Biography

Susan E. Seabrook

Of Counsel
Skadden, Arps, Slate, Meagher & Flom LLP
Tax Controversy and Litigation

Susan E. Seabrook joined Skadden, Arps in September 2010 as a member of the Tax Group in the Washington, D.C. office. Ms. Seabrook focuses on tax controversy and litigation matters, with extensive experience with respect to financial institutions, insurance companies, and financial and insurance products.

Ms. Seabrook has been advising clients in private practice in connection with a broad range of tax controversy matters since 2000, and has successfully resolved tax controversies at all levels of tax administration and in court. Ms. Seabrook has assisted clients in responding to congressional, regulatory and other governmental inquiries in connection with tax-related issues and provided advice in connection with insurance company or product-related tax implications of complex transactions.

Ms. Seabrook was recognized in the 2010 edition of *Legal 500* as "recommended for all insurance and reinsurance controversy."

Ms. Seabrook served as an attorney advisor in the National Office of Chief Counsel, IRS, Financial Institutions and Products, from September 1997 to September 1999. She was appointed industry counsel for the Life Insurance Industry, and assisted in identifying and developing issues related to insurance company and product tax issues.

Ms. Seabrook previously served as a senior trial attorney, Southwest District Counsel, from August 1991 to August 1997, specializing in insurance company litigation. In this capacity, she tried numerous cases before the United States Tax Court and coordinated refund and appeal litigation with the Department of Justice. Ms. Seabrook also served as a special assistant United States attorney.

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Education

LL.M., University of Denver College of Law, 1990

J.D., Gonzaga University, 1985

B.A., University of Colorado, 1982

Bar Admissions

U.S. Tax Court
U.S. Court of Federal Claims
Federal District Court
District of Columbia

Associations/Affiliations

Former Chair, Insurance Companies Committee, American Bar Association, Tax Section

Barrister, J. Edgar Murdock (Tax Court), American Inns of Court

Adjunct Professor, University of Baltimore School of Law, Masters of Taxation Program (2003)

Authorships and Presentations

"Coming Soon to a Transaction Near You — Why Tax Advisors Should Care About E-Discovery," *Taxes — The Magazine*, March 2010

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Susan E. Seabrook

Authorships and Presentations (cont.)

Moderator, "Recent Developments in Life Insurance Reserves Taxation," Federal Bar Association, Insurance Tax Seminar, Washington, D.C., June 2010

"Managing Outside Tax Advisors," Tax Executives Institute, San Diego Chapter, March 2010

"Trends and Developments in Federal Tax Controversies," Tax Executives Institute, Arizona Chapter, March 2010

Moderator, Combined Committees Luncheon, "The Perfect Storm: Financial and Tax Regulatory Reform and the Effect on Convergence in the Financial Services Sector, ABA Tax Section Mid-Year Meeting, San Antonio, Texas, January 2010

Panelist, "Penalty Update — IRS Policies and Practice," Insurance Tax Conference, Chicago, November 2009

Lunch Speaker, "Coming Soon to a Transaction Near You — Why Tax Advisors Should Care About E-Discovery," University of Chicago Law School 62nd Annual Tax Conference, November 2009

Moderator, "Tax Controversy Update for Insurance Companies," ABA Tax Section Fall Meeting, Chicago, September 2009