

IN THE SUPREME COURT OF INDIA  
CIVIL APPELLATE JURISDICTION

CIVIL APPEAL NO.1259 OF 2016

DIRECTOR OF I.T.

Appellant(s)

Versus

M/S MITSUBISHI CORP.

Respondent(s)

WITH

C.A Nos.1276/2016, 1290/2016, 1291-1294/2016, 1300/2016, 1302/2016, 1308/2016, 1309/2016, 1313/2016, 1332-1337/2016, 1345/2016, 1347/2016, 1353/2016, 1354/2016, 1355/2016, 1356/2016, 1368/2016, 1371/2016, 1374/2016, 1378/2016, 1393/2016, 10703/2018, 3337/2019.

O R D E R

Perused the office report dated 26.02.2020, according to which in following matters the tax effect is less than Rs.Two Crores.

C.A Nos.1259/2016, 1276/2016, 1290/2016, 1291-1294/2016, 1300/2016, 1302/2016, 1308/2016, 1309/2016, 1313/2016, 1332-1337/2016, 1345/2016, 1347/2016, 1353/2016, 1354/2016, 1355/2016, 1356/2016, 1368/2016, 1371/2016, 1374/2016, 1378/2016, 1393/2016, 10703/2018, 3337/2019.

In view of CBDT Circular dated 8.8.2019, we see no reason to interfere in aforesaid appeals, which are accordingly dismissed. No costs.

.....J.  
(UDAY UMESH LALIT)

.....J.  
(VINEET SARAN)

New Delhi  
February 28, 2020.

ITEM NO.8+57

COURT NO.6

SECTION IX

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

SPECIAL LEAVE PETITION (CIVIL) Diary No(s). 42745/2019

(Arising out of impugned final judgment and order dated 30-04-2019  
in ITA No. 200/2017 passed by the High Court Of Judicature At  
Bombay)

COMMISSIONER OF INCOME TAX (IT) 4

Petitioner(s)

VERSUS

M/S FOX NETWORKS GROUP ASIA PACIFIC LIMITED

Respondent(s)

(IA No. 197795/2019 - CONDONATION OF DELAY IN FILING)

ITEM NO.57

C.A. No(s). 1262/2016

WITH

C.A. No. 1256/2016 (X)

C.A. No. 1268/2016 (XIV-A)

C.A. No. 1276/2016 (XIV-A)

C.A. No. 1259/2016 (XIV-A)

C.A. No. 1373/2016 (XIV-A)

C.A. No. 1271/2016 (III)

C.A. No. 1376/2016 (XIV-A)

C.A. No. 1272/2016 (XIV-A)

C.A. No. 1289/2016 (XIV-A)

C.A. No. 1370/2016 (XIV-A)

C.A. No. 1372/2016 (XIV-A)

C.A. No. 1371/2016 (XIV-A)

C.A. No. 1378/2016 (XIV-A)

C.A. No. 1382/2016 (XIV-A)

C.A. No. 576-577/2012 (XIV-A)

C.A. No. 1374/2016 (XIV-A)

C.A. No. 578-585/2012 (XIV-A)

SLP(C) No. 16137-16138/2012 (IX)

C.A. No. 3886/2014 (XIV-A)

C.A. No. 3884/2014 (XIV-A)

C.A. No. 3883/2014 (XIV-A)

C.A. No. 1290/2016 (XIV-A)

C.A. No. 1300/2016 (XIV-A)

C.A. No. 1295-1299/2016 (XIV-A)  
( IA No. 1/2014 - EXEMPTION FROM FILING C/C OF THE IMPUGNED  
JUDGMENT)

C.A. No. 1291-1294/2016 (XIV-A)

C.A. No. 1301/2016 (III)

C.A. No. 1313/2016 (XIV-A)

C.A. No. 1303-1307/2016 (XIV-A)

C.A. No. 1311-1312/2016 (XIV-A)

C.A. No. 1338-1341/2016 (XIV-A)

C.A. No. 1309/2016 (XIV-A)

C.A. No. 1323/2016 (XIV-A)

C.A. No. 1324/2016 (XIV-A)

C.A. No. 1315-1321/2016 (XIV-A)

C.A. No. 1325/2016 (XIV-A)

C.A. No. 1332-1337/2016 (XIV-A)

C.A. No. 1302/2016 (XIV-A)

C.A. No. 1326-1331/2016 (XIV-A)

C.A. No. 1308/2016 (XIV-A)

C.A. No. 1322/2016 (XIV-A)

C.A. No. 1342/2016 (XIV-A)

C.A. No. 1314/2016 (XIV-A)

C.A. No. 1310/2016 (XIV-A)

C.A. No. 1344/2016 (XIV-A)

C.A. No. 1347/2016 (XIV-A)

C.A. No. 1368/2016 (XIV-A)

C.A. No. 1345/2016 (XIV-A)

C.A. No. 1354/2016 (XIV-A)

C.A. No. 1395/2016 (XIV-A)

C.A. No. 1353/2016 (XIV-A)

C.A. No. 1356/2016 (XIV-A)

C.A. No. 1355/2016 (XIV-A)

C.A. No. 1369/2016 (XIV-A)

C.A. No. 1391/2016 (XIV-A)

C.A. No. 1393/2016 (XIV-A)

C.A. No. 176/2016 (III)

C.A. No. 7330/2016 (III)

C.A. No. 9136/2017 (XVI)

(IA No.49697/2017-CONDONATION OF DELAY IN FILING and IA No.49698/2017-EXEMPTION FROM FILING C/C OF THE IMPUGNED JUDGMENT)

SLP(C) No. 26610/2017 (XIV)

(FOR ADMISSION and I.R. and IA No.91875/2017-CONDONATION OF DELAY IN FILING)

SLP(C) No. 21415/2018 (XIV)

(IA No. 102906/2018 - EXEMPTION FROM FILING C/C OF THE IMPUGNED JUDGMENT)

C.A. No. 10703/2018 (XIV-A)

Diary No(s). 37883/2018 (XIV)  
 (IA No. 150467/2019 - APPROPRIATE ORDERS/DIRECTIONS  
 IA No. 160124/2018 - CONDONATION OF DELAY IN FILING)

SLP(C) No. 29895/2018 (XIV)  
 (IA No.151848/2018-CONDONATION OF DELAY IN FILING)

SLP(C) No. 33484/2018 (XIV)  
 (IA No.176443/2018-CONDONATION OF DELAY IN FILING and IA  
 No.176444/2018-EXEMPTION FROM FILING C/C OF THE IMPUGNED JUDGMENT)

C.A. No. 64/2019 (XIV-A)  
 (IA No.180261/2018-CONDONATION OF DELAY IN FILING)

C.A. No. 655/2019 (XIV-A)  
 (IA No.185074/2018-CONDONATION OF DELAY IN FILING and IA  
 No.185075/2018-EXEMPTION FROM FILING C/C OF THE IMPUGNED JUDGMENT)

C.A. No. 1793/2019 (XIV-A)  
 ( IA No.26468/2019-CONDONATION OF DELAY IN FILING)

C.A. No. 3337/2019 (XIV-A)

SLP(C) No. 24896/2019 (X)

SLP(C) No. 915/2020 (IX)  
 (FOR ADMISSION and I.R. and IA No.392/2020-CONDONATION OF DELAY IN  
 FILING)

Date : 28-02-2020 These matters were called on for hearing today.

CORAM :

HON'BLE MR. JUSTICE UDAY UMESH LALIT  
 HON'BLE MR. JUSTICE VINEET SARAN

For parties:

Mr. K.M. Nataraj, ASG  
 Ms. Manish Pushkarna, Adv.  
 Mr. Kumar Shashank, Adv.  
 Mrs. Anil Katiyar, AOR

Mr. M. Yogesh Kanna, AOR  
 Mr. S. Raja Rajeshwaran, Adv.  
 Ms. Uma Prasuna Bachu, Adv.

Mr. Kunal Verma, AOR

Ms. Yugandhara Pawar Jha, Adv.  
Mr. Ashwin Kr. Nain, Adv

Mr. Ambhoj Kr.Singh, AOR  
Ms. Monika Ghai, Adv.  
Mr. Tavi Malik, Adv.  
Dr. Rakesh Gupta, Adv.

Mr. Mayank Negi, Adv.  
Mr. Bhargava V. Desai, Adv.  
Ms. Aditi Diwan, Adv.

Mr. C. S. Agarwal, Sr. Adv.  
Mr. Bhargava V. Desai, Adv  
Mr. Uma Shankar, Adv.  
Ms. Aditi Diwan, Adv.

Mr. TVS Raghavendra Sreyas, AOR  
Ms. Gayatri Gulati, Adv.

Ms. Kavita Jha, AOR  
Ms. Devika Jain, Adv.

Mr. Aarohi Bhalla, Adv.  
Mr. Devesh Kr. Diwakar, Adv.  
Ms. Sujata Kurudkar, AOR

Mr. Nageswar Rao, Adv.  
Mr. Sandeep S. Karhail, Adv.  
Mr. Pukhrambam Ramesh Kr., AOR  
Ms. Anupama Ngangom, Adv.  
Mr. Karun Sharma, Adv.

Mr. Deepak Chopra, Adv.  
Mr. Harpreet Singh Ajmani, AOR  
Mr. Amit Shrivastava, Adv.  
Mr. Ankul Goyal, Adv.

Mr. Mayank Nagi, Adv.  
Mr. Pulkit Verma, Adv.  
Mr. Shekhar Preet Jhat, AOR

Mr. Sachit Jolly, Adv.  
Ms. Vijayalakshmi Menon, Adv.  
Mr. Vasydevab G., Adv.

Mr. Rahul Jain, Adv.  
Mr. Kishor Kunal, Adv.

Mr. Salil Kapoor, Adv.

Ms. Ananya Kapoor, Adv.  
Mr. Sidharth Kanwar, Adv.  
Mr. Praveen Swaroop, AOR  
Mr. Sumit Lalchandani, Adv.

Mr. B. V. Balaram Das, AOR

Mr. Ashwarya Sinha, AOR

Ms. Mahua Kalra, AOR

Mr. Kamal Mohan Gupta, AOR

Mr. Rameshwar Prasad Goyal, AOR

Mr. Bhargava V. Desai, AOR

Mr. Rustom B. Hathikhanawala, AOR

Mr. T. V. S. Raghavendra Sreyas, AOR  
Mr. Pukhrambam Ramesh Kumar, AOR

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

Perused the office report dated 26.02.2020, according to which following matters have the tax effect less than two crores.

C.A Nos.1259/2016, 1276/2016, 1290/2016, 1291-1294/2016, 1300/2016, 1302/2016, 1308/2016, 1309/2016, 1313/2016, 1332-1337/2016, 1345/2016, 1347/2016, 1353/2016, 1354/2016, 1355/2016, 1356/2016, 1368/2016, 1371/2016, 1374/2016, 1378/2016, 1393/2016, 10703/2018, 3337/2019.

In view of the CBDT Circular dated 8.8.2019, we see no reason to interfere in aforesaid appeals which are accordingly dismissed. No costs.

It is submitted that in some cases (Civil Appeal Nos. 1373/2016, 1376/2016, 1289/2016, 1370/2016, 1372/2016, 1371/2016,

1382/2016, 576-577/2012 & 578-585/2012), the concerned assesseees had taken the benefit of Direct Tax Dispute Resolution Scheme, 2016, as a result of which these Civil Appeals are required to be withdrawn and the Department has accordingly written to the Registry of the Supreme Court.

Let the concerned appeals be placed alongwith the intimation received from the Department on the next date of hearing with advance intimation to the other side.

Rest of the matters be listed for final disposal on 6.3.2020.

In the meantime, the Registry shall go through all matters and prepare an office report on the same footing giving details of tax effect in respect of each of those matters.

(INDU MARWAH)  
COURT MASTER (SH)

(PRADEEP KUMAR)  
BRANCH OFFICER

(signed order is placed on the file)