Amol

IN THE HIGH COURT OF JUDICATURE AT BOMBAY

ORDINARY ORIGINAL CIVIL JURISDICTION

INCOME TAX APPEAL NO. 139 OF 2024

Pr Commissioner of Income Tax 8 …Appellant

Versus

Reliance Payment Solutions Ltd …Respondent

WITH

INCOME TAX APPEAL NO. 160 OF 2025

Pr Commissioner of Income Tax Central 3 …Appellant

Versus

Marathon Nextgen Realty Ltd …Respondent

Mr. Suresh Kumar, for the Appellants.

Mr. P. C. Tripathi a/w. Mr. Ketan Dave, Mr.Pratik Shah i/b. A S Dayal & Associates for the Respondent In ITXA/139/2024.

CORAM M.S. Sonak &
Advait M. Sethna, JJ.
DATED: 09 October 2025

PC:-

1. Heard Mr Suresh Kumar for the Appellants.

2. The tax effect in these matters is below Rs. 2 Cores. Income Tax Appeal 128 of 2024 relates to exercise of revisional powers but, the tax effect is determinable and can quantified therefore, in terms of Clause 3.1(f) of the Circular dated 15 March 2025, these Appeal should not have been instituted or pursued.

3. Accordingly, both these Appeals are disposed of. Interim Applications, if any, are disposed of. However, if at a later stage, it is found that the tax effect is greater than Rs. 2 Crores or that the Appeals fall within any of the exceptions, the Appellants will have the liberty to apply for revival/restoration. This is provided that an application for restoration/revival is filed within reasonable time i.e., on or before 31 January 2026.

(Advait M. Sethna, J) **(M.S. Sonak, J)**