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

INCOME TAX APPEAL(IT) NO. 235 OF 2024

Pr Commissioner Of Income Tax 3 Pune ...Appellant
Versus
Namrata Developers ...Respondent

Mr. Vikas T. Khanchandani for Appellant.

Mr. Devendra Jain (Through VC) a/w S. Lakade, Shashank Mehta i/by Kashyap Chotani for Respondent.

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

DATED : 16 October 2025

P.C.:-

1. The tax effect in this matter is less than Rs.2 Crores.

2. In terms of the CBDT Circular, these Appeals ought not to be pursued by the Revenue. Mr Khanchandani, learned counsel, however, has no instructions to withdraw.

3. Accordingly, we dispose of both these Appeals by leaving the questions of law open. However, if the Appellants find that the tax effect is greater than Rs.2 Crores or the Appeals fall within the excepted categories, the Appellants will have liberty to apply for restoration/revival. This is provided applications for restoration/revival are made within reasonable time i.e. on or before 31 January 2026.

4. The Appeal is disposed of with liberty in the above terms.

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