

**IN THE INCOME TAX APPELLATE TRIBUNAL
BANGALORE BENCHES "A", BANGALORE**

Before Shri George George K, JM & Shri B.R.Baskaran, AM

ITA No.546/Bang/2008 : Asst.Year 2003-2004

M/s.Nandi Steels Limited F-4, Richmond Plaza Richmond Circle Bangalore – 560 025. PAN : AAACN4849D.	v.	The Asst.Commissioner of Income-tax, Circle 12(2) Bangalore.
(Appellant)		(Respondent)

Appellant by : Sri.S.Ramasubramanian, CA
Respondent by : Sri.Kannan Narayanan, JCIT-DR

Date of Hearing : 26.08.2021	Date of Pronouncement : 26.08.2021
-------------------------------------	---

ORDER

Per George George K, JM

This appeal was restored to the I.T.A.T. by the Hon'ble High Court in ITA No.103/2012 (judgment dated 23.02.2021). Before the Hon'ble High Court, there were four substantial questions of law for adjudication. The question of law 1 and 2 was regarding the issue on merits whereas the questions of law 3 and 4 were regarding validity of proceedings u/s 148 of the I.T.Act. The Hon'ble High Court in the above judgment, decided the issues raised on merits (ground No.1 and 2) in favour of the assessee. As regards the issue on jurisdiction for completing reassessment u/s 147 of the I.T.Act, the Hon'ble High Court restored the matter to the Tribunal (ground No.3 and 4).

2. When the matter had come up for hearing today, the learned AR submitted that the assessee is not pressing

		Date	Initial	
1.	Draft dictated on	26.08.2021		Sr.PS
2.	Draft placed before author	26.08.2021		Sr.PS
3.	Draft proposed & placed before the second member			JM/AM
4.	Draft discussed/approved by Second Member.			JM/AM
5.	Approved Draft comes to the Sr.PS/PS			Sr.PS/PS
6.	Kept for pronouncement on			Sr.PS
7.	Date of uploading the order on website			
8.	If not uploaded, furnish the reason			
8.	File sent to the Bench Clerk			Sr.PS
9.	Date on which file goes to the AR			
10.	Date on which file goes to the Head Clerk.			
11.	Date of dispatch of Order.			
12.	Draft dictation sheets are attached			Sr.PS