PR. COMMISSIONER OF INCOME TAX - 4, DELHI v. M/S JAYPEE CAPITAL SERVICES LTD

ITA 421/2026

No neutral citation stated in source | 2026-05-20

Revenue appeal dismissed on its own submission of low tax effect under CBDT circulars.

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

Assessment years: Not specified in source

01 FACTS OF THE CASE

In ITA 421/2026 with CM Application 34356/2026, Revenue's Senior Standing Counsel stated that the tax effect fell below the limits in CBDT Circular 5/2024 dated 15 March 2024 read with Circular 9/2024 dated 17 September 2024. The order supplies no assessment year, tax-effect figure or description of the underlying addition.

Source: PDF p.1

02 DISCUSSION BY THE HON'BLE COURT

The Court acted on Revenue's submission about the monetary limits. It recorded no independent analysis of reassessment, additions or any substantive tax question.

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03 JUDICIAL DECISION

The appeal was dismissed and the pending application disposed of.

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04 OUTCOME / IN WHOSE FAVOUR

Revenue's appeal ended on the stated low-tax-effect ground. This was not a merits endorsement of any underlying proposition in favour of Jaypee.

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05 EXPERT COMMENTS

AKHB EXPERT COMMENTS — editorial analysis, distinct from the Court's findings.

The source establishes a litigation-limit disposal — Revenue itself supplied the reason for ending the appeal. The Court's dismissal therefore documents the application of the cited monetary-limit policy to this appeal; it does not explain or resolve the underlying tax controversy. The absence of a merits discussion is particularly important when citing this order alongside a substantive judgment.

Do not manufacture the missing tax computation — Neither the numerical limit nor the actual tax effect is reproduced. The source supports the recorded conclusion that this appeal fell below the cited limits, not a calculation that can be carried into another taxpayer's case. No assessment year or section 148 issue can be inferred from the caption or source filename.

The operative disposal is complete on its own terms — The appeal and pending application were disposed of without an express remand or revival clause. That is the procedural result to record. It does not establish current circular policy or determine whether a different appeal falls within an exception; those matters were not examined in this short order.

Source: PDF p.1

SOURCE & VERIFICATION

Delhi High Court original order - verified repository copy

1-page official High Court of Delhi judgment PDF (DLHC011105362025_1_2026-05-20.pdf).

All 1 original pages read and visually inspected; all five panels audited.

Open cited source rendition

Complete one-page original read and visually inspected; unsupported assessment year and section 148 narrative removed.

STATUTORY SCOPE

The order cites CBDT Circular 5/2024 dated 15 March 2024 read with Circular 9/2024 dated 17 September 2024. It states no assessment year, tax amount, numbered Act provision or merits issue.

LATER TREATMENT

Source checked 2026-10-21. Subsequent 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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