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

INCOME TAX APPEAL(IT) NO. 523 OF 2025

Pr Commissioner Of Income Tax 1 Thane ...Appellant
Versus
Sanjay Co-operative Credit Society Ltd.
A.Y. 2017-18 ...Respondent

Mr. Akhileshwar Sharma (Thr. VC), a/w Ms. Shradha Worlikar for Appellant.

Ms. Shruti Kalyani for the Respondent.

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

DATED : 6 November 2025

P.C.:-

1. Mr. Sharma, learned counsel for the Appellant and Ms. Shruti Kalyani, learned counsel for the Respondent.

2. Mr. Sharma points out that though tax effect in this Appeal is shown as less than Rs.2 Crores, the order challenged was made in exercise of Revisional Jurisdiction under Section 263 of the Income Tax Act. He submitted that such Appeal falls within the exceptions issued by the CBDT Circulars.

3. The CBDT Circular of 15 March 2024, indeed provides that challenges to orders made in exercise of powers under Section 263 of the said Act would fall within the exceptions provided the tax effect is not quantifiable or involved. Here, the tax effect is quantified at less than Rs.2 Crores. Therefore, the exception, would not be applicable.

4. This Appeal is accordingly disposed of on the ground of low tax effect by keeping open the questions of law. No costs.

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