

S U P R E M E C O U R T O F I N D I A  
RECORD OF PROCEEDINGSCIVIL APPEAL NO(S). 4948-4949/2016M/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 (X)

C.A. No. 4952/2016 (X)

C.A. No. 1956/2020 (X)

C.A. No. 4953/2016 (X)

Date : 24-09-2025 These appeals were called on for hearing today.

CORAM :

HON'BLE MRS. JUSTICE B.V. NAGARATHNA

HON'BLE MR. JUSTICE R. MAHADEVAN

For Appellant(s)

Mr. Vikas Mehta, AOR  
Mrs. Shashi M Kapila, Adv.  
Mr. Pravesh Sharma, Adv.  
Mr. Sushil Kumar, Adv.  
Mr. Kartik Pandey, Adv.  
Mr. Nishant Anshul, Adv.

Mrs. Anil Katiyar, AOR

Mr. 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.

For Respondent(s)

:Mr. A. N. Arora, AOR  
Mrs. Anil Katiyar, AORMr. Vikas Mehta, AOR  
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Mr. Kartik Pandey, Adv.  
Mr. Nishant Anshul, Adv.

Ms. Shashi M Kapila,, Adv.  
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Mr. Pravesh K Sharma, Adv.  
Mr. Siddharth Kapila, Adv.  
Mr. Sushil Kumar, Adv.  
Ms. Tanwangi Shukla, Adv.  
Ms. Apoorva jain, Adv.

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

List on 29.10.2025.

(RADHA SHARMA)  
ASTT. REGISTRAR-cum-PS

(DIVYA BABBAR)  
COURT MASTER (NSH)