



David D. Sherwood

Partner

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PRACTICE AREAS

Business Tax
Corporate Tax
Partnership Tax
General Tax
Tax Controversies

EDUCATION

Harvard University Law School,
1998, J.D., *cum laude*
John M. Olin Fellowship in Law
and Economics
Harvard University, 1996, M.A.,
Economics
Columbia College, 1993, B.A.,
Economics-Mathematics, *summa
cum laude*
Phi Beta Kappa

BAR AND COURT ADMISSIONS

District of Columbia
California
United States Tax Court
United States Court of Federal
Claims
United States Court of Appeals
for the Federal Circuit

David Sherwood is a partner in the Washington, D.C. office of Ivins, Phillip & Barker, having joined the firm in 2000. He has extensive experience in advising clients on a broad range of domestic tax issues affecting corporations, joint ventures and their owners, including the tax treatment of spin-offs and other restructurings, consolidated returns, the availability of deductions on the worthlessness or other disposition of stock, financial products and partnership special allocations. In addition, his training in economics and mathematics before becoming a lawyer, as well as business valuation training since becoming a lawyer, has provided him with the ability to incorporate an understanding of complicated business appraisals and financial models with the tax advice he provides. He is also involved with issues concerning the disclosure of tax shelters and other reportable transactions.

REPRESENTATIVE MATTERS

- Advised on the tax treatment to a public issuer of dealer remarketable debt upon the exchange of such debt for cash and securities.
- Advised a client on the availability of an ordinary worthless stock deduction on the stock of a subsidiary with multiple classes of stock owned by minority shareholders.
- Represented a client before IRS Appeals and the United States Tax Court regarding an IRS challenge to a leveraged LLC transaction.
- Represented an industry association before IRS and Treasury in an attempt to have a revenue ruling affecting the industry withdrawn.

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- Working with business appraisers and critiquing IRS business appraisals in connection with tax planning, IRS audits and litigation.

MEMBERSHIPS & AFFILIATIONS

Member, American Bar Association

Member, District of Columbia Bar

PUBLICATIONS

- September 1, 2010
Schedule UTP: Ready or Not, Here It Comes
Tax Management Real Estate Journal
- April 20, 2010
Codification of the Economic Substance Doctrine
Business Tax Insider

SPEECHES & PRESENTATIONS

David Sherwood has spoken at the District of Columbia Bar Tax Section and co-taught a lecture on the consolidated return investment adjustment rules to young attorneys in the IRS National Office.

NEWS

- August 1, 2011
Ivins Attorneys Comment on Guidance under Section 355