



**IN THE HIGH COURT OF JUDICATURE AT BOMBAY
ORDINARY ORIGINAL CIVIL JURISDICTION**

INCOME TAX APPEAL NO. 2331 OF 2022

Commissioner of Income-tax (International
Taxation)-2, Mumbai

... Appellant

Versus

Gemological Institute of America Inc.

... Respondent

**WITH
INCOME TAX APPEAL NO. 2306 OF 2022
WITH
INCOME TAX APPEAL NO. 779 OF 2023
WITH
INCOME TAX APPEAL NO. 72 OF 2023
WITH
INCOME TAX APPEAL NO. 73 OF 2023
WITH
INCOME TAX APPEAL (L) NO. 21874 OF 2022
WITH
INCOME TAX APPEAL NO. 945 OF 2022
WITH
INCOME TAX APPEAL NO. 553 OF 2023**

Adv. N. Venkatraman, ASG, a/w Mr. Subir Kumar, Mr. Akhileshwar Sharma, Ms. Ashita Aggarwal, Ms. Diksha Pandey, for the Appellants.

Mr. J.D. Mistri, Senior Advocate, a/w Mr. Niraj Sheth, Mr. Gunjan Kakkad, i/b Mr. Atul K. Jasani, for the Respondents.

**CORAM: B. P. COLABAWALLA &
FIRDOSH P. POONIWALLA, JJ.**

DATE: APRIL 24, 2026

P. C.

1. The above Income Tax Appeals were heard by us on 8th April 2026 and were kept on board today for 'Directions' to enable the parties to file their written submissions and also, add to their arguments. Today, the parties have tendered their written submissions.

2. Accordingly, the above Appeals are closed for judgment, which shall be pronounced in due course.

3. This order will be digitally signed by the Private Secretary/ Personal Assistant of this Court. All concerned will act on production by fax or email of a digitally signed copy of this order.

[FIRDOSH P. POONIWALLA, J.]

[B. P. COLABAWALLA, J.]