



Taj Kudhail
Associate

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Expertise
Tax

Bar Admissions
Québec, 2015

Taj offers sophisticated solutions to clients' tax challenges.

Taj specializes in the tax aspects of domestic and cross-border mergers and acquisitions, as well as corporate restructurings and reorganizations, corporate financing, estate planning and executive compensation.

Before joining Davies, Taj practised in the Tax group at two international law firms. He had previously served as a judicial law clerk at the Tax Court of Canada.

REPRESENTATIVE WORK

Outfront Media Inc.

Acted as Canadian counsel to OUTFRONT Media Inc. in the C\$410-million sale of its Canadian outdoor advertising business to Bell Media, a wholly-owned subsidiary of BCE.

Plusgrade Inc.

Acted for Plusgrade in connection with General Atlantic's strategic investment in the ancillary revenue powerhouse. The investment represents a monumental transaction for the global travel tech sector.

Vance Street Capital LLC

Acted for Vance Street Capital, a Los Angeles private equity fund, in the sale of Terra Insights, a Vancouver-based geotechnical, structural and geospatial monitoring company, to Orica for cash consideration of C\$505 million.

RelationShop Inc.

Acted as Canadian counsel for RelationShop Inc. in its acquisition of all of the issued and outstanding shares of Mercatus Technologies, a leading provider of eCommerce solutions for regional grocers and independents.

Searchlight Pharma Inc.

Acting for the shareholders of Searchlight Pharma Inc., a top-growth Canadian specialty and innovative branded pharmaceutical company, in connection with the sale of their 100% interest to Apotex Inc., Canada's largest pharmaceutical company.

IOU Financial Inc.

Acted for IOU Financial Inc., a fintech company listed on the TSX-V, in its sale to 9494-3677 Québec Inc., a corporation created by a group composed of funds managed by Neuberger Berman, Palos Capital and Fintech Ventures, for an all-cash consideration.

Integrated Media Company

Acted for Integrated Media Company, a TPG platform dedicated to the new media ecosystem, in its C\$147.5-million acquisition of Toon Boom Animation Inc., an Emmy® Award-winning Montreal-based animation software company, from Nelvana Limited, a subsidiary of Corus Entertainment Inc.

DAVIES

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Sustana

Acted for Sustana, a portfolio company of Blackstone, in its acquisition of Hanna Paper, a high-grade paper recycling company.

Industrial and Financial Systems AB

Acted for Industrial and Financial Systems AB in its acquisition of Poka Inc., a Québec-based provider of connected worker platform software.

Burgundy Diamond Mines Limited

Acted for Burgundy Diamond Mines Limited (BDM) in its US\$136-million acquisition of Arctic Canadian Diamond Company Limited, including the world-class Ekati Diamond Mine in Canada's Northwest Territories, and Arctic Canadian Diamond Marketing N.V. Upon closing, BDM became one of the largest listed diamond companies globally.

RECOGNITIONS

Best Lawyers: Ones to Watch—Tax Law

INSIGHTS

Government of Canada Releases Package of Proposed Domestic and International Tax Legislation
Aug. 16, 2023

CIBC v. The King: Does the FCA undermine its decision in *The Queen v. Bank of Montreal*?
Aug. 01, 2023

Federal Budget 2023 – Major Changes for Business and High Net Worth Individuals
Mar. 28, 2023

International Tax, co-author
Dec. 01, 2022

Top Court Blesses Treaty-Shopping Arrangement: The *Alta Energy* Decision
Dec. 14, 2021

“Certains aspects fiscaux des clauses de non concurrence”
May 01, 2019

IFA International Tax Seminar, “The Limitation on Benefits Provision of the Canada-US Tax Treaty: 10 Years of Observations”; Montréal, QC
Apr. 11, 2019

“L’Affaire *Univar*: la Cour canadienne de l’impôt applique la RGAÉ à un dépouillement de surplus transfrontalier”
Dec. 01, 2016

EDUCATION

Osgoode Hall Law School, LLM (Taxation), 2018
Université de Montréal, LLB, 2013
John Molson School of Business, BComm, 2010

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PROFESSIONAL AFFILIATIONS

Association de planification fiscale et financière
Canadian Tax Foundation

BOARD MEMBERSHIPS

Scapegoat Carnivale Theatre