

**IN THE HIGH COURT OF PUNJAB AND HARYANA AT
CHANDIGARH**

ITA No. 69 of 2015 (O & M)

Date of Decision:- 15.05.2015

M/s. Rana Polycot Ltd.

.....Appellant(s)

vs.

The Additional Commissioner of Income Tax, Range-I, Chandigarh

.....Respondent(s)

**CORAM:- HON'BLE MR. JUSTICE S.J. VAZIFDAR,
ACTING CHIEF JUSTICE**

HON'BLE MR. JUSTICE G.S.SANDHAWALIA

Present:- Mr. Nitin Kaushal, Advocate,
for the appellant.

S.J. VAZIFDAR, A.C.J. (Oral)

The appellant has *inter alia* raised the following substantial question of law:-

(ii) *Whether the Ld. Tribunal is correct in law in not appreciating the purposive, conscious and intentional usage of the term 'PAYABLE' by the Legislature in section 40(a)(ia) of the Income Tax Act?"*

The question has been answered against the appellant by an order and judgment dated 29.04.2015 passed by this Court in ***ITA No. 716 of 2009, M/s. P.M.S. Diesels vs. CIT-2, Jalandhar.***

The present appeal is dismissed in the abovesaid terms.

**(S.J. VAZIFDAR)
ACTING CHIEF JUSTICE**

**(G.S. SANDHAWALIA)
JUDGE**

15.05.2015

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