

J. Stephen Barge

Partner

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OVERVIEW

Steve Barge's practice is a distinct blend of a robust tax controversy and litigation practice coupled with domestic and cross-border corporate and business tax planning and transactional knowledge. His deep experience spans multiple industries in which he has negotiated and structured acquisitions, dispositions, expansions, contractions, restructurings, and financing transactions for corporate and pass-through entities in the United States and abroad. Steve has resolved numerous complex US federal and state tax controversies at the audit, appeal, and litigation stages that span a variety of industries. His deep understanding of tax law and strategic approach have been instrumental in successfully defending clients against a wide range of tax assessments and penalties. Steve's transactional work focuses not only on pre-transaction design and execution but also on post-transaction integration structures that obtain maximum tax benefits and preserve favorable tax attributes while balancing non-tax issues of other stakeholders. He has prepared and received numerous private rulings and technical advice memoranda from the IRS National Office and foreign taxing authorities. Steve is experienced in virtually all aspects of United States federal taxation that affect business activities and brings a practical and collaborative approach to the most sophisticated issues facing taxpayers in the United States taxing regimes.

PROFESSIONAL BACKGROUND

Steve has published several articles on a variety of federal income taxation matters and has spoken nationally, regionally, and locally. For more than 20 years, he has been selected by his peers each year for inclusion in *The Best Lawyers in America*.

ACHIEVEMENTS

- Listed in *The Best Lawyers in America*® in Pittsburgh
  - Tax Law, 2001-2025
  - Litigation and Controversy - Tax, 2011-2025
  - Corporate Governance Law - Tax, 2023-2025
- Recognized in *The Best Lawyers in America*® as “Lawyer of the Year” for Tax in Pittsburgh, 2025 and 2021

- Recognized in *The Best Lawyers in America*® as "Lawyer of the Year" for Litigation and Controversy - Tax in Pittsburgh, 2024

PROFESSIONAL / CIVIC ACTIVITIES

- Allegheny Tax Society
- American Bar Association (*Tax Section*)
- International Fiscal Association (*U.S. Branch*)
- Pittsburgh Tax Club

EDUCATION

- J.D., Duke University School of Law, 1989 *(Order of the Coif; Member, Duke Law Journal)*
- B.A., Illinois Wesleyan University, 1986

ADMISSIONS

- Bar of Pennsylvania
- United States Court of Federal Claims
- United States Tax Court

THOUGHT LEADERSHIP *POWERED BY HUB*

- 29 September 2025, Prosecutor, Jury, and Judge? Courts Split on IRS Penalty Power Post Jarkesy
- 28 October 2020, IRS Issues Section 1446(f) Final Regulations
- 14 August 2018, Proposed Regulations Provide Welcome Guidance for 20% Pass-Through Deduction
- 27 October 2016, Tax Evasion - Nowhere Left to Hide
- 18 May 2016, Investing in India? Take a Look at the Amended India-Mauritius Tax Treaty Before You Do
- 23 July 2015, Recent Legislative Developments Will Create Headaches and Increase Financial Risks for Mortgage Servicers and Originators
- 12 May 2015, New MLP Rules Provide Bright Lines and New Challenges

OTHER PUBLICATIONS

- "Investing In India? Time To Rethink Structures," *Law360*, 3 June 2016

NEWS & EVENTS

- 24 August 2026, K&L Gates Advises Silicon Motion on US$1.15 Billion Convertible Senior Notes Offering
- 11 June 2026, K&L Gates Advises ATI Inc. on US$450 Million Senior Notes Offering
- 19 May 2026, K&L Gates Advises Tyler Technologies on US$1.4375 Billion Convertible Notes Offering
- 21 August 2025, More Than 350 K&L Gates Lawyers Recognized Among 2026 Best Lawyers in America, Ones to Watch
- 20 March 2025, K&L Gates Advises PPG Industries in €900 Million Notes Offering
- 15 August 2024, Nearly 430 K&L Gates Lawyers Named Among 2025 Best Lawyers in America, Ones to Watch
- 17 August 2023, Nearly 400 K&L Gates Lawyers Named Among 2024 Best Lawyers in America, Ones to Watch
- 18 August 2022, More Than 350 K&L Gates Lawyers Named Among 2023 Best Lawyers in America, Ones to Watch
- 18 May 2022, K&L Gates Advises Albemarle Corporation on $1.7 Billion Senior Notes Offering
- 19 August 2021, Nearly 300 K&L Gates Lawyers Named Among 2022 Best Lawyers in America, Ones to Watch
- 6 November 2020, K&L Gates Advises Exact Sciences Corporation on Acquisitions of Cancer Detection Companies, Common Stock Sale
- 17 August 2020, K&L Gates Advises Tokyo Gas America on Two Acquisitions
- 30 March 2020, K&L Gates Advises Accion Labs on Investment by TA Associates
- 4 October 2017, K&L Gates Advises on Tokyo Century Corporation

AREAS OF FOCUS

- Tax
- Corporate Governance
- Mergers and Acquisitions
- Tax Controversy and Litigation