

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

INCOME TAX APPEAL(IT) NO. 54 OF 2020

The Pr. Commissioner Of Central Tax - 1APPELLANTS

V/S

Bny Mellon International Operations (india)RESPONDENT
Pvt.ltd.

Mr. Arjun Gupta, Advocate for the Appellant

Mr. Nitesh Joshi a/w Mr. Harsh Unhavane i/b. Cyril Amarchand
Mangaldas, Advocates for the Respondent

[MENTIONED]

**CORAM : HON'BLE SHRI JUSTICE B.P.
COLABAWALLA &
HON'BLE SHRI JUSTICE FIRDOSH
PHIROZE POONIWALLA, JJ**

DATE : 18th February, 2026

P.C. :

S. O. to 05/03/2026 .

(ASSOCIATE)