



IN THE HIGH COURT OF KARNATAKA, AT DHARWAD

DATED THIS THE 27TH DAY OF FEBRUARY, 2026

PRESENT

**THE HON'BLE MR. JUSTICE S G PANDIT
AND**

THE HON'BLE MR. JUSTICE G BASAVARAJA

REVIEW PETITION NO.100138/2024

C/W

REVIEW PETITION NO.100166/2024

IN REVIEW PETITION NO.100138/2024:

BETWEEN:

M/S. KARNATAKA VIKAS GRAMEENA BANK
REP. BY ITS GENERAL MANAGER,
SRI. I.G. KUMARAGOUD, NO.133A, HO BUILDING,
BELGAUM ROAD, D.N. KOPPA, DHARWAD-580009
PAN:AAA6324Q.

...PETITIONER

(BY SRI. MADHUSUDAN U.A., ADV. FOR
SRI SHASHANK S HEGDE, ADV.)

AND:

THE JOINT COMMISSIONER OF INCOME TAX
RANGE -2, C.R. BUILDING,
HUBBALLI-DHARWAD ROAD,
NAVANAGAR, HUBLI-580025.

...RESPONDENT

THIS REVIEW PETITION IS FILED UNDER SECTION 114 R/W ORDER 47 RULE
1 OF CPC, PRAYING TO REVIEW THE JUDGMENT PASSED BY THIS COURT IN ITA NO.
100045/2018 DATED 03.06.2024 FOR THE ASSESSMENT YEAR 2010-11, IN THE
INTEREST OF JUSTICE.

IN REVIEW PETITION NO.100166/2024:

BETWEEN:

THE JOINT COMMISSIONER OF INCOME TAX
RANGE -2, CENTRAL REVENUE BUILDING,
HUBBALLI-DHARWAD ROAD,
NAVANAGAR, HUBLI-580025.

...PETITIONER

(BY THIRUMALES M, ADVOCATE)

AND:

M/S. KARNATAKA VIKAS GRAMEENA BANK
REP. BY ITS GENERAL MANAGER,
SRI. I.G. KUMARAGOUD,
HO, CTS NO. 52/B1/A1/DH, NO.133A,
HO BUILDING, BELAGAVI ROAD,
D.N. KOPPA, DHARWAD-580008.

...RESPONDENT





NC: 2026:KHC-D:3211-DB
RP No. 100138 of 2024
C/W RP No. 100166 of 2024

THIS REVIEW PETITION IS FILED UNDER SECTION 114 R/W ORDER 47 RULE 1 OF CPC, PRAYING TO REVIEW/RECALL THE ORDER DATED 03.06.2024 PASSED BY THIS HON'BLE COURT IN ITA NO. 100045/2018 AND ETC.,

THESE PETITIONS, COMING ON FOR FINAL HEARING, THIS DAY, THE COURT MADE THE FOLLOWING:

CORAM: THE HON'BLE MR. JUSTICE S G PANDIT
AND
THE HON'BLE MR. JUSTICE G BASAVARAJA

ORAL ORDER

(PER: THE HON'BLE MR. JUSTICE S G PANDIT)

These two review petitions presented by both The petitioner and respondent in ITA No.100045/2018 under Order XLVII Rule r/w 1 Section 114 of CPC, 1908 seeking to review Order dated 03.06.2024 in ITA No.100045/2018 insofar as challenge to order dated 25.04.2018 in ITA No. 674/Bang/2014 for the Assessment Year 2010-11.

2. Heard Sri. Madhusudhan U A learned counsel for petitioner - Karnataka Vikas Gramena Bank in RP No.100138/2024 as well as Sri. Tirumalesh for petitioner - Revenue in RP No.100166/2024.

3. Both the learned counsel appearing for the parties would submit that M/s. Karnataka Vikas Grameena Bank had settled the issue for the Assessment Year 2010-11 under the Direct Tax Vivad Se Vishvas Act, 2020 which was



inadvertently not brought to the notice of the Court while passing the order. It is also submitted that there was some miscommunication and as such, both the learned counsel could not bring to the notice of the Court when it was disposed of.

4. Learned counsel Sri. Madhusudhan would submit that the order may be reviewed insofar as Assessment Year 2010-11 is concerned and the appellant therein be permitted to withdraw the ITA No. 674/Bang/2014 insofar as Assessment Year 2010-11 is concerned. Learned counsel for respondent-Revenue would not dispute the aforesaid position. He further submits that the Revenue has also filed the review on the same ground.

5. On hearing the learned counsel for the parties and on perusal of the entire review and petition papers, we are inclined to allow the review petitions and to set aside the order dated 03.06.2024 in ITA No. 100045/2018 in so far as quashing the order dated 25.04.2018 in ITA No. 674/Bang/2014 in so far as Assessment Year-2010-11 on the



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file of Income Tax Appellate Tribunal, Bangalore Bench 'A' and remitting the matter to the Tribunal for consideration of the issues at Sl. Nos. 39(a) and 39(b) referred to in the order, taking note of the fact that assessee has settled the issue under Direct Tax Vivad Se Vishvas Act, 2020.

Accordingly, both the review petitions are allowed and order dated 03.06.2024 in ITA No.100045/2018 is reviewed insofar as ITA No.674/Bang/2014 for Assessment Year 2010-11 is concerned and ITA No.100045/2018 in so far as ITA No.674/Bang/2014 stands ***dismissed as withdrawn.***

SD/-
(S G PANDIT)
JUDGE

SD/-
(G BASAVARAJA)
JUDGE