

Contents

| | |
|--|------|
| Preface | V |
| List of Authors | VII |
| <i>Cees Peters</i> | |
| The Starbucks decision of the General Court (Cases T-760/15 and T-636/16): Stepping stone towards a sustainable solution? | 1 |
| <i>Rita Szudoczky/Balazs Karolyi</i> | |
| Hungary: Tesco (Case C-323/18), Vodafone (Case C-75/18), Google Ireland Limited (Case C-482/18) | 17 |
| <i>Edoardo Traversa/Kim Van de Velden</i> | |
| Belgium: Recent and Pending CJEU Cases | 51 |
| <i>Bertil Wiman</i> | |
| Sweden: Cross-border loss deductions | 71 |
| <i>Paolo Arginelli</i> | |
| Italy: Cadeddu (C-667/17); HB v INPS and IC v INPS (C-168/19 and C-169/19); Société Générale (C-565/18) | 81 |
| <i>José Manuel Almudí Cid</i> | |
| Spain: Amortization of Financial Goodwill Resulting from the Acquisition of Shareholdings in Non-Resident Companies in Light of State Aid Rules | 99 |
| <i>Dinis Tracana/José Almeida Fernandes</i> | |
| Portugal: Taxation of capital gains from real estate properties and the EU Fundamental Freedoms: a never-ending story? | 113 |
| <i>Alexander Rust</i> | |
| Germany: C-480/17 Montag, C-135/17 X GmbH, C-685/16 EV | 125 |
| <i>Roland Ismer/Julia Rufß</i> | |
| Germany: College Pension Plan of British Columbia, Wächtler and A-Brauerei | 143 |
| <i>Claus Staringer</i> | |
| Austria: Vorarlberger Landes- und Hypothekenbank AG (C-625/17) | 157 |
| Lang et al (Eds), CJEU – Recent Developments in Direct Taxation 2019, Linde | XIII |

Contents

| | |
|--|-----|
| <i>Søren Friis Hansen</i> Denmark: Beneficial Ownership and Abuse of Rights | 165 |
| <i>Kristiina Äimä/Aki Kokko</i> Finland: Recent and Pending CJEU Cases | 177 |
| <i>Katerina Pantazatou</i> Luxembourg: Recent and Pending CJEU Cases: Fiscal Unity, taxpayers' fundamental rights and the FIAT case | 195 |
| <i>Werner Haslechner/Antonio Ancora</i> The Apple State Aid Case | 229 |
| <i>Dov Milsztajn</i> France: CJEU Recent Cases | 249 |
| <i>Rauno Õismaa</i> Request for a Preliminary ruling from the European Court of Justice (request for precautionary measures, Case C-420/19) | 263 |
| <i>Ivan Lazarov</i> Bulgaria: Withholding Tax on Dividend Payments to Gibraltar | 275 |
| Series on International Tax Law | 287 |