

S U P R E M E C O U R T O F I N D I A
R E C O R D O F P R O C E E D I N G S

SPECIAL LEAVE PETITION (CIVIL) Diary No(s). 29747/2026

[Arising out of impugned final judgment and order dated 01-07-2025 in TCA No. 104/2024 passed by the High Court of Judicature at Madras]

THE PRL. COMMISSIONER OF INCOME TAX 1

Petitioner(s)

VERSUS

BNY MELLON TECHNOLOGY PVT. LTD.

Respondent(s)

(FOR ADMISSION and I.R.

IA No. 175030/2026 - CONDONATION OF DELAY IN FILING)

WITH

Diary No(s). 28225/2026 (XII)

(IA No. 186570/2026 - CONDONATION OF DELAY IN FILING)

Diary No(s). 29755/2026 (XII)

(IA No. 180565/2026 - CONDONATION OF DELAY IN FILING)

Date : 20-08-2026 These matters were called on for hearing today.

CORAM :

HON'BLE MRS. JUSTICE B.V. NAGARATHNA

HON'BLE MR. JUSTICE R. MAHADEVAN

For Petitioner(s) Mr. N Venkataraman, A.S.G.
Mr. Sudarshan Lamba, AOR
Mr. Mukesh Kumar Verma, Adv.
Mr. V Chandrashekhara Bharathi, Adv.
Mr. Padmesh Mishra, Adv.
Mr. Nikhil Aradhe, Adv.

For Respondent(s) :

UPON hearing the counsel the Court made the following
O R D E R

1. Delay condoned.
2. Issue notice to the respondent(s).
3. Tag with SLP(C) No.26584/2025.

(RADHA SHARMA)
ASTT. REGISTRAR-cum-PS

(DIVYA BABBAR)
COURT MASTER (NSH)