



## Jonathan M. Rhein

Partner

### Office

New York

### Tel

212.588.5518

### Email

jrhein@dwpv.com

### Expertise

Tax

### Bar Admissions

New York, 2015

New Jersey, 2014

## Jonathan provides strategic solutions to his clients' complex tax challenges.

Jonathan focuses on providing efficient service with thorough analysis and clear explanation. He advises on the tax aspects of domestic and cross-border mergers and acquisitions, joint ventures, financings, inbound and outbound investments, corporate restructurings and other commercial transactions. His clients value his creativity and his ability to clearly present complicated tax concepts, decision points and negotiation strategy.

Prior to joining Davies, Jonathan practised in New York City at a multinational law firm.

### REPRESENTATIVE WORK

#### OMERS Life Sciences

Acted for OMERS Life Sciences in its US\$304.7-million acquisition of 100% of Esperion's royalty entitlement (subject to a cap) on net sales of bempedoic acid products in Europe by Daiichi Sankyo Europe.

#### Russel Metals Inc.

Acted for Russel Metals Inc. in the establishment of a \$600 million credit facility.

#### International Food Corporation

Acted for International Food Corporation (dba Bakery de France) and its shareholders in the sale of 50% of the issued and outstanding shares of International Food Corporation to La Lorraine Bakery Group.

#### Ironbridge Equity Partners Management Limited

Acted for funds affiliated with Ironbridge Equity Partners Management Limited in the acquisition and related financing of Gardner Glass Products, Inc., a North Carolina-based company that manufactures and distributes tempered, mirrored, backpainted, and laminated glass products.

#### Amcor Rigid Plastics USA, Inc.

Acting for Amcor Rigid Plastics USA, Inc. in the sale of its 50% interest in Bericap North America, a 50/50 joint venture between Amcor and Germany-based Bericap Holding GmbH that manufactures closures for beverage, food and industrial end markets in the U.S., Canada and Mexico.

#### Recochem

Acted as counsel to Recochem management in the acquisition of H.I.G portfolio company Recochem by funds managed by CapVest.

#### Copper Mountain Mining Corporation

Acted for Copper Mountain Mining Corporation in its US\$439-million all-share acquisition by Hudbay Minerals Inc. by way of a court approved plan of arrangement.

#### Smile CDR Inc.

Acted for Smile CDR Inc. (doing business as Smile Digital Health), a leading

# DAVIES

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FHIR® health data fabric (HDF) and exchange solutions provider, in its approximately \$30-million Series B funding round led by existing investors.

### Fulcrum Capital Partners

Acted for Fulcrum Capital Partners in the merger of its portfolio company, Accucam Machining, with EQI Ltd., a portfolio company of Atlas Holdings, to create a leading global supply chain solution for metal products.

## INSIGHTS

U.S. Supreme Court Upends 40 Years of Judicial Deference to Regulations  
July 25, 2024

IRS Proposes to Limit Application of Funding Rule on Stock Buyback Excise Tax  
June 20, 2024

IRS Relaxes Rules for Domestically Controlled REITs  
June 19, 2024

US Corporate AMT: Inbound Investors Beware of Aggregation Rules, co-author  
Nov. 15, 2023

U.S. Tax Laws: A Review of 2022 and a Look Ahead to 2023  
Feb. 21, 2023

Disclosure Requirements Aimed at Shell Companies, co-author  
Jan. 24, 2023

Upcoming Proposed Regulatory Changes to Stock Buyback Excise Tax  
Dec. 29, 2022

## EDUCATION

Harvard Law School, JD, 2014  
Touro College, BS (Summa Cum Laude), 2009