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Webcast: A First Look at the One Big Beautiful Bill Act: Key Federal Tax Changes

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We invite you to listen to a timely and informative 30-minute webinar discussing the newly enacted One Big Beautiful Bill Act (OBBBA), signed into law on July 4, 2025. This landmark legislation introduces major changes to the U.S. federal income tax system.
Topics discussed:

- Permanent reinstatement of 100% bonus depreciation and R&D expensing
- Modifications to business interest deductibility and qualified business income deductions
- Changes to partnership taxation
- New limitations on energy tax credits
- Restructured international tax rules (GILTI, FDII, and BEAT)
- Expansion of Opportunity Zones and favorable changes for Qualified Small Business Stock
- Changes to state and local tax deductions

Our panel of tax partners walk through the most significant provisions of the Act, including those extending key elements of the 2017 Tax Cuts and Jobs Act and limiting or modifying provisions from the 2022 Inflation Reduction Act. We also discuss the practical implications for businesses, investors, and fund sponsors.

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PANELISTS: Eric Sloan is a partner in the New York and Washington, D.C. offices of Gibson, Dunn & Crutcher and a Co-Chair of the firm's Tax Practice Group. With nearly 35 years of broad transactional and structuring experience, Mr. Sloan is a nationally recognized expert on the use of partnerships and limited liability companies in domestic and cross-border mergers and acquisitions, financing transactions, and restructurings and has a significant corporate M&A practice representing both financial and strategic investors. He also has developed substantial experience in spin-offs and initial public offerings, including advising on many "UP-C" IPOs in a range of industries. **Pamela Lawrence Endreny** is a partner in the New York office of Gibson, Dunn & Crutcher and a Co-Chair of the firm's Tax Practice Group. Ms. Endreny represents clients in a broad range of U.S. and international tax matters. Ms. Endreny's experience includes mergers

Related People

Eric B. Sloan

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and acquisitions, spin-offs, joint ventures, financings, restructurings and capital markets transactions. She has obtained private letter rulings from the Internal Revenue Service on tax-free spin-offs and other corporate transactions. **Matt Donnelly** is a partner in the New York and Washington, D.C. offices of Gibson Dunn & Crutcher and a member of the firm's Tax Practice Group. Mr. Donnelly represents public and private companies on a broad range of U.S. federal and state income tax matters, with a concentration on domestic and international mergers and acquisitions, dispositions, spin-offs, Reverse Morris Trust transactions, joint ventures, financing transactions, capital markets transactions, restructurings and internal reorganizations. **Kathryn Kelly** is a partner in the New York office of Gibson Dunn & Crutcher and is a member of the firm's Tax Practice Group. Ms. Kelly represents clients in a broad range of tax matters, including public and private mergers and acquisitions, cross-border transactions, restructurings, and financing transactions. Ms. Kelly earned her Juris Doctor in 2010 from Columbia Law School, where she was a Harlan Fiske Stone Scholar and Executive Editor of the *Columbia Journal of Tax Law*. © 2025 Gibson, Dunn & Crutcher LLP. All rights reserved. For contact and other information, please visit us at www.gibsondunn.com. Attorney Advertising: These materials were prepared for general informational purposes only based on information available at the time of publication and are not intended as, do not constitute, and should not be relied upon as, legal advice or a legal opinion on any specific facts or circumstances. Gibson Dunn (and its affiliates, attorneys, and employees) shall not have any liability in connection with any use of these materials. The sharing of these materials does not establish an attorney-client relationship with the recipient and should not be relied upon as an alternative for advice from qualified counsel. Please note that facts and circumstances may vary, and prior results do not guarantee a similar outcome.

Related Capabilities

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