



Highlights from Our History

Ivins, Phillips & Barker is one of the last pristine tax boutiques still standing in the country, and it fully intends to be standing a generation from now.

The Legal Times

- **1924** President Coolidge appoints Judge James S.Y. Ivins and Judge Percy W. Phillips as two of the original members of the United States Board of Tax Appeals (now the United States Tax Court). The first reported decision of the court, *Appeal of John H. Parrott*, 1 B.T.A. 1 (1924) was rendered by Judge Ivins.
- **1935** Alongside prominent tax lawyer Richard Barker, Judges Ivins and Phillips form the firm that will evolve into the present-day IPB. Since its inception, the firm has practiced exclusively in the areas of tax, benefits and compensation, and estate planning.
- **1930s and 1940s** The firm establishes its reputation as the leading tax specialty law firm in the country, forming relationships with major corporations and prominent families including H. J. Heinz, Dominion Resources, Milliken, and several key members of the du Pont Family many of whom remain clients of the firm today.
- **1969** IPB successfully lobbies Congress on behalf of its charitable foundation clients to enact certain key provisions of the Tax Reform Act of 1969, the law that established much of the regulatory framework governing tax-exempt organizations today.
- **1973** IPB elects our first woman equity partner; in 2025 over 44% of our equity partners are women.
- **1978** IPB benefits and compensation attorneys play a central role in the enactment of the 401(k) and cafeteria plan provisions of the Internal Revenue Code.
- **1980s** The firm litigates landmark cases involving the foreign tax credit provisions of the Internal Revenue Code and treaties, and the subpart F rules applicable to foreign joint ventures, on behalf of clients such as Xerox and Eastman Kodak.
- **2001** In an 8-1 decision, IPB wins a seminal Supreme Court case involving consolidated corporate tax returns in *United Dominion Industries v. United States*. This is the latest of four tax cases that Ivins, Phillips & Barker has argued before the U.S. Supreme Court throughout the firm's history.
- **2001** IPB represents Carolina Power & Light when the IRS determines the client and its VEBA made excess contributions to the VEBA based on an illegal formula. IPB devises an alternative contribution formula and settles on the steps of the Tax Court, with the IRS conceding the entire \$17.3 million in alleged deficiencies.
- **2007** On behalf of Delphi Corporation, the firm secures the largest pension funding waivers ever granted by the IRS and PBGC.



| 2 | Highlights from Our History

- **2012** IPB prevails in *Dominion Resources v. United States*, the first case in which any court has applied the Administrative Procedure Act's arbitrary and capricious standard to invalidate a tax regulation.
- **2012** On behalf of General Motors, IPB obtains one of the first ever IRS rulings permitting a lump sum payment window to be offered to retirees in payment status.
- **2015** IPB provides corporate tax and employee benefits advice to Heinz in connection with its acquisition of Kraft, in a transaction valued at approximately \$60 billion.
- **2018** In response to IPB's motion for summary judgment, the IRS concedes in full that our client, Platinum Supplemental Insurance, was not liable for \$3.6 million in alleged FICA tax and income tax withholding.
- **2018** IPB leads the planning and advice on the U.S. tax aspects of the largest all-cash acquisition in history, Bayer's \$63 billion purchase of Monsanto.
- **2020** IPB joins inaugural class of Midsize Mansfield Rule firms, embarking on an 18-month program whose overall goal is to increase diversity in leadership pipelines within midsize law firms by broadening the pool of women lawyers, LGBTQ+ lawyers, lawyers with disabilities, and/or underrepresented racial and ethnic lawyers who are considered for entry-level and lateral attorney job openings, firm governance opportunities, equity partner promotions, and opportunities to connect with clients.
- **2022** IPB achieves Mansfield Plus certification, a status conveyed on firms that, in addition to meeting or exceeding the consideration requirements, have successfully achieved 30 percent diverse representation in current leadership roles, formal client pitches, and staffing on key matters.
- **2022** IPB establishes the Ivins, Phillips & Barker Diversity Scholars Program, welcoming law students with a demonstrated commitment to diversity, a record of academic achievement, and an interest in exploring careers in our practice areas to apply for a paid summer associate position at the firm's Washington, D.C. office between their first and second years of law school.
- **2023** IPB achieves Mansfield Plus Certification for the second consecutive cycle, once again having successfully achieved 30 percent diverse representation in current leadership roles, formal client pitches, and staffing on key matters.
- **2023** IPB signs on for the launch of Diversity Lab's Disability Inclusion Commitments challenge, to continue building a culture of inclusion for people with disabilities by implementing one or more of the 10 actions on its list of Disability Inclusion Commitments.