

## Contact

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## Pete Lowy, shareholder at Chamberlain Hrdlicka, was quoted in Law360's December 21, 2023 article on Top Federal Tax Cases Of 2023

**Pete Lowy explains that in 2023 the IRS was successful in dodging questions about the scope of judicial remedies under the Administrative Procedures Act but taxpayers will likely press the issues in cases in 2024**

January 3, 2024

Pete Lowy, shareholder at Chamberlain Hrdlicka, was quoted in Law360's December 21, 2023 article on Top Federal Tax Cases Of 2023. On the arcane tax procedure subject of the scope of the judiciary's authority to vacate IRS pronouncements that violate the Administrative Procedures Act, Pete stated that the issue "is unsettled." He further explained that the IRS in 2023 was successful in dodging questions about the scope of judicial remedies under the Administrative Procedures Act but taxpayers will likely press the issues in cases in 2024.

Read the full article here:

<https://www.law360.com/tax-authority/articles/1775039/top-federal-tax-cases-of-2023>