

Contact**Houston**

1200 Smith Street, Suite 1400
Houston, Texas 77002-4310
Tel: 713.658.1818
Fax: 713.658.2553

Atlanta

191 Peachtree Street, N.E.,
Forty-Sixth Floor
Atlanta, Georgia 30303
Tel: 404.659.1410
Fax: 404.659.1852

Philadelphia

300 Conshohocken State Road
Suite 570
West Conshohocken, PA 19428
Tel: 610.772.2300
Fax: 610.772.2305

San Antonio

112 East Pecan Street, Suite
1450
San Antonio, Texas 78205
Tel: 210.253.8383
Fax: 210.253.8384

Pete Lowy, shareholder at Chamberlain Hrdlicka, was quoted in Law360s December 21, 2023 article on Top Federal Tax Cases Of 2023

Pete Lowy explains that in 2023 the IRS was successful in dodging questions about the scope of judicial remedies under the Administrative Procedures Act but taxpayers will likely press the issues in cases in 2024

January 3, 2024

Pete Lowy, shareholder at Chamberlain Hrdlicka, was quoted in Law360s December 21, 2023 article on Top Federal Tax Cases Of 2023. On the arcane tax procedure subject of the scope of the judiciary's authority to vacate IRS pronouncements that violate the Administrative Procedures Act, Pete stated that the issue is unsettled. He further explained that the IRS in 2023 was successful in dodging questions about the scope of judicial remedies under the Administrative Procedures Act but taxpayers will likely press the issues in cases in 2024.

Read the full article here:

<https://www.law360.com/tax-authority/articles/1775039/top-federal-tax-cases-of-2023>