HIGH COURT OF JUDICATURE FOR RAJASTHAN
JODHPUR

D.B. Income Tax Appeal No. 16/2024

Rajasthan Marudhar Gramin Bank

----Appellant

Versus

Asst. Commissioner Of Income-Tax

----Respondent

For Appellant(s)	:	Mr. Anil Bhansali with Mr. Dixit Panwar.
For Respondent(s)	:	Mr. K.K. Bissa.

HON'BLE DR. JUSTICE PUSHPENDRA SINGH BHATI
HON'BLE MR. JUSTICE CHANDRA PRAKASH SHRIMALI

Order

03/03/2025

Heard.

Upon consideration of pleadings and orders, and also the joint submission made by Mr. Bhansali and Mr. Bissa, following question of law are framed for consideration:

(i) Whether the learned ITAT is correct in law in holding assessment can be made of an entity even in case of amalgamation whereby the MGB Gramin Bank stood dissolved and non-existent, therefore, whether the order of assessment under the Income-Tax can be made in the name of the said MGB Gramin Bank?

(ii) Whether in the facts and circumstances of the case the amounts of provision in respect of various loans/advance debited to the profit and loss account in case of a Bank as per statutory provisions prescribed by

the Reserve Bank of India are allowable expenditure under the provisions of Income-Tax Act?

Admit.

Mr. K.K. Bissa, learned counsel is appearing on behalf of respondents. Thus, the service is complete.

List for final disposal alongwith D.B. Income Tax Appeal No.61/2017.

(CHANDRA PRAKASH SHRIMALI),J **(DR.PUSHPENDRA SINGH BHATI),J**

27-Zeeshan