



The Chamber of Tax Consultants

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Please find attached list of decisions to be discussed on ISG meeting of July 27, 2021

Sr.No	Case name	Citation	Pertaining to	ITAT/HC/SC	Broad Principle
1	CIT v. Texas Instruments India (P.) Ltd	(2021) 127 taxmann.com 59 (Kar)	Deduction u/s 80JJAA	HC	300 days period for the purpose of sec 80JJAA can be taken into consideration by observing performance of duties in the previous year as well as in the succeeding year.
2	CIT v. Reliance Energy Ltd	(2021) 127 taxmann.com 69 (SC)	Deduction for 80IA	SC	Deduction for 80IA is available against the total income and is not confined only to "business income"
3	Karti P. Chidambaram v. PCIT	[2021] 128 taxmann.com 116 (Madras)	Sec 153C – powers of HC in writ	HC	legal malice needs to be proved for the HC to entertain a writ
4	Nandi Steels Limited v. ACIT	ITA No. 103 of 2012 (Kar HC)	Set off of losses	HC	Brought forward business loss can be set-off against capital gains arising from assets used for business