

# **M&A Tax Fundamentals 2009**

## **Table of Contents**

### **Introduction**

### **Country Surveys**

#### Contributors

Argentina  
Australia  
Austria  
Belgium  
Brazil  
Canada  
China  
Denmark  
France  
Germany  
Hong Kong  
India  
Ireland  
Italy  
Japan  
Republic of Korea  
Luxembourg  
Netherlands  
Norway  
South Africa  
Spain  
Sweden  
Switzerland  
United Kingdom  
United States

### **EC Directives**

Merger Directive  
Parent-Subsidiary Directive  
Interest and Royalties Directive

## **Case Law of the European Court of Justice involving Mergers**

Cases related to Directive 90/434 (Merger Directive)

*Leur-Bloem*

*Andersen og Jensen*

*Kofoed*

*AT*

Cases related to Directive 69/335 on indirect taxes on the raising of capital

*Aro Tubi Trafilerie*

*Magpar VI*

Cases related to state aid granted for corporate reorganizations

*Italian Republic v. Commission of the European Community*

Non-tax case

*Centros*

*SEVIC*

*Cartesio*