Katten

ARTICLE



Restructuring and Repurchasing Distressed Debt: Risks and Opportunities for Borrowers

Published in *Tax Stringer*

September 1, 2020

The article highlights how debt restructuring and workout transactions are accelerating in the COVID-19 pandemic. Similarly, dislocations in the debt markets have presented and continue to present opportunities for relatively well-situated borrowers or their affiliates to capitalize on substantial discounts. These transactions can have significant federal and state income tax implications, including cancellation of debt (COD) income that may exacerbate (or create) financial distress for a corporate borrower or the owners of a flow-through entity. The article discusses certain federal income tax ramifications of modifying debt instruments or repurchasing debt in secondary markets, as well as related planning techniques.

Read "Restructuring and Repurchasing Distressed Debt: Risks and Opportunities for Borrowers" in its entirety.

CONTACTS

For more information, contact your Katten attorney or any of the following attorneys.



Todd Hatcher
+1.212.940.6506
todd.hatcher@katten.com

Attorney advertising. Published as a source of information only. The material contained herein is not to be construed as legal advice or opinion.

©2026 Katten Muchin Rosenman LLP.

All rights reserved. Katten refers to Katten Muchin Rosenman LLP and the affiliated partnership as explained at katten.com/disclaimer.