

question in assessee's case on 11.03.2011 leading to initiation of Section 153A proceedings culminating in the Assessing Officer's assessment framed on 26.12.2011 making the additions in question. There could be hardly any dispute that we are dealing with an "unabated" assessment as on the date of search wherein any additions has to be made in the assessee's hands based on the specific seized material only as per PCIT Vs. Abhisar Builwell P. Ltd. (2023) 454 ITR 212 (SC).

3. Learned CIT-DR at this stage seeks to postpone the hearing in the instant Revenue's appeal on the ground that the necessary status report is yet to come from the field authorities.

4. We are of the considered view that given facts that there is no addition made on the basis of the seized material, we reject the Revenue's instant adjournment as well as the main appeal in very terms.

5. Revenue's appeal is dismissed.

Order pronounced in the open court on 12.02.2025

Sd/-
(Manoj Kumar Aggarwal)
ACCOUNTANT MEMBER

Sd/-
(Satbeer Singh Godara)
JUDICIAL MEMBER

Dated 12.02.2025

PS: Rohit/Subodh, Sr. PS

Copy forwarded to:

1. Appellant
2. Respondent
3. CIT
4. CIT(Appeals)
5. DR: ITAT

ASSISTANT REGISTRAR