Amol

IN THE HIGH COURT OF JUDICATURE AT BOMBAY

ORDINARY ORIGINAL CIVIL JURISDICTION

INCOME TAX APPEAL NO. 481 OF 2024

Pr Commissioner of Income Tax Central 3 …Appellant

Versus

Morgan Credits Pvt Ltd …Respondent

WITH

INCOME TAX APPEAL NO. 504 OF 2024

WITH

INCOME TAX APPEAL NO. 506 OF 2024

WITH

INCOME TAX APPEAL NO. 516 OF 2024

WITH

INCOME TAX APPEAL NO. 521 OF 2024

WITH

INCOME TAX APPEAL NO. 529 OF 2024

WITH

INCOME TAX APPEAL NO. 541 OF 2024

WITH

INCOME TAX APPEAL NO. 548 OF 2024

WITH

INCOME TAX APPEAL NO. 549 OF 2024

WITH

INCOME TAX APPEAL NO. 552 OF 2024

WITH

INCOME TAX APPEAL NO. 559 OF 2024

WITH

INCOME TAX APPEAL NO. 580 OF 2024

WITH

INCOME TAX APPEAL NO. 646 OF 2024

WITH

INCOME TAX APPEAL NO. 649 OF 2024

WITH

INCOME TAX APPEAL NO. 731 OF 2025

WITH

INCOME TAX APPEAL NO. 585 OF 2024

Ms. Ankita Singh on behalf of Ms. Swapna Gokhale, for the Appellants.

Ms. Vasanti Patel, for the Respondent ITXA/521/2024.

Mr. Dinkle Hariya a/w. Ms.r Shruti Kalyananikar, for the Respondent In ITXA/548/2024 & ITXA/580/2024.

Mr. Sham V. Walve a/w. Mr. Sameer Dalal, for the Respondent ITXA/549/2024, ITXA/559/2024 & ITXA/585/2024.

Ms. Aasifa Khan, for the Respondent IN ITXA/731/2025.

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

PC:-

1. Ms Ankita Singh holding for Ms Swapna Gokhle, appears for the Appellants in all these Appeals.

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. Ms Ankita Singh, however, submits that she has no instructions to seek withdrawal.

4. 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.

5. 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)**