



## Exhibit B - RC Refund Claims Limitation Periods (Published 5/2008)

I.R.C. Section	Situation	Limitation Period and Amount
6511(a)	Period of limitation on filing claim for refund.	Claim must be filed within 3 years from the time the return was filed or 2 years from the time the tax was paid, whichever of such periods expires the later, or if no return was filed by the taxpayer, within 2 years from the time the tax was paid.
6511(b)(1)	Limitation on allowance of credits and refunds – Filing of claim within prescribed period.	No credit or refund shall be allowed or made after the expiration of the period of limitation prescribed in section 6511(a) for the filing of a claim for refund, unless a claim is filed within such period.
6511(b)(2)	Limitation on allowance of credit and refunds – Claim filed within 3 year period.	(A) The amount of the refund shall not exceed the portion of the tax paid within the period, immediately preceding the filing of the claim, equal to 3 years plus the period of any extension of time for filing the return.
	Limitation on allowance of credit and refunds – Claim not filed within 3 year period.	(B) If the claim was not filed within such three-year period, the amount of the refund shall not exceed the portion of the tax paid during the 2 years immediately preceding the filing of the claim.
6511(c)(1)	Extension of time by agreement– Time for filing claim.	The period for filing claim for refund shall not expire prior to 6 months after the expiration of the period within which an assessment may be made pursuant to the agreement or any extension thereof under section 6501(c)(4).
6511(d)(2)	Special period of limitation with respect to net operating	The period for filing a claim shall be that period which ends 3 years after the time prescribed by law for filing the return (including extensions) for the taxable year of the net operating loss or net capital loss which results in such carryback, or the period prescribed in section 6511(c) for extension of the period of assessment in respect of such taxable year, which ever expires later.

	loss or capital loss carrybacks.	
6511(d)(4)	Special period of limitation with respect to certain credit carrybacks	The period for filing a claim shall be that period which ends 3 years after the time prescribed by law for filing the return (including extensions) for the taxable year of the unused credit which results in the carryback (or, with respect to any portion of a credit carryback from a taxable year attributable to a net operating loss carryback, capital loss carryback, or other credit carryback from a subsequent taxable year, the period shall be that period which ends 3 years after the time prescribed by law for filing the return, including extensions thereof, for such subsequent taxable year) or the period prescribed in section 6511(c) for extension of the period of assessment in respect of such taxable year, which ever expires later.