2013 Schedule
THE COLLEGE OF WILLIAM & MARY
LAW SCHOOL

ALSO SPONSORED BY

McGUIREWOODS

TAXATION SECTION
OF THE
VIRGINIA STATE BAR
# Table of Contents

<table>
<thead>
<tr>
<th>Topic and Materials</th>
<th>Tab</th>
</tr>
</thead>
<tbody>
<tr>
<td>MCLE and CPE Information and Forms</td>
<td>1</td>
</tr>
<tr>
<td>Speaker Biographies</td>
<td></td>
</tr>
</tbody>
</table>

*Thursday, November 7, 2013*

**8:00-8:30 A.M.**
Registration & Coffee

**8:30-8:45 A.M.**
**Introductory Remarks**
Howard J. Busbee

**8:45-10:15 A.M.**
**Federal Tax Update**
Stephen L. Owen

Something Old, Something New: Structuring and Restructuring Deals in 2013 (and Beyond) (PowerPoint presentation)

**10:15-10:30 A.M.**
Refreshment Break

**10:30 A.M.-12:00 P.M.**
**Federal and State Due Diligence for M&A and Equity Investments LLCs**
Jerald D. August

Tax Due Diligence, Warranties and Indemnification In Connection With Business Acquisitions of Private Companies: Selected Topics

**12:00-12:15 P.M.**
Refreshment Break

**12:15-1:15 P.M. – Lunch Session**
**Virginia Hot Topics**
Craig D. Bell
William L.S. Rowe

Recent Tax Developments in Virginia Taxation  

1
1:15-1:30 P.M.
REFRESHMENT BREAK

1:30-3:00 P.M.
COMPENSATING OWNERS AND KEY EMPLOYEES OF PARTNERSHIPS AND LLCs

ELIZABETH DRIGOTAS
STEVEN R. SCHNEIDER

Compensating Owners and Key Employees of Partnerships and LLC’s (PowerPoint presentation) 5

3:00-3:15 P.M.
REFRESHMENT BREAK

3:15-4:45 P.M.
RECENT DEVELOPMENTS & TAX PLANNING FOR HIGH INCOME TAXPAYERS

CAMERON N. COSBY
BRIAN J. O’CONNOR

Recent Developments & Tax Planning for High Income Taxpayers (PowerPoint presentation) 6

5:00-6:00 P.M.
INTRODUCTION TO M&A TAXATION: S CORPORATIONS AND SECTION 336(e)

ROBERT G. MCELROY
WILLIAM M. RICHARDSON

Introduction to M&A Tax: S Corporations and Section 336(e) (PowerPoint presentation) 7
Friday, November 8, 2013

8:00-8:30 A.M.  
REFRESHMENT BREAK

8:30-10:15 A.M.  
FEDERAL TAX CONTROVERSY

CRAIG D. BELL  
WILLIAM L. S. ROWE

Representing Clients in Audits and Controversies in Today’s Tax Enforcement Environment

10:15-10:30 A.M.  
REFRESHMENT BREAK

10:30 A.M. - 12:00 P.M.  
I WANT OUT – TAX CONSIDERATIONS IN EXITING A PARTNERSHIP

JAMES B. SOWELL

I Want Out – Tax Considerations In Exiting a Partnership (PowerPoint presentation)

12:00-12:15 P.M.  
REFRESHMENT BREAK

12:15-1:15 P.M. – LUNCH SESSION  
KEYNOTE ADDRESS – TAX REFORM IN THE 113TH CONGRESS: INSIGHTS AND ANALYSIS

RUSSELL W. SULLIVAN

Tax Reform in the 113th Congress: Insights and Analysis

1:15-1:30 P.M.  
REFRESHMENT BREAK

1:30-3:00 P.M.  
ESTATE & GIFT – ADVISING CLIENTS AFTER THE 2012 TAX ACT

DENNIS I. BELCHER

Advising Estate Planning Clients After the 2012 Tax Act
3:00-3:15 P.M.
REFRESHMENT BREAK

3:15-4:45 PM.
REAL ESTATE & PARTNERSHIP HOT TOPICS

ROBERT J. CRNKOVICH
STEVEN M. FRIEDMAN

*Hot Topics in Partnership Tax Planning*

4:45 P.M.
ADJOURNMENT