

IN THE HIGH COURT OF KARNATAKA, BENGALURU

DATED THIS THE 14TH DAY OF AUGUST 2018

PRESENT

THE HON'BLE DR.JUSTICE VINEET KOTHARI

AND

THE HON'BLE MRS.JUSTICE S.SUJATHA

I.T.A. CROB. No.1/2018

IN

I.T.A. No.884/2017

BETWEEN:

M/S SWISS RE GLOBAL BUSINESS
SOLUTIONS INDIA PRIVATE LIMITED,
(FORMERLY KNOWN AS SWISS RE SHARED
SERVICES (INDIA) PRIVATE LIMITED),
VASWANICENTROPOLIS, 2ND TO 6TH FLOOR,
NO.21, LANGFORD ROAD,
BANGALORE - 560027. ... CROSS OBJECTOR

(BY SRI.NAGESWARA RAO, ADV. FOR SRI. MALLAHARAO, ADV.)

AND:

1. PR. COMMISSIONER OF INCOME TAX (CENTRAL)
C.R. BUILDING, QUEENS ROAD,
BENGALURU – 560 001.
2. DY. COMMISSIONER OF INCOME TAX,
CIRCLE 6(1)(2), BMTC BUILDING,
KORMANGALA, BENGALURU. ... RESPONDENTS

(BY SRI.K.V.ARAVIND , ADV.)

THIS ITA CROB. IS FILED UNDER ORDER 41 RULE 22 OF
THE CPC, ARISING OUT OF ORDER DATED: 13.04.2017 PASSED
IN IT[TP]A NOS. 2315/BANG/2016, FOR THE ASSESSMENT
YEAR 2012-2013, VIDE ANNEXURE-A, PRAYING TO: (I) DISMISS

THE APPEAL FILED BY REVENUE TO ANSWER THE SUBSTANTIAL QUESTION OF LAW IN FAVOUR OF APPELLANT/CROSS OBJECTOR; M(II) ALTERNATIVELY ADMIT PRESENT CROSS OBJECTION AND UPHOLD EXCLUSION OF COMPANIES AS COMPARABLES AS HELD THE IMPUGNED ORDER AT ANNEXURE-'A' PASSED BY THE INCOME-TAX APPELLATE TRIBUNAL DATED: 13.04.2017 IN IT(TP)A NOS.2315/BANG/2016 FOR ASSESSMENT YEAR:2012-2013 KEEPING IN VIEW ENTIRETY OF FACTS AND LAW; (III) PASS SUCH FURTHER AND OTHER ORDERS IN FAVOUR OF THE APPELLANT. CROSS OBJECTOR AS THIS HON'BLE COURT MAY DEEM FIT TO GRANT, IN THE FACTS AND CIRCUMSTANCES OF THE CASE, AND IN THE INTEREST OF JUSTICE AND EQUITY.

THIS ITA.CROB. COMING ON FOR ORDERS, THIS DAY, **Dr. VINEET KOTHARI, J.**, MADE THE FOLLOWING:

ORDER

Mr. Nageswar Rao, Mr. Mallaharao, Mr. Parth, Advs.,
for Cross Objector– Assessee.

Mr. K.V. Aravind, Adv. for Respondents – Revenue.

Learned Counsel for the Cross Objector-Assessee
submits that the Cross Objections is not required to be
pressed on merits.

Cross Objections is dismissed as not pressed.

**Sd/-
JUDGE**

**Sd/-
JUDGE**

AN/-