

IN THE SUPREME COURT OF INDIA  
CIVIL APPELLATE JURISDICTION

MISCELLANEOUS APPLICATION NO.1099/2026

IN

CIVIL APPEAL No. 14573 OF 2015

DIRECTOR OF INCOME TAX  
(INTERNATIONAL TAXATION)

Applicant(s)

VERSUS

M/S. SIEMENS AKIENGESELLSCHAFT

Respondent(s)

O R D E R

We have heard Shri S Dwarakanath, learned A.S.G. appearing for the applicant.

We do not find any reason to entertain this application as similar application arising under similar circumstances has also been dismissed. However, we refrain from imposing any cost in the matter.

The Miscellaneous Application stands dismissed.

.....J.  
( B.V. NAGARATHNA )

.....J.  
[UJJAL BHUYAN]

NEW DELHI  
APRIL 24, 2026

S U P R E M E C O U R T O F I N D I A  
R E C O R D O F P R O C E E D I N G S

Miscellaneous Application No. 1099/2026 in C.A. No. 14573/2015

[Arising out of impugned final judgment and order dated 13-01-2026  
in C.A. No. 14573/2015 passed by the Supreme Court of India]

DIRECTOR OF INCOME TAX (INTERNATIONAL TAXATION) Applicant(s)

VERSUS

M/S. SIEMENS AKIENGESELLSCHAFT Respondent(s)

IA No. 99436/2026 - MODIFICATION OF COURT ORDER

Date : 24-04-2026 This matter was called on for hearing today.

CORAM :

HON'BLE MRS. JUSTICE B.V. NAGARATHNA  
HON'BLE MR. JUSTICE UJJAL BHUYANFor Petitioner(s) :Mr. S Dwarakanath, A.S.G.  
Mr. Sudarshan Lamba, AOR  
Mr. S Vijay Adithya, Adv.  
Ms. Nasadiya Singh, Adv.  
Mr. Sarthak Karol, Adv.  
Mr. Nithin Chowdary Pavuluri, Adv.  
Mr. Abhyudey Kabra, Adv.  
Mr. Rajat Vaishnav, Adv.  
Mr. Mudit Bansal, Adv.

For Respondent(s) :Mr. Rustom B. Hathikhanawala, AOR

UPON hearing the counsel the Court made the following  
O R D E RThe Miscellaneous Application stands dismissed in terms  
of the signed order.

Pending application(s) shall stand disposed of.

(NEETU SACHDEVA)  
DEPUTY REGISTRAR(DIVYA BABBAR)  
COURT MASTER (NSH)

(signed order is placed on the file)