Weeks 1–2: Residence & Source Jurisdiction
Text: Part 1, chs. 1–5
Review Problems: § 5.01
Planning Problems: § 5.02
  Code: §§ 7701(a), (b)
  Regs: §§ 301.7701(b)-1, -2, -3, -7

Week 3–6: Taxation of Foreign Persons
Text: Part 2, chs. 6–7 (skim §§ 7.06 and 7.07.2)
Planning Problem: § 7.05 (Mr. Doe, the Bread Maker)
  Code: §§ 871(b), 882, 864, 872, 873, 875, 897

Investment Income of Foreign Persons; Branch Profits Tax (skim), Earnings Stripping (skim) (branch profits tax on interest and earnings stripping not on exam)
Text: Part 2, chs. §§ 8.01, 8.02, 8.05; 9.01 (skim), 9.02 (skim)
Planning Problem: § 9.05 (Cheese Shoppe)
  Code: §§ 871(a),(b),(h); 881; 1441; 1442; 884; 163j;
  Regs: §§ 1.871-1, -7(a), (b); 1.881-1, -2

Source Rules (gross income)
Text: Part 3, ch. 11-14
  Code: §§ 861-863, 865
  Regs: §§ 1.861-1 to -7; 1.862-1; 1.863-1 to -3

Week 7: Treaty Issues, Conduits (inbound)
Text: Part 4, ch. 16 § 16.06
Canada Treaty, Arts. 1–7, 10–13, 16, 17, 25
  Code: §§ 7701(l); 994; 7852; 1012aa (off-code)
  Regs. Reg. § 1.881-3
Week 8: Planning Problem (Top-Tip), § 16.06

Week 9-10: Foreign Tax Credit, Creditable Taxes, Allocation of Deductions
Text: ch. 15 (very general, no details) 18, 19
Code: §§ 901; 902; 903; 905, 906
Regs: §§ 1.901-1; 1.901-2; 1.902-1; 1.903-1

Week 11: Limitations on Credit
Text: ch. 20
Code: § 904(a) to (d)

Week 12: Allocation of Income among Related Parties; Controlled Foreign Corporations
Text: ch. 22 (skim)
Code: § 482
Regs: 1.482-1

Text: ch. 25, 26 (passive income and base company sales income only)
Code: §§ 951; 952; 954(a)-(e); 957; 958
Regs: §§ 1.951-1; 1.957-1, -4; 1.958-1, -2; 1.954-1, -3

Week 13: Planning Problem 29.01 (Collectible Dolls)

Planning Problem 29.02 (Classic Films) (see my answer, posted April 26)