38] Current High Tech Tax Issues
- [40] Tax Sensitive Investing