Amol

IN THE HIGH COURT OF JUDICATURE AT BOMBAY

ORDINARY ORIGINAL CIVIL JURISDICTION

INCOME TAX APPEAL NO. 824 OF 2025

Pr Commissioner Income Tax Central Pune …Appellant

Versus

Gujarat Realtors ITA 2013 …Respondent

WITH

INCOME TAX APPEAL NO. 630 OF 2024

WITH

INCOME TAX APPEAL NO. 635 OF 2024

WITH

INCOME TAX APPEAL NO. 672 OF 2025

Mr Ashok Kotangale for the Appellant.

Mr. Govind Javeri, for the Respondent In ITXA/824/2025, ITXA/672/2025.

AMOL PREMNATH JADHAV

Digitally signed by AMOL PREMNATH JADHAV Date: 2025.10.15 22:04:07 +0530

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

PC:-

1. Heard learned Counsel for the parties.

2. The tax effect in all these Appeals is below Rs. 2 Crores. Therefore, in accordance with the Central Board of Direct

Taxes Circulars, these matters ought not to have been filed or in any event, pursued by the Revenue.

3. Accordingly, we dispose of these Appeals on the grounds of low tax effect by keeping the questions raised therein open. Interim Applications, if any, are disposed of.

4. 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)**