



TAX DISPUTE RESOLUTION VIRTUAL COUNSEL SERVICES



When helping your clients resolve tax disputes, you inevitably encounter complex substantive and/or procedural tax questions that can best be answered after a “check-in” with an expert. Gowling WLG (Canada) LLP can help.

OUR OFFERING

We are just a phone call or email away from providing you with legal advice on all types of tax dispute resolution (“TDR”) matters that you can share with your clients. **Think of our TDR Virtual Counsel Services as your TDR Hotline.**

WE OFFER

- Solicitor-client privilege over all client advice
- Direct and immediate access to nationally and internationally recognized TDR experts
- Risk management of legal issues
- Quick answers to legal queries, so you can focus on your client service

HOW WILL IT WORK?

THE PROCESS IS SIMPLE

When you have a client who needs TDR legal advice, reach out to us at any time, with your question(s) and the name of your client. Our response target is same or next business day. The costs for this advice will be covered by the client, as a disbursement on your account, pursuant to our retainer with you.

WHAT CAN I ASK?

Our TDR Virtual Counsel Services are designed as a resource for any TDR matters, ranging from answering discreet questions affording a quick response to becoming counsel of record for more advanced tax litigation.

You identify
a potential TDR issue
with a client matter.

You contact
Gowling WLG.

We provide you with
the answers you need
to help your client.

You integrate our
legal advice into the
service you provide
your client.

HOW WILL THIS HELP YOU AND YOUR CLIENT?

With Gowling WLG in your corner, you'll tap into the expertise of a large international law firm. We have a long history of successfully resolving TDR matters, including everything from the initial stages of personal income tax disputes to advising multinational enterprises with complex tax litigation. Our lawyers are consistently recognized as TDR leaders, including by International Tax Review and The Best Lawyers in Canada.

With our depth and experience, we can offer you the added advantages of:

- **Reduced Risk:** Practicing outside your comfort zone can be fraught with risk and attendant potential professional liability. We reduce that risk.
- **Effective Collaboration:** By working in collaboration with us, we can offer you an integrated team of professional advisors familiar with TDR issues to quickly help you help your clients.
- **Exceptional Client Service:** The ease of access to our legal professionals will enable you to provide your clients with a considerable "value add."
- **Cost-effective Advice:** Our TDR Virtual Counsel Services have adjustable hourly rates. For more complex matters, we also offer competitive pricing using Practical LPM™ by Gowling WLG, our ground breaking approach to legal project management. Our services will provide you with cost certainty, efficiency and value.

ADDED VALUE

Included in the retainer we will work with you to offer, as added value:

- **Professional Development Seminars:** We will present professional development TDR seminars to help your professionals manage risk while providing exceptional client service.
- **Tip sheets:** We will develop customized TDR tip sheets for common TDR issues, to help guide your professionals.

THE BOTTOM LINE?

With quick and easy access to expert TDR legal advice, we will not only allow you to deliver excellent coverage on TDR legal matters to your clients, we will allow you to focus on what you do best... provide outstanding advisory and tax services

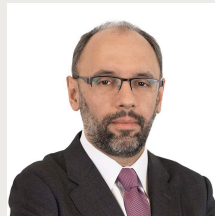


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Stevan Novoselac is the Canadian co-leader of Gowling WLG's Tax Dispute Resolution team, an integral part of the firm's Tax Group. Stevan helps taxpayers across Canada resolve all kinds of tax disputes, including voluntary disclosures, requirements for information, audits, objections, appeals, collections issues, taxpayer relief applications, rectification orders and remission orders.



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John Sorensen is co-head of the Business Law Department in Gowling WLG's Toronto office, a member of the Toronto office management committee, and co-leader of the firm's Tax Dispute Resolution team. John provides prudent advice and expeditious, cost-effective solutions to tax problems. He is a leading expert on rectification and rescission order applications and voluntary disclosures, with extensive experience resolving income tax and GST/HST disputes at the audit and appeal stages, as well as before the Courts.



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Gowling WLG (Canada) LLP is a member of Gowling WLG, an international law firm which consists of independent and autonomous entities providing services around the world. Our structure is explained in more detail at www.gowlingwlg.com/legal