

Final Spotlights
ABA Section of Taxation
Real Estate Committee
Washington, D.C.
May 2002

Thursday, May 9, 2002

6:30 p.m. - 9:30 p.m.

REAL ESTATE AND PARTNERSHIPS DINNER

Members of the Real Estate and Partnerships Committees will meet for cocktails and dinner at the Old Ebbitt Grill, within walking distance of the Grand Hyatt Hotel. Cocktails will begin at 6:30 p.m. followed by dinner at 7:30 p.m. Reservations and advance payment are required. For details, please go to the Committee's website: www.abanet.org/tax/groups/realest/.

Friday, May 10, 2002

12:30 p.m. – 1:30 p.m.

REAL ESTATE & PARTNERSHIPS COMMITTEES LUNCHEON

Speaker: Robert P. Hanson, Tax Legislative Counsel, United States Department of the Treasury, Washington, DC. Ticketed event.

2:30 p.m. - 5:30 p.m.

REAL ESTATE COMMITTEE

Chair: Michael J. Grace, Powell Goldstein Frazer & Murphy LLP, Washington, DC.

2:30 p.m. Opening Remarks.

Michael J. Grace, Powell Goldstein Frazer & Murphy LLP, Washington, DC.

2:35 p.m. Estate Tax Phaseout and Repeal: What It Means for Real Estate Tax Lawyers.

The panel will discuss practical estate planning techniques for the real estate owner in view of the dramatic legislative changes in the past year, emphasizing the income tax issues that must be considered in connection with each such technique. The focal point will be "what still works and what does not?" This panel will be broadcast via ABA teleconference!

Moderator: Kevin Thomason, Thompson, Coe, Cousins & Irons LLP, Dallas, TX.

Panelists: Elizabeth Crewson Paris, Tax Counsel, Senate Finance Committee, Washington, DC; Stefan F. Tucker, Venable, Baetjer, Howard & Civiletti, Washington, DC; Victor F. Keen, Duane Morris LLP, Philadelphia, PA; Stephen M. Breitstone, Meltzer, Lippe, Goldstein & Schlissel, Mineola, NY.

3:35 p.m. Real Estate Workouts: Securitized Loans; Exempt Assets; Other Current Developments.

The panel will address the difficult tax and business planning issues that arise in connection with debt restructurings and cancellations where securitized loans are involved. The panel also will consider the definition of “exempt assets” and other current developments concerning workouts.

Moderator: George R. Nelson, Deloitte & Touche LLP, Houston, TX.

Panelists: William P. O’Shea, Deputy Associate Chief Counsel (Passthroughs & Special Industries), Internal Revenue Service National Office, Washington, DC; Linda Swartz, Cadwalader, Wickersham & Taft, New York, NY; Terence B. Meyers, Deloitte & Touche LLP, Washington, DC.

4:05 p.m. Dealer vs. Investor: Techniques to Protect Capital Gain.

Individual real estate investors and developers continually seek opportunities to preserve capital gain treatment. The panel will review the current state of the law distinguishing real estate “dealers” from “investors,” and discuss specific planning techniques.

Moderator: Michael L. Cook, Jenkins & Gilchrist, Austin, TX.

Panelists: Alfred F. DeLeo, Cox, Castle & Nicholson LLP, Los Angeles, CA; Donald B. Reynolds, Silverstein & Mullens, a division of Buchanan Ingersoll Professional Corporation, Washington, DC; Bradley T. Borden, Oppenheimer, Blend Harrison & Tate, Inc., San Antonio, TX.

4:35 p.m. Real Estate Opportunity Funds.

Real estate opportunity funds have become a significant source of real estate capital, and the primary real estate investment vehicle for many tax exempt, foreign and institutional investors. The panel will explain the structure and economics of the typical fund and will address the significant tax (and related business) issues addressed by persons who advise investors and fund sponsors.

Moderator: Sanford C. Presant, Ernst & Young LLP, Los Angeles, CA.

Panelists: Donald Clark, Chief Financial Officer, Rockwood Capital, San Francisco, CA; Other Panelists: TBA.

5:10 p.m. Like-Kind Exchanges of Undivided Interests in Real Property and Other Current Developments Under Section 1031.

The panel will discuss the anticipated revenue procedure addressing whether and when undivided or fractional interests in pools of real estate may qualify as relinquished or replacement property, and, time permitting, other current developments.

Moderator: Mary B. Foster, 1031 Services, Inc., Bellevue, WA.

Panelists: Deborah A. Harrington, Attorney-Advisor, Office of Tax Legislative Counsel, United States Department of the Treasury, Washington, DC; Jeanne E. Sullivan, Senior Technical Reviewer, Branch 3, Office of Associate Chief Counsel (Passthroughs & Special Industries), Internal Revenue Service, Washington, D.C.; Richard M. Lipton, McDermott, Will & Emery, Chicago, IL; Ronold Platner, Snell

& Wilner, LLP, Phoenix, AZ; Kelly A. Alton, Deloitte & Touche LLP, Washington, DC.

Saturday, May 11, 2002

7:15a.m. - 8:30 a.m.

REAL ESTATE/PARTNERSHIPS “SHOP TALKING” BREAKFAST

Members of the Real Estate and Partnerships Committees will gather for the traditional “open mike” breakfast to share ideas and war stories, and to seek input on technical issues. Ticketed event.

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