EXHIBIT II

Case 2:15-cv-01605 Document 1-2 Filed 10/07/15 Page 2 of 14

BAKER & MCKENZIE

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James M. O'Brien

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James.M.O'Brien@bakermckenzie.com

Asia Pacific Bangkok Beijing Hanoi

IRS FOIA Request **HQ FOIA**

Ho Chi Minh City Hong Kong Jakarta Kuala Lumpui

Stop 211 2385 Chamblee Tucker Road Manila Melbourne Chamblee, GA 30341

RE:

Shanghai Singapore Sydney Taipei

IRS FOIA Request Disclosure Scanning Operation - Stop 93A Tokyo PO BOX 621506

Atlanta, GA 30362-3006

E.I. No.

August 16, 2011

Europe & Middle East Abu Dhabi Almaty Amsterdam Antwern Bahrain Baku Barcelona

Microsoft Corporation & Subsidiaries

Freedom of Information Act Request

Brussels Budapest Cairo Dusseldorf Frankfurt / Main Geneva Kyiv London

Madrid Milan Moscow Munich Paris Prague Riyadh Rome Stockholm Vienna

North & South America

Warsaw

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Bogota Brasilia **Buenos Aires** Caracas Chicago Chihuahua Dallas Guadalajara Houston Juarez Mexico City Miami Monterrev New York Palo Alto Porto Alegre Rio de Janeiro San Diego San Francisco Santiago Sao Paulo Tijuana Toronto

Valencia Washington, DC Dear Sir or Madam:

In accordance with the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552, we request copies of certain documents maintained by the Internal Revenue Service ("IRS") in the Examination Administrative File, tax litigation files, and related files relating to the examination of Microsoft Corporation & Subsidiaries ("Microsoft") for the taxable years ended June 30, 2004, 2005, and 2006 ("2004," "2005," and "2006," respectively). Specifically, we request all documents relating to the IRS's examination and analysis under section 482 of the cost-sharing buy-in under the Technology License Agreement dated July 1, 2005, as amended and restated, and other intercompany transactions among Microsoft, Microsoft Operations Puerto Rico LLC ("MOPR") and Microsoft Puerto Rico, Inc., covering the Americas region (the "Americas Transfer Pricing Issue"). This request also covers the IRS's audit of MOPR's prices for software products, which was conducted between the issuance of a draft economist report entitled "Analysis of Microsoft Americas Retail Buy-In," dated September 24, 2009 and the issuance of the thirty day letter and revenue agent's report on May 3, 2011, which resulted in one or more draft economist reports and other analyses relating to MOPR's product prices. This request includes the following:

- 1. All documents contained in the Examination Administrative Files relating to the examination of the Americas Transfer Pricing Issue, including but not limited to any of the following items described in the Internal Revenue Manual, whether maintained in electronic or hardcopy format:
 - a. Forms 4318 Examination Workpapers (Field Examination) and Forms 4318-A Continuation of Examination Workpapers.

Baker & McKenzie LLP is a member of Baker & McKenzie International, a Swiss Verein.

- b. Issue Lead Sheets and Sub-Issue Lead Sheets, supporting workpapers, index systems, pro forma audits, and pro forma interviews.
- c. Forms 9984 Examining Officer's Activity Record.
- d. Automated workpapers and reports.
- e. Forms 3198 Special Handling Notices.
- f. Forms 3210 Document Transmittals.
- g. Forms 5346 Examination Information Reports.
- h. Revenue Agent Reports ("RAR")/Examination Reports.
- i. Forms 4665 Report Transmittals.
- j. Forms 3963 International Examiner's Reports.
- k. Special Agents' Reports and Collateral Reports.
- 2. All communications, including e-mails, involving the members of the IRS Examination Team for Microsoft, or any other IRS employees or contractors, regarding, referring, or relating to the examination of the Americas Transfer Pricing Issue, whether maintained in electronic or hardcopy format, including but not limited to any communications involving:
 - a. Cheryl Potop-Jackson, Sr. Team Coordinator.
 - b. Chuck Davis, Team Manager.
 - c. Al White, International Team Manager.
 - d. Paul Weibel, International Examiner.
 - e. Fred Rapaport, International Examiner.
 - f. Doug Odell, International Examiner.
 - g. Bill McCarthy, IRS Counsel.

- h. Christopher Miller, Economist Team Manager.
- i. Joy Yen, IRS Economist.
- j. Michael Danilack, LB&I Deputy Commissioner (International).
- k. Patricia Chaback, Industry Director, Communications, Technology and Media.
- 1. Maria Hwang, Director, Field Operations (West).
- m. Nancy Bronson, Program Manager (International).
- n. Marty Walker, Territory Manager.
- 3. All documents constituting any Tax Litigation Division Legal File, Tax Litigation Advice File, Miscellaneous Law File, Chief Counsel Office Files, or Regional Counsel Office Files relating to the examination of the Americas Transfer Pricing Issue, whether maintained in electronic or hardcopy format.
- 4. All documents contained in files of, or maintained by the IRS in connection with the retention of, and work performed by, Ceteris, Inc., its officers, employees and contractors ("Ceteris") regarding, referring, or relating to the examination of the Americas Transfer Pricing Issue, including but not limited to any correspondence, memoranda, presentations and summaries, workpapers, forms, records, reports, transcripts, interviews, spreadsheets, data, databases, disks, files, cases, folders, packages, notices, notes, drafts, or other similar documents, whether in electronic or hardcopy format.
- 5. All documents contained in files of, or maintained by the IRS in connection with the retention of, and work performed by any other outside experts regarding, referring, or relating to the examination of the Americas Transfer Pricing Issue, including but not limited to any correspondence, memoranda, presentations and summaries, workpapers, forms, records, reports, transcripts, interviews, spreadsheets, data, databases, disks, files, cases, folders, packages, notices, notes, drafts, or other similar documents, whether in electronic or hardcopy format.
- 6. Any memoranda, documents, reports, writings, notes, contact sheets, purchase orders and contracts that describe, discuss, summarize, memorialize or record the circumstances and details of the IRS's engagement of, or contracting with, Ceteris or any additional outside

consultants ("Outside Consultants") relating to the examination of the Americas Transfer Pricing Issue:

- a. Any documents in the IRS files prepared by the Appeals Office and the Office of Collection, Service Center and Appraisal Services that identify any of the Outside Consultants. See I.R.M. 1.1.7.2.
- b. Any documents in possession of the IRS kept in the LMSB or LB&I Outside Expert Program referencing any of the Outside Consultants, including:
 - i. Any written recommendations from Area Counsel and the Technical Advisor. See I.R.M. 4.46.3.9.11.6.
 - ii. Any LMSB or LB&I Outside Expert Pre-Approval Worksheets. See I.R.M. 4.46.3.9.11.4; I.R.M. 4.46.3.9.11.7.
 - iii. Any documents prepared, approved or rejected by the Engineer Territory Manager, Industry Team Manager, Industry Territory Manager, Field Specialists Team Manager(s), Field Specialists Territory Manager(s) or Engineer Manager evaluating the need for an outside expert. See I.R.M. 4.46.3.9.10.4; I.R.M. 4.46.3.9.11.7.
 - iv. Any documents or information located in the files of the Filed Specialist assigned as the Specialist "Point-of-Contact" (Specialist POC) referencing any of the Outside Consultants. See I.R.M. 4.46.3.9.11.15; I.R.M. 4.46.3.9.11.16.
 - v. Any documents prepared by or sent from the Contracting Officer's Technical Representative, responsible for all liaisons with any Outside Consultants including budget requests, Request Tracking System entries and invoices. See I.R.M. 4.46.3.9.11.14; I.R.M. 35.4.4.8.2.1.
- c. Any documents prepared by the IRS Chief Counsel, including the files of the Chief Counsel's library referencing any of the Outside Consultants. See I.R.M. 35.4.4.8.1.

- d. Any purchase orders or contracts prepared by the IRS Department of Contracts and Procurement referencing any of the Outside Consultants. See I.R.M. 35.4.4.8.2.3.
- e. Any files or packages entitled "Requesting Services of an Expert Witness" and the documents located therein, referencing the engagement of, or contracting with, any of the Outside Consultants as outside expert witnesses. See I.R.M. 35.4.4.8.2.3.
- f. Any documents prepared in reference to the Significant Case Program, including information contained on the APOLLO system referencing any of the Outside Consultants. See I.R.M. 31.2.1.
- 7. All communications between the Outside Consultants and/or the IRS regarding the establishment of any engagement of, or contracting with, each of the Outside Consultants to provide outside consulting services to the IRS in connection with the examination, appeal and/or prospective litigation of the Americas Transfer Pricing Issue.
- 8. To the extent not covered by the categories of documents listed above, all documents contained in any IRS administrative, legal or other files, or otherwise maintained by the IRS, regarding, referring, or relating to the issues described in the categories of documents listed above concerning the examination of the Americas Transfer Pricing Issue, including but not limited to any correspondence, memoranda, presentations and summaries, workpapers, forms, issues, records, reports, transcripts, interviews, spreadsheets, data, databases, disks, files, cases, folders, packages, notices, notes, drafts, or other similar documents, whether in electronic or hardcopy format.

For purposes of this request, the term "document" is used expansively and includes, by way of illustration and without limitation, all agreements, contracts, communications, letters, reports, analyses, memoranda, e-mails, transcripts, minutes, notes, bulletins, worksheets, schedules, notebooks, drawings, photographs, drafts, diaries, calendars, workpapers, contracts, purchase orders, telecopies, telexes, or any information stored on optical disc, magnetic tape, microfilm or microfiche, or computer memory storage device. The term "document" also refers to any draft or prior version of a document responsive to this request.

If it is determined that any requested document or record, or any portion thereof, will not be disclosed, please provide us with the non-exempt documents and records and with the non-exempt portions of the remaining documents and records. In the event an exemption is claimed, please provide us with all segregable non-exempt portions of any withheld document or record pursuant to 5 U.S.C. § 552(b). When material is to be redacted, please

"black out" rather than "white out" or "cut out" any portions for which an exemption is claimed.

If records responsive to this request have been destroyed, please identify the documents destroyed, the date of destruction, and the person who destroyed the document.

Pursuant to 5 U.S.C. §§ 552(a)(6)(A)(i) and 552(b), if this request is denied either in part or in whole, please provide us with an index that specifies which exemption(s) is (are) being claimed for each portion of each document withheld. Please provide a detailed description of each document or record withheld, including the author(s) and any recipients, the date of its creation, its subject matter, and its current physical location. In addition, please provide the reason that each document or record falls within the exemption claimed for it. Please also specify the number of pages in each document or record and the total number of pages that are responsive to this request. Such an index is required to allow us to evaluate the IRS's claims that these documents are exempt from disclosure. See Vaughn v. Rosen, 484 F.2d 820 (D.C. Cir. 1973), cert. denied 415 U.S. 977 (1974); Church of Scientology v. IRS, 792 F.2d 146 (D.C. Cir. 1986); Osborne v. IRS, 754 F.2d 195 (6th Cir. 1985); White v. IRS, 707 F.2d 897 (6th Cir. 1983) (quoting Church of Scientology v. Bell, 603 F.2d 945 (D.C. Cir. 1979)); Brooks v. IRS, 80 AFTR 2d 97-6370 (E.D. Cal. 1997) (citing Wiener v. FBI, 943 F.2d 972 (9th Cir. 1991)).

In accordance with Treas. Reg. §§ 601.702(c)(4)(i)(H) and 601.702(f), we agree to pay reasonable charges incurred to search for and duplicate the requested documents. Once the materials have been assembled, please advise the undersigned of the projected copying charges.

In accordance with Treas. Reg. §§ 601.702(c)(4)(i)(E) and 601.702(c)(5)(iii)(C), I establish my identity and right to access to the requested documents by the previously filed Power of Attorney and Declaration of Representative on Form 2848 executed by Microsoft, attached as Exhibit A. A copy of my State of Illinois driver's license is attached for photo identification as Exhibit B. Microsoft authorizes you to send any of the above-mentioned documents to and/or communicate with counsel below regarding this request:

James M. O'Brien Baker & McKenzie LLP 130 East Randolph Street Suite 3700 Chicago, Illinois 60601 Telephone: (312) 861-8602

In accordance with Treas. Reg. § 601.702(f)(3), Microsoft is a "commercial requester" as defined in Treas. Reg. § 601.702(f)(3)(ii)(A). As set forth in 5 U.S.C. § 522(a)(6)(A)(i), 31

C.F.R. § 1.5(h), and Treas. Reg. § 601.702(c)(9)(ii), we would appreciate a response to this request within twenty (20) working days of its receipt.

We understand and appreciate that you will exercise a presumption in favor of disclosure, and are committed to accountability and transparency in connection with this request. See Memorandum from President Barack Obama, Memorandum for the Heads of Executive Departments and Agencies, 74 Fed. Reg. 4,683 (Jan. 26, 2009); Eric Holder, Memorandum for Heads of Executive Departments and Agencies (Mar. 19, 2009) (stating that an agency "should not withhold information simply because it may do so legally. I strongly encourage agencies to make discretionary disclosures of information. An agency should not withhold records merely because it can demonstrate, as a technical matter, that the records fall within the scope of a FOIA exemption").

Please send the requested records to the address set forth above. If you have any questions concerning this request or require further identifying information, please contact the undersigned at (312) 861-8602.

Thank you in advance for your consideration of this matter.

Sincerely,

James M. O'Brien

Enclosures

Form 2848 Play. June 2008) Department of the Theasury Infamil Revenue Service	and Declar ► Type or print	wer of Atto ation of Re	presentative		OMB No. 1545-0150 For BRS Use Only Received by: Name
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Redmond, WA 9805	2-R399		: :	· · · · · · · · · · · · · · · · · · ·	
			Daytima telephone nu (425) 702-63		number (if applicable)
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	must sign and date this form on page	2, Part II.			
Name and address			CAF No.		
James M. O'Brien, B	laker & McKenzie LLP		Telephone No.	372-881-88	D2
130 E. Randolph Str.	eet, Suite 3700		Fax No. 3 w: Address T	12-698-2323	
Chicago, IL 60801 Name and address		Check if ne			Fax No.
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Paul E. Schick, Bake 130 E. Randolph Str	er & McKenzie LLP	- }	Telephone No.	312-861-885	50
Chicago, IL 60601	oet, duite 3100	Check if ne	Fax No. 3 w: Address Te	112-698-2381	1
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Form 2848 (Rev. 6-20					Pa
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representative listed on line 2. If you also want the second representative listed to receive a copy of notices and communications, check this box If you do not want any notices or communications sent to your representative(s), check this box Retention/revocation of prior power(s) of attorney. The filing of this power of attorney automatically revokes all earlier power(s) of attorney on file with the internal Revenue Service for the same tax matters and years or periods covered by this document. If you do not want to revoke a prior power of attorney, check here. YOU MUST ATTACH A COPY OF ANY POWER OF ATTORNEY YOU WANT TO REMAIN IN EFFECT. Signature of tempsyer(s). If a tax matter concerns a joint return, both husband and wife must sign if joint representation is requested, otherwise, see the instructions. If signed by a corporate officer, partier, ourdian, tax matters partner, executor, receiver, administrator, of trustee on behalf of the texpayer, I certify that I have the authority to execute this form on behalf of the texpayer. If NOT SIGNED AND DATED, THIS POWER OF ATTORNEY WILL BE RETURNED.					
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Form 2848 (Rev. 6-2008

Microsoft Corporation & Subsidiaries E.I. No. Power of Attorney (Form 2848) Addendum

Part I: Box 2 Additional Representatives	,	
John M. Peterson, Jr., Baker & McKenzie LLP 660 Hansen Way Palo Alto, CA 94304	Telephone No. Fax No.	650-856-5538 650-856-9299
Salim R. Rahim, Baker & McKenzie LLP 815 Connecticut Avenue, NW Washington, DC 20006	Telephone No. Fax No.	202-835-1658 202-416-7041
Ivan A. Morales, Baker & McKenzie LLP 660 Hansen Way Palo Alto, CA 94304	Telephone No. Fax No.	650-251-5911 650-856-9299
Nancy E. Hacker, Baker & McKenzie LLP 660 Hansen Way Palo Alto, CA 94304	Telephone No. Fax No.	650-856-5531 650-856-9299
Colleen F. Romero, Baker & McKenzie LLP 130 E. Randolph Street, Suite 3700 Chicago, IL 60601	Telephone No. Fax No.	312-861-8280 312-698-2945
Brian C. Dursch, Baker & McKenzie LLP 130 E. Randolph Street, Suite 3700 Chicago, IL 60601	Telephone No. Fax No.	312-861-2944 312-698-2135
Phillip J. Taylor, Baker & McKenzie LLP 815 Connecticut Avenue, NW Washington, DC 20006	Telephone No. Fax No.	202-452-7082 202-416-7071

Microsoft Corporation & Subsidiaries E.I. No. Power of Attorney (Form 2848) Addendum (continued)

Part II: Declaration of Representatives

Designation	Jurisdiction	Signature	Date
a	CA	Afrom Sidnesson	8/11/11
a	DC	Salim R. Rakim	5/10/11
а	CA, FL	pAhr	5/10/11
а	CA	Mary Hade	5/10/11
e,	n.	Colle-Feerey Romero	5/10/11
а	IL -	130	5/10/2011
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Case 2:15-cv-01605 Document 1-2 Filed 10/07/15 Page 13 of 14

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JAMES M O BRIEN		Jocovies A.
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	THIS IS A LEGAL DOCUMENT UNDER THE UNFORM ANATOMICAL GIFT ACT OR SMALAR LAWS I hyrothy make an anatomical pin, effective upon my death DATE Any organ or 65504	Blood Type PM Factor
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	License expires four (4) years fro expiration date on the face of licen	m.
=	Jesse White Hinois Secretary of State	

BAKER & McKENZIE LLP Case 2:15-cv-01605 Document 1-2 Filed 10/07/15 Page 14 of 14

Citibank Delaware Operating Account

	DATE: 09-2	1-11 PAYE	E: Depart	ment of the Treasu	ry of the United Stat⊌€NDOR ID:	SF128803	CHECK #:	263121
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CHECK IS VOID IF ANY OF THE FOLLOWING SECURITY FEATURES ARE ABSENT: ORIGINAL DOCUMENT PRINTED ON CHEMICAL REACTIVE PAPER

BAKER & McKENZIE LLP ATTORNEYS AT LAW TWO EMBARCADERO CENTER, 11TH FLOOR SAN FRANCISCO, CA 94111-3802

Citibank Delaware A Subsidiary of Citicorp One Penn's Way New Castle, DE 19720

CHECK NO. 263121

CHECK DATE

Sep 21, 2011

VOID AFTER 6 MONTHS

CHECK AMOUNT

\$****12,580.00

PAY** TWELVE THOUSAND FIVE HUNDRED EIGHTY AND 00/100 US Dollar

TO THE **ORDER OF** Department of the Treasury of the United States

Internal Revenue Service

Disclosure Scanning Operations-Stop 93A, PO Box 621506

Atlanta, GA 30362-3006

TWO SIGNATURES REQUIRED OVER \$2,500

RUB RED IMAGE. - DISAPPEARS WITH HEAT.

SECURITY FEATURES INCLUDED, DETAILS ON BACK.

SEE BACK FOR ARTIFICIAL WATERMARK