

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). 4452/2026

[Arising out of impugned final judgment and order dated 23-01-2025  
in ITA No. 771/2023 passed by the High Court of Delhi at New Delhi]THE COMMISSIONER OF INCOME TAX INTERNATIONAL  
TAXATION 1

Petitioner(s)

VERSUS

ADOBE SYSTEM SOFTWARE IRELAND LTD.

Respondent(s)

WITH

SLP(Cr1) No. 4392/2026 (II)

Date : 14-05-2026 These petitions were mentioned today.

CORAM :

HON'BLE MR. JUSTICE J.B. PARDIWALA

HON'BLE MR. JUSTICE UJJAL BHUYAN

For Petitioner(s) : Mr. Ramjee Pandey, AOR  
Miss Madhulika Upadhyay, AORFor Respondent(s) : Mr. Anil Kumar Gautam, AOR  
Ms. Tulika Mukherjee, AOR  
Mr. Sudarshan Lamba, AORUPON hearing the counsel the Court made the following  
O R D E RUpon being mentioned by the learned counsel appearing for the  
petitioner pointing out that wrong petition has been tagged with  
the main matter, let Diary No.10888/2026 be de-tagged and Diary  
No.10088/2026 be tagged with the main matter.(VISHAL ANAND)  
DEPUTY REGISTRAR(POOJA SHARMA)  
COURT MASTER (NSH)