



\$~66 to 75

* **IN THE HIGH COURT OF DELHI AT NEW DELHI**
CNR No. DLHC013380762017
+ ITA 710/2017
HUAWEI TECHNOLOGIES CO., LTD.Appellant
Through: Ms. Kavita Jha, Sr. Advocate with Ms.
Himanshu Aggarwal & Ms. Kanika
Sethi, Advocates.

versus

ASSISTANT DIRECTOR OF INCOME TAX CIRCLE 3(2),
INTERNATIONAL TAXATION, NEW DELHIRespondent
Through: Mr. Puneet Rai, SSC with Mr. Ashvini
Kumar & Mr. Rishabh Nangia, JSCs.

67

CNR No. DLHC013380662017
+ ITA 711/2017
HUAWEI TECHNOLOGIES CO., LTD.Appellant
Through: Ms. Kavita Jha, Sr. Advocate with Ms.
Himanshu Aggarwal & Ms. Kanika
Sethi, Advocates.

versus

ASSISTANT DIRECTOR OF INCOME TAX CIRCLE 3(2),
INTERNATIONAL TAXATION, NEW DELHIRespondent
Through: Mr. Puneet Rai, SSC with Mr. Ashvini
Kumar & Mr. Rishabh Nangia, JSCs.

68

CNR No. DLHC013380542017
+ ITA 712/2017
HUAWEI TECHNOLOGIES CO., LTD.Appellant
Through: Ms. Kavita Jha, Sr. Advocate with Ms.
Himanshu Aggarwal & Ms. Kanika
Sethi, Advocates.

versus

ASSISTANT DIRECTOR OF INCOME TAX CIRCLE 3(2),



INTERNATIONAL TAXATION, NEW DELHIRespondent
Through: Mr. Puneet Rai, SSC with Mr. Ashvini
Kumar & Mr. Rishabh Nangia, JSCs.

69

CNR No. DLHC013380872017

+ ITA 714/2017

HUAWEI TECHNOLOGIES CO., LTD.Appellant
Through: Ms. Kavita Jha, Sr. Advocate with Ms.
Himanshu Aggarwal & Ms. Kanika
Sethi, Advocates.

versus

ASSISTANT DIRECTOR OF INCOME TAX CIRCLE 3(2),
INTERNATIONAL TAXATION, NEW DELHIRespondent
Through: Mr. Puneet Rai, SSC with Mr. Ashvini
Kumar & Mr. Rishabh Nangia, JSCs.

70

CNR No. DLHC010000302021

+ ITA 128/2023

HUAWEI TECHNOLOGIES CO LTDAppellant
Through: Ms. Kavita Jha, Sr. Advocate with Ms.
Himanshu Aggarwal & Ms. Kanika
Sethi, Advocates.

versus

ADDITIONAL DIRECTOR OF INCOME TAXRespondent
Through: Mr. Vipul Agarwal, SSC with Ms.
Sakashi Shairwal, JSC, Mr. Gaoraang
Ranjan & Ms. Harshita Kotru, Advs.

71

CNR No. DLHC010000322021

+ ITA 130/2023

HUAWEI TECHNOLOGIES CO LTDAppellant
Through: Ms. Kavita Jha, Sr. Advocate with Ms.
Himanshu Aggarwal & Ms. Kanika
Sethi, Advocates.



versus

ADDITIONAL DIRECTOR OF INCOME TAXRespondent
Through: Mr. Vipul Agarwal, SSC with Ms.
Sakashi Shairwal, JSC, Mr. Gaoraang
Ranjan & Ms. Harshita Kotru, Advs.

72

CNR No. DLHC010000462021

+ ITA 158/2023

THE COMMISSIONER OF INCOME TAX - INTERNATIONAL
TAXATION -1Appellant

Through:

versus

A.T. KEARNEY LTD.Respondent
Through: Mr. Ajay Vohra, Sr. Adv. with Ms.
Ishita Farsaiya, Mr. Sparsh Bhargava,
Mr. Apoorv Shukla, Mr. Jaidev
Prasada and Ms. Vanshika Taneja,
Advs.

73

CNR No. DLHC010361662021

+ W.P.(C) 13258/2021

HONDA CARS LTDPetitioner
Through: Mr. Deepak Chopra, Sr. Advocate
with Mr. Harpreet Singh Ajmani &
Mr. Shashvat Dhamija, Advocates.

versus

DEPUTY COMMISSIONER OF INCOME TAX & ORS.
.....Respondents

Through:

74

CNR No. DLHC010259202022

+ W.P.(C) 10505/2022

M/S BACARDI INDIA PRIVATE LIMITEDPetitioner
Through: Mr. Kamal Sawhney, Mr. Arun



Bhadauria & Mr. Puru Medhira,
Advocates.

versus

DISPUTE RESOLUTION PANEL-1 & ORS.Respondent

Through: Mr. Anurag Ojha, SSC with Mr. V.K.
Saksena, JSC & Ms. Hemlata Rawat,
JSC.

75

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CNR No. DLHC010259222022

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W.P.(C) 10507/2022

M/S BACARDI INDIA PRIVATE LIMITEDPetitioner

Through: Mr. Kamal Sawhney, Mr. Arun
Bhadauria & Mr. Puru Medhira,
Advocates.

versus

DISPUTE RESOLUTION PANEL-1 & ORS.Respondents

Through: Mr. Anurag Ojha, SSC with Mr. V.K.
Saksena, JSC & Ms. Hemlata Rawat,
JSC.

CORAM:

HON'BLE MR. JUSTICE DINESH MEHTA

HON'BLE MR. JUSTICE RAJNEESH KUMAR GUPTA

ORDER

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20.08.2026

List these cases on 10.12.2026.

DINESH MEHTA, J.

RAJNEESH KUMAR GUPTA, J.

AUGUST 20, 2026/nk