

IN THE INCOME TAX APPELLATE TRIBUNAL
DELHI BENCH : I-1 : NEW DELHI

BEFORE SHRI R.K. PANDA, ACCOUNTANT MEMBER
AND
SHRI KULDIP SINGH, JUDICIAL MEMBER

ITA No.5420/Del/2016
Assessment Year: 2010-11

ITA No.91/Del/2017
Assessment Year: 2011-12

CH2M Hill (Pvt.) Ltd.,
B-1D, Sector-10,
Noida.
PAN: AAECA3097N

Vs

DCIT,
Circle-3(1),
New Delhi.

ITA No.6236/Del/2016)
Assessment Year: 2010-11

ACIT,
Circle-6(1),
New Delhi

Vs.

CH2M Hill (Pvt.) Ltd.,
A-422, Defence Colony,
New Delhi.
PAN: AAECA3097N

(Appellant)

(Respondent)

Assessee by	:	Ms Sakshi Jain, AR
Revenue by	:	Ms Shashi Kajli, Sr. DR
Date of Hearing	:	03.03.2020
Date of Pronouncement	:	03.03.2020

ORDER

PER BENCH:

The Id. Counsel for the assessee at the time of hearing, filed an application seeking withdrawal of the appeals filed by the assessee on the ground that pursuant

to an application filed by the AE of the assessee in the United States seeking resolution under MAP with the Competent Authority of US under Article 9 and 27 of Indo-US Income Tax Convention, a settlement has been arrived at between the US Competent Authority and the Competent Authority of India. The assessee has accepted the resolution arrived at under the said MAP. Under these circumstances, the assessee seeks to withdraw the appeals filed before the Tribunal.

2. In absence of any objection from the side of the Ld. DR, the request of the assessee seeking permission of the Bench to withdraw the appeals are allowed. Since the grounds raised by the Revenue also pertain to the issues covered under the MAP proceedings, therefore, the appeal of the Revenue becomes infructuous. Accordingly, the two appeals filed by the assessee are dismissed as withdrawn and the appeal filed by the Revenue is dismissed being infructuous.

3. In the result, the appeals filed by the assessee as well as the appeal filed by the Revenue are dismissed.

The decision was pronounced in the open court on 03.03.2020.

Sd/-

(KULDIP SINGH)
JUDICIAL MEMBER

Sd/-

(R.K. PANDA)
ACCOUNTANT MEMBER

Dated: 03rd March, 2020.

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Copy forwarded to :

1. Appellant
2. Respondent
3. CIT
4. CIT(A)
5. DR

Asstt. Registrar, ITAT, New Delhi