

# AMY FEINBERG

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## EXPERIENCE

### **VILLANOVA UNIVERSITY CHARLES WIDGER SCHOOL OF LAW**, Villanova, PA

Visiting Assistant Professor and Director, Tax Clinic, June 2025-May 2026

- Utilize a non-directive clinical teaching model to supervise 8 first-time clinic students and up to 3 returning clinical students per semester in the provision of legal services to indigent clients with tax controversy matters
- Instruct students in tax litigation and administration during a twice-weekly two-hour seminar
- Conduct outreach and client development in the geographic region of the law school
- Supervise students in representing clients before Tax Court, the Internal Revenue Service and IRS Independent Office of Appeals, the Pennsylvania Department of Revenue, and the United States Court of Appeals for the Sixth Circuit.
- Manage grant reporting and application processes
- Oversee multiple supporting staff, including two paralegals

### **LATHAM & WATKINS**, Washington, DC

Tax Controversy Associate, November 2019-Present (Leave of Absence June 2025-May 2026)

- Achieved a unanimous victory in the Supreme Court regarding equitable tolling of collection due process petitions, setting a significant precedent benefitting low-income taxpayers
- Argued before the Eighth Circuit that the filing deadline for Tax Court collection due process petitions was non-jurisdictional and subject to equitable tolling
- Defended a groundbreaking taxpayer victory in the Third Circuit regarding deficiency petitions, by successfully opposing the Solicitor General's petition for certiorari to the Supreme Court
- Represented clients in U.S. Tax Court trial and before the IRS Independent Office of Appeals
- Drafted comprehensive tax protests, Tax Court petitions, and federal appellate briefs
- Prepared fact and expert witnesses for depositions and trial testimony
- Represented low-income taxpayers before the IRS in tax credit matters
- Led multi-firm teams of both junior and senior attorneys to draft tax protests
- Guided summer associate interns to develop and apply core litigation skills, including assessing tax positions, analyzing depositions, and preparing witnesses
- Trained junior attorneys to develop their tax controversy representation skills
- Supervised associate teams on significant components of complex tax cases
- Taught new attorneys the basics of tax practice in an annual "core curriculum" training
- Mentored junior attorneys and summer associate interns
- Led a team of attorneys in obtaining asylum for a refugee family
- Guided junior attorneys in preparing their first witnesses, culminating in their successful direct examinations in virtual and in-person court proceedings
- Supervised a mid-level associate to file for and obtain custody for a single mother

### **U.S. COURT OF APPEALS FOR THE FEDERAL CIRCUIT**, Washington, DC

Law Clerk to Hon. Richard G. Taranto, August 2018-August 2019

- Conducted legal research, prepared the Judge for argument, and assisted in drafting opinions

### **HARVARD FEDERAL TAX CLINIC**, Cambridge, MA

Clinical Student, September 2017-December 2017

- Argued before the Fourth Circuit that the deadline to petition the Tax Court from a collection due process hearing is non-jurisdictional and subject to equitable tolling
- Drafted a Federal Circuit amicus brief in support of low-dollar compromise settlement offers

**LATHAM & WATKINS**, Washington, DC  
Summer Associate, May 2017-July 2017

**DRUG ENFORCEMENT ADMINISTRATION**, Arlington, VA  
Law Clerk, May 2016-July 2016

**THE GEORGIA DEBATE INSTITUTES**, Athens, GA  
Policy Debate Lab Instructor (25 Students), June 2013, June 2014, and June 2015

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**PUBLICATIONS  
& SPEAKING**

- Guest Lecturer (Chronology of a Tax Dispute and IRS Appeals Procedures) and Teaching Assistant, “Tax Practice and Procedure (Administrative Practice)” Georgetown Law, Fall 2024
- Presentation: *For Whom the Bell Equitably Tolls*, on the non-jurisdictional nature of Tax Court deadlines and the mailbox rule, at the Oregon Tax Institute, June 2024
- *New IRS Unit Leverages AI to Step up Partnership Audits, Hundreds of New Inquiries Expected*, Artificial Intelligence & Law, May-June 2024, Vol. 7, no. 3 (with Miriam Fisher, et. al).
- Presentation: *PolSELLI v. Commissioner and Low-Income Taxpayers*, ABA Tax Section Administrative Practice Committee Lunch, April 2023
- Presentation: *Boechler v. Commissioner at the Supreme Court* at the DC Women in Tax Lunch, October 2022
- Presentation: *The Supreme Court and the 30-day CDP Petition Deadline: A discussion of Boechler v. Commissioner* at the ABA Tax Section Virtual 2022 Midyear Tax Meeting, February 2022

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**EDUCATION**

**HARVARD LAW SCHOOL**, Cambridge, MA  
J.D., *magna cum laude*, May 2018

- *Harvard Negotiation Law Review*, Editor-in-Chief
- Harvard Women’s Law Association, Communications Chair & Treasurer

**UNIVERSITY OF GEORGIA**, Athens, GA  
M.A. in Journalism and Mass Communication, Public Relations concentration, May 2015

- Thesis: *Candidate False Statement Laws and the First Amendment*

**UNIVERSITY OF GEORGIA**, Athens, GA  
B.A., *summa cum laude*, in International Affairs; A.B.J., *summa cum laude*, in Public Relations, May 2015

- Zell Miller Scholar (full tuition merit scholarship)
- Georgia Debate Union, President and Russell Scholarship Recipient
- Public Relations Student Society of America, Drewry Chapter Member of the Year
- Sigma Delta Tau, ETA Chapter, Vice President of General Board and Scholarship

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**REFERENCES**

**T. Keith Fogg**, Clinical Professor of Law, Emeritus  
Harvard Law School • 617-390-2532 • kfogg@law.harvard.edu

**Susannah Barton Tobin**, Assistant Dean and Ezra Ripley Thayer Senior Lecturer on Law  
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**Hon. Richard G. Taranto**, U.S. Court of Appeals for the Federal Circuit  
tarantor@cafc.uscourts.gov

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