

ITEM NO.43

COURT NO.2

SECTION IIIA

S U P R E M E C O U R T O F I N D I A
RECORD OF PROCEEDINGS

Petition(s) for Special Leave to Appeal (Civil)
No(s).21061-21062/2010

(From the judgement and order dated 22/06/2009 in ITA No.1293/2008
and ITA No.1295/2008 of The HIGH COURT OF BOMBAY)

C.I.T,MUMBAI

Petitioner(s)

VERSUS

INMARSAT LTD.

Respondent(s)

(With office report)

Date: 11/04/2014 These Petitions were called on for hearing today.

CORAM :

HON'BLE MR. JUSTICE R.M. LODHA
HON'BLE MR. JUSTICE KURIAN JOSEPH

For Petitioner(s) Mr. Gourab Banerji, A.S.G.
Mr. S.A. Haseeb, Adv.
Ms. A. Subhashini, Adv.
Ms. Anil Katiyar, Adv.
Mr. B.V. Balaram Das, Adv.

For Respondent(s) Mr. Jay Savla, Adv.
Ms. Renuka Sahu, Adv.

UPON hearing counsel the Court made the following
O R D E R

Question No. 2(A) which has been raised in the
present special leave petitions is directly under
consideration in Special Leave Petition (Civil) Nos.

7715-7718 of 2014 titled Alcatel Lucent USA Inc. Vs.
SLP(C) Nos.21061-21062/2010

DIT-I, International Taxation filed by the assessee
against the judgment of the Delhi High Court dated
7.11.2013.

It is true that some of the special leave
petitions involving similar issue have been dismissed,
but, in our view, since different High Courts have been
taking different view, it is necessary that legal

position with regard to liability to pay interest in terms of Section 234B of the Income Tax Act, 1961 is settled once for all.

Leave granted.

Hearing expedited.

(Rajesh Dham)
Court Master

(Renu Diwan)
Court Master