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CONTENTS

	Page No
Editorial	v
Thin Capitalization Rules in Latvia Kristine Valdniece	1
‘The Switzerland-EC Savings Tax Agreement: A Positive Result?’ Gianluca Nessi	37
Will <i>Lidl</i> get its Supermarket Refund? (C-414/06) Tiago Pedro Rodrigues	75
The 2008 Corporate Tax Reform – Germany’s New Interest Deduction Rules and their compatibility with EC Law Martin Schuh	93

EDITORIAL

This issue contains four articles written by recent LLM students at the University of London. They all consider recent developments in other European jurisdictions and the interaction of those developments with European law.

In the first article, Kristine Valdniece considers, in the light of recent litigation, how the 2003 thin capitalisation provisions in Latvia would fare if challenged in the ECJ.

Gianluca Nesi then analyses the savings tax agreement entered into between the EU and Switzerland within the context of Swiss-EU relations in general.

In the third article, Tiago Pedro Rodrigues analyses the opinion of Advocate General Sharpston in *Lidl Belgium GmbH & Co KG* suggesting that the ECJ will not follow it in its entirety. The *Lidl* case is the natural consequence of the ECJ's decision in *Marks & Spencer plc* and will clarify the extent to which overseas losses may (or must) be relievable against domestic profits.

Finally, Martin Schuh reviews the interest deduction rules introduced in Germany's 2008 Corporate Tax Reforms and their compatibility with ECJ jurisprudence.

Robert Venables QC

Jonathan Schwarz

Keith Gordon