Pr. Commissioner of Income-tax (International Taxation), Bengaluru & Anr. v. M/s. Synamedia Limited

ITA No. 107 of 2024

2025:KHC:32370-DB | 2025-08-20

AY 2006-07 Revenue appeal dismissed: no factual or legal distinction from Synamedia ITA 698/2023 demonstrated.

Income-tax Act,1961: sections 260A

High Court of Karnataka | 2-judge bench (Division Bench) | Hon'ble Mr. Justice S.G. Pandit | Hon'ble Mr. Justice K.V. Aravind

Assessment years: 2006-07

01 FACTS OF THE CASE

Revenue challenged the ITAT order of 12 November 2021 in IT(IT)A 363/Bang/2017 for AY 2006-07. Synamedia relied on the dismissal of ITA 698/2023 on 12 August 2025.

Source: PDF pp.2–3

02 DISCUSSION BY THE HON'BLE COURT

Revenue argued that Engineering Analysis Centre of Excellence did not apply. After considering the submissions and appeal questions, the Court found the questions identical to ITA 698/2023 and no demonstrated distinction in fact or law.

Source: PDF p.3, paras 3–5

03 JUDICIAL DECISION

The appeal was dismissed because no substantial question of law arose.

Source: PDF p.4, para 6

04 OUTCOME / IN WHOSE FAVOUR

Assessee successful; the AY 2006-07 Tribunal result remained undisturbed.

Source: PDF pp.2–4

05 EXPERT COMMENTS

AKHB Expert Comments — editorial analysis, distinct from the Court's findings.

A proposed distinction needs factual substance: Revenue's assertion that Engineering Analysis was inapplicable did not identify a distinction from the earlier Synamedia appeal. In using this judgment, compare the actual questions and agreements with the earlier case. A different label for the payment alone would not reproduce the factual exercise recorded here. (PDF p.3, paras 4–5)

Read the adopted judgment for the detailed rule: This order identifies Engineering Analysis and the earlier appeal but does not reproduce contract terms, payment amounts or a detailed royalty analysis. Its immediate reasoning is consistency on identical questions. A broader conclusion about every software or service payment would go beyond these four pages. (PDF pp.3–4)

The year and docket remain separate: ITA 107/2024 concerns AY 2006-07 and Tribunal appeal 363/Bang/2017. Following ITA 698/2023 does not merge the two appeals or turn the earlier assessment year into the present one. Preserve each order when tracing the litigation and the effect of any later proceeding. (PDF pp.2–3)

Source: PDF p.3, paras4–5

SOURCE & VERIFICATION

Original High Court judgment PDF — AKHB source repository

Complete 4-page original reviewed; source bytes verified.

Full original and all five panels re-reviewed on 21 October 2026.

Open cited source rendition

Complete original source and all five note panels checked; original docket identities preserved.

STATUTORY SCOPE

Current law and subsequent treatment not independently verified.

LATER TREATMENT

Source checked 2026-10-21. Subsequent proceedings and current judicial treatment have 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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