

Pallavi

**IN THE HIGH COURT OF JUDICATURE AT BOMBAY
ORDINARY ORIGINAL CIVIL JURISDICTION**

INCOME TAX APPEAL (IT) NO. 435 OF 2025

Pr Commissioner of Income Tax 1	...Appellant
Versus	
Future Corporate Resources Ltd.	...Respondent

Ms. Samiksha Kanani a/w Ms. Gayatri Naik for Appellant.

Ms. Sruti Kalyanikar for Respondent.

**CORAM : M.S. Sonak &
Advait M. Sethna, JJ.**

DATED : 8 October 2025

P.C.:-

1. Ms. Gayatri Naik, learned counsel for the Appellant, on instructions and in view of the CBDT Circular seeks leave to withdraw this Appeal on the ground that the Tax effect in this case is less than Rs.2 Crores.
2. Accordingly, we dispose of this appeal on the ground of low tax effect, leaving open all the questions of law raised in the Appeal.
3. If, at the later stage, it is found that the tax effect is greater than Rs. 2 Crores or that the matter falls within any of the exceptions to the CBDT Circular, liberty is granted to apply for revival within a reasonable time, i.e., on or before 31 January 2026.
4. The Appellant shall be entitled to refund of Court fees in accordance with Rules.

(Advait M. Sethna, J)

(M. S. Sonak, J.)