



Overview

Paul Hastings' London-based tax practice advises UK and international clients on the tax aspects of some of the largest and most challenging mandates in the market.

Our team advises on the tax features of M&A, private equity, real estate, investment funds, structured and asset finance, joint ventures, securitisations, financing arrangements, corporate mergers, demergers, organisations and restructuring, as well as tax litigation and IP planning matters.

We help to keep clients up to date on ever changing legislation and policy developments and work as part of an integrated global team to provide commercial and practical tax advice to a broad range of clients.

Market Leading Expertise: We are recognised for our expertise and experience in many areas, including:

- **Investment Funds**
- **Structured finance / CLOs**
- **Real Estate**
- **Private Equity / M&A**

Standalone Practice: Our London tax team is at the heart of our European tax practice and is suitably versed on cross-border issues. We generate work for and support the firm's other practice groups. The team is widely-recognised for its commercial expertise, which goes beyond only tax, allowing the team to truly stand alone among its competitors.

Innovation: Our team provides innovative tax solutions. Our team regularly liaises with HMRC on matters of policy and legislative changes. We consistently advise on cutting-edge issues to provide legal and market firsts.

Our approach: We deal with complex tax issues in a practical and commercial manner, demonstrating an up-to-date understanding of the relevant industry, commercial and legal environment. We deliver results that are cost efficient and operationally simple.

Representative Experience

Paul Hastings' tax team is consistently involved in many of the most sophisticated, high value mandates in the market, including:

- Advising **Octopus Healthcare** in relation to the structuring and tax aspects of the conversion of the closed-ended MedicX1 Healthfund into a perpetual life fund targeting over **£1billion** of commitments;
- Representing **Starwood Capital** in the tax aspects of its **USD1billion+** disposal of 12 full-service hotels forming part of the Principal Hotel Company to FdM, winner of the **Hot.E 2018 Merger & Acquisition/Portfolio of the Year** and described as a 'game changer' in industry press;
- Advising asset manager, **Immediate Capital Group**, on the tax aspects of Senior Debt Partners II, one of the largest pooled direct lending funds in Europe at **EUR5.2billion** which commended in the Financial Times' Innovative Lawyers Europe 2018 report for innovation in accessing new markets & capital;
- Advising an ad hoc committee of Tier 2 noteholders in connection with the **£250million** equity capital raise and restructuring of **The Co-Operative Bank p.l.c.** implemented by a consent solicitation, a creditors' scheme of arrangement and a members' scheme of arrangement;
- Representing, **Abry Partners II, LLC** in the tax aspects of its disposal of Basefarm Holding AS to the Orange Group for a total consideration of **EUR350million**;
- Advising **Capita Asset Services/Link Asset Services** on the 2015 and 2018 restructurings of BMI Healthcare/Theatre Hospitals, two of the **largest** and **most complex** CMBS restructurings in Europe to date; and
- Advising **LaSalle Real Estate Debt Strategies III S.C.Sp.** on the tax aspects of its **£800million+** European Real Estate Debt.

Our London Tax Practice

Representative Clients



What Others are Saying

Arun Birla – Recommended for *Tax*

"He is client-focused, goal-oriented and has a pragmatic approach driven by business sense."

– *Chambers UK, 2019*

Arun Birla - Recommended for *Corporate Tax*

"Paul Hastings LLP is noted for its 'focused' work relating to the tax aspects of collateralised loan obligation (CLO) transactions and securitisations, but it has also built up a strong practice of funds work"

– *Legal 500 UK, 2018*

Arun Birla is 'reassuringly concise and practical in his advice and has an obvious depth of knowledge' according to clients, who add: 'he is a pleasure to work with and an efficient manager of transactions'.

– *Chambers Europe, 2018 – Corporate Tax*

Jiten Tank – Recommended for *Corporate Tax*

– *Legal 500 UK*

Arun Birla – a "name of note" for Investment Fund Formation and Management: Private Funds

– *Legal 500 UK, 2017*

Your Team



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