
**TRANSFER PRICING
APA AND ARBITRATION: ISSUES AND TRENDS**

MAISTO E ASSOCIATI

HOTEL VILLA D'ESTE, CERNOBBIO (ITALY)
3 – 4 MAY 2013

TP, APA AND ARBITRATION: ISSUES AND TRENDS

MAISTO E ASSOCIATI

First day

Friday 3rd May 2013

11.00 - 11.30	Registration
<u>11.30 - 12.30</u>	<u>Application for APA</u>
	<i>Introduction: framework and trends</i>
	- [Guglielmo Maisto - Maisto e Associati]
	- [Reeves Westbrook - Covington & Burling LLP]
	<i>Yes or No: the key factors (not jeopardizing the past and protecting the future)</i>
	- [Juda Chetrit – IBM]
	<i>When to do for it</i>
	- [William W. Chip - Covington & Burling LLP]
<u>12.30 - 13.00</u>	<u>Roundtable</u>
	- [Guglielmo Maisto]
	- [Juda Chetrit]
	- [William W. Chip]
	- [Reeves Westbrook]
13.00 - 13.15	Question time
13.15 - 14.30	Lunch
<u>14.30 - 16.00</u>	<u>APA implementation</u>
	<i>The procedure</i>
	- [Johann Muller - Skat (Danish Tax & Customs Administration)]
	- [Marco Valdonio – Maisto e Associati]
	<i>The economic studies</i>
	- [Gianni De Robertis – K Studio Associato]
	<i>The agreements</i>
	- [Marco Cerrato – Maisto e Associati]
	- [Johann Muller - Skat (Danish Tax & Customs Administration)]
16.00 - 16.30	Coffee
<u>16.30 - 17.00</u>	<u>Roundtable</u>
	- [Gianni De Robertis]
	- [Marco Valdonio]
	- [Marco Cerrato]
	- [Johann Muller]
17.00 - 17.15	Question time
19.30 - 20.00	Cocktails
20.00 - 22.00	Dinner

Second day

Saturday 4th May 2013

9.30 - 11.15

MAP and arbitration

MAP and arbitration

- [Bruno Gibert – CMS Bureau Francis Lefebvre]
- [John Avery Jones]

Interaction between MAP, arbitration and internal remedies (the Italian experience)

- [Pietro Piccone Ferrarotti – Maisto e Associati]
- [Aurelio Massimiano – Maisto e Associati]

The practical experience and open issues

- [Frank Glowania – Bayer]

11.15 - 11.45

Coffee

11.45 - 12.15

Roundtable

- [Bruno Gibert]
- [John Avery Jones]
- [Pietro Piccone Ferrarotti]
- [Aurelio Massimiano]
- [Frank Glowania]

12.15 - 12.30

Question time

13.00 - 14.30

Lunch