



# Robert Wellen Speaks on Corporate Spin-Offs

## **ATTORNEYS**

Robert H. Wellen

## **PRACTICE AREAS**

Tax

October, 21, 2010

Ivins partner Bob Wellen participated in a panel on "Divisive Strategies - Spin-Offs and Synthetic Spin-Offs" at the Practising Law Institute program on "Strategies for Acquisitions, Spin-Offs, Joint Ventures, Financings, Reorganizations & Restructurings" in New York.

The panel discussed current IRS ruling practices (including "no-ruling" issues, supplemental rulings and the pilot program on single-issue rulings), issues arising in selected recent private rulings (including retention of stock after a spin-off, "North-South" issues, treatment of continuing payments between the parties after a spin-off, determination of stock basis and assumptions of contingent liabilities), proposed regulations on the active trade-or-business requirement, recent temporary regulations on "hot stock" and financing of corporate separations. These subjects and others are addressed in an extensive slide deck prepared by the panel.

In addition, an updated version of Bob's outline, "Contingent Purchase Price and Contingent Liabilities in Acquisitions" is included in the course materials.