

**IN THE HIGH COURT OF JUDICATURE AT BOMBAY
ORDINARY ORIGINAL CIVIL JURISDICTION
INCOME TAX APPEAL NO.3039 OF 2019**

Pr. Commissioner of Income Tax-10 MumbaiAppellant
V/s.
Procter & Gamble Hygiene & Healthcare Ltd. ...Respondent

**WITH
INCOME TAX APPEAL NO.929 OF 2019**

Pr. Commissioner of Income Tax-10 MumbaiAppellant
V/s.
Procter & Gamble Hygiene & Healthcare Ltd. ...Respondent

**WITH
INCOME TAX APPEAL NO.397 OF 2021**

Pr. Commissioner of Income Tax-10 MumbaiAppellant
V/s.
Procter & Gamble Hygiene & Healthcare Ltd. ...Respondent

**WITH
INCOME TAX APPEAL NO.2110 OF 2019**

Pr. Commissioner of Income Tax-10 MumbaiAppellant
V/s.
Prothious Engineering Services Pvt. Ltd. ...Respondent

**WITH
INCOME TAX APPEAL NO.367 OF 2021**

Pr. Commissioner of Income Tax-10 MumbaiAppellant
V/s.
Prothious Engineering Services Pvt. Ltd. ...Respondent

Mr. Akhileshwar Sharma for Appellant in all Appeals
Mr. B. S. Yewale i/b Rajesh Shah & Co. for Respondent in ITXA/3039/2019
Mr. Harsh Kapadia for Respondent in ITXA/929/2019 & ITXA/397/2021
Mr. Abhishek Tilak for Respondent in ITXA/2110/2019 & ITXA/367/2021

CORAM : K.R. SHRIRAM &
N.J. JAMADAR, JJ
DATED : 21st FEBRUARY 2022

PC. :

- 1 Not on board. Upon mentioning taken on board.
- 2 Mr. Sharma states that the proposed substantial questions of law are covered by judgment of the Apex Court in *Deputy Commissioner of Income Tax Vs. Pepsi Foods Ltd.*,¹ and therefore, these appeals could be disposed.
- 3 Accordingly, appeals stand disposed.

(N. J. JAMADAR, J.)

(K.R. SHRIRAM, J.)

1. (2021) 126 taxmann.com 69 (SC)