

ITEM NO.3

COURT NO.11

SECTION IX

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

SPECIAL LEAVE PETITION (CIVIL) Diary No.60843/2024

[Arising out of impugned final judgment and order dated 15-04-2024 in WPL No. 29578/2023 passed by the High Court of Judicature at Bombay]

ASSISTANT / DEPUTY COMMISSIONER OF INCOME TAX & ORS.Petitioner(s)

VERSUS

RELIANCE PROJECTS AND PROPERTY
MANAGEMENT SERVICES LIMITED

Respondent(s)

IA No. 15118/2025 - CONDONATION OF DELAY IN FILING

WITH

Diary No(s). 10262/2025 (IX)

IA No. 84446/2025 - CONDONATION OF DELAY IN FILING

Diary No(s). 14782/2025 (IX)

FOR ADMISSION and I.R.

IA No. 85062/2025 - CONDONATION OF DELAY IN FILING

Date : 09-04-2025 These matters were called on for hearing today.

CORAM :

HON'BLE MR. JUSTICE J.B. PARDIWALA

HON'BLE MR. JUSTICE R. MAHADEVAN

For Petitioner(s) :Mr. S Dwarakanath, A.S.G.
Mrs. Nisha Bagchi, Sr. Adv.
Mr. Raj Bahadur Yadav, AOR
Mr. Udai Khanna, Adv.
Mr. Anmol Chandan, Adv.
Mr. Shashank Bajpai, Adv.
Ms. Priyanka Das, Adv.

For Respondent(s) :Mr. Rajiv Shakhder, Sr. Adv.
Mr. K. R. Sasiprabhu, AOR
Mr. Amit Mathur, Adv.

Mr. Chandrashekar Bharathi, Adv.
Mr. Pratik Shah, Adv.
Mr. Vishnu Sharma A S, Adv.
Mr. Karan Khetani, Adv.
Mr. Jonathan Ivan Rajan, Adv.
Ms. Namrata Saraogi, Adv.

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

Item no.3 Diary No.60843/2024

1. The learned counsel appearing for the revenue submit that the matter is covered by the "*Union of India & Ors. vs. Rajeev Bansal*" (Civil Appeal No.8629/2024 etc.) reported in 2024 (11) Scale 473. However, Mr. Rajiv Shakhder the learned counsel appearing for the assessee invited our attention to the fact that there is one additional point involved in this matter and i.e., one relating to the decision rendered by the Bombay High Court in the case of *Alok Industries Ltd. v. Assistant Commissioner of Income Tax Central Circle 6(2), Mumbai & Ors.*(Writ Petition No.3088 of 2022).
2. The learned counsel appearing for the revenue submitted that the only ground which has been raised in the present petition is one which is covered by the *Rajiv Bansal (Supra)* decision.
3. He prays for some time to look into the second issue involved in the matter as discussed by the High Court in *Alok Industries Ltd.(Supra)*.
4. Post it in the next week.

Diary No.10262/2025 and Diary No.14782/2025

1. Delay condoned.
2. These Special Leave Petitions are covered by the Judgment of this Court rendered on 3-10-2024 in "Union of India & Ors. vs. Rajeev Bansal" (Civil Appeal No.8629/2024 etc.) 2024 (11) Scale 473.
3. In view of the above, the petitions filed by the Revenue are disposed of. The assessee will be governed by reasons discussed in the said Judgment.
4. The assessing officers will dispose of the objections in terms of the law laid down by this Court. Thereafter, the assessee who is aggrieved will be at liberty to pursue all the rights and remedies in accordance with law, save and except for the issues which have been concluded in the Judgment.
5. Pending application(s), if any, stands disposed of.

(CHANDRESH)
ASTT. REGISTRAR-cum-PS

(POOJA SHARMA)
COURT MASTER (NSH)