

आयकर अपीलीय अधिकरण "बी" न्यायपीठ पुणे में ।
IN THE INCOME TAX APPELLATE TRIBUNAL "B" BENCH, PUNE

BEFORE SHRI R.K. PANDA, VICE PRESIDENT
AND
MS. ASTHA CHANDRA, JUDICIAL MEMBER

आयकर अपील सं. / ITA No.368/PUN/2025
निर्धारण वर्ष / Assessment Year : 2015-16

Satyaprem Rajabhau Dhole, Adas Kaij, Beed-431517	Vs.	ITO, Ward-1(5), Aurangabad
PAN : CBJPD5458H		
अपीलार्थी / Appellant		प्रत्यर्थी / Respondent

Assessee by :	Shri Shubham Rathi (Virtual)
Department by :	Shri Manish Mehta
Date of hearing :	21-01-2026
Date of Pronouncement :	12-02-2026

आदेश / ORDER

PER ASTHA CHANDRA, JM :

The appeal filed by the assessee is directed against the order dated 13.01.2025 of the Ld. Commissioner of Income Tax (Appeals)/NFAC, Delhi [**"CIT(A)"/"NFAC"**] pertaining to Assessment Year (**"AY"**) 2015-16.

2. Briefly stated, the facts are that the assessee is an individual and did not file his return of income for AY 2015-16. Based on the information as per the NMS module of Insight portal, it was found that during the relevant AY 2015-16, the assessee had deposited cash totaling to Rs.74,20,000/- in his saving bank account, the source of which remained unexplained due to non-filing of return of income. The case of the assessee was thus reopened for reassessment u/s 147 of the Income Tax Act, 1961 (**the "Act"**) following the procedure mandated in law. A show cause notice u/s 148A(b) was issued on 23.03.2022 by the Ld. Assessing Officer (**"AO"**) requiring the assessee to furnish the reply on or before 30.03.2022. The assessee, however, failed to comply. The Ld. AO, therefore, concluded that the income of Rs.74,20,000/- in the hands of the assessee has escaped assessment for AY 2015-16. Order u/s

148A(d) of the Act was passed with the prior approval of the Pr. Chief Commissioner of Income Tax, Pune on 06.04.2022 followed by issuance of notice u/s 148 of the Act on 07.04.2022. Thereafter, statutory notice(s) u/s 143(2) and 142(1) of the Act along with show cause letters were issued to the assessee from time to time. In response to notice u/s 148 of the Act, the assessee filed his return of income for AY 2015-16 on 20.02.2023. The assessee also raised objections before the Ld. AO for initiation of reassessment proceedings. The reply of the assessee was considered but was not found tenable and acceptable by the Ld. AO. Thereafter, rebuttal letter was issued by the Ld. AO. Due to lack of compliance from the side of the assessee to the statutory notices/show cause notice and after obtaining information from the State Bank of India and Maharashtra Gramin Bank u/s 133(6) of the Act, the Ld. AO completed the assessment vide order dated 31.01.2024 passed u/s 147 r.w.s. 144 r.w.s. 144B of the Act determining the total income of the assessee at Rs.75,11,045/- by making an addition on account of – (i) Rs.69,47,776/- as unexplained money u/s 69A of the Act and (ii) saving bank interest of Rs.17,389/- as income from other sources.

3. Aggrieved, the assessee filed an appeal before the Ld. CIT(A)/NFAC challenging the above addition(s) made by the Ld. AO as well as the validity of reassessment proceedings. Since, the assessment was complete ex-parte u/s 144 of the Act by the Ld. AO, the Ld. CIT(A)/NFAC set aside the assessment order passed by the Ld. AO for making fresh assessment under the newly inserted proviso to section 251(1)(a) of the Act by observing as under :

“5. Decision & findings:

I have gone through the assessment order dated 31.01.2024, grounds of appeal, statement of facts and other material on record. The present appeal has been filed by the appellant against the assessment order passed under section 147 r.w.s. 144 read with section 144B of the Act dated 31.01.2024 by the Assessing Officer for A.Y. 2015-16. The assessment order was passed on 31.01.2024 determining the appellant's assessed income at Rs.75,11,045/- which was based on addition on account of unexplained money etc. u/s 69A of the Act and unexplained interest income. It is found that the assessment order has been passed u/s 144 as a best judgement assessment order. The assessment order states that many opportunities were provided to the assessee to furnish replies & written submissions. The details of such opportunities are also mentioned in the body of the assessment order. It is further stated that the assessee failed to avail the opportunities provided which in fact led to passing of an ex-parte best judgement assessment order.

Relevant portion of assessment order dated 31.01.2024 of Assessing officer :

"Assessee has failed to comply with the terms of notice(s) issued under section 142(1). It was proposed to assess income under section 144 on the basis of material available on record. The assessee was given an opportunity to show cause Under Section 144B(1)(ix) of the Income Tax, 1961 as to why the assessment should not be completed ex parte under Section 144 read with section 147 read with 144B of the Income Tax Act 1961. Assessee was requested to submit response through registered e-filing account at www.incometax.gov.in by 11:00 hours of 11/10/2023. The assessee did not comply with the notice on stipulated date and time even as on date.

Show cause under clause (xii) (b) of section 144B of the Income Tax Act 1961 was issued on 12/07/2023. Fixing the date of hearing on or before 19/01/2024. The facts and circumstances of the case were discussed in the said show cause. For the sake of brevity the same is not reproduced here. The assessee did not comply with the notice on stipulated date and time even as on date."

After considering facts of the case, I am inclined to set aside the impugned order dated 31.01.2024.

It is found that on this subject, there has been a change in law w.e.f. 01-10-2024. Section 251 has been amended to provide powers of set-aside to CIT (Appeals). The relevant provisions after amendment read as under

251. (1) in disposing of an appeal, the Commissioner (Appeals) shall have the following powers-

(a) in an appeal against an order of assessment, he may confirm, reduce, Enhance or annul the assessment,

Provided that where such appeal is against an order of assessment made under Section 144, he may set aside the assessment and refer the case back to the Assessing Officer for making a fresh assessment;

It is found that such powers of setting aside an assessment order have been inserted by the Finance Act, 2024, w.e.f. 01-10-2024. It is clear that in this case, the assessment order has been made u/s 144 of the Act. Keeping in view these facts and the change in law, principles of natural justice require that this assessment order should be set aside and referred back to the Assessing Officer for making a fresh assessment. The same is hereby done, ie the assessment order is set aside to the Assessing Officer for making fresh assessment. The Assessing Officer shall provide reasonable opportunities of being heard to the assessee and shall consider all the submissions made & documents furnished by the assessee and pass a detailed, exhaustive and speaking order on the impugned issues. The Assessing Officer may take such steps as advised in accordance with law. The A.O is directed to make fresh assessment within time limit provided in section 153(3) of the Act. The assessee is also requested to furnish the requisite details before the AO to substantiate his claim.

Keeping in view the above, it is not considered necessary to go into the merits of each ground taken by the assessee, considering the fact that the assessment order has been set-aside in toto, to be made afresh by the Assessing Officer.

6. In the result, the appeal of the appellant is set aside."

4. Dissatisfied, the assessee is in appeal before the Tribunal raising the following grounds of appeal :

"1. THE CHALLENGE TO REASSESSMENT

1.1 The Learned Commissioner of Income Tax (Appeals) [the Ld. CIT] has erred in confirming the validity of initiation of reassessment proceedings.

- 1.2 *On the facts and in the circumstances of the case, the Learned Income Tax Officer, Ward 1(5), Aurangabad ["The Ld. JAO"] has initiated the reassessment proceedings without fulfilling the preconditions required to initiate the reassessment proceedings U/s 148-151 of the Act.*
- 1.3 *On the facts and in circumstances of the case, the Ld. CIT(A) confirmed the validity of initiation of reassessment proceedings without application of mind to the facts and submission submitted before him.*
- 1.4 *In the above circumstances, facts and in law, the Appellant submits that the initiation of reassessment proceedings in the present case is without jurisdiction*

WITHOUT PREJUDICE TO THE ABOVE

2. THE NOTICE U/S 148 IS NOT IN ACCORDANCE WITH THE PROVISIONS OF SECTION 151A

- 2.1 *The Ld. JAO has erred in assuming the jurisdiction to issue the notice u/s 148 which is in non-compliance to the provisions of section 151A of the Act.*
- 2.2 *It is submitted that in the facts and in the circumstances of the case and in law, the notice issued u/s 148 of the Act in the present case is bad in law and therefore deserves to be quashed.*

3. LEAVE

The Appellant craves leave to add, alter, amend or delete any of the above grounds of appeal.”

5. The Ld. AR submitted that the assessee has challenged the validity of reassessment proceedings before the Tribunal on the ground that the notice issued u/s 148 is barred by limitation and therefore bad in law and deserves to be quashed. He submitted that the assessee had challenged the initiation of reassessment proceedings before the Ld. CIT(A)/NFAC as well but he did not adjudicate the legal grounds raised by the assessee as well as merits of the case and restored the matter back to the file of the Ld. AO for fresh adjudication. He submitted that there are no disputed facts/new facts involved and therefore the legal issue raised by the assessee may be decided by the Tribunal. Relying on the decision of the Hon'ble Supreme Court in the case of Union of India Vs. Rajeev Bansal (2024) 167 taxmann.com 70 (SC), the Ld. AR submitted that as per the said decision the due date of issuing notice u/s 148 of the Act for AY 2015-16 as applicable to the instant case is 31.03.2022, however the notice u/s 148 was issued to the assessee on 07.04.2022 and thus said notice issued by the Ld. JAO/AO u/s 148 of the Act on 07.04.2022 is barred by limitation. He further relied on the following decision(s) in support of his above claim:

- i. Cherian Nallathu Abraham Annamma Vs. ITO (2025) 179 taxmann.com 433 (Bom.);
- ii. Verjina Foods Ltd. Vs. ITO (2025) 179 taxmann.com 626 (Bom);
- iii. Manju Somani Vs. ITO (2024) 165 taxmann.com 675 (Delhi);
- iv. Babu Hasan Shaikh Vs. ITO in ITA No. 926/Mum/2025, order dated 28.04.2025 (Mumbai-Trib.).

6. The Ld. DR, on the other hand, submitted that since the assessee failed to file any compliance before the Ld. AO and the Ld. CIT(A)/NFAC has also not considered the impugned issues on merits and not adjudicated the legal ground as well, the matter may be set aside to the file Ld. CIT(A)/NFAC for fresh adjudication.

7. We have heard the rival arguments made by both the sides, perused the paper book filed by the Ld. AR on behalf of the assessee as well as various judicial precedents relied upon by the Ld. AR. Admittedly, there was non-compliance by the assessee before the Ld. AO which constrained him to pass an exparte order qua the assessee. We observe that the order of the Ld. CIT(A)/NFAC is a non-speaking order and he has not adjudicated the matter on merits including the legal ground raised by the assessee and set aside the assessment order for denovo adjudication by the Ld. AO in terms of newly inserted proviso to section 251(1)(a) of the Act. Before us, the assessee has raised a legal ground challenging the validity of reassessment proceedings relying on the decision of Hon'ble Supreme Court in the case of Union of India Vs. Rajeev Bansal (supra) on the ground that the notice issued to the assessee under section 148 of the Act is barred by limitation. On perusal of this legal ground raised by the assessee, we find that it goes to the root of the matter and does not require verification of any additional/ new facts. Further, we find that the impugned issue raised in the said legal ground stands squarely covered in favour of the assessee by the decision of the Hon'ble Apex Court and the Hon'ble jurisdictional Bombay High Court as well as Co-ordinate Bench(es) of the Tribunal including the Pune Tribunal. In the absence of any contrary material brought on record by the Revenue, we deem it fit, in the interest of justice and fair play, to proceed and adjudicate the legal ground at this stage.

8. The facts of the case are not in dispute. The Ld. AO issued notice u/s 148 of the Act for the relevant AY 2015-16 under consideration on 7.04.2022

(page 8 of the paper book refers). Under the old provisions of section 149, which is applicable for the assessment year under consideration i.e. AY 2015-16, the notice u/s 148 would not have been issued beyond the period of 6 years from end of the relevant assessment year. The period of 6 years from the AY 2015-16 laps on 31.03.2022. As stated earlier, in the instant case, notice u/s 148 was issued to the assessee on 07.04.2022 which is clearly beyond the time limit prescribed under the said provisions of the Act. We find that the Revenue has also conceded before the Hon'ble Supreme Court in the case of Rajeev Bansal (supra) that the provisions of Taxation and Other Laws (Relaxation and Amendment of Certain Provisions) Act, 2020 (TOLA) is not applicable to the notices issued for AY 2015-16. The relevant para of the judgment is reproduced below :

“19. Mr N Venkataraman, learned Additional Solicitor General of India, made the following submissions on behalf of the Revenue:

- a. Parliament enacted TOLA as a free-standing legislation to provide relief and relaxation to both the assesses and the Revenue during the time of COVID-19. TOLA seeks to relax actions and proceedings that could not be completed or complied with within the original time limits specified under the Income Tax Act;*
- b. Section 149 of the new regime provides three crucial benefits to the assesses: (i) the four-year time limit for all situations has been reduced to three years; (ii) the first proviso to Section 149 ensures that re-assessment for previous assessment years cannot be undertaken beyond six years; and (iii) the monetary threshold of Rupees fifty lakhs will apply to the re- assessment for previous assessment years;*
- c. The relaxations provided under Section 3(1) of TOLA apply “notwithstanding anything contained in the specified Act.” Section 3(1), therefore, overrides the time limits for issuing a notice under Section 148 read with Section 149 of the Income Tax Act;*
- d. TOLA does not extend the life of the old regime. It merely provides a relaxation for the completion or compliance of actions following the procedure laid down under the new regime;*
- e. The Finance Act 2021 substituted the old regime for re-assessment with a new regime. The first proviso to Section 149 does not expressly bar the application of TOLA. Section 3 of TOLA applies to the entire Income Tax Act, PART C including Sections 149 and 151 of the new regime. Once the first proviso to Section 149(1)(b) is read with TOLA, then all the notices issued between 1 April 2021 and 30 June 2021 pertaining to assessment years 2013-2014, 2014-2015, 2015-2016, 2016-2017, and 2017-2018 will be within the period of limitation as explained in the tabulation below:*

Assessment Year	Within 3 Years	Expiry of Limitation read with	Within six Years	Expiry of Limitation read with TOLA for

		TOLA (or (2))		(4)
(1)	(2)	(3)	(4)	(5)
2013-2014	31-3-2017	TOLA not applicable	31-3-2020	30-6-2021
2014-2015	31-3-2018	TOLA not applicable	31-3-2021	30-6-2021
2015-2016	31-3-2019	TOLA not applicable	31-3-2022	TOLA not applicable
2016-2017	31-3-2020	30-6-2021	31-3-2023	TOLA not applicable
2017-2018	31-3-2021	30-6-2021	31-3-2024	TOLA not applicable

- f. The Revenue concedes that for the assessment year 2015-16, all notices issued on or after 1 April 2021 will have to be dropped as they will not fall for completion during the period prescribed under TOLA;
- g. Section 2 of TOLA defines “specified Act” to mean and include the Income Tax Act. The new regime, which came into effect on 1 April 2021, is now part of the Income Tax Act. Therefore, TOLA continues to apply to the Income Tax Act even after 1 April 2021; and
- h. Ashish Agarwal (supra) treated Section 148 notices issued by the Revenue between 1 April 2021 and 30 June 2021 as show-cause notices in terms of Section 148A(b). Thereafter, the Revenue issued notices under Section 148 of the new regime between July and August 2022. Invalidation of the Section 148 notices issued under the new regime on the ground that they were issued beyond the time limit specified under the Income Tax Act read with TOLA will completely frustrate the judicial exercise undertaken by this Court in Ashish Agarwal (supra).

9. Similarly, at para 46 of the order the Hon'ble Supreme Court has observed as under:

“46. The ingredients of the proviso could be broken down for analysis as follows:

(i) no notice under Section 148 of the new regime can be issued at any time for an assessment year beginning on or before 1 April 2021; (ii) if it is barred at the time when the notice is sought to be issued because of the “time limits specified under the provisions of” 149(1)(b) of the old regime. Thus, a notice could be issued under Section 148 of the new regime for assessment year 2021-2022 and before only if the time limit for issuance of such notice continued to exist under Section 149(1)(b) of the old regime.”

10. Finally, the Hon'ble Supreme Court at para 114 of the order has observed as under:

“G. Conclusions

114. In view of the above discussion, we conclude that:

- a. After 1 April 2021, the Income Tax Act has to be read along with the substituted provisions;
- b. TOLA will continue to apply to the Income Tax Act after 1 April 2021 if any action or proceeding specified under the substituted provisions of the Income Tax Act falls for completion between 20 March 2020 and 31 March 2021;
- c. Section 3(1) of TOLA overrides Section 149 of the Income Tax Act only to the extent of relaxing the time limit for issuance of a reassessment notice under Section 148;
- d. TOLA will extend the time limit for the grant of sanction by the authority specified under Section 151. The test to determine whether TOLA will apply to Section 151 of the new regime is this: if the time limit of three years from the end of an assessment year falls between 20 March 2020 and 31 March 2021, then the specified authority under Section 151(i) has extended time till 30 June 2021 to grant approval;
- e. In the case of Section 151 of the old regime, the test is: if the time limit of four years from the end of an assessment year falls between 20 March 2020 and 31 March 2021, then the specified authority under Section 151(2) has extended time till 31 March 2021 to grant approval;
- f. The directions in Ashish Agarwal (supra) will extend to all the ninety thousand reassessment notices issued under the old regime during the period 1 April 2021 and 30 June 2021;
- g. The time during which the show cause notices were deemed to be stayed is from the date of issuance of the deemed notice between 1 April 2021 and 30 June 2021 till the supply of relevant information and material by the assessing officers to the assesses in terms of the directions issued by this Court in Ashish Agarwal (supra), and the period of two weeks allowed to the assesses to respond to the show cause notices; and h. The assessing officers were required to issue the reassessment notice under Section 148 of the new regime within the time limit surviving under the Income Tax Act read with TOLA. All notices issued beyond the surviving period are time barred and liable to be set aside;”

11. Recently in the case of Cherian Nallathu Abraham Annamma, order dated 13.10.2025 (supra), the Hon'ble Bombay High Court held as under:

“6. We have heard the learned counsel for the parties. It is not in dispute that the present petition relates to A.Y.2015-16. Further, it is also undisputed that the notice under Section 148 has been issued on 5th April 2022 which is at page 52 of the paperbook. Once these are the facts, paragraphs 19 (e) and (f) of the judgment of the Hon'ble Supreme Court in the case of Rajeev Bansal (supra) become relevant. They read as under:-

19. Mr. N Venkataraman, learned Additional Solicitor General of India, made the following submissions on behalf of the Revenue:-

.....

e. The Finance Act 2021 substitute the old regime for reassessment with a new regime. The first proviso to Section 149 does not expressly bar the application of TOLA. Section 3 of TOLA applies to the

entire Income-tax Act, including Sections 149 and 151 of the new regime. Once the first proviso to Section 149(1)(b) is read with TOLA, then all the notices issued between 1 April 2021 and 30 June 2021 pertaining to assessment years 2013-2014, 2014-2015, 2015-2016, 2016-2017, and 2017-2018 will be within the period of limitation as explained in the tabulation below:

Assessment Year	Within 3 Years	Expiry of Limitation read with TOLA for (2)	Within six Years	Expiry of Limitation read with TOLA for (4)
(1)	(2)	(3)	(4)	(5)
2013-2014	31-3-2017	TOLA not applicable	31-3-2020	30-6-2021
2014-2015	31-3-2018	TOLA not applicable	31-3-2021	30-6-2021
2015-2016	21-3-2019	TOLA not applicable	31-3-2022	TOLA not applicable
2016-2017	31-3-2020	30-6-2021	31-3-2023	TOLA not applicable
2017-2018	21-3-2021	30-6-2021	31-3-2024	TOLA not applicable

f. The Revenue concedes that for the assessment year 2015-16, all notices issued on or after 1 April 2021 will have to be dropped as they will not fall for completion during the period prescribed under TOLA;"

(emphasis supplied)

7. From the above it is clear, that the Department has conceded before the Hon'ble Supreme Court that all the notices issued under Section 148 after 1st April 2021 for A.Y.2015-16 have to be dropped. In the present case, the Notice under Section 148 is dated 5th April 2022 and therefore, has to be dropped.

8. The decision in *Rajeev Bansal (supra)* has been subsequently followed by the Hon'ble Supreme Court in *Deepak Steel and Power Limited (supra)*. Paragraphs 4 and 5 of the said order is reproduced hereunder:-

4. The learned counsel appearing for the revenue with his usual fairness invited the attention of this Court to a three judge bench decision of this Court in *Union of India and Ors. v. Rajeev Bansal*, reported in 2024 SCC OnLine SC 2693, more particularly, paragraph 19(f) which reads thus:-

"19. (f) The Revenue concedes that for the assessment year 2015-2016, all notices issued on or after April 1, 2021 will have to be dropped as they will not fall for completion during the period prescribed under the Taxation and other Laws (Relaxation and Amendment of Certain Provisions) Act, 2020."

5. As the revenue made a concession in the aforesaid decision that is for the assessment year 2015-2016, all notices issued on or after 1st April, 2021 will have to be dropped as they would not fall for completion during the period prescribed under the taxation and other laws (Relaxation and Amendment of certain Provisions Act, 2020). Nothing further is required to be adjudicated in this matter as the notices so far as the present litigation is concerned is dated 25.6.2021.

(emphasis supplied)

9. Similarly, even in the matter of *Nehal Ashit Shah (supra)*, the Hon'ble Supreme Court, relying upon paragraphs 19 (e) and (f) of the decision in case of *Rajeev*

Bansal (supra), dismissed the SLP filed by the Revenue. Paragraph 5 of the said order is reproduced hereunder:-

"5. In this regard, reference could also be made to paragraph 19(e) and (f) in the case of Union of India vs. Rajeev Bansal, Civil Appeal No.8629 of 2024 on 03.10.2024 (2024 SCC ONLINE 754) under which the learned Additional Solicitor General for India has made a concession insofar as the assessment year 2015-16 is concerned."

10. Lastly, this very Bench has on 6th October 2025, in the matter of Spicy Sangria (supra), allowed the petition filed by the Petitioner therein by noting that since, the notice under Section 148 was issued after 1st April 2021, the same was required to be set aside in light of the concession made by the Revenue before the Hon'ble Supreme Court in the case of Rajeev Bansal (supra).

11. In light of the above discussion, we find merit in the submissions as canvassed by the Petitioner. The Revenue has categorically made a concession that for A.Y.2015-16 they would drop all notices issued under Section 148 after 1st April 2021. Once this is position, it is appropriate that the notice under Section 148 dated 5th April 2022, and the consequential assessment order, notice of demand, penalty notices/orders as well as the recovery notices be quashed and set aside. It is accordingly so ordered."

12. Similar view has been taken by the Hon'ble Bombay High Court in the case of Verjina Foods Ltd., order dated 06.10.2025 holding as under :

"17. Accordingly, we hold that the Notice under Section 148 for A.Y. 2015-16 issued on 5th April 2022 was barred by limitation and ought to have been dropped pursuant to the decision of Hon'ble Supreme Court in the case of UOI v. Rajeev Bansal (supra). We also agree with the submission of both the parties, that the Notice issued on 5th April 2022 under Section 148 is also bad in law in view of the decision of this Court in Hexaware (supra).

18. Since the Notice issued on 5th April 2022[wrongly mentioned as 6th April 2024] under Section 148 was already quashed by order dated 9th May 2024 passed in the above Writ Petition, the consequent order of reassessment dated 3rd March 2025 passed under Section 147 read with Section 144B of the Act, the Notice of Demand dated 3rd March 2025 issued under Section 156 and all the notices proposing to impose penalty under Section 271F, Section 271(1)(b) and Section 271(1)(c) and any order/notice, if any, emanating therefrom are hereby quashed and set aside."

13. The case of the assessee also finds support from the various decisions of the Mumbai as well as Pune Tribunal wherein the Tribunal in turn relying upon the decision of the Hon'ble Supreme Court in the case of Rajeev Bansal (supra) has decided the impugned issue in favour of the assessee. In view of the factual matrix of the case and legal position set out above and in the absence of any contrary material/judicial precedent brought on record by the Revenue, we hold that the impugned notice issued to the assessee under section 148 of the Act dated 07.04.2022 is bad in law and deserves to be quashed. Since the assessee succeeds on this legal ground, the other grounds

raised by the assessee are rendered academic in nature and therefore not adjudicated.

14. In the result, the appeal of the assessee is allowed.

Order pronounced in the open court on 12th February, 2026.

Sd/-
(R.K. Panda)
VICE PRESIDENT

Sd/-
(Astha Chandra)
JUDICIAL MEMBER

पुणे / Pune; दिनांक / Dated : 12th February, 2026.
रवि

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

1. अपीलार्थी / The Appellant.
2. प्रत्यर्थी / The Respondent.
3. The Pr. CIT concerned.
4. विभागीय प्रतिनिधि, आयकर अपीलीय अधिकरण, "बी" बेंच,
पुणे / DR, ITAT, "B" Bench, Pune.
5. गार्ड फ़ाइल / Guard File.

//सत्यापित प्रति// True Copy//

आदेशानुसार / BY ORDER,

सहायक पंजीकार/ Assistant Registrar
आयकर अपीलीय अधिकरण, पुणे / ITAT, Pune