L. Paul Hood, Jr.
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Professional Experience:

Chief Operating Officer (Part-Time), The Law Office of Carol A. Sobczak. August 2008-December 2010.

Independent part-time consultant, speaker and writer. May 2006-Present.

Unlicensed Law Clerk/Associate, Dickenson, Peatman & Fogarty, Napa, California; Dec. 2005-May 2006.
Tax and estate planning/administration practice.

Shareholder, L. Paul Hood, Jr., APLC, Metairie and Mandeville, Louisiana; Sept. 1995-Aug. 2005.
Tax and estate planning/administration practice.

Associate and then Partner: Deutsch, Kerrigan & Stiles, L.L.P.; New Orleans, Louisiana; July 1992-Sept. 1995.
Tax and estate planning/administration practice.

Associate: Baldwin & Haspel; New Orleans, Louisiana; June 1988-June 1992.
Tax and estate planning/administration practice.

Associate: Provosty, Sadler & de Launay; Alexandria, Louisiana; Sept. 1986-July 1987.
General practice.

Law Clerk: The Honorable Leo P. Higginbotham, Jr.; 19^{th} Judicial District Court for the Parish of East Baton Rouge, State of Louisiana. Dec. 1985-Sept. 1986.

Education: B.S., Bus. Adm. (Accounting), Louisiana State University, 1982; J.D., Louisiana State University Law Center, 1986; Master of Laws in Taxation, Georgetown University Law Center, 1988.

Law Organizations and Teaching Experience: Past Chair, Section of Taxation, Louisiana State Bar Association; chief examiner and grader, Louisiana Estate Planning and Administration Specialization Examination, 2001-2003. Fellow, American College of

Trust and Estate Counsel, 1998-2009. Taught Estate and Gift Tax in the Graduate School of the University of New Orleans from 1998-2002. Taught at law school programs sponsored by Duke, Georgetown, NYU, Tulane, Loyola and LSU. Taught at programs sponsored by BNA Tax Management, AICPA, NACVA, IBA and LCPA. Member, Continuous Trust Code Revision Committee, Louisiana State Law Institute, 1997-2006. Taught an on-line course on estate planning for the graduate school of Northeastern University in Boston in the spring of 2011.

Quasi-Judicial Experience: Spent eight years from 1996 to 2004 as a gubernatorial appointee on the three member Louisiana Board of Tax Appeals, which serves as Louisiana's primary state tax court.

Personal Interests: Baseball (as a paid youth pitching instructor for over 25 years), history, literature, books, music and news.

References:

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SELECTED PUBLISHED BOOKS AND ARTICLES

"Defined Value Gifts and Sales Under the Microscope: What's Possible and What's Not-Revisited," *Tax Management Estates Gifts and Trusts Journal* (July 2011).

Co-Author (with Timothy R. Lee) of *A Reviewer's Handbook to Business Valuation: Practical Guidance to the Use and Abuse of a Business Appraisal* (Wiley 2011).

"Must Synergistic Buyers be Considered in Fair Market Value Analysis?," *Valuation Strategies* Vol. 13, No. 6, pp. 28-33 (2010).

"Who Says Appraisers Agree on Everything? Ten Issues That Affect Valuations (Parts One and Two)," *Valuation Strategies* Vol. 11, No. 6, pp. and Vol. 12, No. 1, pp. 27-31 (2008).

"Application of the Excess Business Holdings Tax to DAFs and SOs," *Family Foundation Advisor*, Vol. 7, No. 1 (Nov./Dec. 2007).

Dallas v. Commissioner, *BNA Tax Management Insights and Commentary*, Jan. 2007.

Hermeneutic for Evaluation, Selection and Design of Estate Planning Tools and Techniques, *Tax Management Estates, Gifts and Trusts Journal*, May 12, 2005, at pp. 155-175.

BNA Portfolio, Valuation and Real Estate, Bureau of National Affairs (2003 and 2007).

Defined Value Gifts and Sales Under the Microscope: What's Possible and What's Not?, *BNA Tax Management Estates, Gifts and Trusts Memorandum*, March 13, 2003, pp. 175-191.

Gifting, Valuation and Metaphysics, *BNA Tax Management Insights and Commentary*, 2004.

Louisiana Wills & Trusts: A Drafting System (with Gerald LeVan, Esq. and the late Judge Alvin B. Rubin), 1992-.

"The Initial Estate Planning Interview," 27 *ACTEC Journal* 297 (2002).

"Defined Value Gifts: Does IRS Have it all Wrong?" 28 *Estate Planning* No. 12, pp. 582-591 (2001).

"Did the IRS Answer the Wrong Defined Value Gift Question?"-Parts 1 and 2, *Probate Practice Reporter* (Part 1-Aug. 2001; Part 2-Sept. 2001).

"The Initial Estate Planning Client Interview," 2 CCH *Journal of Practical Estate Planning* No. 4 (Aug./Sept. 2000), pp. 32-41.

"10% Remainder Interest Requirement Poses Sticky Drafting Problems," *Tax Management Estates, Gifts and Trusts Journal*, Vol. 24, No. 3, pp. 146-150 (May-June 1999).

"Its Not Easy to Draft a Testamentary Charitable Remainder Trust", *Charitable Gift Planning News* (October 1998).

"*Buy-Sell Agreements*" (with John A. Rouchell, Esq.), *Tax Ideas*, Warren Gorham Lamont (1993).

Steve Leimberg's Business Entities Newsletter (on Internet http://www.leimbergservices.com) Nos. 103, 106, 112, 119, 122, 124 and 126 (2000-)

Steve Leimberg's Charitable Planning Newsletter (on Internet http://www.leimbergservices.com) Nos. 60, 62, 63, 111, 117, 138 and 156 (2000-).

Steve Leimberg's Estate Planning Newsletter (on Internet http://www.leimbergservices.com) Nos. 1837, 1829, 1825, 1804, 1780, 1774, 1749, 1712, 1694, 1686, 1650, 1642, 1599, 1585, 1566, 1557, 1511, 1501, 1490, 1470, 1409, 1378, 1376, 1328, 1304, 1295, 1272, 1210, 1197, 1189, 1175, 1173, 1163, 1148, 1138, 1132, 1120, 1119, 1118, 1075, 1074, 1043, 1026, 1025, 1014, 1010, 1003, 988, 971, 968, 955, 917, 901, 896, 791, 761, 756, 721, 692, 687, 684, 683, 678, 655, 646, 644, 643, 614, 609, 343, 341, 339, 337, 332, 328, 322, 318, 312, 268, 266, 265, 263, 262, 257, 256, 246, 233, 232, 227, 224 and 210 (2000-).

Steve Leimberg's Employee Benefits and Retirement Newsletter (on Internet http://www.leimbergservices.com) No. 22 (2000-).

Editor, *The Louisiana Estate Planner*, Vol. 20- (p. 1041-); co-editor (with Gerald LeVan, Esq.), Vol. 17, No. 12 - Vol. 19, No. 12 (pp. 842-1040); special editor (with Gerald LeVan, Esq. and Carey J. Messina, Esq.), Vol. 17, No.3 - Vol. 17, No. 11 (pp. 770-841).

"Trust Anxiety: Revocable Trusts in Louisiana", 39 *La. Bar Journal* 574 (1991).

"Legislature Puts Trap in State Tax 'Cookie Jar'", 38 *La. Bar Journal* 415 (1990).

"Fifth Circuit Symposium: Federal Taxation", 35 *Loyola Law Review* 493 (1989).

SELECTED SPEECHES AND PRESENTATIONS

A Method in the Madness: The Fine Art of Designing Estate Planning Tools and Techniques; Rendezvous, Denver, CO, August 19, 2011

Business Appraisal Reports: Perfecting the Art (with Timothy R. Lee, ASA), BVResources Webinar, August 11, 2011

*Who Says Appraisers Agree on Everything? Burning Issues That Affect Valuation*s, NACVA/IBA, May 28, 2009

Buy-Sell Agreements: Ticking Time Bombs or Reasonable Solutions? (with Z. Christopher Mercer and Hugh Q. Gottschalk), BV Resources, October 12, 2008

Top Ten Burning Issues in Valuation From the Perspective of an Estate Tax Attorney, FCG, New Orleans, December 1, 2007.

Hermeneutic for Evaluation, Selection and Design of Estate Planning Tools and Techniques, Emerald Coast Estate Planning Council, August 16, 2007.

You'll Never Think About Buy-Sell Agreements the Same Way Again (Part 1 of 3), with Z. Christopher Mercer, ASA, CFA and John H. Brown, June 14, 2007.

From the School of Hard Knocks: Thoughts on the Initial Client Interview, Emerald Coast Estate Planning Council, August 20, 2006.

Recent Developments in Federal Estate Taxation (With Special Emphasis on Family Entity Planning), Louisiana Society of CPA's 2004 Louisiana Tax Conference

Selected Tax and Estate Implications of Life Insurance in Louisiana, Loyola New Orleans Law School 2004 Estate Planning Conference

Valuation 2004: What's Happening?, LCPA Annual Business Valuation Conference

Recent Developments in Estate Planning, Fifteenth Annual Family Wealth Conference.

Uses of Life Insurance in Estate Planning, Sixteenth Annual Family Wealth Conference**,** Monroe, Shreveport, New Orleans and Baton Rouge, September 19, 21, 26 and 28, 2001.

Recent Developments in Estate Planning, Sixteenth Annual Family Wealth Conference**,** Monroe, Shreveport, New Orleans and Baton Rouge, September 19, 21, 26 and 28, 2001.

But for the Grace of God Go I...The Minefields of the Professional as a Fiduciary, Sixteenth Annual Family Wealth Conference**,** Monroe, Shreveport, New Orleans and Baton Rouge, September 19, 21, 26 and 28, 2001.

Professionalism, Tax Section, Louisiana State Bar Association, Baton Rouge, December 13, 2001.

Professionalism, Loyola (N.O.) School of Law Estate Planning Conference, December 6, 2001.

Ethics, 60th Annual Institute on Federal Taxation, New York University, San Francisco, November 14, 2001.

Defined Value Gifts: Does IRS Have it all Wrong?, 2001 Accounting Lecture Series, University of New Orleans, November 2, 2001.

Recent Developments in Estate Planning, Thirteenth Annual Family Wealth Conference**,** Monroe, Shreveport, New Orleans and Baton Rouge, September 19, 21, 26 and 28, 2001.

Pre- and Post- Nuptial Agreements—What's Mine is Mine; What's Your Lawyer's is Mine Too , Thirteenth Annual Family Wealth Conference**,** Monroe, Shreveport, New Orleans and Baton Rouge, September 19, 21, 26 and 28, 2001.

This Is <u>Not</u> Your Father's Estate Practice Anymore..., Thirteenth Annual Family Wealth Conference**,** Monroe, Shreveport, New Orleans and Baton Rouge, September 19, 21, 26 and 28, 2001.

Professionalism, Thirteenth Annual Family Wealth Conference**,** Monroe, Shreveport, New Orleans and Baton Rouge, September 19, 21, 26 and 28, 2001.

Valuation: A March Through the Bog-2001 Style, Thirty-First Annual LSU Estate Planning Conference**,** Baton Rouge, Louisiana, September 14, 2001.

The Initial Estate Planning Client Interview, West River (S.D.) Estate Planning Council, August 17, 2001.

Planning for the Surviving Spouse, West River (S.D.) Estate Planning Council, August 17, 2001.

A Tour of Estate Planning Tools and Techniques, West River (S.D.) Estate Planning Council, August 17, 2001.

Professionalism, *Annual Mardi Gras Symposium*, Tax Section, Louisiana State Bar Association, New Orleans, Louisiana, February 21, 2001.

The Estate's Timetable: Time is of the Essence, Probate: Beyond the Basics, National Business Institute, New Orleans, February 16, 2001.

Ethics in Probate Practice, Probate: Beyond the Basics, National Business Institute, New Orleans, February 16, 2001.

Selected Recent Developments in Estate Planning and Some Predictions, New Orleans Estate Planning Council, New Orleans, November 13, 2000.

Planning for the Surviving Spouse, Twenty-Second Annual Duke University Estate Planning Conference, Durham, North Carolina, October 19-20, 2000.

Drafting Inter Vivos Crummey and Life Insurance Trusts (With Forms), Tenth Annual Tulane Estate Planning Seminar, New Orleans, Louisiana, October 13, 2000.

Planning for the Surviving Spouse, Twelfth Annual Family Wealth Conference, Shreveport, Monroe, Baton Rouge and New Orleans, August 17, 18, 24 and 25, 2000.

Forced Heirship 2001: A Law Odyssey?, Twelfth Annual Family Wealth Conference, Shreveport, Monroe, Baton Rouge and New Orleans, August 17, 18, 24 and 25, 2000.

Recent Developments in Estate Planning, Twelfth Annual Family Wealth Conference, Shreveport, Monroe, Baton Rouge and New Orleans, August 17, 18, 24 and 25, 2000.

Trends in Estate Planning as Pertaining to Participants in the Financial Services Industry, Top 20 Group, November 9, 1999.

Recent Developments in Estate Planning, Eleventh Annual Family Wealth Conference, September 23, 24, 30 and October 1, 1999.

Drafting and Living Under the New Succession Laws, Eleventh Annual Family Wealth Conference, September 23, 24, 30 and October 1, 1999.

Practical Valuation Tips and Traps, Eleventh Annual Family Wealth Conference, September 23, 24, 30 and October 1, 1999.

Back to Drafting Basics, Eleventh Annual Family Wealth Conference, September 23, 24, 30 and October 1, 1999.

Protecting Your Valuation Expert and the Valuation Opinion, UNO Annual CPE Program, November 5, 1999.

The Human Side of Estate Planning, Eleventh Annual Georgetown University Law Center Advanced Estate Planning Institute, October 22, 1998.

Recent Developments in Louisiana Successions and Trusts, Loyola Estate Planning Conference, October 8, 1998.

Recent Developments in Estate Planning, Tenth Annual Family Wealth Conference, September 21, 22, 30 and October 1, 1998.

Checklist Round Robin: Life Insurance Trusts; At The IRA Intersection: Roth or Regular; Estate Planning for the Terminally Ill, Tenth Annual Family Wealth Conference, September 21, 22, 30 and October 1, 1998.

Trusts in the New Millennium, Tenth Annual Family Wealth Conference, September 21, 22, 30 and October 1, 1998.

His, Hers and Ours: "Blended Family" Issues, Tenth Annual Family Wealth Conference, September 21, 22, 30 and October 1, 1998.

Foundations of Estate Planning: Separating Myth From Reality, Tenth Annual Family Wealth Conference, September 21, 22, 30 and October 1, 1998.

Qualitative v. Quantitative Issues in Estate Planning, 1998 IAFP Advanced Planning Pre-Convention Seminar, May 16, 1998.

The ABC's of LLC's (Superficially Simple; Deceptively Complex), Eleventh Annual CLE by the Sea Program, Jefferson Bar Association, April 27, 1998.

Worlds Apart: Reconciling the Secular and Human Side of Estate Planning, Memphis Estate Planning Council, February 24, 1998.

A Tour of Estate Planning Tools and Techniques, 1997 LCPA Estate and Financial Planning Cluster, November 13, 1997.

Recent Developments in Estate Planning, Ninth Annual Family Wealth Conference, September 15-16, 18-19, 1997.

A "Tour" of Estate Planning Tools: From "Meat and Potatoes" to "Cutting Edge" (and Over), Ninth Annual Family Wealth Conference, September 15-16, 18-19, 1997.

Estate Planning With Qualified Plans: Case Study, Ninth Annual Family Wealth Conference**,** September 15-16, 18-19, 1997.

Town Hall Meeting: Reengineering the Estate Planning Process, Ninth Annual Family Wealth Conference, September 15-16, 18-19, 1997.

GRAT's in Estate Planning, FocusOn Advanced Estate Planning Workshops, Planning For The Future, L.L.C., June 20, 1997.

Planning For The Surviving Spouse, FocusOn Advanced Estate Planning Workshops, Planning For The Future, L.L.C., June 20, 1997.

Protecting Your Valuation Expert and the Valuation Opinion, FocusOn Advanced Estate Planning Workshops, Planning For The Future, L.L.C., June 19, 1997.

Planning for the (Not So) Elderly, Tenth Annual CLE by the Sea Program, Jefferson Bar Association, April 19, 1997.

Drafting for the Boomerang and Foul Forced Heir, The Pieces You Need to Better Understand Forced Heirship and Estate Planning, Louisiana State Bar Association, March 14, 1997.

The Louisiana Board of Tax Appeals: An Insider's View, Tax Section, Louisiana State Bar Association, January 23, 1997.

Health Care Directives and Ethical Issues in Elder Law, Louisiana Elder Law: Planning for Incapacity and Long Term Care, HMS Continuing Legal Education, January 16, 1997.

Recent Developments in Estate Planning, Eighth Annual Family Wealth Conference, September 5-6, 11-13, 1996.

Good Draft-ernoon..., Eighth Annual Family Wealth Conference, September 5-6, 11-13, 1996.

Forced Heirship, Eighth Annual Family Wealth Conference, September 5-6, 11-13, 1996.

Ethics and the Practitioner After January 1, 1996, Eighth Annual Family Wealth Conference, September 5-6, 11-13, 1996.

Forced Heirship: Alive and Kicking, Planning For The Future, L.L.C., June 27-28, 1996.

Ten Things You Need to Know About the New Forced Heirship Regime, Slidell Bar Association, July 11, 1996.

Thrills and Spills O' Simple Wills, Ninth Annual CLE by the Sea Program, Jefferson Bar Association, April 18, 1996.

Why Donors Give, New Orleans Chapter (inaugural meeting), National Committee on Planned Giving, March 12, 1996.

A Humorous View of Estate Planning, Money Watch Live Kick Off Luncheon, New Orleans Chapter, International Association for Financial Planning, March 1, 1996.

Ethics in Estate Planning, Twenty-Fifth Annual Estate Planning Conference, Paul M. Hebert Law Center, Louisiana State University, December 1, 1995.

Taxes and Attorneys, Tax Law for the General Practitioner, Loyola School of Law, November 18, 1995.

Estate Planning Utilizing Foundations, The Tax Forum, November 16-17, 1995.

Estate Planning With Family Limited Partnerships and Limited Liability Companies, Estate and Financial Planning Center, Louisiana Society of CPAs, October 26, 1995.

Recent Developments and Trends in Estate Planning, Shreveport Estate Planning Council, October 18, 1995.

Recent Developments in Estate Planning, Seventh Annual Louisiana Family Wealth Conference, September 18-22, 1995.

Legislative Roundup, Seventh Annual Louisiana Family Wealth Conference, September 18-22, 1995.

Life Insurance: Due Diligence and Care, Seventh Annual Louisiana Family Wealth Conference, September 18-22, 1995.

New Opportunities for Trusts, Seventh Annual Louisiana Family Wealth Conference, September 18-22, 1995.

Ethics in Estate Planning, Seventh Annual Louisiana Family Wealth Conference, September 18-22, 1995.

Ethical Considerations of Drafting Family Partnership and LLC Agreements, New Orleans Technical Meeting, Tax Section, Louisiana State Bar Association, August 30, 1995.

Family Limited Partnerships in Louisiana (with Robert R. Casey, Esq. and Rudolph R. Ramelli, Esq.), National Business Institute, Inc., March 2-3, 1995.

Selected Recent Developments in Probate and Estate Planning, Annual CLE Procrastinator's Seminar, New Orleans Bar Association, December 19, 1994.
Charitable Giving, Tax for Non-Tax Practitioners Seminar, Loyola School of Law, December 9, 1994.

Recent Developments and Trends in Estate Planning, Baton Rouge Estate and Business Planning Council, October 27, 1994.

Professional Ethics in Estate Planning, The Here and After: Estate Planning Issues for the 1990's, Loyola School of Law, October 7, 1994.

Probate: Beyond the Basics (with Clinton W. Shinn, Esq.), National Business Institute, Inc., September 29, 1994.

6th Annual Louisiana Family Wealth Conference (with Gerald LeVan, Esq.), September 9, 12 and 13, 1994.

Buy-Sell Agreements: Practical, Tax and Ethical Considerations, New Orleans Chapter, Louisiana Society of CPAs, January 25, 1994.

Ethical Considerations of Attorneys as Fiduciaries, Twenty-Third Annual Estate Planning Conference, Paul M. Hebert Law Center, Louisiana State University, November 19, 1993.

Powers of Attorney and Living Wills, Loyola School of Law, October 21, 1993.

Fifth Annual Louisiana Family Wealth Conference (with Gerald LeVan, Esq.), September 9, 10, 13 and 14, 1993.

Basic Probate Procedure and Practice in Louisiana (with Robert E. Tarcza, Esq.), National Business Institute, Inc., June 3, 1993.

Planned Giving: A Formula for Success, 90th Annual Convention Exposition & Religious Congress, National Catholic Educational Association, April 15, 1993.

Family Business Continuation Planning (with Gerald LeVan, Esq.), National Convention, Associated Buildings and Contractors, Las Vegas, Nevada, March 16, 1993.

Choosing the Entity: A New Kid's on the Block, New Orleans Chapter, Louisiana Society of CPAs, February 1, 1993.

Ethics: Attorneys as Fiduciaries (with Laura Junge Carman, Esq. and Philip Montelepre, Esq.), Annual Procrastinators' CLE by the Hour Program, Tulane Law School, December 30, 1992.

Trusts from A-Z, Louisiana Tax Conference, Louisiana Society of CPAs*, December 8, 1992.*

CRATs, CRUTs, CLATs, CLUTs...CGAs, DCGAs??, 8th Annual Seminar for the Certified Public Accountant, Baldwin & Haspel, August 28, 1991.

Louisiana/Federal Fiduciary Income Tax Workshop, Professional Education Seminars, Inc., July 15, 1991.

Using Life Insurance in Deferred Compensation Agreements, 9th Annual Baldwin & Haspel Legal Seminar, New Orleans Life Underwriters Association, November 15, 1990.

Estate Planning in Louisiana (with John A. Rouchell, Esq.), Cenla Chapter, Louisiana Society of CPAs, October 12, 1990.

Planning for the Turnaround: It's Here , 7th Annual Seminar for the Certified Public Accountant, Baldwin & Haspel, August 23, 1990.

Estate Planning and the "Rate of the Month" Club, Tax Section, Louisiana Bar Association, May 18, 1990.