

## SERVICE

# Tax Litigation

Our team helps corporations manage, mitigate and litigate tax disputes by focusing on risk prevention and management.



## Related Expertise

- [Indirect Tax](#)
- [Tax: M&A, Reorganizations and Restructuring Transactions](#)
- [Transfer Pricing](#)

## Navigating a complex, evolving landscape

Against a backdrop of amplified public and governmental discourse on tax avoidance, and increasingly complex rules and compliance requirements, taxpayers face greater scrutiny by the tax authorities. Access to strategic and experienced tax law counsel is imperative in mitigating the potential impact of such scrutiny.

Widely acknowledged as having the leading tax litigation practice in Canada, our lawyers advocate for taxpayers in disputes arising in the audit, appeal and litigation stages. Osler is counsel of record to Canadian and foreign-based corporations doing business in Canada on all aspects of litigating tax disputes, and our lawyers are retained on more complex and significant tax cases than any other firm in the country.

Our tax litigators operate as an integrated unit with our tax subject matter experts and with our commercial litigators for courtroom intensive matters. Osler stands alone in its ability to litigate complex tax matters, such as transfer pricing and the general anti-avoidance rule (GAAR), that involve multiple weeks of factual and expert evidence. This type of litigation can only be conducted by a well-integrated team with depth of talent at every level and across disciplines. Our clients also benefit from deep litigation bench strength on contested motions and evidentiary matters.

Osler has acted as counsel on landmark and complex tax cases of national importance affecting large classes of taxpayers before the Supreme Court of Canada, the Federal Court of Appeal, the Tax Court of Canada, and other courts in numerous cases that have shaped Canadian tax law. Our work includes acting as counsel on the first GAAR and transfer pricing cases in which a taxpayer succeeded before the Supreme Court of Canada, as well as the only cases before the Supreme Court involving the interpretation of Canada's foreign subsidiary taxation rules.

Our firm is at the leading edge of the market, advising clients on an expansive range of contentious tax issues, with expertise in a number of industries, including

- Banking and Financial Services
- Energy and Infrastructure
- Logistics and Retail

- Mining and Natural Resources
- Pharmaceuticals
- Power and Utilities
- Real Estate
- Telecom

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## Key Contacts



Al Meghji

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## Awards and Recognition

- **Chambers Canada – Band 1:** Osler is renowned for its exceptional tax group, with strength and depth in both tax planning and dispute resolution. Much admired for the breadth of its subject matter and geographical coverage, the firm is particularly well regarded for its litigation expertise. It is also noted for its robust sales tax practice and its work on international taxation and transfer pricing issues. The department’s impressive client list includes significant players from a variety of sectors, including manufacturing, energy, real estate, technology and financial services.
  - “The depth of the team is unbelievable.”
  - “Top operator in the market.”
  - “I enjoy working with them – they bring a level of technical expertise that is extremely deep. We get tremendous insight.”
  - “Osler is technically strong. They are also commercial and will take a view supported by reasoned and principled judgment in areas with no clear answer. I am very happy with their advice.”
- **Chambers Global:**
  - “They are a premier tax group.”
  - “They bring credibility and objectivity in their advocacy.”
- **The Canadian Legal Lexpert Directory:** Recognized in Litigation – Corporate Tax (Calgary, Alberta; Toronto, Ontario; Montréal, Quebec)
- **The Lexpert/American Lawyer Guide to the Leading 500 Lawyers in Canada:** Osler

lawyers recognized as leaders in Tax Litigation

- **Benchmark Litigation Canada:** Received the 2021 'Impact Case Award' for our work on *Cameco Corporation v. Her Majesty the Queen*
- **The Legal 500:** Tax (Tier 1)
- **International Tax Review: World Tax Guide:** Osler earns Tier 1 ranking in Tax, Tax Controversy and Transactional Tax
- **International Tax Review: Americas Tax Awards:** Osler wins Canada Tax Firm of the Year (2021), Canada Tax Firm of the Year and Americas Tax Innovator of the Year Awards (2020), Canada Tax Court Firm of the Year Award (2019)
- **International Tax Review: Americas Tax Awards:** Alan Kenigsberg wins North America Indirect Tax Practice Leader of the Year Award (2020), Al Meghji wins Americas Tax Dispute Practice Leader of the Year Award (2019)
- **International Tax Review: World Transfer Pricing Guide:** Osler's Tax group is ranked Tier 1 and lawyers recognized as leaders in Transfer Pricing
- **International Tax Review: Tax Controversy Leaders Guide:** Osler lawyers recognized as leaders in Tax Controversy
- **Who's Who Legal:** Osler lawyers recognized in Tax
- **Best Lawyers Canada:** Recognized as "Law Firm of the Year" in the area of Tax Law (Canada), 2022