HIGH COURT OF JUDICATURE FOR RAJASTHAN
BENCH AT JAIPUR

D.B. Income Tax Appeal No. 56/2026

Principal Commissioner Of Income Tax, Jaipur-2, At New Central Revenue Building, Statue Circle, Jaipur (Raj.)-302005

----Appellant

Versus

M/s Gvk Jaipur Expressway Pvt. Ltd., 156-159 Paigah House, Sardar Patel Road, Secunderabad, Talengana Pan No. Aabcg5541J.

----Respondent

For Appellant(s)	:	Mr. Sandeep Pathak
For Respondent(s)	:	

HON'BLE MR. JUSTICE INDERJEET SINGH
HON'BLE MR. JUSTICE ASHOK KUMAR JAIN

Order

29/04/2026

Heard learned counsel for the appellant.

This appeal is admitted on the following substantial question of law:-

i) Whether, on the facts and in the circumstances of the case and in law, the Ld. ITAT was justified in deleting addition made on account of disallowance of the interest expenditure amounting to Rs. 1,03,59,39,573/- relating to investments made in the shares of group companies made by the Assessing Officer U/s 14A of the Act, while directing that the said disallowance be made U/s 36(1) (iii) of the Act and further holding that the said disallowance cannot be added back to the assessee's income computed *under the provision of the section 115JB of the Act?*

Issue notice to the respondent(s).

List along with D.B. Income Tax Appeal No.52/2021.

(ASHOK KUMAR JAIN),J (INDERJEET SINGH),J

Upendra Pratap Singh /38