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

\+ W.P.(C) 6670/2023 and CM APPL. 26122/2023

PUNJAB NATIONAL BANK INTERNATIONAL LIMITED

.....Petitioner

Through: Mr Rajat Navet, Advocate.

versus

DEPUTY COMMISSIONER OF INCOME TAX & ANR.

.....Respondents

Through: Mr Vipul Agarwal, SSC.

CORAM:
HON'BLE MR. JUSTICE VIBHU BAKHRU
HON'BLE MS. JUSTICE SWARANA KANTA SHARMA

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

% **13.11.2024**

1. The petitioner has filed the present petition, *inter alia*, praying as under:

> "a) Issue an appropriate writ in the nature of mandamus or in any other nature quashing the entire reassessment proceedings in the case of the Petitioner under Section 148 & 148A for the Assessment Year 2019-20; and/or
>
> b) Issue an appropriate writ in the nature of certiorari or any other appropriate writ, order and/or direction quashing the Order dated 30.03.2023 passed by the Respondent under Section 148A(d) of the Income Tax Act, 1961 (Annexure P·-6) as well as for quashing of the notice dated 30.03.2023 issued under Section 148 of the Act pursuant thereto for the Assessment Year 2019-20 (Annexure P-7); and/or
>
> c) Stay the effect and operation of the impugned Order & Notice, both dated 30.03.2023 and stay further proceedings under Section 147/148 of the Act for the A.Y. 2019-20."

2. Learned counsel appearing for the petitioner submits that the petitioner's grievance stands addressed in terms of an order dated 03.07.2024 passed by the Assistant Commissioner of Income Tax under Section 154/147 read with Section 144 of the Income Tax Act, 1961, whereby it is stated in unambiguous term that the income earned by the assessee is not taxable in India and the assessee company is not liable to file a return of income in India for the assessment year in question.

3. Accordingly, the writ petition is disposed of. Pending application also stands closed.

VIBHU BAKHRU, J

SWARANA KANTA SHARMA, J

NOVEMBER 13, 2024 /*tr*

Click here to check corrigendum, if any