Sayali

SAYALI DEEPAK UPASANI

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

INCOME TAX APPEAL NO. 658 OF 2025

Principal Commissioner of Income Tax 6 Mumbai ...Appellant

Versus

Aadi Industries Ltd (AY 2010-11 ITA 3315 Mum 2024) ...Respondent

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Mr Akhileshwar Sharma, for Appellant

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

DATED: 11 November 2025

PC:-

1. Heard Mr. Shah, for the Appellant.

2. The tax effect in this case is less than Rs. 2 Crores. However, Mr. Sharma refers to the exceptions carved out in the CBDT Circular by pointing out that this is a case of exercise of revisional jurisdiction under Section 263 of the IT Act. Though this may be a case of exercise of revisional jurisdiction, still the tax effect is quantified and has been so quantified. Such tax effect is less than Rs. 2 Crores, as is evident from the connected tax appeal bearing ITXA (L) No. 25530 of 2023.

3. Therefore, on the ground of low tax effect, we dispose of this Appeal by keeping the question of law law.

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