



## Eric R. Fox

Partner

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### PRACTICE AREAS

#### Tax

- International Tax
- Arbitration & Litigation Support
- Tax Controversies
  - IRS Audit Defense
  - IRS Appeals Proceedings
  - Tax Litigation
- Tax Planning & Advisory Services

#### Estate Planning

- Privately Held Businesses
- Exempt Organizations & Charitable Giving
- Estate Administration
- Gift & Estate Tax Planning
- Income Tax Planning
- International Planning & Compliance
- Wills & Trusts

### EDUCATION

Harvard University Law School, 1964,  
LL.B., *cum laude*

Amherst College, 1961, A.B.

### BAR AND COURT ADMISSIONS

District of Columbia

New York

U.S. Supreme Court

U.S. Tax Court

Eric has a diverse practice encompassing corporate tax issues and estate planning matters. Outside the office, he is an avid chess player.

Eric has often been cited by *Washingtonian Magazine* as one of the outstanding tax lawyers in Washington, D.C., and in 2022 was selected to its Top Lawyers Hall of Fame. He has been named in *Best Lawyers in America* in each of the last thirty consecutive years. Although, during his more than 50 years with the firm, Eric devoted a substantial portion of his activities to international and corporate taxation, today he concentrates primarily on matters in controversy before the Internal Revenue Service and the courts, as well as on estate planning. He has represented clients before the United States Tax Court, the United States Court of Federal Claims, various United States District Courts, a variety of United States Courts of Appeals, and the United States Supreme Court, where he won an 8-1 decision in the United Dominion Industries case in 2001.

Eric served as Editor-in-Chief of the *Journal of International Taxation* from 1990 through 1996 and, after many years of service in various capacities in the Tax Section of the American Bar Association, served as its Vice Chair, Administration, from 1996 to 1998.

### GOVERNMENT SERVICE

United States Department of State, Legal Advisor's Office (1964-1965)

Hearing Committee Member, District of Columbia Court of Appeals  
Board on Professional Responsibility (April 2009 to 2015)



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U.S. Court of Federal Claims

U.S. Court of Appeals, District of  
Columbia Circuit

U.S. Court of Appeals, Federal Circuit

U.S. Court of Appeals, Fourth Circuit

U.S. Court of Appeals, Sixth Circuit

U.S. Court of Appeals, Ninth Circuit

U.S. District Court for the District of  
Columbia

**HONORS & AWARDS**

*The Best Lawyers in America*, 1993 - present

*Washingtonian Magazine* Top Lawyers, biannually from 2006 - 2022;  
Top Lawyers Hall of Fame 2022

*Super Lawyers* 2007 - present

**MEMBERSHIPS & AFFILIATIONS**

Member, International Association of Managing Partners (IAMP)

**NEWS**

- March 5, 2026  
IPB Recognized in Best Law Firms 2026
- March 5, 2026  
Twenty-One IPB Attorneys Recognized in Best Lawyers in  
America and Ones to Watch 2026 Editions
- November 7, 2024  
IPB Recognized in Best Law Firms 2025
- August 15, 2024  
Twenty-Two IPB Attorneys Recognized in Best Lawyers in  
America and Ones to Watch 2025 Editions