

आयकर अपीलीय अधिकरण, चण्डीगढ़ न्यायपीठ "ए", चण्डीगढ़
IN THE INCOME TAX APPELLATE TRIBUNAL, CHANDIGARH BENCH "A", CHANDIGARH
(VIRTUAL COURT)

न्यायमूर्ति श्री पी.पी. भट्ट, अध्यक्ष एवं श्री एन.के.सैनी, उपाध्यक्ष
BEFORE: JUSTICE SHRI P.P. BHATT, PRESIDENT & SHRI. N.K.SAINI, VICE PRESIDENT

आयकर अपील सं./ ITA Nos. 202 & 203/Chd/2019
निर्धारण वर्ष / Assessment Years : 2009-10 & 2010-11

M/s Citizen Global(P) Ltd. 16, Maya Nagar, Ludhiana	बनाम	The ITO Ward-7(1), Ludhiana
स्थायी लेखा सं./PAN NO: AADCC2543E		
अपीलार्थी/Appellant		प्रत्यर्थी/Respondent

निर्धारिती की ओर से/Assessee by : Shri Ashwani Kumar, C.A
Shri Aditya Kumar, C.A
Shri Bhawesh Jindal, C.A
Miss Udit Jain, C.A

राजस्व की ओर से/ Revenue by : Smt. Meenakshi Vohra, Addl. CIT

सुनवाई की तारीख/Date of Hearing : 02/12/2020
उद्घोषणा की तारीख/Date of Pronouncement : 02/12/2020

आदेश/Order

PER BENCH:

Both the above appeals are filed by the Assessee against the separate orders of the Ld. CIT(A)-3, Ludhiana each dt. 18/12/2018.

2. The Ld. Counsel for the Assessee furnished different applications each dated 20/11/2020 for withdrawal of these appeals. Since the contents of the application in both the above cases are almost same except Appeal Number and Assessment Year, therefore we reproduce hereunder application moved in ITA No. 202/Chd/2019 which read as under :

Subject: Request for permission to withdraw appeals in the case of M/s Citizen Global Private Limited, 16, Maya Nagar, Ludhiana....A/y 2009-10... PAN: AADCC2543E..... ITA No. 202/Chd/2019

Sir

Respectfully it is submitted that ITA No. 202/Chandi/2019 in the case of M/s Citizen Global Private Limited is pending for adjudication before the Hon'ble Bench. The petitioner seeks permission to withdraw the above captioned appeals, as the appellant company has moved before Ld. Principal Commissioner of Income Tax-1, Ludhiana under "Vivad Se Vishwas Scheme". Also, Form 3 has been issued by Ld. PCIT-1, Ludhiana on 20.10.2020, copy of the same is enclosed.

Thanking You

Yours faithfully

Sd/-
(Ashwani Kumar)
C.A.
Counsel for the Appellant

3. During the course of hearing the Ld. Counsel for the Assessee submitted that since the assessee had availed the immunity scheme i.e; Vivad Se Vishwas and the Income Tax Department had issued Form No. 3, in response to the applications filed by the assessee, under section 5(1) of the Direct Tax Vivad se Vishwas Act, 2020, therefore the appeals of the assessee may be allowed to be withdrawn. The details of above said certificates are as under:

Sl.No.	Appeal No.	Name of Case	Certificate No.
1.	ITA No. 202/Chandi/2019	M/s Citizen Global(P) Ltd.	662795840201020
2.	ITA No. 203/Chandi/2019	M/s Citizen Global(P) Ltd.	662777790201020

4. The Ld. DR did not object if the above appeals of the assessee are dismissed as withdrawn.

5. In view of the above the appeals of the assessee are dismissed as withdrawn.

6. In the result, appeals of the assessee are dismissed.

(Order pronounced in the Court on 02/12/2020)

Sd/-
एन.के.सेनी,
(N.K. SAINI)
उपाध्यक्ष / VICE PRESIDENT
AG
Date: 02/12/2020

Sd/-
पी.पी. भट्ट
(P.P. BHATT)
अध्यक्ष / PRESIDENT

आदेश की प्रतिलिपि अग्रेषित/ Copy of the order forwarded to :

1. अपीलार्थी/ The Appellant
2. प्रत्यर्थी/ The Respondent
3. आयकर आयुक्त/ CIT
4. आयकर आयुक्त (अपील)/ The CIT(A)
5. विभागीय प्रतिनिधि, आयकर अपीलीय आधिकरण, चण्डीगढ़/ DR, ITAT, CHANDIGARH
6. गार्ड फाईल/ Guard File