

Gibson Dunn Adds Tax Controversy Group, Led by Sanford Stark, in Washington, D.C.

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Gibson, Dunn & Crutcher LLP is pleased to announce that Sanford Stark, Saul Mezei, and C. Terrell Ussing have joined the firm as partners in the Washington, D.C. office. Formerly with Morgan, Lewis & Bockius LLP, they will continue their preeminent tax controversy and litigation practices. Stark will serve as Co-Chair of the firm's newly formed Global Tax Controversy and Litigation Practice Group, along with Michael Desmond. Desmond, who previously served as Chief Counsel of the U.S. Internal Revenue Service, joined the firm earlier this year. Desmond previously served as Tax Legislative Counsel at the U.S. Treasury Department and as a Trial Lawyer in the Tax Division of the U.S. Department of Justice, in addition to his extensive experience in private practice. "We are delighted to have Sanford, Saul, and Terrell join the firm," said Barbara L. Becker, Chair and Managing Partner of Gibson Dunn. "Our clients turn to us for guidance on a range of complex domestic and international tax issues, and, with this group, we'll be able to meet the growing demand. Their additions are a great complement to our tax, corporate, litigation, appellate and other practice groups and will help us realize our long-standing objective of establishing a market-leading global tax controversy practice." "Sanford, Saul, and Terrell have impeccable credentials and are excellent additions to the firm and our growing tax practice," said Eric Sloan, Co-Chair of Gibson Dunn's Tax Practice Group. "With IRS enforcement activity on the rise, it is the right time to expand our tax controversy and litigation capabilities. We began that expansion by bringing Mike Desmond to the firm earlier in May, and Sanford, Saul, and Terrell are the perfect additions. We have the skill and experience to handle the largest, most complex corporate tax disputes." "Gibson Dunn is an exceptional firm. Partnering with Mike Desmond and our colleagues across the firm presents a unique and exciting opportunity to expand our offering to clients and continue growing a market-leading tax controversy and litigation practice. We are thrilled to join Mike and all of our new colleagues at Gibson Dunn," said Stark. **About Sanford Stark** Stark counsels clients on a wide range of complex domestic and international tax issues including a significant emphasis on cross-border transfer pricing. He has served as counsel in a number of the largest tax controversy and litigation matters in recent years. Stark's clients turn to him for guidance on all aspects of the tax controversy process, including pre-audit, audit, administrative appeals, Advance Pricing Agreements, and Competent Authority proceedings. Stark litigates tax disputes in federal trial and appellate courts, and his transfer pricing experience includes planning and internal restructurings in addition to controversy and litigation. Stark is a Fellow in the American College of Tax Counsel. He is an adjunct professor in the Graduate Tax Program of Georgetown University Law Center, where he teaches "Survey of Transfer Pricing." He is a co-author of "Transfer Pricing: Litigation Strategy and Tactics," *Bloomberg Tax*, Transfer Pricing Portfolio 6932. Stark consistently has been ranked as a leading Tax Controversy practitioner by several publications. Before entering private practice, Stark served as a Trial Attorney in the Tax Division of the U.S. Department of Justice. He received his law degree in 1991 with high honors from Duke University School of Law, where he was a member of the *Alaska Law Review*. He served as a law clerk for Judge Peter Hill Beer of the U.S. District Court for the Eastern District of Louisiana. **About Saul Mezei** Mezei practices in the federal tax controversy area, with a focus on international tax and transfer pricing. He has substantial experience advising

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clients at all stages of federal tax controversy, from audit and administrative appeals to trial and judicial appeals. His clients turn to him for counsel on a wide range of tax controversy matters, including international transfer pricing, foreign tax credits, deemed dividend issues under section 956, partnership tax, employment taxes, and civil penalties. Mezei is an adjunct professor in the Graduate Tax Program of Georgetown University Law Center, where he currently teaches "Survey of Transfer Pricing." He previously taught a class on administrative and litigation procedure. He is a co-author of "Transfer Pricing: Litigation Strategy and Tactics," *Bloomberg Tax*, Transfer Pricing Portfolio 6932. Before entering private practice, Mezei served as attorney-advisor to Judge Robert A. Wherry, Jr. of the U.S. Tax Court and senior law clerk to Judge Lawrence B. Hagel of the U.S. Court of Appeals for Veterans Claims. He received his law degree, *cum laude*, from Benjamin N. Cardozo School of Law in 2002 and was elected to the Order of the Coif. He received his LL.M. in Taxation *with distinction* from the Georgetown University Law Center in 2009.

About C. Terrell Ussing Ussing represents multinational companies across all industries in all aspects and phases of tax controversy and litigation. He has significant experience representing clients on a range of complex domestic and international tax issues, with an emphasis on transfer pricing. His transfer pricing experience includes complex transfer-pricing litigation, planning, and risk assessment at the federal, international, and state levels. Ussing is an adjunct professor in the Graduate Tax Program of Georgetown University Law Center, where he teaches "Survey of Transfer Pricing." Ussing received his law degree in 2012 from the University of Virginia School of Law, where he was an editor of the *Virginia Journal of International Law*.

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