

# Stocked Based Compensation (SBC) Managing Unforeseen Foreign Tax Issues

**Speaker Bios & Contact Info**

**UC Berkeley**  
Center for Law & Technology

# BCLT BY THE NUMBERS

*Unrivaled Impact in Tech Law*

**#1** Ranked IP law program  
21 years by US News



**21** Faculty directors teaching full time and writing on law and tech issues

**3** Faculty Directors ranked among top 5 most cited IP scholars



**17,000+** Law & tech courses planned for 2024-2025

**50+** Law & tech courses planned for 2024-2025

**9** BCLT faculty-authored textbooks



**9** Tech-focused Student Groups



**16** Major conferences planned for 2024-2025

**20+** Other expert-level events planned for 2024-2025

**27** Years BCLT has been collaborating with Federal Judicial Center

**900+** Federal judges trained at the BCLT/ FJC IP seminar



# Gene Tien

Gene Tien, Ph.D, works with global multinationals on intercompany pricing and economic valuation issues that impact their most relevant tax positions. Gene assists in the design of intercompany transaction flows with an eye to reducing transfer pricing (TP) and other value-added pricing flow disputes. He specializes in valuing intangible property (IP) transactions, and the direct and indirect tax implications, assists companies in documenting and managing with the evolving TP and tax landscape, and regularly consults on dispute resolution and controversy matters globally. He regularly presents and writes about international TP policy, and on broader fiscal policy issues relating to economic development.



Connect with Gene on:

[Baker McKenzie](#)  
[LinkedIn](#)

# Himali Patel

Himali Patel is an associate in Baker McKenzie's Palo Alto office and a member of the Firm's Tax Practice Group. Patel's practice involves all areas of domestic and international taxation with an emphasis on international tax planning and transactions for multinational corporations. Prior to joining as an associate, she interned with Baker McKenzie as a summer associate while in law school at UC Berkeley Law and clerked for the Northern District of California.



Connect with Inez on:

[Baker McKenzie](#)  
[LinkedIn](#)

# Thank you for joining us.

Connect with BCLT on our [website](#) and on [LinkedIn](#)

**UC Berkeley**  
Center for Law & Technology