26th Annual High Technology Tax Institute

November 8 & 9, 2010

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

Sponsored by
Tax Executives Institute, Inc.
&
San José State University
College of Business
### Monday November 8  
#### Morning

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| 7:30 - 8:15 | **REGISTRATION & REFRESHMENTS**  
Sponsored by *Fenwick & West*       |
| 8:15 - 8:30 | **WELCOME**  
Rick Eigenbrode, Managing Director, International Taxes – *Applied Materials*, TEI Santa Clara Valley Chapter President  
Annette Nellen, Tax Professor - SJSU |
| 8:30 - 10:10 | **International High Technology U.S. Tax Current Developments**  
Jim Fuller, Partner - *Fenwick & West*       |
| 10:10 - 10:30 | **BREAK**       |
| 10:30 - Noon | **BREAKOUT A**  
**IRS Examination Practices and Strategies**  
Michael J. Bernard, Tax Counsel - *Microsoft Corporation*  
Patricia Chaback, LMSB – Industry Director for Communications, Technology & Media – *Internal Revenue Service*  
Barbara Leonard, Area Counsel, Communications, Technology & Media – *Internal Revenue Service*  
Thomas Wilson, Senior Managing Director – IRS Services – *PricewaterhouseCoopers*       |
| Noon - 1:30 | **BREAKOUT B**  
**Successful Tax Practice in China and India**  
Dharmesh Pandya, Senior Manager – *KPMG India Center of Excellence*  
Lili Zhang, Managing Director – US Tax Services, Hong Kong – *Deloitte*  
Jon Eichelberger, Partner – *Baker & McKenzie*       |

### Monday November 8  
#### Afternoon

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| Noon - 1:30 | **LUNCH & SPEAKER**  
Eric Solomon, Director of National Tax - *Ernst & Young*; former Assistant Secretary for Tax Policy, *U.S. Treasury Department*       |
| 1:45 - 3:15 | **Getting Proper Research Credit**  
Mark Andrus, Partner – Strategic Federal Tax Services – *Grant Thornton*  
Jeffery Jones, Partner - National R & D Practice, West Region Leader – *PricewaterhouseCoopers*  
Roger Kave, Associate Issue Counsel for R & –D Credit – *Internal Revenue Service*       |
| 3:15 - 3:35 | **BREAK**       |
| 3:35 - 4:10 | **International and Multistate Concepts – Similarities, Differences and Traps**  
Bart Bassett, Tax Partner – *Morgan Lewis*  
Kim Reeder, Tax Partner – *Morgan Lewis*       |
| 4:10 - 5:30 | **Economic Substance**  
Karen Gilbreath Sowell, National Tax Department – *Ernst & Young*, former Deputy Assistant Secretary for Tax Policy, U.S. Treasury Department  
Laurel Robinson, Deputy Area Counsel – *Internal Revenue Service*  
Eric Solomon, Director of National Tax – *Ernst & Young*; former Assistant Secretary for Tax Policy, U.S. Treasury Department       |
Tuesday November 9

Morning

7:30 - 8:00
REGISTRATION & REFRESHMENTS

8:00 - 9:45
Accounting for Income Taxes and Its Challenges
Scott Jaconetty, Partner – BDO Seidman
Glen Kohl, Senior Vice President - Tax and Treasury – Electronic Arts
Tony Rebello, Partner - Ernst & Young
Gregory Rowley, Partner - Industry Tax Practice – PricewaterhouseCoopers
Jeff Sokol, Partner – Deloitte; Faculty – SJSU MST Program
Rusty Thomas, Partner – KPMG

9:45 - 10:00
BREAK
Sponsored by Thomson Reuters

10:00 - 11:45
Uncertain Tax Positions – Tax Returns and Financial Statements
Patricia Chaback, LMSB - Industry Director for Communications, Technology & Media – Internal Revenue Service
Larry R. Langdon, Partner - Mayer Brown LLP; former Commissioner LMSB, IRS
Heather Maloy, LMSB Commissioner - Internal Revenue Service
Michael Reichert, Global Managing Tax Partner – High Technology – Deloitte
Neil Traubenberg, Past International President - Tax Executives Institute

Afternoon

Tuesday November 9

11:45 - 1:15
LUNCH & SPEAKER
Heather Maloy, LMSB Commissioner – Internal Revenue Service

1:45 - 3:00
BREAKOUT C
Cross Border Issues
David Bowen, Principal – Grant Thornton
Steven A. Musher, Associate Chief Counsel (International) – Internal Revenue Service
Ron Schrotenboer, Partner – Fenwick & West

BREAKOUT D
Cloud Computing Primer
Stephen Bates, Principal – KPMG
Brett Weaver, Partner - KPMG
Rocky Cummings, Partner – National Leader Multistate Tax Services – BDO Seidman

3:00 - 3:30
BREAK
Sponsored by Ernst & Young

3:30 - 4:30
M&A Hot Topics
Danni Dunn, Partner – Ernst & Young; Faculty – SJSU MST Program
Ivan Humphreys, Partner – Wilson Sonsini Goodrich & Rosati
Kirt Switzer, Partner – Latham

4:30 - 5:30
Federal Domestic and State Tax Updates
Tony Fuller, Managing Director – Alvarez & Marsal Taxand
Annette Nellen, Professor – San José State University; Director – SJSU MST Program
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. An application is pending for approval of MCLE credit by the State Board of California.

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

Contact the hotel by October 15, 2010 and identify yourself as a High Technology Tax Institute participant to qualify for the special rate.

The Institute will refund registration fees contingent on receipt of a written request postmarked by October 20, 2010. A $50 processing fee will be retained by the Institute. No refund requests postmarked after October 20, 2010 will be accepted. Non-attendance at the institute does not qualify as a cancellation of registration.

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

Call Julie Ryan (408) 924-3460

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A or B   C or D

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