PRINCIPAL COMMISSIONER OF INCOME TAX- 10 DELHI v. JAGAT JEWELS

ITA 133/2026

ITA 133/2026 (2026-02-17) | 2026-02-17

Revenue appeal dismissed on the recorded low tax effect; underlying tax merits not adjudicated.

High Court of Delhi | Division Bench | Justice Dinesh Mehta | Justice Vinod Kumar

Assessment years: Not specified in supplied order

Scope of this order

Respondent assessee retained the benefit of Revenue's appeal ending on monetary limits; no substantive High Court tax ruling was made.

01 FACTS OF THE CASE

In ITA 133/2026, Revenue's counsel stated that the tax effect fell below the limits prescribed by CBDT Circular 5/2024 dated 15 March 2024 read with Circular 9/2024 dated 17 September 2024. The supplied order does not state an assessment year or determine the substantive tax dispute. The Court first condoned 780 days in re-filing under CM APPL.10897/2026.

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02 DISCUSSION BY THE HON'BLE COURT

The Court relied on the recorded monetary-limit submission. Its short reasoning concerns whether Revenue's appeal should proceed under the cited litigation circulars; it contains no adjudication approving a deduction, cancelling a reassessment or deciding the underlying addition.

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03 JUDICIAL DECISION

The 780-day re-filing delay was condoned and that application disposed of; the appeal was then dismissed for low tax effect.

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04 OUTCOME / IN WHOSE FAVOUR

Respondent assessee retained the benefit of Revenue's appeal ending on monetary limits; no substantive High Court tax ruling was made.

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05 EXPERT COMMENTS

Read the reason for disposal before relying on the result — The result in ITA 133/2026 rests on the tax-effect submission under the two identified circulars. It does not supply a merits precedent on the underlying assessment, even though it ends this Revenue appeal.

Do not fill gaps with assumed assessment facts — The original does not identify an assessment year, detailed tax computation or the provision governing the underlying addition. Those details cannot responsibly be supplied from a filename, another case or a generic reassessment template.

Keep condonation separate from tax relief — Condoning the 780-day re-filing delay merely removed a procedural obstacle. The subsequent dismissal was based on monetary limits, not acceptance of Revenue's substantive grounds.

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SOURCE & VERIFICATION

High Court of Delhi official judgment PDF (DLHC011085482023_1_2026-02-17.pdf)

1-page official High Court of Delhi judgment PDF (DLHC011085482023_1_2026-02-17.pdf).

Complete source text and every original page visually reviewed; identity and SHA-256 checked. AI-assisted source analysis.

Open cited source rendition

All 1 physical source pages read and visually inspected. SHA-256: a176eb69987845332787b36ed87f25bcad65ab42a4fc372b3f218293cfe12b16.

STATUTORY SCOPE

The order applies CBDT litigation monetary-limit circulars. It does not decide the underlying assessment provisions or identify an assessment year.

LATER TREATMENT

Source checked 2026-10-21. Subsequent judicial treatment has not been independently verified.

AI DISCLOSURE

AI-assisted research checked against the identified source. Extraction, interpretation or omission errors remain possible. Source review does not mean independent approval by a practising professional. Verify every material statement against the complete original judgment.

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