Commissioner of Income Tax (International Taxation)-2 v. Lex Sportel Vision Pvt. Ltd.

ITA 334/2026

ITA 334/2026 (Delhi High Court, 27 April 2026) | 2026-04-27

Live-feed royalty appeal dismissed following Sri Lanka Cricket

Income-tax Act, 1961: 260A, 9(1)(vi)

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

Assessment years:

Precedent quotation distinguished

The detailed cricket-series and recording-rights narrative is quoted from Sri Lanka Cricket. The source does not independently set out Lex Sportel's full contract or an assessment year.

01 FACTS OF THE CASE

Revenue appealed under section 260A against the Tribunal's order of 26 December 2023. Its proposed questions challenged the treatment of foreign remittances, live rights and use of a process under section 9(1)(vi). The Court first condoned 656 days of delay in re-filing the appeal.

Source: Paras 1–4, PDF pp.1–2

02 DISCUSSION BY THE HON'BLE COURT

The Court applied its 15 January 2026 decision in CIT v. Sri Lanka Cricket, ITA 4/2026, reported at 2026 SCC OnLine Del 242. It quoted that decision's distinction between limited live telecast rights and rights to retain and re-telecast recordings for continuing benefit. The detailed series terms appear within that quotation, not as a fresh recital of Lex Sportel's contract.

Source: Para 5, PDF pp.2–3

03 JUDICIAL DECISION

Following Sri Lanka Cricket, the Court found no substance or merit in Revenue's appeal and dismissed it. The dismissal followed condonation of the re-filing delay.

Source: Paras 2,6, PDF pp.1,3

04 OUTCOME / IN WHOSE FAVOUR

Final assessee-favourable dismissal of the royalty challenge by applying the live-feed precedent. The source does not establish that every broadcasting payment, recording right or bundle of rights is outside royalty.

Source: Paras 5–6, PDF pp.2–3

05 EXPERT COMMENTS

Analyse rights rather than the label of a broadcast — Revenue's questions expressly raised a bouquet of rights and process royalty. The Court nevertheless applied the live-feed decision. For any comparison, the relevant contract rights must be identified; this short order does not reproduce Lex Sportel's agreement and cannot substitute for that factual exercise.

Do not import quoted facts into the current transaction — The twelve-month series restriction, absence of later-match rights and discussion of recording are from Sri Lanka Cricket. They explain the precedent followed here but are not independently established as Lex Sportel-specific terms. Likewise, the quoted SLP withdrawal is background to that precedent, not a disposal of this appeal by the Supreme Court.

Keep procedural indulgence distinct from substantive success — Condonation of 656 days in re-filing permitted the Court to address the appeal; Revenue still lost on the royalty issue. The order supplies neither AY 2018-19 nor a current-law clearance. Its value is the expressly applied precedent and the disposition of this identified appeal.

Source: Editorial analysis; source references in the structured comments

SOURCE & VERIFICATION

High Court of Delhi official judgment PDF (DLHC011322312024_1_2026-04-27.pdf)

3-page official High Court of Delhi judgment PDF (DLHC011322312024_1_2026-04-27.pdf).

All 3 original pages read and visually inspected; source hash verified. AI-assisted substantive correction.

Open cited source rendition

Source bytes and identity checked; see panel-specific references and disclosed source anomalies.

STATUTORY SCOPE

Sections 260A and 9(1)(vi) are expressly referred to. No assessment year is stated in this three-page order; no 2025 Act equivalence is asserted.

LATER TREATMENT

Source checked 2026-10-21. Subsequent treatment not 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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