

# The Pr. Commissioner Of Income Tax-23 ... vs India Structured Asset Trust Series V on 24 July, 2024

**Author: G. S. Kulkarni**

**Bench: G. S. Kulkarni**

Board Sr.No.:-1

IN THE HIGH COURT OF JUDICATURE AT BOMBAY  
ORDINARY ORIGINAL CIVIL JURISDICTION

INCOME TAX APPEAL(IT) NO. 1525 OF 2018

The Principal Commissioner Of Income Tax-23, ....APPELLANTS  
Mumbai

V/S

Indian Corporate Loan Securitization Trust - ....RESPONDENT

2008, Series 14 WITH INCOME TAX APPEAL(IT) NO. 240 OF 2022 Pr. Commissioner Of Income Tax 19 Mumbai ....APPELLANTS V/S India Commercial Loan Trust Series Iii 2009 ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 1946 OF 2017 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S Ge Capital Services India ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 2026 OF 2017 The Principal Commissioner Of Income Tax -23 ....APPELLANTS V/S Ge Capital Services India ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 25 OF 2018 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S Ge Capital Services India ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 53 OF 2018 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S Ge Capital Services India ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 154 OF 2018 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S Ge Capital Services India ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 152 OF 2018 The Principal Commissioner Of Income Tax - ....APPELLANTS Mumbai V/S Ge Capital Services India ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 146 OF 2018 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S Ge Capital Services India ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 251 OF 2018 The Principal Commissioner Of Income Tax 23, ....APPELLANTS Mumbai V/S Ge Capital Services India ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 271 OF 2018 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S Ge Capital Services India ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 257 OF 2018 The Principal Commissioner Of Income ....APPELLANTS Tax-23,mumbai V/S Ge Capital Services India ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 314 OF 2018 The Principal Commissioner Of Income Tax-23 ....APPELLANTS V/S Ge Capital Services India ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 472 OF 2018 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S Indian Loan Receivable Trust May 2008 ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 654 OF 2018 The Principal Commissioner Of Income Tax -23 ....APPELLANTS V/S Ge Capital Services India ....RESPONDENT WITH

INCOME TAX APPEAL(IT) NO. 643 OF 2018 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S Ipl Loan Trust ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 646 OF 2018 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S Iop Loan Trust ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 753 OF 2018 The Principal Commissioner Of Income Tax-23, Mumbai V/S Iel Loan Trust ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 813 OF 2018 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S Pes Loan Trust ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 826 OF 2018 The Principal Commissioner Of Income Tax -23, ....APPELLANTS V/S Indian Corporate Loan Securitization Trust - ....RESPONDENT 2008, Series -xli WITH INCOME TAX APPEAL(IT) NO. 923 OF 2018 The Pr. Commissioner Of Income Tax-23 ....APPELLANTS Mumbai V/S Iwh Loan Trust ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 921 OF 2018 The Pr. Commissioner Of Income Tax-23 ....APPELLANTS Mumbai V/S Ighcc2 Loan Trust ....RESPONDENT ....APPELLANTS WITH INCOME TAX APPEAL(IT) NO. 920 OF 2018 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S Indian Corporate Loan Securitization ....RESPONDENT Trust-2008, Series-13 WITH INCOME TAX APPEAL(IT) NO. 919 OF 2018 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S India Structured Asset Trust Series Viii ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 926 OF 2018 The Principal Commissioner Of Income Tax-23 ....APPELLANTS Mumbai V/S Indian Corporate Loan Securitization Trust-2008 ....RESPONDENT Series 28 WITH INCOME TAX APPEAL(IT) NO. 1079 OF 2018 The Principal Commissioner Of Income Tax-23 ....APPELLANTS V/S Indian Corporate Loan Securitization Trust ....RESPONDENT 2008,series-lxii WITH INCOME TAX APPEAL(IT) NO. 1132 OF 2018 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S Indian Corporate Loan Securitization ....RESPONDENT Trust-2008, Series Vi WITH INCOME TAX APPEAL(IT) NO. 1282 OF 2018 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S India Structured Asset Trust Series Iv ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 1308 OF 2018 The Principal Commissioner Of Income Tax-23 ....APPELLANTS Mumbai V/S Long Bond Receivable Trust 2007 Series V ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 1618 OF 2018 The Principal Commissioner Of Income Tax-23 ....APPELLANTS V/S Ighcc Loan Trust ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 1617 OF 2018 The Principal Commissioner Of Income Tax-23, Mumbai V/S Pes Loan Trust ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 1969 OF 2018 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S Pse Loan Trust ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 1984 OF 2018 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S Iml Loan Trust ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 2016 OF 2018 The Pr. Commissioner Of Income Tax-23 ....APPELLANTS Mumbai V/S India Structured Asset Trust Series V ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 2068 OF 2018 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S Kjs Loan Trust ....RESPONDENT ....APPELLANTS WITH INCOME TAX APPEAL(IT) NO. 2138 OF 2018 The Principal Commissioner Of Income Tax-23 ....APPELLANTS V/S Indian Corporate Loan Securitization ....RESPONDENT Trust-2008, Series-lvi WITH INCOME TAX APPEAL(IT) NO. 2210 OF 2018 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S Indian Corporate Loan Securitization ....RESPONDENT Trust-2008, Seres-40 WITH INCOME TAX APPEAL(IT) NO. 2214 OF 2018 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S Indian Corporate Loan

Securitization ....RESPONDENT Trust-2008, Series-37 WITH INCOME TAX APPEAL(IT) NO. 2212 OF 2018 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S Indian Corporate Loan Securitization ....RESPONDENT Trust-2008, Series-24 WITH INCOME TAX APPEAL(IT) NO. 2240 OF 2018 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S Indian Corporate Loan Securitization ....RESPONDENT Trust-2008, Series 24 WITH INCOME TAX APPEAL(IT) NO. 2274 OF 2018 The Principal Commissioner Of Income Tax-23 ....APPELLANTS Mumbai V/S Indian Corporation Loan Securitization ....RESPONDENT Trust-2008 WITH INCOME TAX APPEAL(IT) NO. 2522 OF 2018 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S Indian Corporate Loan Securitization ....RESPONDENT Trust-2008, Series-18 WITH INCOME TAX APPEAL(IT) NO. 2519 OF 2018 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S Long Bond Receivable Trust 2007 Series V ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 2652 OF 2018 The Principal Commissioner Of Income Tax-23 ....APPELLANTS Mumbai V/S Loans Receivable Trust April 2008 ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 2983 OF 2018 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S Indian Corporate Loan Securitization ....RESPONDENT Trust-2008, Series-20 WITH INCOME TAX APPEAL(IT) NO. 2980 OF 2018 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S Kag Loan Trust ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 2978 OF 2018 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S Kba Loan Trust ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 3067 OF 2018 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S Indian Corporate Loan Securitization ....RESPONDENT Trust-2008, Series-ii WITH INCOME TAX APPEAL(IT) NO. 3069 OF 2018 The Principal Commissioner Of Income Tax-23 ....APPELLANTS V/S Pfl Loan Trust ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 3088 OF 2018 The Principal Commissioner Of Income Tax-23 ....APPELLANTS V/S Indian Corporate Loan Securitization Trust-2008 ....RESPONDENT Series 33 WITH INCOME TAX APPEAL(IT) NO. 3095 OF 2018 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S Indian Corporate Loan Securitization ....RESPONDENT Trust-2008, Series-xi WITH INCOME TAX APPEAL(IT) NO. 644 OF 2019 The Principal Commissioner Of Income Tax-23 ....APPELLANTS V/S Indian Corporate Loan Securitization Trust-....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 645 OF 2019 The Principal Commissioner Of Income Tax 23....APPELLANTS V/S Indian Loan Receivable Trust April Ii 2009 ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 646 OF 2019 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S Indian Corporate Loan Securitization ....RESPONDENT Trust-2008, Series-xl Vii WITH INCOME TAX APPEAL(IT) NO. 649 OF 2019 The Principal Commissioner Of Income Tax-23 ....APPELLANTS Mumbai V/S Indian Corporate Loan Securitization ....RESPONDENT Trust-2008, Series - Vii WITH INCOME TAX APPEAL(IT) NO. 653 OF 2019 The Principal Commissioner Of Income Tax -23, ....APPELLANTS V/S Kse Loan Trust ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 648 OF 2019 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S Indian Corporate Loan Securitization ....RESPONDENT Trust-2008, Series-9 WITH INCOME TAX APPEAL(IT) NO. 708 OF 2019 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S Indian Corporate Loan Securitization ....RESPONDENT Trust-2008, Series-vi WITH INCOME TAX APPEAL(IT) NO. 709 OF 2019 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S Ighcc 3 Loan Trust ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 763 OF

2019 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S Sme Loan Receivable Trust August 2007 ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 1215 OF 2019 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S Indian Corporate Loan Securitization ....RESPONDENT Trust-2008, Series 20 WITH INCOME TAX APPEAL(IT) NO. 1212 OF 2019 The Principal Commissioner Of Income Tax-23 ....APPELLANTS V/S India Commercial Loan Trust Series V ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 1219 OF 2019 The Pr. Commissioner Of Income Tax-23 ....APPELLANTS Mumbai V/S Itcl Loan Trust ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 1214 OF 2019 The Pr. Commissioner Of Income Tax-23 ....APPELLANTS Mumbai V/S Indian Corporate Loan Securitization Trust-2008 ....RESPONDENT Series-lxi WITH INCOME TAX APPEAL(IT) NO. 1216 OF 2019 The Principal Commissioner Of Income Tax -23, ....APPELLANTS V/S India Commercial Loan Trust Series Iv 2009 ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 1218 OF 2019 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S Indian Corporate Loan Securitization ....RESPONDENT Trust-2008, Series-39 WITH INCOME TAX APPEAL(IT) NO. 1213 OF 2019 The Pr. Commissioner Of Income Tax-23 ....APPELLANTS Mumbai V/S India Commercial Loan Trust Series Iii 2010 ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 1217 OF 2019 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S Ire Loan Trust ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 1476 OF 2019 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S India Structured Asset Trust Series Ii ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 1474 OF 2019 The Pr. Commissioner Of Income Tax-23 ....APPELLANTS Mumbai V/S India Structured Asset Trust Series Ii ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 1781 OF 2019 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S Indian Corporate Loan Securitization ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 1819 OF 2019 The Principal Commissioner Of Income Tax-23 ....APPELLANTS Mumbai V/S Indian Corporate Loan Securitization Trust-2008 ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 1816 OF 2019 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S Ibh Loan Trust The Il And Fs Financial Centre....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 1839 OF 2019 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S India Structured Asset Trust Series Vii ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 1838 OF 2019 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S India Structured Asset Trust Series Iv The Il And ....RESPONDENT Fs Financial Centre WITH INCOME TAX APPEAL(IT) NO. 1837 OF 2019 The Principal Commissioner Of Income Tax-23 ....APPELLANTS V/S Indian Corporate Loan Securitization ....RESPONDENT Trust-2008,series Lxi WITH INCOME TAX APPEAL(IT) NO. 1842 OF 2019 The Principal Commissioner Of Income Tax-23 ....APPELLANTS V/S India Commercial Loan Trust Series Ix-2008 ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 1851 OF 2019 The Principal Commissioner Of Income Tax -23 ....APPELLANTS V/S Indian Corporate Loan Securitization Trust - ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 1853 OF 2019 The Pr. Commissioner Of Income Tax-23 ....APPELLANTS Mumbai V/S India Commercial Loan Trust Series Iii 2008 ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 1867 OF 2019 The Principal Commissioner Of Income Tax-23 ....APPELLANTS Mumbai V/S Indian Corporate Loan Securitization Trust-2008 ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 1869 OF 2019 The Principle Commissioner Of Income Tax-23 ....APPELLANTS V/S India Structured Asset Trust Series Iii ....RESPONDENT WITH INCOME TAX

APPEAL(IT) NO. 1935 OF 2019 The Principal Commissioner Of Income Tax -23 ....APPELLANTS V/S Indian Corporate Loan Securitization Trust - ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 1952 OF 2019 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S Long Bond Receivable Trust 2006 Series Iv ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 2613 OF 2019 The Principal Commissioner Of Income Tax 23....APPELLANTS V/S Indian Corporate Loan Securitization Trust-2008 ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 179 OF 2022 Pr. Commissioner Of Income Tax 19 Mumbai ....APPELLANTS V/S Indian Corporate Loan Securitisation Trust 2008 ....RESPONDENT Series 14 WITH INCOME TAX APPEAL(IT) NO. 924 OF 2018 The Principal Commissioner Of Income Tax-23 ....APPELLANTS Mumbai V/S Itbl Loan Trust ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 173 OF 2018 The Principal Commissioner Of Income Tax-23 Mumbai V/S Ge Capital Services India ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 278 OF 2018 The Principal Commissioner Of Income Tax-23 ....APPELLANTS Mumbai V/S Ge Capital Services India ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 2067 OF 2018 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S Kge Loan Trust ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 172 OF 2018 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S Ge Capital Services India ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 1806 OF 2019 The Principal Commissioner Of Income Tax-23,....APPELLANTS Mumbai V/S Long Bond Receivable Trust 2006 Series Iii ....RESPONDENT ....APPELLANTS WITH INCOME TAX APPEAL(IT) NO. 1091 OF 2018 The Principal Commissioner Of Income Tax -23, ....APPELLANTS V/S Pfl Loan Trust ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 1853 OF 2017 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S Ge Capital Services India ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 762 OF 2019 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S India Structured Asset Trust Series Iii ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 275 OF 2018 The Principal Commissioner Of Income ....APPELLANTS Tax-23,mumbai V/S Ge Capital Services Inida ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 2134 OF 2018 The Pr. Commissioner Of Income Tax-23 Mumbai V/S Kag Loan Trust ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 1752 OF 2017 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S Ge Capital Services India ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 1968 OF 2017 The Principal Commissioner Of Income Tax -23 ....APPELLANTS V/S Ge Capital Services India ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 148 OF 2018 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S Ge Capital Services India ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 1106 OF 2018 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S Indian Corporate Loan Securitization ....RESPONDENT Trust-2008, Series Xli ....APPELLANTS WITH INCOME TAX APPEAL(IT) NO. 1519 OF 2018 The Principal Commissioner Of Income Tax-23 ....APPELLANTS V/S Long Bond Receivable Trust 2006 Series Iii ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 1520 OF 2018 The Principal Commissioner Of Income Tax-23,....APPELLANTS Mumbai V/S Indian Loans Receivable Trust February 2008....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 1677 OF 2018 The Principal Commissioner Of Income Tax-23 ....APPELLANTS V/S Ish Loan Trust ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 2518 OF 2018 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S Ibh Loan Trust ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 2979 OF 2018 The Principal Commissioner Of Income Tax-23, ....APPELLANTS

Mumbai V/S Kse Loan Trust ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 652 OF 2019 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S Sme Retail Pool Ii Trust ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 1475 OF 2019 The Principal Commissioner Of Income Tax -23, ....APPELLANTS V/S Kul Loan Trust ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 1866 OF 2019 The Pr. Commissioner Of Income Tax-23 ....APPELLANTS Mumbai V/S Ikr Loan Trust ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 1974 OF 2019 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S Ikr Loan Trust ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 145 OF 2018 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S Ge Capital Services India ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 151 OF 2018 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S Ge Capital Services India ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 922 OF 2018 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S K S E Loan Trust ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 825 OF 2018 The Pr. Commissioner Of Income Tax -23 ....APPELLANTS V/S India Commercial Loan Trust Series Ii 2009 ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 774 OF 2018 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S Indian Loan Receivable Trust May 2008 ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 647 OF 2019 The Pr. Commissioner Of Income Tax-23 ....APPELLANTS Mumbai V/S Indian Corporate Loan Securitization Trust-2008 ....RESPONDENT Series 38 WITH INCOME TAX APPEAL(IT) NO. 779 OF 2018 The Principal Commissioner Of Income Tax-23.....APPELLANTS V/S Indian Corporate Loan Securitization Trust ....RESPONDENT 2008,series-27 WITH INCOME TAX APPEAL(IT) NO. 1862 OF 2017 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S Ge Capital Services India ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 1099 OF 2018 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S Long Bond Receivable Trust 2007 Series V ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 2220 OF 2018 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S Kes Loan Trust ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 782 OF 2018 The Principal Commissioner Of Income Tax-23.....APPELLANTS V/S Long Bond Receivable Trust 2006 Series Iv ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 1481 OF 2019 The Principal Commissioner Of Income Tax -23, ....APPELLANTS V/S Long Bond Receivable Trust 2006 Series Iv ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 1522 OF 2018 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S India Commercial Loan Trust Series Viii 2008....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 812 OF 2018 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S India Commercial Loan Trust Series Ii 2008 ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 2977 OF 2018 The Principal Commissioner Of Income Tax -23, ....APPELLANTS V/S Indian Corporate Loan Securitization Trust - ....RESPONDENT 2008, Series Iii WITH INCOME TAX APPEAL(IT) NO. 1285 OF 2018 The Principal Commissioner Of Income Tax -23, ....APPELLANTS V/S Sme Retail Pool Ii Trust ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 1312 OF 2018 The Principal Commissioner Of Income Tax-23,....APPELLANTS Mumbai V/S India Commercial Loan Trust Series Vii 2008....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 2209 OF 2018 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S Indian Corporate Loan Securitization ....RESPONDENT Trust-2008, Series 22 WITH INCOME TAX APPEAL(IT) NO. 2269 OF 2018 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S Kba Loan

Trust ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 1908 OF 2017 The Principal Commissioner Of Income ....APPELLANTS Tax-23,mumbai V/S Ge Capital Services India ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 1910 OF 2017 The Principal Commissioner Of Income Tax - ....APPELLANTS Mumbai V/S Ge Capital Services India ....RESPONDENT WITH INCOME TAX APPEAL(IT) NO. 651 OF 2018 The Pr. Commissioner Of Income Tax-23 ....APPELLANTS Mumbai V/S Indian Corporate Loan Securitization Trust-2008 ....RESPONDENT Series Lvi WITH INCOME TAX APPEAL(IT) NO. 704 OF 2019 The Principal Commissioner Of Income Tax-23, ....APPELLANTS Mumbai V/S Pse Loan Trust ....RESPONDENT Mr. Prakash Chhotaray for Appellant Mr. Madhur Agrawal i/b Mr. Atul K. Jasani for Respondent CORAM : HON'BLE SHRI JUSTICE G. S. KULKARNI & HON'BLE SHRI JUSTICE SOMASEKHAR SUNDARESAN, JJ DATE : 24th July, 2024 P.C. :

S. O. to 13/09/2024 ( H. O. B.).

( ASSOCIATE )