# Commissioner of Income Tax-III, Ludhiana v. Oswal Woolen Mills Ltd.

ITA 555/2006

No neutral citation stated in source | 2007-04-05

## Revenue appeal dismissed by adoption of same-day companion reasons.

High Court of Punjab and Haryana | Division Bench | M.M. Kumar | Rajesh Bindal

Assessment years:

### 01 FACTS OF THE CASE

Revenue brought ITA 555/2006 against Oswal Woolen Mills Ltd. The supplied order identifies the parties and appeal but does not recite the assessment year, amount, underlying transaction or proposed question.

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## 02 DISCUSSION BY THE HON'BLE COURT

The Court adopted the detailed reasons in its same-day order in ITA 552/2006 between the same parties. No independent substantive reasoning appears in the supplied order.

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## 03 JUDICIAL DECISION

The Court held that this appeal also failed and dismissed it for the companion-order reasons.

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## 04 OUTCOME / IN WHOSE FAVOUR

Revenue's distinct appeal ITA 555/2006 was dismissed. The substantive ratio must be read with the separate ITA 552/2006 judgment.

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## 05 EXPERT COMMENTS

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

The disposal is certain; its detailed ratio is incorporated — The operative result is an unqualified dismissal of Revenue's appeal. However, the paragraph expressly locates its reasons in another docket. This source proves the outcome in ITA 555/2006; identifying the underlying tax proposition requires the referenced judgment rather than reconstruction from a case name.

Preserve the separate appeal identity — The common parties and same-day reliance do not make ITA 555/2006 the same docket as ITA 552/2006. Maintain the present order as its own disposition and use the companion only for the reasoning it incorporates. The source gives no basis to assign the companion's assessment year or amounts to this appeal.

Use a two-document citation for substantive reliance — For an argument on the merits, obtain the 5 April 2007 lead judgment and read its issue, facts and operative reasoning alongside this disposal. Until that step, the reliable proposition here is the dismissal by incorporation, not an asserted exemption, deduction or computational rule absent from these pages.

Source: PDF p.1

## SOURCE & VERIFICATION

20070405_PHHC010752902006.pdf

Complete source PDF reviewed: 2 physical pages.

All 2 original pages read and visually inspected; all five panels audited.

Open cited source rendition

Both original pages inspected, including the header-only second page. Detailed reasons are incorporated from ITA 552/2006 dated 5 April 2007; that separate judgment is not reproduced in this source.

## STATUTORY SCOPE

This short order does not identify the substantive tax provision.

## 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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