

**IN THE INCOME TAX APPELLATE TRIBUNAL
DELHI BENCH 'A', NEW DELHI**
Before Sh. Satbeer Singh Godara, Judicial Member
&
Sh. S. Rifaur Rahman, Accountant Member
ITA No. 338/Ind./2025 : Asstt. Year: 2012-13

Karan Singh Dogra, 1903, Lotus Boulevard, Tower-16, Sector-100, Gautam Budh Nagar, Uttar Pradesh-201301	Vs	Income Tax Officer, Ward-2(1), Noida, Uttar Pradesh-201304
(APPELLANT)		(RESPONDENT)
PAN No. AAOPD8275C		

Assessee by : Ms. Shalini Gupta, CA
Revenue by : Sh. Ajay Kumar Arora, Sr. DR

Date of Hearing: 17.11.2025	Date of Pronouncement: 17.11.2025
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ORDER

Per Satbeer Singh Godara, Judicial Member:

This assessee's appeal for Assessment Year 2012-13, arises against the Addl./JCIT(A), Bhopal's DIN & order No. ITBA/APL/S/250/2024-25/1073193791(1) dated 12.02.2025, in proceedings u/s 144 of the Income Tax Act, 1961 (in short "the Act").

2. Heard both the parties at length. Case file perused.
3. Learned counsel submits that on account of communication gaps at various levels, the assessee could not appear to plead and prove all the relevant facts in the lower appellate

proceedings and therefore, in the larger interest of justice met in case, the matter be restored back to the CIT(A).

4. Be that as it may, the fact remains that possibility of some communication gaps at various levels in such an instance could not be altogether ruled out. This is indeed coupled with the facts that there is also no effective compliance to section 250(6) of the Act in the impugned lower appellate order stipulating points of determination to be framed followed by a detailed adjudication thereupon. It is therefore deemed appropriate in the larger interest of justice to set aside the assessee's instant appeal back to the CIT(A) for his afresh appropriate adjudication, within three effective opportunities of hearing at the appellant's risk and responsibility, in consequential proceedings. Ordered accordingly.

5. This assessee's appeal is allowed for statistical purposes.

Order Pronounced in the Open Court on 17/11/2025.

Sd/-

(S. Rifaur Rahman)
Accountant Member
Dated: 17/11/2025

Subodh Kumar, Sr. PS

Copy forwarded to:

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

Sd/-

(Satbeer Singh Godara)
Judicial Member

ASSISTANT REGISTRAR