

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

WRIT PETITION (L) NO. 33618 OF 2023

IMRB Millward Brown International Pte
Limited, Singapore

...Petitioner

Versus

Deputy Commissioner of Income Tax
(International Tax), Circle-2(2)(1), Mumbai &
Ors.

...Respondents

Mr. P. J. Pardiwalla, Sr. Advocate a/w Mr. Jeet Kamdar i/b Mr. Atul
K. Jasani for the Petitioner.

Mr. Dinesh Gulabani a/w Mr. Prathamesh Bhosle for the
Respondents-Revenue.

**CORAM: K. R. SHRIRAM &
DR. NEELA GOKHALE, JJ.**

DATED: 22nd January 2024

PC :

1. Mr. Gulabani seeks two weeks time to file reply. Time granted.
2. Rejoinder, if any, to be filed within two weeks thereafter.
3. Stand over to 26th February 2024.
4. Until 15th March 2024, there shall be ad-interim relief in terms of prayer clause (d), which reads as under :

“(d) that pending the hearing and final disposal of this petition, the Respondents, their successors in office, subordinates, servants and agents be ordered and directed to grant immunity from imposition of penalty under section 270AA of the Act as prayed for in the Petitioner’s application dated April 28, 2023 (Exhibit-P) subject to such terms as this Hon’ble Court deems fit and also grant a stay against the penalty order (Exhibit-X) and the notice of demand dated September 15, 2023 (Exhibit-Z).”

(DR. NEELA GOKHALE, J.)

(K. R. SHRIRAM, J.)