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Chamberlain Hrdlicka Adds Three Prominent Tax Attorneys, Opens Philadelphia Office

February 1, 2007

Chamberlain Hrdlicka has added nationally-recognized tax attorneys from the Philadelphia office of Miller & Chevalier, which is one of the nation's premier tax firms. Miller & Chevalier partners Herbert Odell, Philip Karter and Kevin Johnson announced today their decision to leave the Washington, D.C.-based firm and join Chamberlain Hrdlicka as shareholders, effective Feb. 1.

Former U.S. Department of Justice tax attorneys founded Chamberlain Hrdlicka in 1965 as a tax boutique, and the addition of Messrs. Odell, Karter and Johnson builds on Chamberlain Hrdlicka's well-established tax practice. Messrs. Odell, Karter and Johnson bring a combination of government, trial and academic expertise to Chamberlain Hrdlicka, enhancing its growing national tax presence.

"The opportunity to add significant national-level depth with some of the country's most respected tax attorneys speaks for itself," said George A. Hrdlicka, founding shareholder of Chamberlain Hrdlicka. He continued, "We've long been known for our tax expertise and the addition of such strength and depth in this core practice area will provide significant advantages in serving our clients."

David D. Aughtry, who is also a nationally-renowned tax controversy attorney and head of Chamberlain Hrdlicka's Atlanta office, echoed Mr. Hrdlicka's perspective. "The addition of this team gives us unparalleled strength," he stated.

The three attorneys joining Chamberlain Hrdlicka are battle-tested veterans of tax law. Herbert Odell has practiced in all areas of tax controversy and planning. He has represented major U.S. and multinational corporations and organizations, has successfully litigated precedent-setting cases before the U.S. Tax Court, U.S. Court of Federal Claims and U.S. District Courts. In a case that all practitioners and their clients will keenly watch, Messrs. Odell and Karter are scheduled to try *Black & Decker Corp. vs. United States* in March.

Mr. Odell has also represented clients in international and cross-border activities including inbound and outbound transactions. In addition, he has offered tax advice to U.S. businesses operating abroad. Mr. Odell began his career in the Tax Division of the U.S. Department of Justice, where he worked with Mr. Hrdlicka. Mr. Odell went on to become a principal with several leading tax-focused law firms, including Morgan, Lewis & Bockius, and founded Odell & Partners, which was later acquired by Miller & Chevalier. Mr. Odell founded International Tax Group, an international tax law network spanning six continents that enabled his firm to handle transactions around the world. As lead trial lawyer in the landmark case *Scott Paper Company vs. United States*, Mr.

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Odell's efforts led to a milestone ruling which overturned IRS national policy. Mr. Odell received his undergraduate degree in economics from the University of Pennsylvania's Wharton School and his J.D. from the University of Miami Law School, where he later served as adjunct professor of law. Also a graduate of Harvard Law School, Mr. Odell brings more than 37 years of expertise to Chamberlain Hrdlicka.

"Chamberlain Hrdlicka's reputation as an authority in our field weighed heavily into our strategic decision to join the firm," said Mr. Odell. He emphasized, "Chamberlain Hrdlicka is a natural fit for our collective capabilities."

Philip Karter has specialized in tax controversy and litigation matters for more than 20 years and was a partner with Odell & Partners before joining Miller & Chevalier. He is also a former trial attorney with the U.S. Department of Justice Tax Division and a recipient of the Department's "Outstanding Attorney" award. Mr. Karter has litigated Federal tax cases in the U.S. Tax Court, U.S. District Courts and the U.S. Court of Federal Claims and argued in the appellate courts. His range of trial experience, which includes more than two dozen jury and non-jury cases tried to judgment, has encompassed a wide variety of federal income, estate, gift and excise tax issues. Representative examples have included matters involving hostile takeover expenses, contingent liability transactions, greenmail payments, transition rule tax credits, foreign tax credits, worthless stock, interest recomputations and netting, disparate treatment, timber depletion, coal excise taxes, debt-equity swaps, and other financial product issues. An author of academic and professional articles on taxation and tax strategy, Mr. Karter has spoken before the American Bar Association, the Tax Executives Institute, the Federal Bar Association, various state bar and professional associations and academic institutions. He received his B.A. from Emory University, his J.D. from the University of Wisconsin School of Law, and his LL.M. in taxation from New York University School of Law.

On the move to Chamberlain, Hrdlicka, Karter noted that "few law firms nationwide can match the track record this firm has put together over the years in successfully resolving tax disputes, which is why I can't think of a better platform from which to continue our representation of clients in the tax controversy and litigation arenas."

Kevin Johnson's tax practice has focused on federal tax controversy and domestic and international tax planning. Formerly associated with Dechert LLP in Philadelphia, Mr. Johnson's experience also includes stints as a Revenue Agent and Senior Appeals Agent with the IRS. He has represented clients before the U.S. Tax Court, the U.S. Court of Federal Claims and the U.S. Court of Appeals for the 10th Circuit, as well as large corporate clients before the IRS. Mr. Johnson received his B.B.A. in Accounting and an M.S. in Taxation from Temple University, was a Harlan Fiske Stone Scholar and graduate of Columbia University Law School, and received his LL.M. in Taxation from the New York University School of Law.

Joining Messrs. Odell, Karter and Johnson is Jonathan Prokup, former senior associate at Miller & Chevalier and at the Philadelphia office of Dechert LLP. Mr. Prokup received his law degree from the University of Michigan Law School, magna cum laude, where he was an Associate Editor of Michigan Law Review, a John M. Olin Student Fellow in Law and Economics, and elected to the Order of the Coif. He received his undergraduate degree from Amherst College, magna cum laude, where he was awarded the Gilbert Prize for Public Speaking.