

Structuring Redemptions of Partnership and LLC Interests: Issues Unique to Liquidating Distributions

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On October 5, Winston & Strawn Partner David Stauber and Associate Nick Pesavento will speak on a Strafford live webinar titled “Structuring Redemptions of Partnership and LLC Interests: Issues Unique to Liquidating Distributions.”

The panel will help tax counsel and advisers navigate the tax rules that apply to the redemption of LLC or partnership interests and examine common pitfalls and uncertainties under current tax law. Best practices related to structuring transactions will also be discussed. Key challenges covered during the session will include:

- Distinguishing between redemption and a sale of a partnership interest by the redeeming partner to another partner(s)
- Under what circumstances would a redemption be disadvantageous to the partnership or the remaining partners?
- How the basis adjustment rules apply when a Section 754 election is in effect function in redemption as opposed to a sale of a partnership interest
- Applying the Section 751 “hot asset” rules to the redeeming partner
- Differences in the character of gain or loss between redemption and other sale transactions
- Filing considerations when a partner is redeemed
- How Section 736(b) applies to payments to the redeeming partner
- Treatment of distributions of partnership property (including cash) and deemed cash distributions arising from a reduction in partnership liability allocations under Section 752

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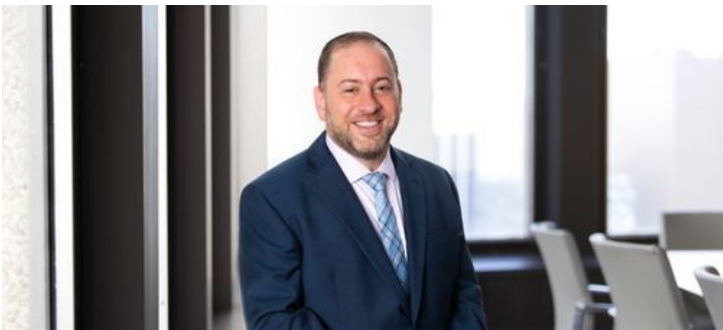
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David Stauber



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