



HIGH COURT OF CHHATTISGARH AT BILASPUR

TAXC No. 61 of 2024

south eastern coalfields ltd., **versus** deputy commissioner of
income-tax,

Order Sheet

24/03/2026	Mr. S. Rajeshwara Rao, counsel for appellant Mr. Ajay Kumrani, Advocate on behalf of Mr. Amit Chaudhari, counsel for the respondent. No notice is required to be issued as respondent appears through his counsel. Heard on Admission. This appeal is admitted on the following substantial question of law:- <i>“1. Whether the Income Tax Appellate Tribunal is justified in confirming the disallowance of Rs. 8,20,49,000/- towards mandatory Provision for Workmen Compensation when the liability was</i>

	<i>ascertained liability and deductible under Section 37 of the Income-Tax Act, 1961?</i> <i>2. Whether the Income Tax Appellate Tribunal is right in upholding the disallowance of depreciation of Rs. 1,02,22,000/- claimed on Hospital Building used under profit-sharing arrangement with Apollo Hospital, particularly when the receipts were not treated rental income under "Income from House Property"?</i> Let the matter be listed for final hearing. Sd/- (Sanjay S. Agrawal) Judge Sd/- (Amitendra Kishore Prasad) Judge
--	--

Raghu Jat