24th Annual High Technology Tax Institute

NOVEMBER 17 & 18, 2008

Crowne Plaza Cabana Palo Alto
4290 El Camino Real
Palo Alto, CA

Sponsored by
Tax Executives Institute &
San Jose State University
College of Business
### Monday November 17

#### Morning

<table>
<thead>
<tr>
<th>Time</th>
<th>Event</th>
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<tbody>
<tr>
<td>7:30 - 8:15</td>
<td><strong>REGISTRATION &amp; CONTINENTAL BREAKFAST</strong>&lt;br&gt;Sponsored by Fenwick &amp; West LLP</td>
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<td>8:15 - 8:30</td>
<td><strong>Welcome</strong>&lt;br&gt;Sandra Hahn, Tax Director - Intuit, TEI Santa Clara Valley Chapter President&lt;br&gt;Neil Traubenberg, Senior Vice-President, Tax Executives Institute&lt;br&gt;David Steele, Dean, San José State University, College of Business&lt;br&gt;Annette Nellen, Tax Professor, San José State University</td>
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<td>8:30 - 10:10</td>
<td><strong>International High Technology U.S. Tax Current Developments</strong>&lt;br&gt;Jim Fuller, Partner - Fenwick &amp; West LLP</td>
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<td>10:10 - 10:30</td>
<td><strong>BREAK</strong></td>
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<td>10:30 - Noon</td>
<td><strong>Contract Manufacturing and the Branch Rule</strong>&lt;br&gt;Michael A. DiFronzo, IRS Deputy Associate Chief Counsel (International – Technical) - Office of the Chief Counsel&lt;br&gt;Bob Giusti, Partner - Ernst &amp; Young LLP&lt;br&gt;John Peterson, Partner – Baker &amp; McKenzie</td>
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#### Afternoon

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<tr>
<th>Time</th>
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<td>Noon - 1:45</td>
<td><strong>LUNCH &amp; SPEAKER</strong>&lt;br&gt;Karen Gilbreath Sowell, Deputy Assistant Secretary for Tax Policy - United States Department of The Treasury&lt;br&gt;Luncheon sponsored by Deloitte</td>
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<td>1:45 - 3:00</td>
<td><strong>BREAKOUT A</strong>&lt;br&gt;Permanent Establishment&lt;br&gt;Gary Sprague, Partner – Baker &amp; McKenzie&lt;br&gt;Ron Saake, International Tax Partner - Deloitte</td>
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<td>3:00 - 3:15</td>
<td><strong>BREAK</strong>&lt;br&gt;Sponsored by Ernst &amp; Young LLP</td>
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<td>5:15 - 7:30</td>
<td><strong>HOSTED SOCIAL HOUR</strong>&lt;br&gt;Sponsored by Alvarez &amp; Marsal Taxand LLC • <a href="http://www.alvarezmarsal.com">http://www.alvarezmarsal.com</a></td>
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7:30 - 8:00  REGISTRATION & CONTINENTAL BREAKFAST
Sponsored by Planitax, Inc.

8:00 - 9:30  BREAKOUT E
Federal Tax Controversy
Maria Hwang, Director Field Operations, Communications, Technology & Media Industry – Internal Revenue Service
Larry R. Langdon, Partner – Mayer Brown LLP; former Commissioner LMSB, IRS
Barbara Leonard, Area Counsel, Communications, Technology & Media – Internal Revenue Service
Barry B. Shott, LMSB Deputy Commissioner (Int'l) – Internal Revenue Service

BREAKOUT F
New Software Business Models and Their Tax Issues
Jeff Levenstam, Principal, International Tax Services – Ernst & Young LLP
Rusty Thomas, Tax Sector Leader, Electronics and Software – KPMG LLP

9:30 - 9:50  BREAK

9:50 - 11:00  BREAKOUT G
Foreign Affairs
Peter D. Skewes-Cox, Partner - PricewaterhouseCoopers LLP
Kent Wisner, Principal, International Corporate Services Group and M&A Group – KPMG LLP

BREAKOUT H
FAS 141R
Andrew Cordonnier, Partner-National Tax – Grant Thornton
Greg Huffaker, Senior Director M&A – Oracle
Michael Reichert, Global Managing Tax Partner – High Technology – Deloitte Tax LLP

11:00 - 12:15  Federal Domestic Tax Update
Ivan Humphreys, Partner – Wilson Sonsini Goodrich & Rosati
Buff Miller, Partner – Cooley Godward Kronish LLP
Annette Nellen, Professor – San José State University

Tuesday November 18  Afternoon

12:15 - 1:45  LUNCH & SPEAKER
Barry B. Shott, LMSB Deputy Commissioner (International) – Internal Revenue Service

1:45 - 3:15  IFRS & GAAP Convergence
Eric L. Johnson, Tax Accounting and Compliance Director - Intel
Wendy Perez, Tax Partner - Ernst & Young LLP
Neil Traubenberg, VP Corporate Tax – Sun Microsystems; Senior Vice-President - TEI

3:15 - 3:30  BREAK
Sponsored by Wilson Sonsini Goodrich & Rosati

3:30 - 5:15  High Tech Accounting
David Forst, Partner - Fenwick & West LLP
Dean Kamahoele, Principle – KPMG LLP
Scott Jaconetty, Tax Partner – BDO Seidman, LLP
Tuition fee includes all sessions, materials, lunches and refreshment breaks.

TUITION FEES

<table>
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<tr>
<th>Attendee</th>
<th>TEI Member/Guest of TEI Member</th>
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<tr>
<td>(before October 31st).............$700</td>
<td>(before October 31st).............$650</td>
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<tr>
<td>After .....................................$725</td>
<td>After .....................................$700</td>
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CPE/MCLE CREDITS

The High Technology Tax Institute has been approved for Continuing Professional Education accreditation by the California State Board of Accountancy. The conference qualifies for 16 hours of CPE credit. San Jose State University’s College of Business, certifies that an application is pending for approval of this activity for MCLE credit by the State Board of California.

HOTEL ACCOMMODATIONS

Crowne Plaza Cabaña Palo Alto
4290 El Camino Real, Palo Alto, California 94306
Hotel Room Rate: $169/night, Reservations: (650) 857-0787

Contact the hotel by October 27, 2008 and identify yourself as a High Technology Tax Institute participant to qualify for the special rate.

REFUND POLICY

The Institute will refund registration fees contingent on receipt of a written request postmarked by October 31, 2008. A $50 processing fee will be retained by the Institute. No refund requests after October 31, 2008 will be accepted. Please note that non-attendance of the institute will not qualify as a cancellation of registration. Written notification must be submitted by the date mentioned above.

ON-LINE REGISTRATION IS NOW AVAILABLE
http://www.tax-institute.com
OR COMPLETE FORM AND:

FAX
Registration form to Julie Ryan /SJSU (408) 924-3463
(forward your check after faxing your registration) and/or

MAIL
Registration form/tuition fee to: High Technology Tax Institute - SJSU
Accounting & Finance Department, Attn: Julie Ryan
One Washington Square, BT 850, San Jose, CA 95192-0066

Questions
Call Lori Wilkin or Julie Ryan (408) 924-3460

Name __________________________________________ Title/Department _______________________
Company __________________________________________ Address ________________________________
City ___________________________________________ State __________ Zip ______
Day Phone __________________________ Email ___________________________

How would you like your name to appear on your badge?

(Company names will be used for transferable badges)

My check is enclosed for the amount of $ __________________

Please circle breakout session preferences (select 4)

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<th>Breakout C or D</th>
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<td>Breakout G or H</td>
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Are you a TEI member or guest of a TEI member? □ YES □ NO

If a guest, name of sponsoring TEI member: ______________________

Tax Identification Number: 94-6017638 Please make your check payable to: SJSU High Technology Tax Institute
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Alvarez & Marsal Taxand LLP

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Applied Materials

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PG&E

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Berger Lewis Accountancy Corporation

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PricewaterhouseCoopers

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Cypress Semiconductor

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STEPHEN SEDLER  
Seagate Technology

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BDO Seidman LLP

CONSTANCE SKIDMORE  
PricewaterhouseCoopers

ALLAN SMITH  
Grant Thornton

RUSTY THOMAS  
KPMG LLP

JANIS ZAIMA  
San José State University

24th Annual High Technology Tax Institute
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College of Business
One Washington Square, BT 850
San Jose, CA 95192-0066

Fax mailing list or address changes to (408) 924-3463.