

आयकर अपीलिय अधिकरण, हैदराबाद पीठ
IN THE INCOME TAX APPELLATE TRIBUNAL
Hyderabad ' DB-A ' Bench, Hyderabad

श्री रविश सूद, न्यायिक सदस्य एवं श्री मधुसूदन सावड़िया लेखा सदस्य समक्ष |
Before Shri Ravish Sood, Judicial Member
A N D
Shri Madhusudan Sawdia, Accountant Member

आ.अपी.सं / **ITA No.1406 & 1511/Hyd/2025**
(निर्धारण वर्ष / Assessment Year: 2016-17 & 2020-21)

Dy. CIT Circle 3(1) Hyderabad	Vs.	Sarvejana Healthcare Private Limited, Hyderabad PAN: AAMCS6700Q
राजस्व द्वारा / Revenue by:	Smt.U.Mini Chandran, CIT(DR)	
निर्धारिती द्वारा / Assessee by:	C.A. Satya Dinakar	
सुनवाई की तारीख / Date of hearing:	24/03/2026	
घोषणा की तारीख / Pronouncement:	08/04/2026	

आदेश/ORDER

Per Madhusudan Sawdia, A.M.:

These appeals are filed by the Revenue feeling aggrieved by the separate orders passed by the Learned Commissioner of Income Tax (Appeals), National Faceless Appeal Centre (NFAC), Delhi ("Ld. CIT(A)") dated 25.06.2025 and 14.07.2025 for the A.Ys.2016-17 and 2020-21 respectively.

ITA No. 1406/Hyd/2025 for A.Y. 2016-17

2. The Revenue has raised the following grounds of appeal:

1. The Ld. CIT(A) erred both in law and facts of the case in allowing relief to the assessee.
2. The Ld.CIT(A) erred in deleting the disallowance of depreciation of Rs 3,56,19,580 on 'goodwill' claimed under section 32, without appreciating that the assessee failed to prove that any intangible asset or goodwill was acquired as part of the business transfer agreement.
3. The Ld.CIT(A) failed to appreciate that the business transfer agreement did not separately quantify goodwill or any intangible asset, and in absence of such quantification or evidence, the claim of depreciation on goodwill was rightly disallowed by the AO.
4. On the facts and in the circumstances of the case and in law, the Ld.CIT(A) erred in deleting the addition of Rs 50,38,59,200 made by the Assessing Officer u/s 56(2)(vii)(b) on account of excess share premium received over the fair market value, without properly appreciating the provisions of section 56(2)(vii)(b) and Rule 11UA, and without considering that the assessee failed to produce valuation report during the course of assessment proceedings.
5. The Ld. CIT(A) erred in law in accepting the Discounted Cash Flow (DCF) valuation produced during appellate proceedings without affording an opportunity to the AO to examine the same, thereby violating the principles of natural justice.
6. The appellant craves leave to add, amend, alter, or withdraw any of the above grounds at the time of hearing.

दिनांक /Date :23.09.2025

स्थान/Place : हैदराबाद /Hyderabad.


 जी. रवि किरण, भा.श.सं.
 G. RAVI KIRAN, I.A.S.
 उपायुक्त आयकर अधिकारी
 Deputy Commissioner of Income Tax
 आयकर उपायुक्त /Deputy Commissioner of Income Tax
 Circle-3(1), हैदराबाद
 सर्किल/ Circle-3(1), हैदराबाद /Hyderabad.

3. The brief facts of the case are that the assessee is a multi-specialty hospital engaged in the business of providing healthcare services. The assessee filed its return of income for Assessment Year 2016–17 on 16.10.2017, declaring total income of Rs.15,32,50,530/-. The assessee subsequently revised its return of income on 31.03.2017, revising the total income to Rs.18,17,25,530/-. The case of the assessee was selected for scrutiny and the assessment was completed under section 143(3)

of the Income Tax Act, 1961 (“the Act”) on 25.12.2018, wherein addition of Rs.58,69,570/- was made. The assessee did not prefer any appeal against the said order. Subsequently, the case of the assessee was reopened under section 147 of the Act and accordingly, notice under section 148 of the Act dated 30.03.2021 was issued by the Learned Assessing Officer (“Ld. AO”). The assessee did not file any return of income in response to the said notice. During the reassessment proceedings, the assessee responded only on one occasion by filing submissions dated 13.10.2021. Considering the submissions of the assessee, the Ld. AO made addition of Rs.3,56,19,580/- on account of disallowance of depreciation on goodwill, Rs.50,38,59,200/- as income from other sources under section 56(2)(vii)(b) of the Act and Rs.65 lakhs under section 69A of the Act. Accordingly, the reassessment was completed by the Ld. AO under section 147 r.w.s. 144B of the Act on 31.03.2022, assessing the total income of the assessee at Rs.73,35,73,880/-.

4. Aggrieved by the reassessment order, the assessee preferred an appeal before the Ld. CIT(A). The Ld. CIT (A) confirmed the addition of Rs.65 lakhs under section 69A of the Act and deleted the additions of Rs.50,38,59,200/- and Rs.3,56,19,580/-. Thus, the appeal of the assessee was partly allowed by the Ld. CIT (A).

5. Aggrieved by the relief granted by the Ld. CIT(A), the Revenue is in appeal before this Tribunal. At the outset, the Learned Departmental Representative (“Ld. DR”) submitted that the present appeal of the Revenue involves two issues, namely, (i) deletion of addition of Rs.3,56,19,580/- made by the Ld. AO on account of disallowance of depreciation on goodwill and (ii) deletion of addition of Rs.50,38,59,200/- made by the Ld. AO under section 56(2)(vii)(b)

of the Act. With regards to the first issue relating to Disallowance of Depreciation on Goodwill, the Ld. DR invited our attention to para nos. 3, 5 and 6 of the order of the Ld. AO and submitted that during the year under consideration, the assessee had acquired the Secunderabad unit of M/s Sahrudaya Healthcare Pvt. Ltd. w.e.f. 06.06.2015 for a total consideration of Rs.24,30,00,000/-, whereas the net assets of the said unit as per audited financial statements were Rs.10,35,28,475/-. It was submitted that after adding Rs. 36,68,443/- on account of Business Transfer Adjustment, the assessee computed goodwill at Rs.14,31,39,968/- based on the book value of net assets. The Ld. DR submitted that the Ld. AO has not disputed the eligibility of depreciation on goodwill per se, but has denied the claim on the ground that the method adopted by the assessee for computation of goodwill is incorrect. According to the Ld. AO, goodwill should be computed as the excess of purchase consideration over the fair market value of net assets acquired, and not over the book value. Inviting our attention to para nos. 2.4 to 2.6 of the order of the Ld. CIT(A), it was further submitted that the Ld. CIT(A), while allowing the claim of depreciation, has not adjudicated upon this core issue raised by the Ld. AO and instead has decided the issue on a different aspect relating to the allowability of depreciation on goodwill by relying on judicial precedents. Accordingly, it was prayed that the matter be restored to the file of the Ld. CIT(A) for adjudication of the core issue.

6. Per contra, the Learned Authorized Representative (“Ld. AR”) submitted that there is a factual error in the findings of the Ld. AO in para no. 6 of his order, wherein the value of Rs.32.84 crores has been considered as the value of land and building, whereas the same represents the value of all tangible assets. The Ld. AR further invited our attention to para no. 8 of the order of the Ld. AO and

submitted that the Ld. AO has relied upon an inapplicable judicial precedent. He also submitted that the goodwill has been correctly computed by the assessee as excess of purchase consideration over the book value of net assets, which is in accordance with Rule 11UA of the Income-tax Rules, 1962 (“the Rules”). It was thus contended that there is no error in the computation of goodwill and the order of the Ld. CIT(A) deserves to be upheld.

7. We have considered the rival submissions and perused the material available on record. We have gone through para nos. 3, 5 and 6 of the order of the Ld. AO, which is to the following effect:

“3. The assessee company during the year under consideration has entered into Business Transfer Agreement (BTA) with M/s Sahrudaya Healthcare Private Limited, in respect of Secunderabad unit, which is effective from 06.06.2015. The net assets of the unit as per Audited Financials are shown at Rs.10,35,28,475/- and consideration received by the assessee company is shown as Rs.24,30,00,000/-.

5. It has been verified from the information available that the assessee company considered the sale consideration received over and above the book value of assets as ‘Goodwill’. The total Goodwill is computed at Rs.14,31,39,968/- after adding Business Transfer Adjustment of Rs.36,68,443/-..

6. The book value of the assets cannot be taken for computing the goodwill. The assets have to be valued as per market value and the excess amount paid over the market value of the assets may only be considered as Goodwill. The assessee company owns land and buildings and other tangible assets amounting to Rs.32.84Cr. These are taken at book value for computing Goodwill and for claiming depreciation on the Goodwill. Business purchase agreement doesn’t indicate purchase of any Goodwill or the market value of the assets.”

8. On perusal of the above, we find that the main contention of the Ld. AO while denying depreciation on goodwill is with regard to the method of computation of goodwill. The Ld. AO has categorically observed that goodwill is required to be computed based on the fair market value of the net assets acquired and not on the basis of their book value. We have also gone through para

nos. 2.4 to 2.6 of the order of the Ld. CIT(A), which is to the following effect:

2.4 The contention of Ld. AO is factually incorrect. There are no land & buildings worth 32.84 crores that was acquired by the company. All the assets that are acquired are in the nature of movable assets, leasehold improvements (interiors/rooms etc), office equipment, furniture & fixtures, current assets like receivables, inventory, advance etc. Please refer to Page-26 Note No 11(a) of the financial statements in BTA for list of all the fixed assets that are taken over.

2.5 It is a well settled proposition that purchased goodwill during acquisition of business is a capital right which would fall under the expression 'any other business or commercial right of a similar nature' and hence eligible for depreciation while computing business income. In a recent decision, the Supreme Court in the case of Pr. CIT v. Zydus Wellness Ltd. [2020] 113 taxmann.com 154/269 Taxman 57 has dismissed the Special Leave Petition (SLP) against the order wherein the High Court had upheld Tribunal's ruling allowing assessee's claim for depreciation on goodwill. Similarly in

Commissioner of Income-tax, Kolkata vs. Smifs Securities Ltd. [2012] 348 ITR 302 (SC), the Hon'ble Apex Court held as under:

Section 32 of the Income-tax Act, 1961 - Depreciation - Allowance/Rate of - Assessment year 2003-04 - Whether 'goodwill' is an asset under Explanation 3(b) to section 32(1) - Held, yes - During relevant assessment year, one

'Y' Ltd. amalgamated with assessee-company - According to assessee, excess consideration paid by it over value of net assets acquired of 'Y' Ltd. amounted to goodwill on which depreciation was to be allowed - Authorities below recorded a finding that assets and liabilities of 'Y' Ltd. were transferred to assessee for a consideration; that difference between cost of an asset and amount paid constituted goodwill and that assessee-company in process of amalgamation had acquired a capital right in form of goodwill because of which market worth of assessee-company stood increased - Accordingly, assessee's claim was allowed - Whether since revenue could not rebut factual findings recorded by authorities below, impugned order passed by them was to be upheld

2.6 Thus, it is prayed that the claim of depreciation on good will may kindly be allowed.

9. On perusal of the above, we find that the Ld. CIT(A) has not adjudicated upon the core issue raised by the Ld. AO. Instead, the Ld. CIT(A) has proceeded to decide an altogether different issue relating to the eligibility of depreciation on goodwill, which was not the dispute raised by the Ld. AO in the assessment order. Further, as regards the contention of the Ld. AR that the Ld. AO has wrongly considered Rs.32.84 crores as the value of land and building alone, we find that the Ld. AO has clearly mentioned that the said value pertains to land and building and also other intangible assets. Therefore, the contention of the Ld. AR in this regard is not borne out from the record. Similarly, the contention of the Ld. AR that the goodwill has been computed in accordance with Rule 11UA of the Rules is also not acceptable, as Rule 11UA of the Rules is applicable for determination of fair market value for the purposes of section 56 of the Act and not for computation of goodwill in the context of depreciation under section 32 of the Act. In view of the present facts of the case, we are of the considered opinion that the Ld. CIT(A) has failed to adjudicate the core issue arising from the assessment order, namely, the correctness of the method adopted for computation of goodwill. Accordingly, we set aside this issue to the file of the Ld. CIT(A) with a direction to adjudicate the issue afresh on merits, after considering the contentions of both parties and after providing adequate opportunity of being heard to the assessee. Thus, the ground raised by the Revenue on the first issue is allowed for statistical purposes.

10. With regard to the second issue, the Ld. DR submitted that the assessee had filed a valuation report for the first time before the Ld. CIT(A), which constitutes additional evidence within the meaning of Rule 46A of the Rules. It was contended that the Ld. CIT(A), without calling for a remand report from the Ld. AO, has

deleted the addition made under section 56(2)(vii)(b) of the Act. It was thus submitted that the Ld. CIT(A) has violated the procedure prescribed under Rule 46A of the Rules and principles of natural justice. Accordingly, the Ld. DR prayed that the order of the Ld. CIT(A) be set aside and the matter be restored to his file with a direction to call for a remand report from the Ld. AO and thereafter decide the issue afresh in accordance with law.

11. Per contra, the Ld. AR fairly admitted that the valuation report was not submitted before the Ld. AO during the assessment proceedings and the same was filed for the first time before the Ld. CIT(A). However, it was submitted that the Ld. CIT(A), after considering the valuation report, has rightly deleted the addition made by the Ld. AO.

12. We have considered the rival submissions and perused the material available on record. It is an admitted fact that the additional evidence in the form of valuation report was submitted by the assessee for the first time before the Ld. CIT(A). As per Rule 46A of the Rules, where any additional evidence is admitted by the appellate authority, the same cannot be considered without affording an opportunity to the Ld. AO to examine the evidence and to furnish a remand report. In the present case, we find that the Ld. CIT(A) has admitted the additional evidence but has not called for any remand report from the Ld. AO. Thus, the Ld. CIT(A) has failed to follow the mandatory procedure prescribed under Rule 46A of the Rules, resulting in violation of principles of natural justice. In view of the present facts of the case, we set aside the impugned order of the Ld. CIT(A) on this issue and restore the matter to his file with a direction to call for a remand report from the Ld. AO and thereafter decide the issue afresh in accordance with law, after considering

the remand report and providing adequate opportunity of being heard to the assessee. Accordingly, the ground raised by the Revenue with regards to the second issue is allowed for statistical purposes.

13. In the result, the appeal of the Revenue in ITA No.1406/Hyd/2025 is allowed for statistical purposes.

ITA NO. 1511/HYD/2025 FOR A.Y.2020-21 :

14. The Revenue has raised the following grounds of appeal:

1. The Ld. CIT(A) erred in law and on facts in deleting the addition of Rs 5,67,61,002 on account of reversal of excess provision for rent straightlining, without appreciating that the assessee failed to establish a clear nexus between prior disallowances made in earlier years and the reversal during the current assessment year.
2. The Ld.CIT(A) erred in deleting the disallowance of depreciation of Rs 1,23,38,700 on 'goodwill' claimed under section 32 of the Income Tax Act, without appreciating that the assessee failed to prove that any intangible asset or goodwill was acquired as part of the business transfer agreement.
3. The Ld.CIT(A) failed to appreciate that the business transfer agreement did not separately quantify goodwill or any intangible asset, and in absence of such quantification or evidence, the claim of depreciation on goodwill was rightly disallowed by the AO.
4. The Ld. CIT(A) relied solely on the appellate order for AY 2016-17 in the assessee's own case, without independently verifying the nature of the transaction, supporting documentation, or asset valuation for AY 2020-21.
5. The Ld. CIT(A) deleted the disallowance of Rs 32,08,700 on account of gratuity, including the reversal of provision of Rs 13,31,625, by accepting additional evidence without providing the AO an opportunity to examine the same, thereby violating the Rule 46A of the Income Tax Rules, 1962.
6. The Ld. CIT(A) erred in deleting the addition of Rs 6,19,251 made by the AO towards the reversal of ESOP provision, in the absence of proof of actual payments or verifiable supporting evidence.
7. The appellant craves leave to add, amend, alter, or withdraw any of the above grounds at the time of hearing.

दिनांक /Date :23.09.2025

स्थान/Place : हैदराबाद /Hyderabad.



जी. रवि किरण, अ.स.से.
(जी रवि किरण / G Ravi Kiran, I.A.S.)
उप आयकर आयुक्त

आयकर उपायुक्त /Deputy Commissioner of Income Tax
सर्किल-3(1), हैदराबाद /Circle-3(1), Hyderabad.

15. The brief facts of the case are that the assessee filed its return of income for Assessment Year 2020-21 on 24.02.2021, declaring total income of Rs.16,30,24,810/-. The case of the assessee was selected for scrutiny under CASS and accordingly notice under section 143(2) of the Act was issued by the Ld. AO. During the course of assessment proceedings, the Ld. AO made disallowances of Rs.5,67,61,002/- on account of reversal of excess provision of rent straight lining, Rs.1,23,38,700/- on account of disallowance of depreciation on goodwill, Rs.32,08,439/- on account of gratuity, Rs.6,19,251/- on account of ESOP provision and Rs.3,26,536/- on account of leave encashment. Accordingly, the Ld. AO passed the assessment order under section 143(3) r.w.s. 144B of the Act on 23.09.2022, making total additions of Rs.7,32,53,928/- and assessing the total income of the assessee at Rs.23,62,78,735/-.

16. Aggrieved by the order of the Ld. AO, the assessee preferred an appeal before the Ld. CIT(A). The Ld. CIT (A) deleted all the additions made by the Ld. AO except the addition of Rs.3,26,536/- on account of provision for leave encashment.

17. Aggrieved by the relief granted by the Ld. CIT(A), the Revenue is in appeal before this Tribunal. At the outset, we find that Ground Nos. 2, 3 and 4 of the Revenue relate to deletion of addition of Rs.1,23,38,700/- on account of disallowance of depreciation on goodwill. We find that the issue involved in these grounds is similar to the issue considered by us in Revenue's appeal in ITA No. 1406/Hyd/2025 for Assessment Year 2016-17. Therefore, our observations and findings in ITA No. 1406/Hyd/2025 for Assessment Year 2016-17 shall mutatis mutandis apply to this appeal also. Accordingly, following our observations and findings in

the said appeal, we set aside the issue involved in Ground Nos. 2, 3 and 4 to the file of the Ld. CIT(A) for re-adjudication in accordance with law and in line with the directions given by us in ITA No. 1406/Hyd/2025 for Assessment Year 2016–17.

18. Further, with regard to Ground Nos. 1, 5 and 6, the Ld. DR submitted that the assessee had filed additional evidence before the Ld. CIT(A) under Rule 46A of the Rules and the Ld. CIT(A) has failed to call for a remand report from the Ld. AO, thereby violating the mandatory procedure prescribed under Rule 46A of the Rules. Accordingly, it was prayed that these issues be set aside to the file of the Ld. CIT(A) for fresh adjudication after obtaining remand report from the Ld. AO.

19. Per contra, the Ld. AR submitted that no additional evidence was filed before the Ld. CIT(A) and the issues were decided by the Ld. CIT (A) on the basis of material already available on record. It was contended that the Ld. CIT(A) has rightly adjudicated the issues and therefore no interference is warranted.

20. We have considered the rival submissions and perused the material available on record. As regards Ground No. 1 of the Revenue relating to deletion of Rs.5,67,61,002/- on account of reversal of excess provision of rent straight lining, we have gone through para-No.12 of Form No. 35 placed at page no.31 and 32 of the appeal set, which is to the following effect:

12. Whether any documentary evidence other than the evidence produced during the course of proceedings before the Income-tax Authority has been filed in terms of Rule 46A	Yes
12. If reply to 12 is Yes, furnish the list of such documentary evidence	
1.	

Sl. No.	Document Name	Description	Documentary Evidence
1	Additional Evidence under Rule 46A	Additional evidence in the form of audited financial statements from 2015-16	-

Page 32

Sl. No.	Document Name	Description	Documentary Evidence
		to 2018-19 along with calculation of Rent equalisation for those years. Petition under Rule 46A is enclosed seperately	

21. On perusal of the above, we find that the assessee has filed additional evidence in the form of audited financial statements for the years 2015-16 to 2018-19 along with calculation of rent equalization for those years. Therefore, when the assessee itself has stated in Form No.35 that additional evidence under Rule 46A of the Rules has been filed, the contention of the assessee that no additional evidence was filed cannot be accepted. We further find that the Ld. CIT(A) has not called for any remand report from the Ld. AO in accordance with Rule 46A of the Rules, thereby violating the mandatory statutory procedure. Accordingly, this issue is set aside to the file of the Ld. CIT(A) for re-adjudication after calling for remand report from the Ld. AO. Accordingly, ground no. 1 of the Revenue is allowed for statistical purposes.

22. As regards Ground No. 5 of the Revenue relating to deletion of Rs.32,08,439/- on account of gratuity, we have gone

through para No. 5.3.2 of the order of the Ld. CIT(A), which is to the following effect:

5.3.2 To substantiate the claim, the appellant has given following assertions:

"Ld. AO Ld. vide the assessment order has added back an amount of Rs. 32,08,814/- on account of the fact that there is no proof of payment is submitted by the assessee nor this amount is disclosed in the tax auditors report. The appellant had submitted the below mentioned information during the proceedings of the scrutiny to justify the claim made by the assessee.

6/Reversal of provision for gratuity	24,354,317	20,172,900	4,081,417	1,331,825	Note 6, 20 and 32	Total Provision Made during the year is Rs. 72,89,858 (Ref note 20) and the same is disclosed in the tax Computation and allowed the deduction to the extent of payment made during the year (as per section 43A(7)). (Ref Note no. 32)
7/Gratuity Paid				1,846,014		

It is humbly submitted that, there will not be any payment challan for the reversal of the Gratuity expenses and this is a book entry based on the report given by an Actuary. The assessee has submitted the reference to financial statements where the details of payments are given and certified by the Statutory Auditor. Hence, it is prayed that additions made on account of provision reversal for gratuity may kindly be deleted."

During the appellate proceedings, the appellant has submitted list of employees to whom gratuity was paid during the year and also bank statement evidencing the payment of gratuity. As the evidence regarding payment of gratuity has been furnished, the addition on the account of the deduction of Reversal of provisions of gratuity amounting to Rs. 32,08,700/- is deleted.

23. On perusal of the above, we find that the Ld. CIT (A) has categorically recorded that the assessee has submitted list of employees to whom gratuity was paid during the year along with bank statement evidencing payments of gratuity. Therefore, it is evident that additional evidence to this extent was submitted by the assessee before the Ld. CIT(A). However, the Ld. CIT(A) has not called for any remand report from the Ld. AO in accordance with Rule 46A of the Rules, thereby violating the mandatory statutory

procedure. Therefore, this issue is also set aside to the file of the Ld. CIT(A) for adjudication afresh after calling for remand report from the Ld. AO. Accordingly, ground no. 5 of the Revenue is allowed for statistical purposes.

24. As regards Ground No. 6 of the Revenue relating to deletion of Rs.6,19,251/- on account of ESOP provision, we have gone through para No. 5.4.3 of the order of the Ld. CIT(A), which is to the following effect:

5.4.3 The AO has made addition on account of disallowance of deduction claimed w.r.t. reversal of ESOP provision of Rs. 6,19,251/-, as per AO , this is not mentioned in tax audited report. As per the appellant, the mention of tax audited report is produced above. Accepting the appellant's contention and after

perusing the audit report, the addition of Rs. 6,19,251/- is deleted.

25. On perusal of the same, we find that the Ld. CIT(A) has allowed the claim of the assessee based on facts already available in the tax audit report, which was also there before the Ld. AO. Therefore, in our considered view, no additional evidence has been filed in respect of this issue. Accordingly, we do not find any infirmity in the order of the Ld. CIT(A). Accordingly, Ground No. 6 of the Revenue is dismissed.

26. Ground No. 7 of the Revenue is general in nature and does not require any separate adjudication. Accordingly, the same is dismissed.

27. In the result, the appeal of the Revenue in ITA No 1511/Hyd/2025 is partly allowed for statistical purposes.

28. To sum up, the appeals of the Revenue in ITA No.1406/Hyd/2025 is allowed for statistical purposes and in ITA No 1511/Hyd/2025 is partly allowed for statistical purposes.

Order pronounced in the Open Court on 8th April, 2026.

Sd/-

Sd/-

(RAVISH SOOD) JUDICIAL MEMBER	(MADHUSUDAN SAWDIA) ACCOUNTANT MEMBER
--	--

Hyderabad, dated 8th April, 2026.

Vinodan/sps

Copy to:

S.No	Addresses
1	Dy. CIT, Circle 3(1) 7 th Floor, Signature Towers, Hyderabad 500084
2	Sarvejana Healthcare (P) Ltd, 1-7-186-189 & 1-7-201-205 Paradise Centre, Prendergast Road, Hyderabad 500003
3	Pr. CIT - Hyderabad
4	DR, ITAT Hyderabad Benches
5	Guard File

By Order