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

201-2 **ITA-200-2012**
Date of Decision: 19.12.2025

STATE BANK OF PATIALA, PATIALA ...Appellant

Vs.

COMMISSION OF INCOME TAX, PATIALA …Respondent

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 (for short '1961 Act') is seeking setting aside of order dated 16.05.2012 passed by Income Tax Appellate Tribunal, Chandigarh Bench, Chandigarh (for short 'Tribunal') for the Assessment Year 2009-10.

2. Learned counsel for the parties are *ad idem* that three issues are involved namely (i) Disallowance under Section 14(A) on the securities held in stock; (ii) Applicability of Section 41(4) read with 36(1)(vii) with respect to recovery of bad debts which were written off in the earlier assessment years, however, deduction was never claimed; and (iii) Disallowance of

unclaimed balance in Nostro-Blocked account.

3. They further concede that matter may be remanded to Tribunal to pass fresh order, in the light of orders passed by Hon'ble Supreme Court as well as Tribunal itself after passing of impugned order.

4. In the wake of statement of both sides, the impugned order is hereby set aside and matter is remanded back to Tribunal for passing fresh order in accordance with law.

5. Disposed of in above terms.

6. 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