

# M/S Bcl Secure Premises Pvt. Ltd vs Union Of India & Ors on 14 January, 2025

**Author: Yashwant Varma**

**Bench: Yashwant Varma**

\$~57 to 323

\* IN THE HIGH COURT OF DELHI AT NEW DELHI

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+ W.P.(C) 13458/2022

M/S BCL SECURE PREMISES PVT. LTD. ....Petitioner

versus

UNION OF INDIA & ORS.

58

+ W.P.(C) 14411/2022

SH. RAM AVTAR AGARWAL

versus

UNION OF INDIA AND ORS

59

+ W.P.(C) 262/2023

AADHAR TOURS AND TRAVELS PVT LTD

versus

UNION OF INDIA & ORS.

60

+ W.P.(C) 14786/2022

AVINASH KUMAR SETIA

versus

INCOME TAX OFFICER, WARD 30-1, EARLIER KNOWN  
AS ASST. COMMISSIONER OF INCOME TAX, CENTRAL  
CIRCLE -15, DELHI & ANR. ....Respondents

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+ W.P.(C) 15952/2022

PRATT AND WHITNEY CANADA  
SEA PTE LTD

versus

DEPUTY COMMISSIONER OF INCOME  
TAX & ANR. ....Respondents

W.P.(C) 13458/2022 & Connected Matters

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+ W.P.(C) 16664/2022  
MUMTAZ PATEL SIDDIQUI

versus

ASSESSING OFFICER, INCOME TAX  
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+ W.P.(C) 5632/2023  
DEEPAK GUPTA

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NATIONAL FACELESS ASSESSMENT  
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+ W.P.(C) 5635/2023  
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versus

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+ W.P.(C) 5638/2023  
SATISH GOYAL

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INCOME TAX OFFICER WARD 49(1),  
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+ W.P.(C) 5645/2023  
PRAMOD KUMAR GUPTA

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+ W.P.(C) 5646/2023  
PAWAN SINGLA

versus

INCOME TAX OFFICER WARD 43(6)

W.P.(C) 13458/2022 & Connected Matters

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DELHI & ORS.

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+ W.P.(C) 5648/2023  
NORTH TOWN ESTATES PRIVATE LIMITED .....Petitioners  
versus

DEPUTY COMMISSIONER OF INCOME  
TAX CIRCLE 16(1) & ANR. ....Respondents

69

+ W.P.(C) 5651/2023  
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+ W.P.(C) 5652/2023  
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71

+ W.P.(C) 5658/2023  
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+ W.P.(C) 8064/2024 & CM APPL. 33261/2024 (STAY)  
NIRMAL KUMAR DHAMMANI .....Petiti

versus

INCOME TAX OFFICER WARD 28(1),

W.P.(C) 13458/2022 & Connected Matters

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DELHI

73

+ W.P.(C) 298/2023  
DIVYA BUILDMART PVT LTD

versus

UNION OF INDIA & ORS.

74

+ W.P.(C) 1005/2023  
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versus

ASSISTANT COMMISSIONER OF INCOME  
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75

+ W.P.(C) 1509/2023  
N.N. FINANCIAL SERVICES PVT. LTD. ....Petitioner

versus

INCOME TAX OFFICER, WARD 18-1,  
DELHI & ANR.

76

+

W.P.(C) 2232/2023  
DINESH GOYAL

versus

DEPUTY COMMISSIONER OF INCOME  
TAX CIRCLE 13. 1 NEW DELHI .....Respondent

77

+

W.P.(C) 2370/2023  
TARIK HANDA

versus

ITO WARD, 50(1) NEW DELHI & ORS.

W.P.(C) 13458/2022 & Connected Matters

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78

+

W.P.(C) 2543/2023  
RAJ INFRA REALTORS PRIVATE LIMITED .....Petitione

versus

INCOME TAX OFFICER WARD 21(1)  
DELHI & ORS.

79

+

W.P.(C) 2844/2023  
SV REALTORS PRIVATE LIMITED

versus

THE ASSISTANT COMMISSIONER OF INCOME  
TAX CIRCLE-22 (2) NEW DELHI & ANR. ....Responden

80

+

W.P.(C) 2889/2023  
ASP DEVELOPERS PRIVATE LIMITED .....Petitioner

versus

ITO WARD 1(1) NEW DELHI & ORS.

81

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W.P.(C) 2890/2023  
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versus

82 ITO WARD 10 (1) NEW DELHI & ORS.  
+ W.P.(C) 2891/2023  
AJAY MITTAL

versus

ASSISTANT COMMISSIONER OF INCOME

W.P.(C) 13458/2022 & Connected Matters

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TAX CIRCLE 52 1 DELHI

83  
+ W.P.(C) 2896/2023  
SHOURYA INFRASTRUCTURE PRIVATE LIMITED

.....Petitione

versus

INCOME TAX OFFICER WARD 23(1) DELHI & ORS.

.....Responde

84  
+ W.P.(C) 3005/2023  
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versus

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85  
+ W.P.(C) 3068/2023  
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.....Petition

versus

THE ASSISTANT COMMISSIONER OF INCOME TAX  
CIRCLE 7(1), DELHI & ANR. ....Respondents

86  
+ W.P.(C) 3097/2023  
VINTAGE FOOTWEAR PRIVATE LIMITED .....Petitioner  
versus

INCOME TAX OFFICER, WARD 26(3),  
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87  
+ W.P.(C) 3106/2023

DIVINE SOFTECH PRIVATE LIMITED

versus

INCOME TAX OFFICER, WARD 7(1),

W.P.(C) 13458/2022 & Connected Matters

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DELHI & ANR.

88

+

W.P.(C) 3136/2023

AMIT JAIN

versus

INCOME TAX OFFICER WARD 47(1), DELHI ...Responden

89

+

W.P.(C) 3138/2023

PAWANSUT MEDIA SERVICES PVT LTD.

versus

INCOME TAX OFFICE WARD 19 3 NEW  
DELHI AND ANR.

.....Respondents

90

+

W.P.(C) 3172/2023

HARJEET SINGH KANDHARI

versus

INCOME TAX OFFICER WARD 53(1)  
DELHI & ORS.

91

+

W.P.(C) 3223/2023

AMIT JAIN (HUF)

versus

INCOME TAX OFFICER WARD 35(1)  
NEW DELHI

92

+

W.P.(C) 3278/2023

SHANTI DEVI CHARITABLE TRUST

versus

INCOME TAX OFFICER & ANR.

W.P.(C) 13458/2022 & Connected Matters

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+ W.P.(C) 3281/2023  
SUNITA SHARMA

versus

ITO, WARD 36(1), DELHI & ANR.

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+ W.P.(C) 3396/2023  
RAJAT SIKKA (HUF)

versus

INCOME TAX OFFICER, WARD 30(1),  
NEW DELHI

95

+ W.P.(C) 3408/2023  
ANCHAL NARANG

versus

ITO WARD 44 6 NEW DELHI

96

+ W.P.(C) 3470/2023  
SEASHELL BUILDSPACES PRIVATE LIMITED

.....Petition

versus

INCOME TAX OFFICER WARD 23(1) DELHI & ORS.

.....Responde

97

+ W.P.(C) 3513/2023  
GAIN CAPITAL PRIVATE LIMITED

versus

ACIT(OSD) DELHI & ORS.

98

+ W.P.(C) 3533/2023  
GAYATRI DHODY

W.P.(C) 13458/2022 & Connected Matters

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versus

99 INCOME TAX OFFICER, WARD 29 (1),  
+ DELHI AND ANR. & ORS. ....Respondents  
W.P.(C) 3572/2023  
GAIN CAPITAL PRIVATE LIMITED

versus

100 ACIT(OSD), DELHI & ORS.  
+ W.P.(C) 3573/2023  
SONA JOSHI

versus

101 INCOME TAX OFFICER WARD 60(1) & ORS.  
+ W.P.(C) 3618/2023  
SUBASH GOYAL HUF

versus

102 ITO, WARD 36(1), DELHI & ANR.  
+ W.P.(C) 3668/2023  
HARSHIT FINVEST PVT LTD

versus

103 INCOME TAX OFFICER, WARD-11(1) & ANR. ....Responden  
+ W.P.(C) 3672/2023 & CM APPL. 10804/2024 (Interim  
VINOD GOYAL AND SONS .....Petiti

W.P.(C) 13458/2022 & Connected Matters

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versus

104 ITO, WARD 36(1), DELHI & ANR.  
+ W.P.(C) 3728/2023  
ANURADHA KHAN

versus



INCOME TAX OFFICER WARD 28(5) & ORS.

.....Responden

105

+

W.P.(C) 3733/2023  
VEEKAY GENERAL INDUSTRIES

versus

UNION OF INDIA & ORS.

107

+

W.P.(C) 3875/2023  
JEET KAUR

versus

INCOME TAX OFFICER WARD 19(3)  
NEW DELHI & ORS.

108

+

W.P.(C) 3878/2023  
HARCHARAN SINGH

versus

INCOME TAX OFFICER WARD (35) 1 & ORS.

.....Responden

109

+

W.P.(C) 3895/2023  
BONLON INDUSTRIES LTD

W.P.(C) 13458/2022 & Connected Matters

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versus

THE DY. COMMISSIONER OF INCOME  
TAX, CIRCLE 4(2) & ANR.

.....Respondents

110

+

W.P.(C) 3940/2023  
M/S SAG INFRASTRUCTURE DEVELOPERS  
PVT LTD

.....Petitioner

versus

INCOME TAX OFFICER WARD 22(1) & ANR.

.....Respondent

W.P.(C) 3908/2023  
KANWALJEET KAUR

versus

ASSISTANT COMMISSIONER OF INCOME  
TAX CIRCLE (34) 1 DELHI & ORS. ....Respondents

111

+

W.P.(C) 3945/2023  
RUPIN KHANDPURA

versus

INCOME TAX OFFICER WARD 28(5)  
NEW DELHI & ORS.

112

+

W.P.(C) 4027/2023  
SANTOSH TIMBER TRADING  
COMPANY LTD

versus

INCOME TAX OFFICER WARD 22(1)  
DELHI & ORS.

113

W.P.(C) 13458/2022 & Connected Matters

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+

W.P.(C) 4038/2023  
HIMALAYA POLYTECH PRIVATE LTD .....Petitioner

versus

INCOME TAX OFFICER WARD 11(3)  
DELHI & ORS.

114

+

W.P.(C) 4060/2023  
SANGEETA VERMA

versus

INCOME TAX OFFICER, WARD 44(1),  
DELHI & ANR.

115

+

W.P.(C) 4150/2023  
LALIT GULATI

versus

ASSISTANT COMMISSIONER OF INCOME  
TAX CIRCLE 28(1) DELHI & ORS. ....Respondents

116

+ W.P.(C) 4245/2023  
LALIT GULATI

versus

ASSISTANT COMMISSIONER OF INCOME TAX  
CIRCLE 28(1),DELHI & ORS. ....Respondents

117

+ W.P.(C) 4257/2023  
VIVO APPARELS PRIVATE LIMITED

versus

INCOME TAX OFFICER, WARD 26(3)

W.P.(C) 13458/2022 & Connected Matters

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DELHI & ANR.

118

+ W.P.(C) 4258/2023  
KAMLESH KUMAR GUPTA

versus

ASSISTANT COMMISSIONER OF INCOME  
TAX CIRCLE 1(1) & ANR. ....Respondents

119

+ W.P.(C) 4326/2023  
BEST INFRATECH PRIVATE LIMITED ....Petitioner

versus

INCOME TAX OFFICER WARD 4(1) AND  
ORS & ORS. ....Respondents

120

+ W.P.(C) 4375/2023  
MR SHUBHAM JAIN

versus

THE INCOME TAX OFFICER CIRCLE -28(5),  
DELHI AND ORS. ....Respondents

121

+ W.P.(C) 4376/2023  
NEERU JAIN

versus

INCOME TAX OFFICER, WARD 29(1),  
DELHI & ORS.

122

+ W.P.(C) 4378/2023  
MOULDCRAFT INDIA PVT LTD

versus

W.P.(C) 13458/2022 & Connected Matters

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DEPUTY COMMISSIONER INCOME  
TAX AND ANR

123

+ W.P.(C) 4405/2023  
ALKA GARG

versus

ITO, WARD 44(6), DELHI & ANR.

124

+ W.P.(C) 4423/2023  
ADYCON INFRASTRUCTURES PVT. LTD.

versus

UNION OF INDIA & ORS.

125

+ W.P.(C) 4574/2023  
GIRISH KAPUR

versus

INCOME TAX OFFICER WARD 10(1)  
DELHI & ORS.

126

+ W.P.(C) 4584/2023  
LALIT KUMAR SAPRA

versus

ASSISTANT COMMISSIONER OF INCOME  
TAX, CIRCLE 43-1 DELHI & ANR. ....Respondents

127

+ W.P.(C) 4658/2023 & CM APPL. 39117/2023 (Directio

VINAY JAIN HUF

.....Petiti

versus

INCOME TAX OFFICER WARD 43(6)

W.P.(C) 13458/2022 & Connected Matters

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DELHI & ORS.

128

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W.P.(C) 4659/2023, CM APPL. 17933/2023 (Stay)  
RAJDHANI EDUCATIONAL CHARITABLE TRUST

...

versus

INCOME TAX OFFICER WARD EXEMP 2(4)

129

+

W.P.(C) 6426/2023  
SHERUL INSULATION PRIVATE LIMITED

versus

INCOME TAX OFFICER WARD 23(1),  
DELHI & ORS.

130

+

W.P.(C) 7997/2023, CM APPL. 30759/2023 (Interim S  
SUNITA KAMRA

...

versus

INCOME TAX OFFICER, WARD 19(3), DELHI

.....Responde

131

+

W.P.(C) 4684/2023  
VAIBHAV JAIN

versus

ASSISTANT COMMISSIONER OF INCOME

TAX CIRCLE 43(1), DELHI & ORS. ....Respondents

132

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W.P.(C) 4786/2023  
JAYCEE HOUSING PRIVATE LIMITED ....Petitioner

W.P.(C) 13458/2022 & Connected Matters

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versus

CENTRAL BOARD OF DIRECT TAX & ORS. ....Responden

133

+

W.P.(C) 4787/2023

ANANT VIR JAIN

versus

INCOME TAX OFFICER, WARD 59(3),  
DELHI & ORS.

134

+

W.P.(C) 4856/2023

SATISH AGRAWAL

versus

INCOME TAX OFFICER, WARD 59(2),  
DELHI & ORS.

135

+

W.P.(C) 4880/2023

PRADEEP KUMAR JAIN

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THE ASSISTANT COMMISSIONER OF INCOME  
TAX CIRCLE 25(1), DELHI & ANR. ....Respondents

136

+

W.P.(C) 4899/2023

ROHIT SAHAI

versus

ASSISTANT COMMISSIONER OF INCOME

W.P.(C) 13458/2022 & Connected Matters

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TAX CIRCLE 52(1) DELHI & ANR.

137

+ W.P.(C) 4915/2023  
NITIN SAXENA

versus

INCOME TAX OFFICER WARD NO. 49(1),  
DELHI & ANR. ....Respondents

138

+ W.P.(C) 4941/2023  
SHARAD GARG

versus

ITO, WARD 63(1), DELHI & ANR.

139

+ W.P.(C) 5123/2023  
LAMBA TRADERS AND ENGINEERS  
PVT LTD

versus

DEPUTY COMMISSIONER OF INCOME TAX ,  
CIRCLE 13 1, DELHI & ORS. ....Respondents

140

+ W.P.(C) 5124/2023  
PANKAJ VERMA

versus

INCOME TAX OFFICER OF INCOME TAX OFFICE  
WARD 69(1),DELHI & ORS. ....Respondents

141

+ W.P.(C) 5186/2023  
MANAK CONSULTANTS PRIVATE LIMITED ....Petitioner

W.P.(C) 13458/2022 & Connected Matters

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versus

INCOME TAX OFFICER WARD 16(3) & ANR.  
.....Respondents

142

+ W.P.(C) 5187/2023  
SHALINI DAGA

versus

ASSISTANT COMMISSIONER OF INCOME  
TAX CIRCLE 28(1) DELHI & ANR. ....Respondents

143

+

W.P.(C) 5210/2023  
BHARAT STEEL CORPORATION

versus

UNION OF INDIA & ORS.

144

+

W.P.(C) 5219/2023  
WHITEFIELDS OVERSEAS LTD

versus

ACIT, CIR 25(1), DELHI

145

+

W.P.(C) 5237/2023  
RAKESH KUMAR GOYAL

versus

ITO, WARD 35(5), DELHI & ANR.

146

+

W.P.(C) 5238/2023  
WHITEFIELDS OVERSEAS LTD  
versus

W.P.(C) 13458/2022 & Connected Matters

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ACIT, CIR 25(1), DELHI & ANR.

147

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W.P.(C) 5239/2023  
BADAL MAHESHWARI

versus

INCOME TAX OFFICER, WARD 58(3),  
DELHI & ANR.

148

+

W.P.(C) 5251/2023  
VANEETA IMPEX PVT LTD



versus

THE ASSTT. COMMISSIONER OF INCOME  
TAX, CIRCLE 25(1) & ANR. ....Respondents

149

+

W.P.(C) 5265/2023  
GYAN CHANDRA MISRA-INSOLVENCY RESOLUTION  
PROFESSIONAL OF TRESCO HOMES PRIVATE LIMITED  
.....Petitioners

versus

ASSISTANT COMMISSIONER OF INCOME-TAX CIRCLE  
16-1, DELHI & ORS. ....Respondents

150

+

W.P.(C) 5272/2023  
BHARAT FITTINGS AND VALVES

versus

UNION OF INDIA & ORS.

151

+

W.P.(C) 5298/2023  
K.H. STEEL CASTING (P) LTD

W.P.(C) 13458/2022 & Connected Matters

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versus

INCOME TAX OFFICER, WARD 14(1) & ORS.  
.....Respondents

152

+

W.P.(C) 5311/2023  
DHUNNA INVESTMENT P LTD

versus

INCOME TAX OFFICER WARD 7(1) DELHI & ORS.  
.....Respondents

153

+

W.P.(C) 5343/2023  
SHARE WISE COMMODITY BROKERS PRIVATE  
LIMITED .....Petitioner

versus

ASSISTANT COMMISSIONER OF INCOME TAX CIRCLE  
22(2) DELHI & ORS. ....Respondents

154

+

W.P.(C) 5369/2023  
K.H. STEEL CASTING (P) LTD

versus

INCOME TAX OFFICER, WARD 14(1) & ORS.

.....Respondent

155

+

W.P.(C) 5371/2023  
PAWAN SINGLA

versus

INCOME TAX OFFICER WARD 43(6) DELHI & ORS.

.....Respondent

156

+

W.P.(C) 5390/2023

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YOGEN KHOSLA

versus

UNION OF INDIA & ORS.

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W.P.(C) 5392/2023  
RAJ KUMAR SABHARWAL

versus

ACIT, CIR 52(1), NEW DELHI & ANR.

158

+

W.P.(C) 5406/2023  
GOURAV BATRA

versus

ASSISTANT COMMISSIONER OF INCOME TAX, CIRCLE  
INT TAX 1(1)(2), NEW DELHI & ANR. ....Respondent

159

+

W.P.(C) 5407/2023  
RAMAYANA ISPAT PVT LTD

versus

ACIT, CIR 19(1), DELHI & ANR.

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+

W.P.(C) 5409/2023  
ONE POINT REALTY PRIVATE LIMITED

versus

INCOME TAX OFFICER WARD 19(1),  
DELHI & ORS.

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W.P.(C) 13458/2022 & Connected Matters

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+

W.P.(C) 5410/2023  
MAC SOFT TECHNOLOGIES PVT LTD .....Petitioner

versus

INCOME TAX OFFICER, WARD 16(1),  
DELHI & ORS.

162

+

W.P.(C) 5427/2023  
UDGAM EDUCATION INSTITUTE PVT. LTD .....Petitione

versus

INCOME TAX OFFICER WARD 27(1)

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+

W.P.(C) 5428/2023 & CM APPL. 21232/2023 (Interim  
GAURAV CHOPRA .....Petiti

versus

UNION OF INDIA & ORS.

164

+

W.P.(C) 5536/2023  
ABHINAV GOEL

versus

INCOME TAX OFFICER WARD 43(6)

165

+

W.P.(C) 5539/2023

PUBLIC CLOTHING PVT.LTD

versus

NATIONAL FACELESS ASSESSMENT CENTRE

.....Respondent

W.P.(C) 13458/2022 & Connected Matters

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166

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W.P.(C) 5725/2023

SADHNA RANI

versus

DEPUTY COMMISSIONER OF INCOME TAX, CIRCLE

16(1), DELHI & ORS.

.....Respondents

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+

W.P.(C) 5727/2023

ATUL KUMAR SAXENA

versus

ASSISTANT COMMISSIONER OF INCOME

TAX, CIRCLE 70(1), DELHI & ORS. ....Respondents

168

+

W.P.(C) 5730/2023

RAVI DHINGRA (HUF)

versus

INCOME TAX OFFICER, WARD 28(1),

DELHI & ORS.

169

+

W.P.(C) 5734/2023

BRIJ BHUSHAN GUPTA

versus

ASSISTANT COMMISSIONER OF

INCOME TAX CIRCLE 59-1)

170

+

W.P.(C) 5761/2023

PAVEL GARG SONS HUF

versus

W.P.(C) 13458/2022 & Connected Matters

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THE INCOME TAX DEPARTMENT

171

+

W.P.(C) 5785/2023 & CM APPL. 22652/2023 (Stay),  
30249/2023 (Addl. Document)

B.C ENTERPRISES

versus

INCOME TAX OFFICER WARD 58 3 DELHI

.....Respondent

172

+

W.P.(C) 5791/2023  
NAVEEN KUMAR GUPTA

versus

INCOME TAX OFFICER WARD 47-1 & ANR.

....Respondents

173

+

W.P.(C) 5792/2023  
JINDAL DYECHEM INDUSTRIES PVT. LTD .....Petitione

versus

DEPUTY COMMISSIONER OF INCOME TAX

CIRCLE 13(1), DELHI & ORS. ....Respondents

174

+

W.P.(C) 5867/2023 & CM APPL. 23016/2023 (Interim  
SUNIL KUMAR .....Petiti

versus

INCOME TAX OFFICER WARD 47( & ANR. ....Responden

175

W.P.(C) 13458/2022 & Connected Matters

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+

W.P.(C) 5869/2023

GSM AUTO SPARES PRIVATE LIMITED .....Petitioner

versus

ASSISTANT COMMISSIONER OF INCOME

TAX (OSD) DELHI & ANR.

.....Respondents

176

+

W.P.(C) 5875/2023

SAURAV BANSAL

versus

ITO WARD 43(6) DELHI & ANR.

177

+

W.P.(C) 5876/2023

VIJAY GARG

versus

ITO WARD 43(6) DELHI & ANR.

178

+

W.P.(C) 5877/2023

AGSONS AGENCIES INDIA PRIVATE LIMITED

.....Petitioner

versus

INCOME TAX OFFICER WARD 1(1)DELHI & ORS.

.....Respondent

179

+

W.P.(C) 5884/2023

RITIKA GARG

versus

W.P.(C) 13458/2022 & Connected Matters

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ACIT CIRCLE 43(1) DELHI & ANR.

180

+

W.P.(C) 5886/2023

RITIKA GARG

versus

ACIT CIRCLE 43(1) DELHI & ANR.

181

+

W.P.(C) 5887/2023  
PAYAL BANSAL

versus

ITO WARD 43(6) DELHI & ANR.

182

+

W.P.(C) 5888/2023  
MEENA CHAWLA

versus

INCOME TAX OFFICER WARD 61 (1)  
DELHI AND ANR

183

+

W.P.(C) 5891/2023  
MAHESH KUMAR MANI

versus

ACIT CIRCLE 28(1) DELHI & ANR.

184

+

W.P.(C) 5892/2023  
HIMANK GARG

versus

W.P.(C) 13458/2022 & Connected Matters

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ITO WARD 43(6) DELHI & ANR.

185

+

W.P.(C) 5894/2023  
GSM AUTO SPARES PRIVATE LIMITED .....Petitioner

versus

ASSISTANT COMMISSIONER OF INCOME  
TAX (OSD) DELHI & ANR. ....Respondents

186

+

W.P.(C) 5895/2023  
ASHA GARG

versus

INCOME TAX OFFICER AND OTHERS .....Respondents

187

+

W.P.(C) 5896/2023  
VIJAY GARG

versus

ITO WARD 43(6) DELHI & ANR.

188

+

W.P.(C) 5964/2023  
ARUNA ANEJA

versus

INCOME TAX OFFICER, WARD 44-6 & ANR.

.....Respondents

W.P.(C) 13458/2022 & Connected Matters

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189

+

W.P.(C) 5975/2023  
MADHUR KABRA

versus

ASSISTANT COMMISSIONER OF INCOME TAX,  
CIRCLE 10(1), DELHI & ORS. ....Respondents

190

+

W.P.(C) 5992/2023  
BRICKHICKS BUILDTECH PRIVATE LIMITED

.....Petitioners

versus

INCOME-TAX OFFICER WARD 16-3, NEW  
DELHI AND ORS. ....Respondents



191

+

W.P.(C) 6008/2023  
BHARAT BHUSHAN HUF

versus

ITO WARD 36(1) DELHI & ANR.

192

+

W.P.(C) 6038/2023  
RAJ POLYBAGS PRIVATE LIMITED

versus

INCOME TAX OFFICER WARD 21(1) & ORS.

193

+

W.P.(C) 6041/2023  
ADITYA LOOMBA

W.P.(C) 13458/2022 & Connected Matters

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versus

UNION OF INDIA AND ANR.

194

+

W.P.(C) 6042/2023  
SE FINVEST PRIVATE LIMITED

versus

ASSISTANT COMMISSIONER OF INCOME  
TAX,CIRCLE 22(2), DELHI AND ORS. ....Respondents

195

+

W.P.(C) 6046/2023  
JINDAL FINANCIAL AND INVESTMENTS SERVICES

.....Petition

versus

ASSISTANT COMMISSIONER OF INCOME TAX,CIRCLE  
52(1), DELHI & ORS. ....Respondents

196

+ W.P.(C) 6053/2023  
BRIJ BHUSHAN GUPTA

versus

ASSISTANT COMMISSIONER OF INCOME  
TAX CIRCLE 59-1

.....Respondent

197

+ W.P.(C) 6147/2023  
BEE KAY WIRES PVT. LTD.

versus

INCOME TAX OFFICER, WARD 4(1),

W.P.(C) 13458/2022 & Connected Matters

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DELHI & ORS.

198

+ W.P.(C) 6148/2023  
MUKESH GUPTA

versus

NATIONAL FACELESS ASSESSMENT  
CENTRE, DELHI

199

+ W.P.(C) 6150/2023  
NARESH KUMAR HUF

versus

ASSISTANT COMMISSIONER OF INCOME TAX  
CIRCLE43(1), DELHI & ORS.

.....Respondents

200

+ W.P.(C) 6151/2023  
AJAY AND SONS HUF

versus

INCOME TAX OFFICER WARD 58(3)  
DELHI & ANR.

201

+

W.P.(C) 6152/2023  
SUNAYANA MALHOTRA

versus

INCOME TAX OFFICER, WARD 44-6 & ANR.

.....Respondents

202

+

W.P.(C) 6156/2023

W.P.(C) 13458/2022 & Connected Matters

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ARTISTIC FINANCE PVT LTD

versus

ITO WARD 3(1) DELHI & ANR.

203

+

W.P.(C) 6158/2023  
PRET STUDY BY JANAK FASHIONS PVT. LTD.

.....Petitio

versus

NATIONAL FACELESS ASSESSMENT CENTRE

.....Respondent

204

+

W.P.(C) 6161/2023  
RAM KALI

versus

ASSISTANT COMMISSIONER OF INCOME

TAX CIRCLE 43(1), DELHI & ORS. ....Respondents

205

+

W.P.(C) 6163/2023  
RAJESH LOOMBA

versus

UNION OF INDIA AND ANR

206

+

W.P.(C) 6166/2023  
HARISH KUMAR ANEJA HUF

versus

INCOME TAX OFFICER WARD 44(6),

W.P.(C) 13458/2022 & Connected Matters

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DELHI & ANR.

207

+

W.P.(C) 6168/2023 & CM APPL. 51069/2023 (Correcti  
O.D. 12-05-2023)

VISUAL TECHNOLOGIES INDIA PVT LTD .....Petitioner

versus

UNION OF INDIA & ORS.

208

+

W.P.(C) 6178/2023  
NOUVELLE SECURITIES PVT LTD

versus

INCOME TAX OFFICER & ORS.

209

+

W.P.(C) 6185/2023  
PRANAY ANEJA

versus

ASSTT CIT, CIR 28(1), DELHI & ANR.

210

+

W.P.(C) 6186/2023  
ANUPAMA HARIBANSH CHOUDHARY .....Petitioner

versus

NATIONAL FACELESS ASSESSMENT CENTRE

.....Respondent

211

+

W.P.(C) 6187/2023

W.P.(C) 13458/2022 & Connected Matters

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B L HEALTH AND SAFETY PVT LTD

versus

ITO, WARD 4(1), DELHI & ANR.

212

+

W.P.(C) 6194/2023 & CM APPL. 24345/2023 (Interim  
YOGEN KHOSLA .....Petiti

versus

DEPUTY COMMISSIONER OF INCOME  
TAX 4(2), DELHI & ANR. ....Respondents

213

+

W.P.(C) 6227/2023  
MOHAN SINGH CHAUHAN

versus

INCOME TAX OFFICER WARD 44(1)  
DELHI & ORS.

214

+

W.P.(C) 6230/2023  
DAYAL FINSEC LTD

versus

UNION OF INDIA & ORS.

215

+

W.P.(C) 6254/2023 & CM APPL. 24587/2023 (Interim  
VIPIN KUMAR JAIN .....Petiti

versus

INCOME TAX OFFICER WARD 63 & ANR. ....Respondent

216

W.P.(C) 13458/2022 & Connected Matters

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+

W.P.(C) 6972/2023 & CM APPL. 27152/2023 (Interim  
BABITA JAIN .....Petiti

versus

INCOME TAX OFFICER WARD 36(1)  
DELHI & ANR.

217

+

W.P.(C) 6259/2023  
KAUSHAL KUMAR HUF

versus

INCOME TAX OFFICER WARD 43(6),  
DELHI & ORS.

218

+

W.P.(C) 6266/2023  
SUNNY AGGARWAL

versus

INCOME TAX OFFICER, WARD 45(1),  
DELHI & ANR.

219

+

W.P.(C) 6270/2023  
BHANU DOGRA

versus

ASSISTANT COMMISSIONER OF INCOME  
TAX CIRCLE 49 (1) & ANR.

.....Respondents

220

+

W.P.(C) 6273/2023  
WELCOME SHOES PVT LTD

versus

W.P.(C) 13458/2022 & Connected Matters

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INCOME TAX OFFICER, WARD 27(1),  
DELHI & ORS.

221

+

W.P.(C) 6274/2023  
TRIPLE ESS INFRASTRUCTURE PRIVATE LIMITED

.....Petitio

versus

ASSISTANT COMMISSIONER OF INCOME  
TAX, CIRCLE 25(1), DELHI & ORS. ....Respondents

222

+

W.P.(C) 6278/2023  
MS GOLDSTAR FOOTWEARS PVT LTD .....Petitioner

versus

NATIONAL FACELESS ASSESSMENT  
CENTRE, DELHI

223

+

W.P.(C) 6279/2023  
ABHIRUCHI BUILDWELL PVT. LTD

versus

INCOME TAX OFFICER, WARD (1 )& ANR. ...Respondent

224

+

W.P.(C) 6280/2023  
GREENBERRY NANDINI RKG PRIVATE LIMITED  
.....Petitioner

versus

INCOME TAX OFFICER, WARD 10(3),  
DELHI & ORS.

225

W.P.(C) 13458/2022 & Connected Matters

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+

W.P.(C) 6282/2023  
GREENBERRY NANDINI RKG PRIVATE LIMITED  
.....Petitioner

versus

INCOME TAX OFFICER, WARD 10(3), DELHI & ORS.  
.....Respondent

226

+

W.P.(C) 6410/2023  
MIDAS GLOBAL SECURITIES LIMITED

versus

INCOME TAX OFFICER, WARD 17(1),  
DELHI & ORS.

227

+

W.P.(C) 6411/2023  
M/S DISHA OVER SEAS PVT LTD THROUGH ITS  
DIRECTOR .....Petitioner

versus

INCOME TAX OFFICER WARD 7 (1)  
DELHI AND OTHERS

228

+

W.P.(C) 6415/2023 & CM APPL. 25285/2023  
39104/2023 (Stay)

HARIS MOHAMMAD

versus

INCOME TAX OFFICER WARD 63(1)  
DELHI & ANR.

229

W.P.(C) 13458/2022 & Connected Matters

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+

W.P.(C) 6416/2023  
AMIT JAIN

versus

INCOME TAX OFFICER WARD 44(1)  
DELHI & ORS.

230

+

W.P.(C) 6417/2023 & CM APPL. 25292/2023 (Interim  
KESRI STEELS LTD .....Petiti

versus

DCIT CIR 13(1) DELHI & ANR.

231

+

W.P.(C) 6420/2023  
SHIV KUMAR GUPTA -HUF



versus

INCOME TAX OFFICER WARD 58 (7),  
DELHI AND ANR.

232

+

W.P.(C) 6421/2023  
SHRIDHAR FINANCIAL SERVICES LIMITED .....Petitioner

versus

INCOME TAX OFFICER, WARD 23(3),  
DELHI & ORS.

233

+

W.P.(C) 6422/2023  
DHARAMBIR AHUJA AND SONS HUF .....Petitioner

versus

W.P.(C) 13458/2022 & Connected Matters

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INCOME TAX OFFICER, WARD-49(1),  
DELHI & ANR.

234

+

W.P.(C) 6423/2023  
ARTISTIC FINANCE PVT LTD

versus

ITO WARD 3(1) DELHI & ANR.

235

+

W.P.(C) 6424/2023  
GIRISH AHUJA

versus

INCOME TAX OFFICER, WARD 49(1),  
NEW DELHI & ANR.

236

+

W.P.(C) 6427/2023 & CM APPL. 10806/2024 (Place on  
Assessment Order)

BHOLE NATH FOODS LIMITED

versus

DEPUTY COMMISSIONER OF INCOME  
TAX, CIRCLE-4(2), NEW DELHI & ANR. ....Responden

237

+ W.P.(C) 6429/2023, CM APPL. 25313/2023 (Stay)  
KANWAR MEET SEHGAL .....Pe

versus

INCOME TAX OFFICER, WARD 36(1) DELHI  
.....Responde

W.P.(C) 13458/2022 & Connected Matters

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238

+ W.P.(C) 6432/2023  
RATHI STEEL AND POWER LTD

versus

UNION OF INDIA AND ANR.

239

+ W.P.(C) 6433/2023  
BHARAT BHUSHAN BANSAL

versus

ACIT CIRCLE 43(1) DELHI & ANR.

240

+ W.P.(C) 6449/2023 & CM APPL. 25394/2023 (Interim  
MOONLIGHT EQUITY PRIVATE LIMITED ....

versus

INCOME TAX OFFICER WARD 17 & ANR.....Respondents

241

+ W.P.(C) 6515/2023  
ANIL KUMAR SOMANI

versus

NATIONAL FACELESS ASSESSMENT  
CENTRE, DELHI

242

+

W.P.(C) 6520/2023  
MAMTA GIRDHAR

versus

INCOME TAX OFFICER, WARD 72 (1),

W.P.(C) 13458/2022 & Connected Matters

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DELHI & ANR.

243

+

W.P.(C) 6525/2023  
AMIT GUPTA

versus

INCOME TAX OFFICER, WARD36(1),  
DELHI & ANR.

244

+

W.P.(C) 6526/2023  
SACHIN GIRDHAR

versus

INCOME TAX OFFICER, WARD 44(6),  
DELHI & ANR.

245

+

W.P.(C) 6531/2023  
ABHISHEK ARORA

versus

ASSISTANT COMMISSIONER OF INCOME  
TAX CIRCLE 59(1), DELHI & ANR. ....Respondents

246

+

W.P.(C) 6560/2023  
SHRI KARSHNI METALS PVT. LTD.

versus

INCOME TAX OFFICER, WARD 23(3),  
DELHI & ORS.

247

+

W.P.(C) 6561/2023  
ABHINAV AGGARWAL

W.P.(C) 13458/2022 & Connected Matters

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versus

INCOME TAX OFFICER WARD 71(3)  
DELHI & ANR.

248

+

W.P.(C) 6620/2023  
ANIL MITTAL

versus

ASSISTANT COMMISSIONER OF INCOME  
TAX WARD 63 1 & ORS. ....Respondents

249

+

W.P.(C) 6622/2023  
RAJESH GUPTA

versus

INCOME TAX OFFICER WARD 62 1 DELHI ....Responden

250

+

W.P.(C) 6624/2023  
REENA KUMARI

versus

INCOME TAX OFFICER WARD 30 5  
NEW DELHI

251

+

W.P.(C) 6630/2023  
RUHIL PROMOTERS PVT.LTD

versus

NATIONAL FACELESS ASSESSMENT  
CENTRE, DELHI

W.P.(C) 13458/2022 & Connected Matters

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252

+ W.P.(C) 6632/2023  
RUHIL PROMOTERS PVT.LTD

versus

NATIONAL FACELESS ASSESSMENT  
CENTRE, DELHI

253

+ W.P.(C) 6634/2023  
MALHOTRA CABLES PVT LTD

versus

DCIT CIRCLE 16(1) DELHI & ANR.

254

+ W.P.(C) 6636/2023  
SABHARWAL PROPERTIES INDUSTRIES PVT. LTD.

.....Petitione

versus

INCOME TAX OFFICER, WARD 22-1 & ANR. ...Responden

255

+ W.P.(C) 6646/2023  
RAJ LAXMI REALTORS PRIVATE LTD .....Petitioner

versus

INCOME TAX OFFICER WARD 21(1) DELHI ...Respondent

256

+ W.P.(C) 6649/2023  
AKSHAT AGGARWAL

versus

INCOME TAX OFFICER, WARD 48-1 & ANR. ...Responden

W.P.(C) 13458/2022 & Connected Matters

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257

+ W.P.(C) 6654/2023  
GUPTA AUTO IMPEX

versus

INCOME TAX OFFICER WARD 58 3 DELHI & ANR.

.....Respondents

258

+

W.P.(C) 6659/2023

UNISEX TRADELINK PRIVATE LIMITED

versus

UNION OF INDIA AND ANR.

259

+

W.P.(C) 6662/2023

SUDHIR KUMAR GOYAL

versus

ASSISTANT COMMISSIONER OF INCOME

TAX WARD 51 (1) & ANR.

.....Respondents

260

+

W.P.(C) 6663/2023

KOPERTEK METALS PVT LTD

versus

DCIT CIRCLE 13(1) DELHI & ANR.

261

+

W.P.(C) 6665/2023

RADHIKA GUPTA

versus

W.P.(C) 13458/2022 & Connected Matters

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ACIT CIRCLE 28(1) DELHI & ANR.

262

+

W.P.(C) 6675/2023

GUPTA AUTO IMPEX

versus

INCOME TAX OFFICER WARD 58 3

DELHI & ANR.

263

+ W.P.(C) 6691/2023  
SATISH KUMAR MITTAL

versus

ASSISTANT COMMISSIONER OF INCOME  
TAX WARD 63 1 & ORS. ....Respondents

264

+ W.P.(C) 6752/2023  
VIVEK NANDA

versus

INCOME TAX OFFICER, WARD 25(1),  
DELHI & ORS.

265

+ W.P.(C) 6753/2023  
NORTHEND FOODS MARKETING PVT. LTD. ....Petitioners

versus

DCIT, CIRCLE - 16(1), DELHI

266

+ W.P.(C) 6754/2023  
ASHLAR COMMODITIES PRIVATE

W.P.(C) 13458/2022 & Connected Matters

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LIMITED

versus

UNION OF INDIA & ORS.

267

+ W.P.(C) 6755/2023  
SAURABH AGGARWAL

versus

UNION OF INDIA & ORS.

268

+ W.P.(C) 6758/2023  
RAJ LAXMI REALTORS PRIVATE LTD ....Petitioner

versus

INCOME TAX OFFICER WARD  
21(1) DELHI

269

+

W.P.(C) 6762/2023  
GARIMA CAPITAL PVT. LTD

versus

INCOME TAX OFFICER, WARD 10(1),  
DELHI & ORS.

270

+

W.P.(C) 6765/2023  
SVAM SOFTWARE LIMITED

versus

INCOME TAX OFFICER, WARD 22(3),  
DELHI & ORS.

W.P.(C) 13458/2022 & Connected Matters

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271

+

W.P.(C) 6766/2023  
M/S CHANDRAMAULI BUILDCON  
PRIVATE LIMITED

versus

INCOME TAX OFFICER WARD-6(1), DELHI .....Responde

272

+

W.P.(C) 6767/2023  
AGLOW FINANCIAL SERVICES PRIVATE  
LIMITED

versus

INCOME TAX OFFICER, WARD 1(1),  
DELHI & ORS.

273

+

W.P.(C) 6770/2023  
M/S CHANDRAMAULI BUILDCON  
PRIVATE LIMITED



versus

INCOME TAX OFFICER WARD-6(1), DELHI .....Respondent

274

+

W.P.(C) 6771/2023 & CM APPL. 26462/2023 (Interim)  
ASHLAR COMMODITIES PRIVATE LIMITED.....Petitioner

versus

INCOME TAX OFFICER WARD 3(1),  
DELHI AND ANR.

275

+

W.P.(C) 6781/2023  
CHRISHMATIC DEVELOPERS PRIVATE

W.P.(C) 13458/2022 & Connected Matters

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LIMITED

versus

INCOME TAX OFFICER, WARD 6(1),  
DELHI & ORS.

276

+

W.P.(C) 6792/2023  
RAJ NANDINI BUILDTECH LTD

versus

INCOME TAX OFFICER WARD 21(1) DELHI ....Respondent

277

+

W.P.(C) 6795/2023  
KHETTERPAL HOTELS PRIVATE LIMITED

versus

INCOME TAX OFFICER WARD 14(3),  
DELHI & ORS.

278

+

W.P.(C) 6801/2023  
AMAN TRADERS PRIVATE LIMITED

versus

UNION OF INDIA & ORS.

279

+

W.P.(C) 6807/2023  
VIVEK NANDA

versus

INCOME TAX OFFICER, WARD 25(1),  
DELHI & ORS.

W.P.(C) 13458/2022 & Connected Matters

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280

+

W.P.(C) 6849/2023  
MANGAL KALAS SERVICES PRIVATE  
LIMITED .....Petitioner

versus

INCOME TAX OFFICER WARD-16(3) & ANR. ...Responden

281

+

W.P.(C) 6885/2023 & CM APPL. 26862/2023 (Interim  
RUCHIKA JAIN .....Petiti

versus

INCOME TAX OFFICER WARD 36(1)  
DELHI & ANR.

282

+

W.P.(C) 6933/2023  
ARIEN GLOBAL LIFESTYLE PRIVATE  
LIMITED .....Petitioner

versus

DEPUTY COMMISSIONER OF INCOME  
TAX CIRCLE 1(1)DELHI & ORS. ....Respondents

283

+

W.P.(C) 6945/2023  
NOVELL BUILDWELL LLP

versus

INCOME TAX OFFICER, WARD 52(1),  
DELHI & ORS.

284

+

W.P.(C) 6959/2023  
PRALEEN CHOPRA

W.P.(C) 13458/2022 & Connected Matters

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versus

ASSISTANT COMMISSIONER OF  
INCOME TAX

285

+

W.P.(C) 6971/2023  
LUV BHARDWAJ

versus

DEPUTY COMMISSIONER OF  
INCOME TAX,

286

+

W.P.(C) 6973/2023  
SHUBHRA MITTAL

versus

ASSISTANT COMMISSIONER OF INCOME  
TAX WARD 63 1 & ORS. ....Respondents

287

+

W.P.(C) 6975/2023  
POOJA PRAVEEN WADHWA

versus

INCOME TAX OFFICER, WARD 29(1),  
DELHI AND ORS.

288

+

W.P.(C) 6994/2023  
RITU JAIN

versus

THE ASSISTANT COMMISSIONER OF INCOME  
TAX, CIRCLE 52(1), DELHI & ORS. ....Respondents

W.P.(C) 13458/2022 & Connected Matters

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289

+

W.P.(C) 7011/2023

SYNERGY PETRO PRODUCTS PRIVATE LIMITED

.....Petitione

versus

UNION OF INDIA & ORS.

290

+

W.P.(C) 7030/2023

MADHU GOYAL

versus

ASSISTANT COMMISSIONER OF INCOME

TAX WARD 35 1 & ANR.

.....Respondents

291

+

W.P.(C) 7051/2023

SUSHIL KUMAR AGGARWAL

versus

INCOME TAX OFFICER, WARD 45(1),

DELHI & ANR.

292

+

W.P.(C) 7060/2023

JAPNA ESTATES PVT. LTD.

versus

INCOME TAX OFFICER, WARD

13(1) & ANR.

293

+

W.P.(C) 7061/2023

DIGNITY MERCHANTS PRIVATE LIMITED .....Petitioner

W.P.(C) 13458/2022 & Connected Matters

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versus

INCOME TAX OFFICER WARD 7 1 DELHI .....Respondent

294

+

W.P.(C) 7073/2023  
SUBHASH CHANDER KATHURIA

versus

INCOME TAX OFFICER & ORS.

295

+

W.P.(C) 7075/2023  
SUNSHINE BUILDING SOLUTIONS  
PRIVATE LIMITED

versus

INCOME TAX OFFICER WARD 24(1)  
DELHI & ORS.

296

+

W.P.(C) 7076/2023  
BK KHULLAR AND SONS

versus

INCOME TAX OFFICER AND ANR

297

+

W.P.(C) 7078/2023  
PREMIUM INFRACON PRIVATE LIMITED

versus

INCOME TAX OFFICER, WARD 20(1),  
DELHI & ORS.

298

+

W.P.(C) 7089/2023

W.P.(C) 13458/2022 & Connected Matters

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CHRISHMATIC DEVELOPERS PRIVATE  
LIMITED

.....Petitioner

versus

INCOME TAX OFFICER, WARD 6(1),  
DELHI & ORS.

299

+ W.P.(C) 7161/2023  
PRATISHTHA GARG

versus

DY COMMISSIONER OF INCOME TAX,  
CENTRAL CIRCLE 28, NEW DELHI & ORS. ....Responden

300

+ W.P.(C) 7164/2023  
MOHINDERJIT SINGH KOCHHAR

versus

UNION OF INDIA THROUGH THE  
SECRETARY & ORS.

301

+ W.P.(C) 7166/2023  
PCG FINVEST LIMITED (FORMERLY KNOWN AS  
SUBHRA FINVEST (INDIA) LTD) .....Petitioner

versus

ASSISTANT COMMISSIONER OF INCOME  
TAX, CIRCLE 22(2), DELHI & ORS. ....Respondents

302

+ W.P.(C) 7172/2023  
DOLPHIN MART PRIVATE LIMITED

versus

W.P.(C) 13458/2022 & Connected Matters

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INCOME TAX OFFICER, WARD 7 (1),  
DELHI & ORS.

303

+ W.P.(C) 7213/2023  
HARI MOHAN SHARMA

versus

ASSISTANT COMMISSIONER OF INCOME  
TAX, CIRCLE-61(1),DELHI & ORS. ....Respondents

304

+ W.P.(C) 7258/2023

CHANDRAMAULI ESTATES PVT LTD .....Petitioner

versus

INCOME TAX OFFICER AND ANR

305

+

W.P.(C) 7263/2023  
SUNSTAR BUILDERS PVT LTD

versus

INCOME TAX OFFICER AND OTHERS .....Respondents

306

+

W.P.(C) 7264/2023  
PAWAN GOYAL

versus

INCOME TAX OFFICER, WARD 10(3)

307

+

W.P.(C) 7273/2023  
RICHFIELD INDUSTRIES PRIVATE LIMITED .....Petitioner

W.P.(C) 13458/2022 & Connected Matters

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versus

DEPUTY COMMISSIONER OF INCOME TAX, ..Respondent

308

+

W.P.(C) 7296/2023  
RANGOLI INTERNATIONAL PVT. LTD.

versus

DEPUTY COMMISSIONER OF INCOME TAX, ..Respondent

309

+

W.P.(C) 7329/2023  
SH. DINESH KUMAR

versus

INCOME TAX OFFICER WARD 34 (1)  
NEW DELHI & ANR.

310

+ W.P.(C) 7381/2023  
BRIJ MOHAN GOYAL (HUF)  
versus  
UNION OF INDIA AND ANR.

311  
+ W.P.(C) 7383/2023  
PAWAN GOYAL  
versus  
INCOME TAX OFFICER, WARD 10(3),  
DELHI

312  
+ W.P.(C) 7388/2023  
CHHAVI AGARWAL  
versus

W.P.(C) 13458/2022 & Connected Matters

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INCOME TAX OFFICER, WARD-28(5),  
DELHI

313  
+ W.P.(C) 7392/2023  
SURPLUS INFOTECH PRIVATE LIMITED .....Petitioner  
versus  
INCOME TAX OFFICER WARD 24 1

314  
+ W.P.(C) 7519/2023  
CARISSA INVESTMENTS PVT. LTD.  
versus  
UNION OF INDIA AND ANR.

315  
+ W.P.(C) 7554/2023, CM APPL. 29300/2023 (Stay)  
JYOTI CHAUHAN .....Petiti  
versus  
INCOME TAX OFFICER WARD 6(1)  
DELHI & ORS.

316  
+ W.P.(C) 7579/2023  
NARESH KUMAR  
versus  
ASSISTANT COMMISSIONER OF INCOME TAX,



CENTRAL CIRCLE 34 & ORS. ....Respondents

317

+ W.P.(C) 7601/2023, CM APPL. 54593/2024, CM APPL.  
54641/2024 (360 days Delay in C.A.)  
KAWAL KUMAR .....Petitioners

W.P.(C) 13458/2022 & Connected Matters

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versus

ASSISTANT COMMISSIONER OF INCOME  
TAX & ORS. ....Respondents

318

+ W.P.(C) 7834/2023 & CM APPL. 30207/2023 (Stay)  
AMISH AGARWAL HUF .....Petitioners

versus

INCOME TAX OFFICER, WARD-30(1), DELHI ..Respondents

319

+ W.P.(C) 8564/2023  
PIUSH GUPTA

versus

NATIONAL FACELESS ASSESSMENT  
CENTRE & ANR.

320

+ W.P.(C) 8894/2023 & CM APPL. 33618/2023 (Stay)  
ANKIT MITTAL .....Petitioners

versus

ASSESSMENT UNIT, NATIONAL FACELESS  
ASSESSMENT CENTRE NEW DELHI AND ANR.

.....Respondents

321

+ W.P.(C) 8465/2024 & CM APPL. 34900/2024 (Interim  
SAKET HIGHWAYS LIMITED, THROUGH DIRECTOR  
GURINDER KUMAR GARG .....Petitioners

versus

ITO, WARD 22(1), DELHI & ANOTHER .....Respondents

322

+ W.P.(C) 8468/2024 & CM APPL. 34904/2024 (Interim  
POOJA SMIT INVESTMENTS AND TRADING PRIVATE

W.P.(C) 13458/2022 & Connected Matters

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LIMITED, THROUGH DIRECTOR BIRENDER KUMAR  
SAHOO .....Petitioner  
versus

ITO, WARD 21(1), DELID

323

+

W.P.(C) 8953/2024 & CM APPL. 36579/2024 (Stay)  
RAJEEV KUMAR OBEROI

versus

INCOME TAX OFFICER AND ANR.

Advocate for the petitioners:

Mr. Vikas Jain, Ms. Shrawani & Mr. Hardik Jayal, Advs. In  
item 28

Mr. Salil Kapoor, Mr. Sumit Lalchandani, Mr. Shivam Yadav  
& Ms. Ananya Kapoor, Advs. In item 34

Mr. Salil Aggarwal, Sr. Adv with Mr. Madhur Aggarwal,  
Adv. In item 95

Mr. Madhur Aggarwal, Adv. In item 94

Mr. Ruchesh Sinha, Mr. Aakash Saini, Ms. Shilpa Choudhary  
& Ms. Monalisa Maity, Advs. in item 65, 67, 70, 77, 78, 80,  
81, 83, 84, 90, 96, 97, 99, 100, 104, 112, 113, 204, 288, 3

Mr. Nitin Gulati & Ms. Reena Gandhi, Advs. in item 25, 26,  
129, 153, 178, 213, 229, 282

Mr. Ajay Vohra, Sr. Adv with Mr. Kishore Kunal & Ms.  
Ankita Parkash, Advs. in item 27

Mr. Kamal Sawhney, Mr. Nikhil Agarwal & Mr. Nishank  
Vashistha, Advs. in item 61

Dr. Kapil Goel & Mr. Sandeep Goel, Advs. in item 74, 76,  
82, 88, 89, 128, 164, 171, 237, 249, 255, 268, 276, 320

Mr. Salil Kapoor, Mr. Sumit Lalchandani, Ms. Ananya  
Kapoor, Mr. Tarun Chanana, Mr. Shivam Yadav & Mr.

Utkarsa Kr. Gupta, Advs. in item 60, 68, 72, 75, 98, 126, 1  
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W.P.(C) 13458/2022 & Connected Matters

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Mr. Rano Jain, Mr. Venketesh Chaurasia, Ms. Renu Arora,  
Ms. Sakshi Rustagi & Ms. Sakshi Srivastava, Advs. in item  
66, 92, 93, 101, 103, 123, 144, 146, 145, 138, 157, 159, 20  
211, 230

Mr. Abhishek Garg, Mr. Yash Gaitha, Mr. Ramesh Singh  
Mankotia & Mr. Naman Mehta, Advs. in item 79

Mr. Prakash Kumar & Ms. Rashmi Singh, Advs. in item 86,  
87, 114

Mr. Kunal Tandon, Sr. Adv. with Mr. Saurabh D. Karan  
Singh, Mr. Akash Kumar, Ms. Kanika Jain, Ms. Natasha &  
Mr. Sanjay Shisodia, Advs. in item 30, 106, 107, 108, 111  
Mr. Bhuvnesh Satija, Ms. Vibhooti Malhotra, Mr. Udit

Sharma & Mr. Aniket Khanduri, Advs. in item 110, 309  
Mr. Ved Jain, Mr. Nischay Kantoor, Ms. Soniya Dodeja, Mr.  
Divyansh Dubey & Mr. Govind Gupta, Advs. in item 115,  
116, 121, 133, 134, 139, 140, 161, 166, 167, 168, 173, 195,  
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277, 283, 297, 298, 301, 303  
Dr. Rakesh Gupta, Mr. Somil Agrawal & Mr. Sourav Verma,  
Advs. in item 117, 118  
Mr. Mahe Zehra, Adv. in item 120  
Mr. Sumit K. Batra, Mr. Manish Khurana & Ms. Priyanka  
Jindal, Advs. in item 130  
Mr. Manuj Sabharwal, Mr. Devvrat Tiwari & Mr. Drona  
Negi, Advs. in item 149, 190  
Mr. Anand Shankar, Mr. Debashis Mukherjee & Mr. Amit  
Kumar, Advs. in item 62  
Mr. Sanjeev Kumar, Mr. Manish Kumar & Ms. Riddhi, Advs.  
in item 341  
Mr. Manibhadra Jain & Mr. Sachin Jain, Advs. in item 266,  
274, 281, 216  
Ms. Kavita Jha, Sr. Adv. with Mr. Vaibhav Kulkarni & Mr.  
Himanshu Aggarwal, Advs. in item 280  
Mr. Satyen Sethi, Mr. Artatrana Panda & Ms. Gargi Sethee,  
Advs. in item 151, 154  
Mr. Rohit Jain & Mr. Samarth Chaudhari, Advs. in item 208

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Mr. A.K. Babbar & Mr. Bharat Tirpathi, Advs. in item 218  
Mr. Amol Sinha, Mr. Kshitiz Garg & Mr. Ankit Kumar,  
Advs. in item 243, 264, 279, 302  
Mr. Shekhar Gupta and Mr. Shashank Upadhyay, Advs. in  
item 248, 259, 263, 286 and 290.  
Ms. Kavita Jha, Sr. Adv. with Mr. Vaibhav Kulkarni and Mr.  
Himanshu Aggarwal, Advs. in item 280.  
Mr. Rahul Malhotra and Mr. Chirag Goyal, Advs. in item  
292.  
Dr. Rakesh Gupta, Mr. Somil Agarwal and Mr. Sourav  
Verma, Advs. in item 295 and 313.  
Mr. Rajeev Sharma, Adv. in item 300.  
Mr. Gautam Jain, Mr. Shaantanu Jain, Mr. Manish Yadav and  
Mr. Deepanshu Jain, Advs. in 305, 304, 112, 186, 271, 273  
and 271.  
Mr. Deepanshu Jain and Mr. Shaantanu Jain, Advs. in item  
312 and 318.  
Mr. Manuj Sabharwal, Mr. Devvrat Tiwari and Mr. Drona  
Negi, Advs. in 315.  
Mr. A.K. Babbar and Mr. B. Tripathi, Advs. in item 291.  
Mr. Rohit Sahai & Ms. Shalini Daga, Adv. in item 69, 136,  
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Advocates for the respondents:  
Mr. Vipul Agrawal, SSC in item 61, 63, 87, 109, 113, 118,

138, 170, 223, 227, 249, 303, 317

Mr. Sandeep Tyagi, SPC with Mr. Manoj Kumar, Adv. for R-1. In item 105

Mr. Akash Vajpai, Adv. for R-5. In item 133

Mr. Puneet Rai, SSC with Mr. Ashvini Kumar, Mr. Nikhil Jain & Mr. Rishabh Nangia, SCs in item 58, 66, 67, 74, 86, 89, 95, 96, 107, 110, 114, 126, 127, 135, 140, 149, 155, 159, 162, 163, 164, 167, 177, 179, 180, 186, 187, 188, 189, 192, 199, 201, 203, 206, 213, 217, 220, 229, 232, 238, 244, 247, 251, 252, 264, 267, 279, 284, 289, 297, 307, 309 and 320.

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Mr. Santosh Kumar Pandey, Adv. in item 32

Mr. Siddhartha Sinha, SSC with Mr. Niranjan Marde, Adv. in item 59, 88, 97, 98, 99, 121, 133, 142, 143, 149, 150, 171

Mr. Abhishek Maratha, SSC with Mr. Apoorv Agarwal, Mr. Parth Samwal, JSCs, Mr. Gaurav Singh, Ms. Nupur Sharma, Mr. Bhanukaran Singh Jodha, Mr. Himanshu Gaur, Ms.

Muskan Goel & Mr. Kamakshraj Singh, Advs. in item 60, 68, 75, 76, 81, 84, 94, 100, 102, 104, 105, 111, 115, 116, 134, 137, 139, 141, 151, 154, 161, 169, 173, 196, 200, 256, 260, 265, 269, 285, 306, 311, 312, 318

Mr. Sunil Agarwal, SSC with Mr. Shivansh B. Pandya, Mr. Viplav Acharya, Ms. Priya Sarkar & Mr. Utkarsh Tiwari, JSCs in item 64, 71, 78, 79, 112, 117, 123, 125, 130, 131, 144, 146, 153, 160, 165, 176, 181, 184, 204, 207, 218, 221, 239, 241, 242, 255, 268, 270, 276, 291, 295, 305

Mr. Sanjay Kumar, SSC with Ms. Monica Benjamin & Ms. Easha Kadian, JSCs in item 59, 69, 85, 88, 119, 124, 157, 195, 197, 215, 248, 278, 281, 286, 302, 309, 315, 316

Mr. Debesh Panda, SSC with Mr. Vikramaditya Singh, Ms. Zehra Khan, JSCs, Ms. Delphina Shinglai, Mr. Kanishk Agarwal & Ms. Yashika Gupta, Advs. in item 57, 73, 80, 82, 90, 93, 101, 103, 108, 136, 145, 152, 156, 178, 182, 191, 192, 202, 205, 208, 211, 212, 214, 228, 234, 236, 263, 272, 273, 275, 282, 283, 288, 290, 293, 296, 298, 304, 314

Mr. Indruj Rai, SSC with Mr. Sanjeev Menon & Mr. Rahul Singh, JSCs in item 73, 216, 266, 271, 274, 296

Mr. Abhishek Garg, Mr. Yash Gaitha, Mr. Ramesh Singh Mankotia & Mr. Naman Mehta, Advs. in item 85

Mr. T.P.Singh, SSC for R-3 in item 103

Mr. Santosh Kumar Pandey, Adv. in item 124

Mr. Hemant Kumar Yadav, SPC with Mr. Mohit Chaturvedi, Adv. for R-2 in item 139

Mr. Shlok Chandra, SSC with Ms. Naincy Jain & Ms.

Madhavi Shukla, JSCs in item 341, 168, 210, 222, 230, 231, 245, 250, 261, 287, 292, 310

Mr. Ruchir Bhatia, SSC with Mr. Anant Mann, JSC, Mr.

W.P.(C) 13458/2022 & Connected Matters

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Abhishek Anand & Mr. Pranjal Singh, Advs. in item 83, 129, 194, 213, 246, 254, 258, 301, 313, 321, 322, 333

Mr. Gaurav Gupta, SSC with Mr. Shivendra Singh & Mr.

Yojit Pareek, JSCs in item 62, 65, 70, 77, 92, 120, 122, 123, 132, 147, 166, 183, 190, 199, 219, 224, 225, 240, 259, 262, 294, 299

Mr. Ashish Batra, SPC in item 193

Mr. Niraj Kumar, SCC for R-5 in item 195

Mr. Rajkumar Yadav, SPC with Mr. Vaibhav Bhardwaj, Adv. in item 214

Ms. Richa Dhawan, SPC with Mr. Anuj Chaturvedi, Mr. Pawan Karan Deo & Ms. Harshita Maheshwari, Advs. in item 51-323, 217

Mr. Sandeep Vishnu, SPC with Ms. Suwaleha Siddiqui & Mr. Rajesh Kumar, Advs. for R-5 in item 232

Mr. Sushil Raja, SPC in item 173.

Ms. Bakshi Vinita, SPC for R-6 in item 121

Mr. Chiranjiv Kumar & Mr. Mukesh Sachdeva, Advs. in item 168, 143, 197, 317

Mr. Hemant Kumar Yadav, SPC for R-2. In item 139

Mr. Ravi Prakash, Sr. Adv. & Mr. Vivek Gurnani, SC in item 338

Mr. Ajay Vohra, Sr. Adv. with Mr. Sparsh Bhargava, Mr. Jaidev Prasada, Mr. Apoorv Shukla, Ms. Ishita Farsaiya & Ms. Vanshika Taneja, Advs. in item 324

CORAM:

HON'BLE MR. JUSTICE YASHWANT VARMA

HON'BLE MR. JUSTICE HARISH VAIDYANATHAN  
SHANKAR

ORDER

% 14.01.2025

1. Learned counsels for the petitioners have commenced submissions on this batch. We have also had the benefit of perusing the composite chart which has been submitted on behalf of the writ This is a digitally signed order.

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2. Since Mr. Aseem Chawla, learned senior counsel was originally addressing submissions and is familiar with the principal issues which arise and which had been identified with his assistance, we have requested Mr. Chawla to address submissions in the capacity of amicus curiae.

3. We have also gone through the chart submitted by Ms. Jha, learned senior counsel who appears amongst others in W.P. (C) 6849/2023. According to Ms. Jha, while examining the issue of limitation and which forms part of Question A as framed in our order of 05 August 2024, on facts, the following position as encapsulated would emerge insofar as the aforementioned writ petitioner is concerned:-

**SUMMARY CHART A. Key Facts:**

S. No	PARTICULARS
1.	Notice issued under section 148 (old regime)
2.	Letter communicating information pursuant to SC decision in Ashish Agarwal - reply to be filed by 01.06.2022
3.	Reply filed by Petitioner
4.	Order u/s 148A(d)
5.	Notice issued u/s 148- Sanction obtained from PCIT

**B. COMPUTATION OF LIMITATION AS PER DECISION OF UOI VS. RAJEEV BANSAL:**

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1. Assessment Year 2014-15

2. Period of limitation u/s 149 [3 years or 6 years] 6 years

3. Original Period of limitation u/s 149 31.03.2021

4. Extended period of limitation as per IT Act read 30.06.2021 Paras with TOLA 65-69

5. Sanction to be obtained u/s 151 till 30.06.2021 PCIT [within 6 years]

6. Date of original notice u/s 148 - deemed SCN u/s 23.04.2021 148A (b)

7. Time surviving from date of issuance of deemed 68 days Paras SCN till expiry of period as extended by TOLA 109-

8. Period of deemed stay to be excluded as per 3rd 23.04.2021 Paras proviso to section 149 [Date of Original 148 till to 105- date allowed to file reply to assessee] 14.06.2022 107

9. Last date for issuing notice u/s 148 [i.e., 21.08.2022 Para

10. Actual date of issuance of notice u/s 148 27.07.2022

11. Notice u/s 148 issued under new regime is within Para

4. We direct learned counsels appearing for the writ petitioners to prepare similar charts encapsulating the facts of each individual case and ensure that copies of the same are duly served upon learned counsels appearing for the respondents. Those charts shall be submitted at least 48 hours prior to the next date fixed.

5. This batch of writ petitions shall thereafter be taken up for consideration on Question A, as well as and wherever so required, on Questions B, C and D.

6. Having heard learned counsels for parties, we are of the opinion that Question F as formulated should be left open to be examined independently in appropriate proceedings.

7. We further take note of the judgment rendered by a Division This is a digitally signed order.

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8. Let this batch be called again on 30.01.2025 in the category of "End of Board" matters as part heard.

YASHWANT VARMA, J.

HARISH VAIDYANATHAN SHANKAR, J.

JANUARY 14, 2025/nd 2024 SCC OnLine Del 8140 This is a digitally signed order.

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