

## CONFERENCE CO-CHAIRS

Elinore J. Richardson, Institute for International Taxation, Inc., Toronto, ON, Canada (IITI)

Joan C. Arnold, Pepper Hamilton LLP, Philadelphia, PA, USA (ABA Section of Taxation)

Dirk J.J. Suringa, Covington & Burling LLP, Washington, DC, USA (IFA USA Branch)

Christian Wimpissinger, Binder Grösswang, Vienna, Austria (IBA Taxes Committee)

Gerald Gahleitner, LeitnerLeitner, Linz, Austria

Clemens Philipp Schindler, Wolf Theiss, Vienna, Austria

## WEALTH MANAGEMENT WORKSHOP

Venue: Erste Bank, Petersplatz 7, 1010 Vienna

Sponsored by:  

1230 – 1330 Registration of Delegates

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1330 – 1500

### Why International Private Clients Like Europe: Effective European Planning Structures

#### Co-Chairs

Richard J. Hay, Stikeman Elliott LLP, London, England

Niklas Schmidt, Wolf Theiss, Vienna, Austria

#### Speakers

Thierry Boitelle, Bonnard Lawson, Geneva, Switzerland

Juanita Brockdorff, KPMG, Malta

Stijin Janssen, Loyens & Loeff, Dubai, United Arab Emirates

Andreas Richter, P+P Pöllath + Partners, Berlin, Germany

1500 – 1530 Networking Break

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1530 – 1700

### Transatlantic Wealth Management – Issues in Planning When Combining Civil and Common Law Jurisdictions

#### Co-Chairs

Clare Maurice, Maurice Turnor Gardner LLP, London, England

Christian von Oertzen, Flick Gocke Schaumburg, Frankfurt  
am Main, Germany

#### Speakers

Olga Boltenko, Withers LLP, Zurich, Switzerland

Patricia Garcia Mediero, Avantia Asesoramiento Fiscal y  
Legal, Bilbao, Spain

Suzanne M. Reisman, London, England

Jean-Marc Tirard, Tirard Naudin, Paris, France

Venue: Hofburg Congress Center, Hofburg 1, 1010 Vienna

0800 – 0845 Registration of Delegates and Continental Breakfast

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0845 – 0900 Conference Opens with Chairs Remarks

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0900 – 1045 Plenary Session

**International Tax Developments: Competition Between Source and Residence States and the Impact on Multinationals**

**Co-Chairs**

Stephen Edge, Slaughter and May, London, England  
Elinore J. Richardson, Institute for International Taxation, Inc., Toronto, ON, Canada

**Speakers**

Peter C. Canellos, Wachtell, Lipton, Rosen and Katz, New York, New York, USA

Nishith Desai, Nishith Desai Associates, Mumbai, India  
Joshua Odintz, Baker & McKenzie LLP, Washington, DC  
Stef van Weeghel, PricewaterhouseCoopers, Amsterdam, The Netherlands

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1045 – 1115 Networking Break

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1115 – 1300 Workshop A

**Investment in the CEE: Structuring for Tax Efficiency**

**Co-Chairs**

Sam Kaywood, Alston & Bird LLP, Atlanta, GA, USA  
Dariusz Wasylkowski, Wardynski & Partners, Warsaw, Poland

**Speakers**

Maxim Alekseyev, Alrud Law Firm, Moscow, Russia  
Juraj Gerzeni, TMF Services Slovakia s.r.o., Bratislava, Slovakia  
Nairy Merheje, Der Arakelian-Merheje LLC, Nicosia, Cyprus  
Dirk J.J. Suringa, Covington & Burlington LLP, Washington, DC, USA  
Henk Verstraete, Liedekerke Wolters Waelbroeck Kirkpatrick, Brussels, Belgium  
Bartjan Zoetmulder, Loyens & Loeff, Amsterdam, The Netherlands

1115 – 1300 Workshop B

**Permanent Establishment: Mitigating Taxation on Trading and Services Income**

**Co-Chairs**

Seth J. Entin, Greenberg Traurig, P.A., Miami, FL, USA  
Christian Wimpissinger, Binder Grösswang, Vienna, Austria

**Speakers**

Alexandre Andrade, PPP/Project Finance Legal Advisor, Lisbon, Portugal  
Torsten Engers, Flick Gocke Schaumburg, Frankfurt, Germany  
Liesl Fichardt, Berwin Leighton Paisner, London, England  
Ståle R. Kristiansen, Thommessen, Oslo, Norway  
Thierry Lesage, Arendt & Medernach, Luxembourg, Luxembourg

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1115 – 1300 Workshop C

**Group Taxation: Use of Cross-Border Losses in Tax Planning**

**Co-Chairs**

Paul Doralt, DORDA BRUGGER JORDIS Rechtsanwälte GmbH, Vienna, Austria

Lucie Vorlíčková, VORLÍČKOVÁ PARTNERS, Prague, Czech Republic

**Speakers**

Nicolas de Boynes, Sullivan & Cromwell, Paris, France  
Sylvia Dikmans, Houthoff Buruma, Amsterdam, The Netherlands  
Lauri Lehmusojä, Hannes Snellman Attorneys Ltd., Helsinki, Finland  
William Lu, Latham & Watkins LLP, New York, New York, USA  
Wolf-Georg von Rechenberg, CMS Hasche Sigle, Berlin, Germany

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1300 – 1400 Networking Lunch

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1400 – 1600 Workshop A

**Austria: The Competitive Investment Platform for Cross-Border Investment**

**Co-Chairs**

Gerald Gahleitner, LeitnerLeitner, Linz, Austria  
Richard M. Lipton, Baker & McKenzie LLP, Chicago, IL, USA

**Speakers**

René Siegl, Austrian Business Agency, Vienna, Austria  
Philipp-August Sommer, Constantia Teich GmbH, Weinburg, Austria  
Gerhard Steiner, Fachbereich Großbetriebsprüfung – LStR/Verrechnungspreise, Linz, Austria  
Michael Weissberg, Linde AG, Munich, Germany

1400 – 1600 Workshop B

**Tax Risk Management by Multinationals: Managing Tax Audits in Light of Recent Tax Litigation**

**Co-Chairs**

Reeves C. Westbrook, Covington & Burling LLP, Washington, DC, USA

Wilhelm Haarmann, HAARMANN Partnerschaftsgesellschaft, Frankfurt am Main, Germany

**Speakers**

Joachim M. Bjerke, Bugge, Arentz-Hansen & Rasmussen (BAHR), Oslo, Norway

Guglielmo Maisto, Maisto e Associati, Milan, Italy

Michael Molenaars, Stibbe, Amsterdam, The Netherlands

Panagiotos Pothos, Kyriakides Georgopoulos & Daniolos Issaias, Athens, Greece

1400 – 1600 Workshop C

**Cross-Border Investment Planning: Use of FTCs and Other Strategies to Reduce Tax on Investment Cash Flows**

**Co-Chairs**

Stuart Chessman, Vivendi S.A., New York, NY, USA

Kevin Keyes, Fried, Frank, Harris, Shriver & Jacobson LLP, Washington, DC, USA

**Speakers**

Massimo Agostini, Carnelutti Studio Legale Associato, Milan, Italy

Marius Ionescu, Nestor Nestor Diculescu Kingston Petersen, Bucharest, Romania

Johannes Prinz, CHSH Cerha Hempel Spiegelfeld Hlawati, Vienna, Austria

Peter Reinarz, Bär Karrer AG, Zurich, Switzerland

Wolfgang Sonnleitner, Marccus Rechtsanwaltsgesellschaft mbH, Düsseldorf, Germany

Sonia Velasco Menal, Cuatrecasas, Gonçalves Pereira, Barcelona, Spain

1600 – 1630 Networking Break

1630 – 1800 Concurrent A

**Reorganizations/Divestitures/Spin-Offs**

**Co-Chairs**

Johannes Frey, Shearman & Sterling LLP, Munich, Germany

Clemens Philipp Schindler, Wolf Theiss, Vienna, Austria

**Speakers**

Pierre-Henri Durand, Bredin Prat, Paris, France

Christian Kaeser, Siemens AG, Munich, Germany

Helena Navratilova, Kocian Solc Balastik, Prague, Czech Republic

Dominic Stuttaford, Norton Rose LLP, London, England

1630 – 1800 Concurrent B

**The Latest in Financial Products and Instruments: What Works and What Does Not**

**Co-Chairs**

Patrick Mears, Allen & Overy LLP, London, England

Stephen L. Gordon, Cravath, Swaine & Moore LLP, New York, NY, USA

**Speakers**

Philippe Derouin, Skadden, Arps, Slate, Meagher & Flom LLP and Affiliates, Paris, France

Lucy W. Farr, Davis Polk & Wardwell LLP, New York, NY, USA

Philip Martin, Henleydown Consulting Limited, Kent, England

Riccardo Michelutti, Maisto e Associati, Milan, Italy

Martin Nilsson, Mannheimer Swartling Advokatbyrå AB, Stockholm, Sweden

1830 – 2000 Cocktail Reception at City Hall

*Sponsored by: StAdt  Wien*

Venue: Hofburg Congress Center, Hofburg 1, 1010 Vienna

0800 – 0830 Registration of Delegates and Continental Breakfast

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0830 – 1030 Concurrent A

**Transfer Pricing: What's New and How Will It Affect Cross-Border Transactions**

**Co-Chairs**

Danny Beeton, Freshfields Bruckhaus Deringer LLP, London, England

Thomas M. Zollo, KPMG LLP, Chicago, IL, USA

**Speakers**

Valentina Akimova, Pepeliaev, Moscow, Russia

Clive Baxter, A.P. Moller – Maersk Group, Copenhagen, Denmark

Christoph Kromer, Luther Rechtsanwaltsgesellschaft mbH, Frankfurt am Main, Germany

Michelle Levac, Revenue Canada, Ottawa, ON, Canada

Kathryn O'Brien, General Electric Company, Washington, DC, USA

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0830 – 1030 Concurrent B

**Challenging Aggressive Tax Planning Domestically: The Impact of Tax Treaties on Source State Options**

**Co-Chairs**

Adriaan Kolff, Alter Domus Nederland B.V., Amsterdam, The Netherlands

Carol P. Tello, Sutherland Asbill & Brennan LLP, Washington, DC, USA

**Speakers**

Bruno Gangemi, Studio Legale Macchi di Cellere Gangemi, Rome, Italy

Anders Oreby Hansen, Bech-Bruun, Copenhagen, Denmark

Tobias Klass, Latham & Watkins LLP, Hamburg, Germany

Xenia Legendre, Hogan Lovells LLP, Paris, France

Silvia Zimmerman, Pestalozzi Attorneys at Law, Zürich, Switzerland

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1030 – 1100 Networking Break

1100 – 1230 Workshop A

**Supply Chain/Contract Manufacturing Restructuring for Multinationals**

**Co-Chairs**

Albert Collado, Garrigues, Barcelona, Spain

Hal Hicks, Skadden, Arps, Slate, Meagher & Flom LLP, Washington, DC, USA

**Speakers**

Martin Busenhardt, Walder Wyss AG, Zürich, Switzerland

Peter H.M. Flipsen, Simmons & Simmons LLP, Amsterdam, The Netherlands

Antoine Glaize, Arsene Taxand, Paris, France

Peter Maher, A&L Goodbody, Dublin, Ireland

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1100 – 1230 Workshop B

**Collective Investment Vehicles: Issues in Cross-Border Investment**

**Co-Chairs**

Herbert Buzanich, Schoenherr, Vienna, Austria

Gordon E. Warnke, Dewey & LeBoeuf LLP, New York, NY, USA

**Speakers**

Jean-Blaise Eckert, Lenz & Staehelin, Geneva, Switzerland

Frederic Feyten, OPF Partners, Luxembourg, Luxembourg

Mark O'Sullivan, Matheson Partners, Dublin, Ireland

Darren Oswick, Simmons & Simmons LLP, London, England

Stefano Petrecca, Di Tanno e Associati, Rome, Italy

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1100 – 1230 Workshop C

**Representing a Client in a Cross-Border Transaction – How Differences in Practice Can Crater the Deal**

**Co-Chairs**

Kimberly S. Blanchard, Weil, Gotshal & Manges LLP, New York, NY, USA

Stanley C. Ruchelman, The Ruchelman Law Firm, New York, NY, USA

**Speakers**

Sandra Hazan, Salans, Paris, France

Godfried Kinnegim, Allen & Overy LLP, Amsterdam, The Netherlands

Thomas Meister, Walder Wyss Ltd., Zürich, Switzerland

Robert G. Rinninsland, Engelhard Corporation USA, Salisbury, CT, USA

Peter Utterström, Delphi, Stockholm, Sweden

Friday, 30 March

FREITAG

1230 – 1330    Networking Lunch

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1330 – 1530    Plenary Session

**Mergers and Acquisitions Update**

**Co-Chairs**

Paul Sleurink, De Brauw Blackstone Westbroek, Amsterdam, The Netherlands

Andrew P. Solomon, Sullivan & Cromwell LLP, New York, NY, USA

**Speakers**

Pia Dorfmueller, P+P Pöllath + Partners, Frankfurt am Main, Germany

Lluís M. Fargas, Alcoa Europe SARL, Geneva, Switzerland

Sara Luder, Slaughter and May, London, England

Edouard Milhac, CMS Bureau Francis Lefebvre, Paris, France

Eveline Saupper, Homburger AG, Zurich, Switzerland

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1530    Conference Closes

