HIGH COURT OF ANDHRA PRADESH AT AMARAVATI

MAIN CASE No.: I.T.T.A.No.39 of 2026

PROCEEDING SHEET

Sl. No	DATE	ORDER	
2.	18.06.2026	**DEV,J & AHHS,J** **I.T.T.A.No.39 of 2025** Heard. In view of the substantial questions of law raised at Paragraph Nos.(b), (c) and (d) as extracted hereinunder**:** **(1).** Whether the Hon'ble Income Tax Appellate Tribunal erred in law in holding that the Agreement of Sale dated 25.05.2004 had become "ineffective", despite undisputed evidence on record establishing receipt of substantial consideration of Rs.4.15 crores through banking channels pursuant to the said agreement? **(2).** Whether the Hon'ble Tribunal was justified in law in refusing to apply the provisos to Section 50C of the Income Tax Act, 1961, on the facts of the present case, notwithdranding that the consideration for transfer was fixed and received prior to the date of registration, and despite settled judicial precedents	

holding the provisos to be curative and retrospective in nature?

(3). Whether the Hon'ble Tribunal committed a jurisdictional error in law in artificially bifurcating a single transaction of transfer of land into multiple segments and applying different dates and different stamp duty values for computation of long-term capital gains, when Section 50C of the Act does not contemplate such fragmented computation?

Admit.

Sri Y.N.Vivekananda, learned Standing Counsel for respondent sought time for filing counter in I.A.No.2 of 2026.

List the matter on 13.07.2026.

DEV, J

AHHS, J

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