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High Court Tax Refund Ruling Indicates State Law Authority

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On Feb. 25, The U.S. Supreme Court issued its decision in *Rodriguez v. Federal Deposit Insurance Corp.*, a case involving a dispute between the trustee in bankruptcy of a defunct bank holding company, and the FDIC, as receiver for the bank holding company's failed bank subsidiary, over the ownership of a federal income tax refund that was payable by the U.S. Department of the Treasury to the bank holding company as the parent of a consolidated tax filing group.

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