### Monday November 13

<table>
<thead>
<tr>
<th>Time</th>
<th>Topic</th>
<th>Presenters</th>
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<tbody>
<tr>
<td>7:30 – 8:20</td>
<td>Registration &amp; refreshments</td>
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<tr>
<td>8:20 – 8:30</td>
<td>Welcome</td>
<td>Ricardo G. Samaniego, Head of Tax, Samsung; President – TEI Santa Clara Valley Chapter</td>
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<td></td>
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<td>Annette Nellen, MST Program Director – SJSU</td>
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<td>Dan Moshavi, Dean – SJSU College of Business</td>
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<tr>
<td>8:30 – 10:00</td>
<td>International High Technology U.S. Tax Current Developments</td>
<td>Jim Fuller, Partner - Fenwick &amp; West LLP</td>
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<td>Comprehensive review of developments relevant to high tech companies.</td>
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<tr>
<td>10:00 – 10:20</td>
<td>Break</td>
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<tr>
<td>10:20 – noon</td>
<td>Supply Chain Planning</td>
<td>Bart Bassett, Partner - Morgan, Lewis &amp; Bockius LLP</td>
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<td>Location and distribution decisions as affected by such tax</td>
<td>Long Hua, Partner - EY</td>
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<td>considerations as BEPS, Brexit, US tax reform and state and</td>
<td>Jimmy Man, Partner - Deloitte</td>
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<td>local tax rules. Considerations for both US and foreign-</td>
<td>Brian Pedersen, Partner – Alvarez &amp; Marsal Taxand LLC</td>
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<td>headquartered companies.</td>
<td>Taylor Reid, Partner – Baker &amp; McKenzie</td>
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<td>Noon – 12:40</td>
<td>Lunch</td>
<td>Steven K. Rainey, CIO and National Leader for Data &amp; Analytics, Tax – KPMG</td>
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<tr>
<td>12:40 – 1:30</td>
<td>Luncheon speaker</td>
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<tr>
<td>1:35 – 3:15</td>
<td>BREAKOUT A</td>
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<td></td>
<td>Indirect Taxes in the Digital Economy</td>
<td>Randy Ferris, Exec. Director – EY</td>
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<td>Strategies to deal with both VAT and sales tax for cloud</td>
<td>David Gaul, VP Taxation – GoPro, Inc.</td>
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<td>computing and other digital transactions.</td>
<td>Hugh Goodwin, Partner - DLA Piper</td>
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<td>Birgit Juergensmann, Partner - Mazars LLP</td>
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<td></td>
<td>BREAKOUT B</td>
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<td>Protecting Your Exit Strategies</td>
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### Planning and due diligence considerations for optimizing tax results and minimizing risks. Topics covered include earnouts, insurance, provisions, reserves, state taxes and loss and credit carryforward limitation rules.

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<thead>
<tr>
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<tr>
<td>3:15 – 3:30</td>
<td>Break</td>
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<td></td>
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<td>Kimberly Edwards, Director, Western Compliance – IRS</td>
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<td>Eric Johnson, Tax Director – Ross Stores; TEI Silicon Valley Chapter past chair</td>
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<td>Larry Langdon, Partner – Mayer Brown LLP</td>
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<td>Andy Mattson, Partner – Moss Adams</td>
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<td>Jean Pawlow, Partner – McDermott</td>
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<td>Eric Slack, Director of Field Operations – West, Western Compliance Practice Area LB&amp;I - IRS</td>
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<td>Gloria Sullivan, Director, Financial Institutions and Products - IRS</td>
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**Tuesday November 14**

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<thead>
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<tbody>
<tr>
<td>7:30 – 8:15</td>
<td>Registration &amp; coffee</td>
<td>Perry Leslie, Partner - KPMG</td>
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<tr>
<td>8:15 – 9:15</td>
<td>Accounting for Income Taxes</td>
<td>Jesus Ochoa, Partner – PwC</td>
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<td>JJ Schneider, Partner – Grant Thornton</td>
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<td>Tyler Spalding, Partner - Deloitte</td>
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<tr>
<td>9:15 – 10:30</td>
<td>BREAKOUT AA IP Location Planning</td>
<td>Gabe Gartner, Principal – PwC</td>
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<td>Pie Geelen, Head of European Desk, New York – DLA Piper</td>
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<td>Adam Halpern, Partner – Fenwick &amp; West, LLP</td>
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<td>Nate Carden, Partner – Skadden, Arps, Slate, Meagher &amp; Flom LLP</td>
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<td>Jon Davies, Partner – Armanino</td>
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<td>BREAKOUT BB The New Research Credit LB&amp;I Directive</td>
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<tr>
<td>Time</td>
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<tr>
<td>10:30 – 10:45</td>
<td><strong>Break</strong></td>
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<td>10:45 – noon</td>
<td><strong>BREAKOUT C</strong></td>
<td>Nora Beltran, Team Manager - <em>IRS</em></td>
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<td>Brexit Tax Implications</td>
<td>Kimberly Edwards, Director, Western Compliance – <em>IRS</em></td>
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<td>Janine Jones, SME, General Business Credit Practice Network - <em>IRS</em></td>
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<td>Jeffrey P. Jones, Partner - <em>PwC</em></td>
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<td>Barry Slivinsky, VP Tax - Adobe</td>
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<td>Paul Zamolo, Deputy Area Counsel, LB&amp;I - <em>IRS</em></td>
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<tr>
<td>12 – 12:40</td>
<td><strong>Lunch</strong></td>
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<td>12:40 - 1:25</td>
<td><strong>Luncheon Speaker</strong></td>
<td>Rohit Kumar, Tax Policy Services Leader and Principal – <em>PwC</em></td>
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<td>1:30 – 2:45</td>
<td><strong>BREAKOUT E</strong></td>
<td>Lance Martin, Partner – <em>Baker &amp; McKenzie</em></td>
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<td>BEPS 2.0</td>
<td>Mark R. Martin, Principal – <em>KPMG</em></td>
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<td>Status update including unilateral actions by some countries, treaty issues, transfer pricing, CbC, and relevance of US tax reform.</td>
<td>Peter Rock, Program Manager, Advance Pricing and Mutual Agreement Program – <em>IRS</em></td>
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<td>Ben Shreck, Tax Counsel – <em>Tax Executives Institute</em></td>
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<td>2:45 – 3:00</td>
<td><strong>Break</strong></td>
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<td>3:00 – 4:30</td>
<td><strong>U.S. Tax Reform</strong></td>
<td>David Forst, Partner – <em>Fenwick and West, LLP</em></td>
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<td>What’s on the table, or perhaps, what has been enacted?</td>
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<tr>
<td>Time</td>
<td>Session Title</td>
<td>Speaker(s)</td>
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<td>4:30 – 5:30</td>
<td><strong>Domestic and Multistate Update</strong></td>
<td>Josh Brady, Partner - Morgan, Lewis &amp; Bockius LLP</td>
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<td>Dana Lance, Partner – Grant Thornton</td>
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<td></td>
<td>Explanation of key changes of greatest impact to tech companies, how the changes affect transfer pricing, decisions on intangibles and workforce location, state tax implications, and more.</td>
<td>Nate Giesselman, Partner – Skadden, Arps, Slate, Meagher &amp; Flom LLP Sajeev Sidher, Managing Director - Deloitte</td>
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