

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

Civil Appeal No(s). 4948-4949/2016

M/S HYUNDAI HEAVY IND. CO. LTD THR.  
ITS MANAGER (F AND A)

Appellant(s)

VERSUS

DIRECTOR OF INCOME TAX (INTERNATIONAL TAXATION) II Respondent(s)

WITH

C.A. No. 4950-4951/2016 (III-A)

C.A. No. 4952/2016 (III-A)

C.A. No. 1956/2020 (III-A)

C.A. No. 4953/2016 (III-A)

Date : 21-01-2026 These appeals were called on for hearing today.

CORAM :

HON'BLE MRS. JUSTICE B.V. NAGARATHNA

HON'BLE MR. JUSTICE ALOK ARADHE

For Appellant(s) : Mr. Vikas Mehta, AOR  
Mrs. Anil Katiyar, AORMr. N Venkatraman, A.S.G.  
Mrs. Anita Sahni, Adv.  
Mr. Shashank Bajpai, Adv.  
Mr. Sarthak Karol, Adv.  
Mr. Abdhesh K Choudhary, Adv.  
Mr. Raj Bahadur Yadav, AOR  
Mrs. Madhulika Upadhyay Aor, Adv.  
Mr. Padmesh Mishra, Adv.For Respondent(s) : Mr. A. N. Arora, AOR  
Mrs. Anil Katiyar, AORMr. Vikas Mehta, AOR  
Ms. Shashi M Kapila, Adv.  
Mr. Pravesh Sharma, Adv.  
Mr. Sushil Kumar, Adv.  
Ms. Nitika Grover, Adv.  
Mr. Vaishnav Kumar, Adv.Ms. Shashi M Kapila, Adv.  
Ms. Malvika Kapila, AOR  
Mr. Pravesh Sharma, Adv.  
Mr. Sushil Kumar, Adv.  
Ms. Tanwangi Shukla, Adv.  
Ms. Harbani Shinh, Adv.  
Ms. Apoorva Jain, Adv.

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

On the request made on behalf of learned A.S.G., list  
on 04.02.2026.

(NEETU SACHDEVA)  
ASTT. REGISTRAR-cum-PS

(DIVYA BABBAR)  
COURT MASTER (NSH)