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. .." Oh my God! How old he is..."

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The judgment of the Tax Court will be modified to provide for the award of a reasonable attorney's fee on this appeal. As modified, the judgment of the Tax Court is affirmed. 1 Inasmuch as the parties in this action are related to one another, a brief summary of their background is appropriate The petitioner Lillian T. Hicks' family background is as follows: She and her brother, James A. Hicks, received identical 20% shares in 1928 of the assets of a partnership known as "The Hicksville-Overly Company," which was organized by their father in 1924. In 1935, by a state court divorce decree, a trust was established for Lillian, and the remaining 80% of the partnership's assets were conveyed to Lillian's trustee. In 1957, Lillian, as trustee, sold her 80% interest to her brothers, James and Robert Hicks, for \$150,000, and the profits from the sale were placed in trust for the benefit of all three brothers, their respective sons and the issue of their sons. 2 The Tax Court allocated 100% of the gain from the c6a93da74d

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