

Intellectual Property & Tax

DATE

11am - 3pm
10.30am registration
12th May 2010

PLACE

Hardwicke Building
New Square
Lincoln's Inn
London WC2A 3SB

CPD POINTS

Accredited with 3 CPD points.

REFRESHMENTS

Includes both lunch and light refreshments.

COST

£50 per person
excl. VAT (£57.50)

Hardwicke, in association with **Gray's Inn Tax Chambers**, is delighted to present this timely seminar examining Tax issues in Intellectual Property matters. The seminar will include a definition of Intellectual Property and Tax, discussions concerning IPR and the potential stumbling blocks you may face.

The speakers include **Mark Engelman** (Barrister, Hardwicke), **Laurent Sykes** (Barrister, Gray's Inn Tax Chambers) and **Edward Morris** (Director, Deloitte LLP). The seminar will be chaired by **Jeremy Phillips** (IP Consultant, Olswang).

This seminar will cover:

What is Intellectual Property?

- Types of Intellectual Property: patents, registered trademarks and passing off, copyrights, design rights registered and unregistered, database rights, confidential information with **Mark Engelman**
- UK domestic tax treatment of these categories of Intellectual Property and discussion of goodwill with **Edward Morris** and **Laurent Sykes**

Why move IPR?

- How Intellectual Property payments affect the tax paid with **Edward Morris**
- Patent box regime with **Laurent Sykes**

How does one move IPR?

- Transactional aspects of transferring patents, registered trademarks, goodwill with **Mark Engelman**

The stumbling blocks

- The practical difficulties of transferring goodwill: *Nanjing v MG Sports and Racing Europe Limited* with **Mark Engelman** and the implications for tax with **Laurent Sykes**
- Withholding tax; double taxation treaties; transfer pricing; the international framework of tax treaties; how the OECD fits in; the OECD's proposals; CFC regime with **Edward Morris** and **Laurent Sykes**

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If you book three places the third can come for free.

A copy of the original form should be returned together with your cheque, made payable to Hardwicke Building. You will be sent a VAT invoice plus a copy which will act as your entry ticket. If you have any queries regarding the seminar please do not hesitate to contact Louise Poppelwell on +44 20 7242 2523 or email louise.poppelwell@hardwicke.co.uk

**FAX THIS BACK TO
LOUISE POPPELWELL
ON +44 (0) 20 7691 1234
TO RESERVE YOUR
PLACE NOW.**

The cost of this seminar is £50.00 excl. VAT (£57.50) per person but if you book three places the third can come for free. Don't forget to add the names of all those wishing to attend.

Delegate 1 _____

Delegate 2 _____

Delegate 3 _____

I enclose a cheque made payable to Hardwicke Building in the sum of _____ being payment

For _____ person(s) inclusive of VAT.

Name _____

Firm _____

Address _____

DX _____

Tel _____

Fax _____

Email _____

Disabled facilities and dietary requirements:

We have disabled facilities at Hardwicke but they are limited, if you have special requirements please indicate here:

