

Textron vs. United States: Are Tax Accrual Workpapers Protected Work Product?

Moderator:

Edward L. Froelich, Morrison & Foerster LLP

Speakers:

Professor Dennis J. Ventry Jr., University of California–Davis

Charles P. Hurley, Mayer Brown LLP

Amar D. Sarwal, General Litigation Counsel, U.S. Chamber of Commerce

May 25, 2010 • 8:30-10:00 a.m.

Morrison & Foerster

2000 Pennsylvania Ave., NW, Suite 6000, Washington, D.C. 20006

A dial-in number is available and will be provided upon registration.

Cost: \$10, whether attending in person or via phone. Breakfast is included.

With the Supreme Court's decision on Textron's pending petition for certiorari expected in the near future, our distinguished panelists will discuss the First Circuit's en banc decision, the issues before the Supreme Court, and what the future might hold for protection of tax accrual workpapers under the work product doctrine.

To register, send this form with payment to Federal Bar Association, Section on Taxation, 1220 N. Fillmore St., Suite 444, Arlington, VA 22201; fax to (571) 481-9090; or e-mail information to Haley Hyland at hhyland@fedbar.org. Please register by May 21.

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