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* **IN THE HIGH COURT OF DELHI AT NEW DELHI**

\+ ITA 578/2018 & CM APPL. 19992-19993/2018

COMMISSIONER OF INCOME TAX INTERNATIONAL TAXATION-3 ..... Appellant

Through Mr. Asheesh Jain, Sr. Standing Counsel with Mr. Shahrukh Ejaz, Adv.

versus

THE BANK OF TOKYO MITSUBISHI UFJ LTD ..... Respondent

Through Mr. Tarun Gulati and Mr. Sparsh Bhargava, Advs.

CORAM:
HON'BLE MR. JUSTICE S. RAVINDRA BHAT
HON'BLE MR. JUSTICE A. K. CHAWLA

O R D E R

% **15.05.2018**

The issues pressed by the Revenue with respect to bringing to tax salary paid to expatriate employees and the applicability of Section 115JB of the Income Tax Act, 1961 to the respondent-assessee, are covered by previous common order of this Court for AY 2007-08 and 2008-09 in respect of the same assessee [*Principal Commissioner of Income Tax (Central-1) vs. The Bank of Tokyo Mitsubishi UFJ Ltd.]*.

No substantial question of law arises. The appeal is dismissed along with the pending applications.

S. RAVINDRA BHAT, J

A. K. CHAWLA, J

MAY 15, 2018

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