

Jeffrey T. Sheffield

Northwestern University School of Law
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Northwestern University School of Law

Professor of Practice 2019 - Present
Senior Lecturer 2013 - 2019

Courses taught: Consolidated Returns
 International Tax
 Tax Aspects of Private Equity Transactions

Kirkland & Ellis LLP

Partner, 1985 - present.
Former member, Firm (Management) Committee

Prior Professional Experience

Lecturer, University of Chicago Law School, (1990-99) (Business Planning)

Adjunct Professor, IIT Chicago-Kent College of Law (1986-89) (Corporate Tax; Corporate Reorganizations; Advanced Income Tax)

Clerk, Hon. Benjamin Kaplan, Massachusetts Supreme Judicial Court (1979-80)

Member, University of Chicago Federal Income Tax Conference (1989-present), and Conference *Chair* (1998-2000 and 2008-09)

Consultant, Federal Income Tax Project: Taxation of Private Business Enterprises (American Law Institute) (1999)

Education

Harvard Law School, Cambridge, Massachusetts (1976-79)
J.D. 1979 (*cum laude*)
Harvard Law Review (1977-79) (Articles Editor 1978-79)

University of Chicago, Chicago, Illinois (1972-76)
B.A. 1976, with Honors
Phi Beta Kappa

Selected Publications (author or co-author)

Whose Earnings and Profits? What Dividend? A Discussion Based on the Dr Pepper – Keurig Transaction, 73 **The Tax Lawyer** 299 (2020)

United States International Taxation (Carolina Academic Press) (4th ed.) (2019)

Intentionally Disqualified Tax-Free Corporate Transactions, 93 **Taxes** 85 (2015)

Spin-offs, Corporate Capital Structure and Disguised Sales, 91 **Taxes** 119 (2013)

Corporate Transactions and the Economic Substance Doctrine, 89 **Taxes** 163 (2011)

Monetization Strategies in Corporate Spin-Offs, 81 **Taxes** 287 (2003)

Selected Developments in Corporate Taxation, 50 **Major Tax Planning** § 2 (1998)

Reconciling Spin-Offs with General Utilities Repeal, 74 **Taxes** 941 (1996)

Organizing The Corporate Venture (Little Brown & Co.) (1995) (updated annually as part of PLI Corporate Tax Practice series)

The Many Guises of Preferred Stock, 70 **Taxes** 793 (1992)

Selected Tax Issues in Partnership Debt Restructurings, 68 **Taxes** 861 (1990)

An Abecedarium on Alphabet Stock, 66 **Taxes** 954 (1988)

The Dealer-Investor Problem, in **Federal Tax Aspects of Real Estate Transactions** (R. Lang, ed.) (1987 + Supps.)

Holding Company Formations, 64 **Taxes** 846 (1986)

Debt Issued for Traded and Nontraded Property, 62 **Taxes** 1022 (1984)

Tax Aspects of Financing New Business Start-Ups and Second Round Financings Through R&D Partnerships, 42 **N.Y.U. Fed. Tax Inst.** ¶9 (1984)

Section 269 Revisited, 61 **Taxes** 881 (1983)

Bailouts and Bootstraps After TEFRA: Section 304, Section 306 and The Consolidated Return Rules, 61 **Taxes** 555 (1983)

Beyond Orrisch: An Alternative View of Substantial Economic Effect Under Section 704(b)(2) Where Nonrecourse Debt is Involved, 60 **Taxes** 937 (1982)

Selected Speeches and Outlines

Northwestern University School of Law (Advanced Topics in Taxation); University of Chicago Federal Income Tax Conference; PLI (Tax Strategies for Corporate Acquisitions, etc.); IIT-Chicago Kent College of Law Federal Tax Institute; USC Tax Institute; Tax Executives Institute; Law & Business Seminars; Chicago Federal Tax Forum; and Chicago Tax Club

Professional Acknowledgements

Chambers Global and USA, *The World's Leading Lawyers for Business*

International Tax Review, *Guide to the World's Leading Tax Advisors* and *North America's Top Tax Advisors*

Best Lawyers in America, *Best Lawyer of the Year* (Tax Law, Chicago) (2012); *Best of the Best* (Top 30 Tax Lawyers in the US)

Finance Monthly & CorporateINTL, *Tax Planning Lawyer of the Year – Illinois*

Who's Who Legal, *The International Who's Who of Corporate Tax Lawyers*

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