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Partner, 1986-89; 1991-2005
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United States Treasury Department

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Northwestern University Law School

Adjunct Professor, 1987-89

University of Chicago Law School Federal Tax Conference

Planning Committee, 1987-1988; 1992-present
Chairman, 2003-2005

American College of Tax Counsel

Fellow, 2003-present

Education:

Yale Law School, JD, 1979

Editor, *Yale Law Journal*, 1978-1979

Magdalen College, Oxford University, B Phil (Economics), 1976

Yale College, BA (Economics) *summa cum laude*, 1974

Publications:

Taxation of the Seller in a Multi-Year Sale or Exchange, presented to 55th Annual University of Chicago Law School Federal Tax Conference, Chicago, IL (2002), 80 TAXES 191 (2003)

Equity-Linked Strategies in the Public Securities Markets, presented to American Conference Institute Conference on Taxation of Financial Instruments, New York, NY (1999)

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Section 384: Limitation on Use of Preacquisition Losses To Offset Built-In Gains, in TAX PLANNING FOR CORPORATIONS WITH NET OPERATING LOSSES OR OTHER FAVORABLE TAX ATTRIBUTES (R. D'Avino ed. 1988)

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The Claim of Right Doctrine and Section 1341, 34 TAX LAW. 297 (1981)

Note, *Creditors' Derivative Suits on Behalf of Solvent Corporations*, 88 YALE L. J. 1299 (1979)

Professional Acknowledgements:

INTERNATIONAL WHO'S WHO OF CORPORATE TAX LAWYERS, Law Business Research Ltd (London)(annually, 1998-2005)

INTERNATIONAL WHO'S WHO OF BUSINESS LAWYERS, Law Business Research Ltd (London)(annually, 2002-2005)

THE BEST LAWYERS IN AMERICA, WOODWARD WHITE, INC. (AIKEN, S.C.)(annually, 1996-2005)

THE WORLD'S LEADING LAWYERS, Chambers & Partners (London)(2002-2003)

AMERICA'S LEADING BUSINESS LAWYERS, Chambers & Partners (London)(2003-2005)

GLOBAL COUNSEL, TAX LAW: THE LAW AND LEADING LAWYERS WORLDWIDE, Practical Law Company (London)(2003)