

David Zimmerman Quoted Regarding Extension of Spinoff Guidance Program in Law360

"IRS to Extend Spinoff Guidance Program Past Original Cutoff"

Law360

02.26.2019

David Zimmerman was quoted regarding the announcement that the Internal Revenue Service (IRS) will extend the 18-month pilot program under which corporations could request private rulings from the IRS on the tax consequences of distributing stock or securities. "I think that is fantastic news," Zimmerman said. "The corporate branch of the IRS has always been willing to take on hard issues, and in some cases they have been able to give a 'will' opinion on a transaction when outside counsel could not give an unqualified opinion."