

Internal Revenue Service

Department of the Treasury
Washington, DC 20224

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Third Party Communication: None
Date of Communication: Not Applicable

Person To Contact:
, ID No.

Telephone Number:

Refer Reply To:
CC:CORP:1
PLR-135582-18

Date:
June 17, 2020

Legend

Purchaser =

Target =

Date A =

Dear :

This letter supplements a private letter ruling issued by the Internal Revenue Service to Purchaser on March 19, 2019 (PLR-135582-18, the "Letter Ruling").

The Letter Ruling responded to a request by Purchaser for an extension of time under §301.9100-3 of the Procedure and Administration Regulations to file an election under section 338(g) with respect to Purchaser's acquisition of the stock of Target on Date A (the "Election"). The Letter Ruling granted Purchaser an extension of time to file the Election. Specifically, the Letter Ruling ruled that "an extension of time is granted under §301.9100-3, until 45 days from the date on [the Letter Ruling], for Purchaser to file the Election with respect to the acquisition of the stock of Target, as described [in the Letter Ruling]."

A question has arisen regarding whether the Letter Ruling addressed any matter other than an extension of time to file the Election. The Letter Ruling did not rule or otherwise

express any opinion on any matter beyond the extension of time to file the Election. No opinion was expressed with respect to any tax consequences arising from the Election or the failure to make the Election in a timely manner. Specifically, the Letter Ruling did not grant any consent or permission with respect to any change in method of accounting. Nor did the Letter Ruling grant any other relief, consent, or permission in order to report the transaction on any return consistently with the making of the Election had the Election been timely made. This letter supplements the Letter Ruling accordingly.

This letter is directed only to the taxpayer(s) who requested it. Section 6110(k)(3) provides that it may not be used or cited as precedent.

Pursuant to the power of attorney on file in this office, copies of this letter are being sent to your authorized representatives.

Sincerely,

Thomas I. Russell
Chief, Branch 1
Office of Associate Chief Counsel (Corporate)

cc: