

IN THE HIGH COURT OF JUDICATURE AT BOMBAY
ORDINARY ORIGINAL CIVIL JURISDICTION
WRIT PETITION NO.5184 OF 2022

Jda Consultancy Services Private Limited ...Petitioner
Versus
Income Tax Officer Ward 6(3)(1) Mumbai &Ors. ...Respondents

Mr. Suhrith Parthasarathy a/w Ms Amritha Sathyajith & Mr. Ram Narayan
i/b Ms Shweta Sadanandan for Petitioner.
Mr. Mr. Suresh Kumar for Respondents-Revenue.

**CORAM : K.R. SHRIRAM &
KAMAL KHATA, JJ**
DATED : 26th SEPTEMBER 2023

P.C. :

1 After the petition was heard for sometime and reply having been filed
to the petition, with the consent of the counsel we pass the following order:

a) The impugned notice dated 31st March 2021 and the assessment order dated 31st March 2022 are hereby quashed and set aside.

b) The matter is remanded for denovo consideration from the stage of disposing the objections to reopening of file, to respondents to pass such order as they deem fit in accordance with law for A.Y-2014-2015.

c) Before passing any order, a personal hearing shall be given to petitioner, notice whereof shall be communicated at least five working days in advance.

d) The order to be passed shall be a reasoned order dealing with all submissions of petitioner.

e) If the Assessing officer is going to rely on any judgments or orders of

any court or Tribunal, a list thereof shall also be provided alongwith the notice for personal hearing, so that petitioner will be able to deal with the same / distinguish the same during the personal hearing.

f) The entire proceedings to be completed by 31st December 2023.

2 We clarify that we have not made any observation on the merits of the matter.

3 Petition disposed.

(KAMAL KHATA, J.)

(K.R. SHRIRAM, J.)