

**IN THE HIGH COURT OF JUDICATURE AT BOMBAY
ORDINARY ORIGINAL CIVIL JURISDICTION**

WRIT PETITION NO.1105 OF 2019

UT Worlwide (India) Pvt. Ltd.

.... Petitioner

versus

Deputy Commissioner of
Income Tax – 11(1)(2)

... Respondent

.....

- Mr.R.V. Easwar, Senior Counsel a/w Ms.Rubal Bansal a/w Mr.Paras Sevla a.w Mr.Harsh Shah, Advocate for Petitioner.
- Mr.P.C. Chhotaray a/w Mr.P.A. Narayanan, Advocate for Respondent.

**CORAM : AKIL KURESHI &
SARANG V. KOTWAL, JJ.**
DATE : 18th APRIL, 2019.

P.C. :

1. After some arguments at the bar, the learned Counsel for the Petitioner agreed that the Petitioner would take up all the issues before the Dispute Resolution Panel ('DRP' for short) arising out of the draft order of assessment passed by the Assessing Officer, pursuant to the order passed by the Transfer Pricing Officer. We notice that a part of this order is already

challenged by the Petitioner before the DRP. Other part of the challenge was sought to be brought in the present Petition.

2. In view of the stand now taken by the Petitioner, we permit the Petitioner to raise all objections before the DRP, for which purpose it would be open for the Petitioner to file further/fresh objections before the DRP. If the same is filed latest by 10/05/2019, the DRP shall take such objections on record and decide them on merits along with existing objections. We have expressed no opinion. All contentions are kept open.

3. Writ Petition is disposed of accordingly.

(SARANG V. KOTWAL, J.)

(AKIL KURESHI, J.)