$~39, 40, 43, 44

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

\+ ITA 1140/2018

PRINCIPAL COMMISSIONER OF INCOME TAX-6

..... Appellant

versus

NALWA SONS INVESTMENT LTD.

..... Respondent

\+ ITA 1141/2018

PRINCIPAL COMMISSIONER OF INCOME TAX-6

..... Appellant

versus

NALWA SONS INVESTMENT LTD.

..... Respondent

\+ ITA 1145/2018

PRINCIPAL COMMISSIONER OF INCOME TAX-6

..... Appellant

versus

NALWA SONS INVESTMENT LTD.

..... Respondent

\+ ITA 1146/2018

PRINCIPAL COMMISSIONER OF INCOME TAX-6

..... Appellant

versus

NALWA SONS INVESTMENTS LTD.

..... Respondent

Counsel for the appellant:

Mr. Sanjay Kumar, Advocate

Counsel for the respondent:

Mr. Ajay Vohra, Sr. Advocate with Ms. Kavita Jha and Ms. Devika Jain, Advocates.

CORAM:
HON'BLE MR. JUSTICE S. RAVINDRA BHAT
HON'BLE MR. JUSTICE PRATEEK JALAN

<u>O R D E R</u>

% **26.03.2019**

In these four appeals concerning the assessment year 2008-2009 to 2011-2012, the assessee had voluntarily disclosed certain amounts as disallowance under Section 14A of the Income Tax Act. The Assessing Officer without recording reasons for rejection of the voluntary disallowance, straightaway proceeded to apply Rule 8D of the Income Tax Rules 1962. The CIT (A) partly granted relief to the assesee whose appeal to the ITAT however was allowed. The Revenue's appeal against the CIT(A) order was rejected. As a consequence, the disallowance voluntarily made by the assessee for each period of the assessment years in question stood restored.

We are satisfied that the reasoning of the ITAT is in conformity with the judgement of the Bombay High Court, duly affirmed by the Hon'ble Supreme Court; the ruling on this score is *Godrej & Boyce Manufacturing Co Ltd vs. DCIT*, 2017 394 ITR 449. No question of law arises in these appeals for consideration. Accordingly, the appeals are dismissed.

S. RAVINDRA BHAT, J

PRATEEK JALAN, J

MARCH 26, 2019
pkb