

ORDER SHEET
IN THE ISLAMABAD HIGH COURT, ISLAMABAD.
JUDICIAL DEPARTMENT

Writ Petition No.1573 of 2021

M/s Orient Petroleum INC.

Vs

Chairman Federal Board of Revenue, Islamabad, etc.

S. No. of order/ proceedings	Date of order/ Proceedings	Order with signature of Judge and that of parties or counsel where necessary.
	29.04.2021.	Ch. Naeem Ul Haq and Muhammad Imran Ul Haq, Advocates for the petitioner.

Through the instant petition, the petitioner has assailed Show Cause Notice dated 16.04.2021 issued by respondent No.2.

2. Learned counsel for the petitioner, *inter-alia*, contends that under section 122 (2) of the Income Tax Ordinance 2001, the limitation period provided for re-assessment of the tax return is five years. It was submitted that likewise under section 174 (3) of the Income Tax Ordinance 2001, the statutory requirement to maintain record is for six years. It was further submitted that the record sought for the year 2009, hence notice as such is barred by limitation and even is not tenable.

3. Notice to the respondents.

CM No.01 of 2021

Notice. Meanwhile, the impugned notice shall remain suspended.

CM No.02 of 2021

The exemption sought for is allowed subject to all just and legal exceptions.

(AAMER FAROOQ)
JUDGE

