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PAUL A. SCZUDLO is a partner in the Los Angeles office. Mr. Sczudlo received his B.A. in English *cum laude* from Yale College in 1977. He attended Harvard Law School (1979-1980) and the University of California at Berkeley, Boalt Hall School of Law (1977-1979), where he received his J.D. in 1980. Mr. Sczudlo was born in Fairbanks, Alaska.

Mr. Sczudlo's practice emphasizes tax planning and structuring for international business transactions, including inbound planning for businesses seeking to set up, acquire or dispose of manufacturing, distribution or other operations in the United States; planning for foreign investments in United States real estate or other U.S. -based assets; outbound planning for U.S. businesses establishing foreign operations; planning for cross-border mergers, acquisitions and financing, licensing or leasing transactions; planning for international executive transfers and international moves by high-net-worth individuals; organizing foreign corporations, partnerships, trusts and other entities; and international tax withholding, reporting, compliance and controversy issues.

He also practices in entertainment taxation; international estate and gift tax planning; international estate administration; partnership and limited liability company taxation; individual taxation, corporate taxation, planning for high-net-worth individuals; international wealth transfer planning; and taxation of litigation settlements. His specialties include corporate acquisitions, mergers, reorganizations and liquidations involving foreign entities; U.S. real estate transactions, involving foreign parties; international film production and distribution; United States and California withholding tax issues with respect to non-U.S. individuals, corporations and other foreign entities; planning for foreign individuals moving to/from the United States; income and estate tax planning for U.S. citizens moving abroad, with or without terminating their U.S. citizenship; and the organization of foreign corporations, limited liability companies, and foreign trusts.

Among Mr. Sczudlo's principal clients are financial institutions, foreign investors in U.S. real estate and other U.S.-situated assets, film production and distribution companies, actors, musicians, writers, producers, directors and agents, and high-net-worth individuals.

Mr. Sczudlo is the Immediate Past Chair of the Taxation Section of the Los Angeles County Bar Association, a member of its Executive Committee, and past Chair of its Foreign Tax Committee. He is a member of the Taxation Section of the State Bar of California and a past Chair of its International Tax Committee. Mr. Sczudlo is Chair of the Los Angeles International Tax Club and a member of the Los Angeles International Tax Forum, the Taxation and International Sections of

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the American Bar Association, the Business Law Section of the International Bar Association and the Board of Directors of the Yale Club of Southern California.

Mr. Sczudlo lectures and writes frequently on international and entertainment tax topics. He writes a regular column, "International Tax Notes" in the *California Tax Lawyer*, with Rufus V. Rhoades. His recent articles and speaking engagements have included "International Development and Distribution of Intangibles" at the California State Bar's 2000 Annual Taxation Section meeting (November 2000), "Source Matters," an ATLAS Seminar on Source of Income and Allocation and Apportionment of Deductions (San Francisco, April 2000); "Offshore Tax Planning: United States and International Perspectives," Sixth Annual International Bar Association Conference on International Wealth Transfer Practice (London, March 2000); "International Wealth Transfer Planning for High Net Worth Individuals," *52 Major Tax Planning* (2000), which he co-authored with Miriam J. Golbert; "International Production and Distribution of Films: Slogging Up the Slippery Slope of U.S. Tax Deferral," *51 Major Tax Planning 12-1* (1999); "Dealing With Offshore Tax Planning: Domestic and International Perspectives," *Institute for International Research, Family Office Planning and Management* (March 1999); and "International Planning for Entertainers and Athletes," *Offshore Investment's Second West Coast Convention* (October 1998).

Mr. Sczudlo has been recognized as one of the preeminent California tax lawyers by California Law Business and Euromoney Publishing.

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