

**IN THE INCOME TAX APPELLATE TRIBUNAL
DEHRADUN BENCH "DB", DEHRADUN**
Before Sh. Satbeer Singh Godara, Judicial Member
&
Sh. Manish Agarwal, Accountant Member

ITA No. 176/DDN/2025 : Asstt. Year: 2017-18

THDC India Ltd., Ganga Bhawan, Pragatipuram, Bye Pass Road, Rishikesh, Uttarakhand-249201	Vs	CIT(A)/NFAC, Delhi
(APPELLANT)		(RESPONDENT)
PAN No. AAAC7905Q		

**Assessee by : Sh. Jeetan Nagpal, CA &
Sh. Sanjay Arora, CA**
Revenue by : Ms. Poonam Sharma, CIT-DR

Date of Hearing: 16.01.2026	Date of Pronouncement: 30.03.2026
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ORDER

Per Satbeer Singh Godara, Judicial Member:

This assessee's appeal for Assessment Year 2017-18, arises against the CIT(A)/NFAC, Delhi's DIN & order No. ITBA/NFAC/S/250/2025-26/1078509132(1) dated 15.07.2025, in proceedings u/s 143(3) r.w.s. 263 of the Income Tax Act, 1961.

2. Heard both the parties at length. Case file perused.

3. It emerges at the outset that we hardly need to deal with the relevant factual matrix at length so far as the assessee's instant appeal involving section 143(3) r.w.s. 263 proceedings;

is concerned. This is for the precise reason that the learned co-ordinate bench's order dated 18.02.2026 has reversed the PCIT's section 263 revision directions dated 27.03.2022 itself in ITA No. 31/DDN/2022.

4. That being the case, we are of the considered view that both the impugned assessment order dated 21.03.2023 as well as the lower appeal one dated 15.07.2025 in issue have no legs to stand in the foregoing terms. Quashed accordingly.

5. All other remaining pleadings between the parties stand rendered academic.

6. This assessee's appeal is allowed.

Order Pronounced in the Open Court on 30/03/2026.

Sd/-

(Manish Agarwal)
Accountant Member
Dated: 30/03/2026

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