



## 2007 DirectWomen Institute Class Member Pinney L. Allen

**M**s. Allen, a native of Marshalltown, Iowa, and Columbia, Missouri, has lived in Atlanta with her family for over twenty-five years. In 1999, Ms. Allen was recognized by *Atlanta Magazine* and Georgia Public Television as one of twenty-one “Women Making a Mark” on Atlanta, honoring powerful women who have made a permanent, positive mark on lives in Atlanta. She is active in the community in matters affecting women and girls and matters affecting education. Ms. Allen serves on the boards of The Atlanta Women’s Foundation and The Lovett School.

Ms. Allen regularly leads large, multi-disciplinary teams in the structuring and effecting of complex business transactions in her work as a Partner with Alston + Bird LLP. Specifically, she has worked in a variety of settings to use joint ventures, partnerships and LLCs to achieve business objectives in “non-traditional” acquisition, supply and other contexts. She recently led a team of over 100 lawyers in the formation and later break up of an industry leading multi-billion dollar “factory” transaction involving the joint sharing of cellular infrastructure and complex service relationships. She also worked in representing a major real estate investor in creating a \$500 million “mixing bowl” structure for ownership of mature real estate assets. She has also been involved in numerous transactions involving the use of partnerships and LLCs to achieve corporate goals in moving and re-deploying assets, including major U.S. and foreign corporate reorganizations.

Ms. Allen also maintains an active corporate tax practice, having secured a one-of-a-kind ruling (in less than three months) from the Internal Revenue Service for a Dutch public company when making its first U.S.

acquisition on the characterization of its stock that was not voting in the traditional sense as voting stock for purposes of the reorganization provisions. She has been involved in numerous other transactions in recent years, leading the firm one year in issuing over 100 opinions in taxable and tax-free transactions.

Ms. Allen is a frequent author and speaker on the topics of corporate, partnership and real estate business and income tax problems and has spoken to numerous professional organizations, including the Southern Federal Tax Institute, Tax Executives Institute (nationally, regionally, and locally), American Bar Association, Atlanta Tax Forum, Georgia Tax Conference, National Business Institute, Duke University Urban Property Development Council, State Bar of Georgia and Atlanta Bar Association.

Ms. Allen received her J.D. degree, cum laude, in 1979 and her A.B. degree, summa cum laude, in 1976 from Harvard University. She is identified in *The Best Lawyers in America* and was named one of the top ten business tax attorneys in the United States by Best of the U.S. Ms. Allen was also identified in the Lawdragons 500 as one of the top lawyers in the U.S. and was identified by *Chambers USA* as a “leading light” for her corporate and tax work.

Ms. Allen is Co-Chair of her firm’s Tax Section. A member of the Federal Income Tax Group, Ms. Allen concentrates her practice on the structuring and effecting of complex business transactions, as well as partnership and corporate tax planning and litigation. Ms. Allen completed a four year term on the firm’s Partners’ Committee and chaired the committee in 2002.