

Partnership Taxation

Fall 2017

Professor Abrams

Assignments¹

1. Introduction: pp. 581-596; problems 19-1 thru 19-5.
2. General Test for Economic Test: pp. 597-609; problems 20-1 thru 20-3.
3. Alternate Test for Economic Effect: pp. 609-615; problems 20-4 thru 20-6.
4. Contributed Property: pp. 616-623; problems 20-7.
5. Contributed Property and Reverse Allocations: pp. 623-627; problems 20-8 and 20-9..
6. Nonrecourse Deductions: pp. 632-643; problem 20-11.
7. Substantiality; Retroactive Allocations: pp. 643-51; problems 20-12 thru 20-15.
8. Outside Basis and Recourse Debt: pp. 653-666; problems 21-1 and 21-2.
9. Nonrecourse Debt: pp. 666-671; problems 21-3 and 21-4.
10. Nonliquidating Distributions: pp. 681-688; problems 22-1 thru 22-3.
11. Distributions of Encumbered Property and Marketable Securities: pp. 689-695; problems 22-4 and 22-5.
12. Disposition of Distributed Assets; Section 751(b): pp. 695-704.
13. Guaranteed Payments; Controlled Partnerships: pp. 711-714, 737-739; problems 23-1, 23-2, 23-9, and 23-10.
14. Disguised Sales: pp. 714-730 (replace Note 5, p. 723); problems 23-3 thru 23-5.
15. Distributions of Contributed Property: pp. 730-731; problem 23-6.
16. Section 737; Capitalization Avoidance: pp. 732-737; problem 23-7 and 23-8.
17. Contributions of Property: pp. 741-749; problems 24-1 thru 24-3.
18. Contributions of Services: pp. 749-759; problems 24-4 and 24-5.
19. Liquidating Distributions: pp. 761-775; problem 25-1.
20. Disposition of a Partnership Interest: pp. 776-786; problems 25-2 thru 25-9.
21. Section 734: pp. 807-818; problems 27-1 thru 27-3.
22. Section 743: pp. 818-833; problems 27-4 thru 27-6.
23. Exit Strategies: Supplemental Slides

¹All assignments are to Richard L. Doernberg, Howard E. Abrams & Don A. Leatherman, Federal Income Taxation of Corporations and Partnerships (5th ed. 2014). We will cover one assignment each class session.