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

INCOME TAX APPEAL NO.82 OF 2024

Pr. Commissioner of Income Tax ...Appellant
Versus
Saunak Jitendra Parikh A.Y. 2006-2007 ...Respondent

WITH
INCOME TAX APPEAL NO.931 OF 2023

Pr. Commissioner of Income Tax ...Appellant
Versus
Saunak Jitendra Parikh A.Y. 2006-2007 ...Respondent

Mr. Suresh Kumar, for Appellant.

Mr. Madhur Agrawal, a/w Mr. Punit J. Shah i/b. Mr. Atul K. Jasani for Respondent.

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

DATED : 3 December 2025

P.C.:-

1. Heard the learned counsel for the parties.

2. ITXA/931/2023 is concerned with the quantum and ITXA/82/2024 is concerned with the issue of penalty.

3. The ITAT, by a common order dated 19 October 2020 in case of the Respondents in the present Appeal and one Milan Kavin Parikh, had held in favour of the Assessees.

4. The quantum appeal instituted by the Revenue challenging the ITAT's common order dated 19 October 2020, insofar as it concerns Milan Kavin Parikh i.e. ITXA/1827/2022, was dismissed by a coordinate Bench of this Court vide order dated 25 November 2025.

5. Therefore, by following the reasoning of the coordinate Bench in its order of 25 November 2025, we dismiss ITXA/931/2023 as involving no substantial questions of law.

6. Since the quantum Appeal i.e. ITXA/931/2023 is now dismissed, even ITXA/82/2024 which deals with the issue of penalty will have to be dismissed and is hereby dismissed.

7. Both these Appeals are accordingly dismissed without any costs order.

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