IN THE HIGH COURT OF PUNJAB AND HARYANA
AT CHANDIGARH
****

201-1 **ITA-954-2008 (O&M)**
Date of Decision: 19.12.2025

STATE BANK OF PATIALA, PATIALA ...Appellant

Vs.

COMMISSION OF INCOME TAX, PATIALA & ANR. …Respondents

CORAM:- HON'BLE MR. JUSTICE JAGMOHAN BANSAL
HON'BLE MR. JUSTICE AMARINDER SINGH GREWAL

Present:- Mr. Sanjay Bansal, Sr. Advocate with
Mr. Gurdeep Singh, Advocate
Mr. Sushrut Singla, Advocate and
Mr. Iman Singla, Advocate
for appellant-State Bank of Patiala

Mr. Saurabh Kapoor, Sr. Standing Counsel *(through V.C.)* with
Mr. Rana Gurtej Singh, Jr. Standing Counsel and
Ms. Muskaan Gupta, Advocate
for respondent-Income Tax Department

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JAGMOHAN BANSAL, J. (ORAL)

1. The appellant through instant appeal under Section 260A of Income Tax Act, 1961 is seeking setting aside of order dated 06.06.2008 passed by Income Tax Appellate Tribunal, Chandigarh Bench, Chandigarh (for short 'Tribunal') for the Assessment Year 1995-96.

2. Learned counsel for the parties are *ad idem* that only one issue is involved namely disallowance of balance outstanding for more than three years in respect of inter-bank/inter-branch unreconciled entries.

3. Learned Sr. Advocate for the appellant submits that Tribunal vide order dated 28.03.2016 passed in *ITA-391-2011* has settled the issue in favour of assessee. The money lying with Bank with respect to unreconciled

inter-bank/inter-branch entries does not belong to Bank. This is customer's money and in case of being unclaimed is transferred to Reserve Bank of India.

4. Learned counsel for the respondent-Revenue expressed his inability to controvert that issue involved herein stands adjudicated in favour of assessee by Tribunal. No appeal against order passed by Tribunal has been filed.

5. In view of the fact that issue involved herein stands settled by Tribunal in favour of assessee, we deem it appropriate to set aside impugned order.

6. Appeal is allowed.

7. Pending application(s), if any, stands disposed of.

(JAGMOHAN BANSAL)
JUDGE

(AMARINDER SINGH GREWAL)
JUDGE

December 19, 2025
Deepak DPA

Whether Speaking/reasoned	Yes/No
Whether Reportable	Yes/No