



**IN THE HIGH COURT OF JUDICATURE AT BOMBAY
ORDINARY ORIGINAL CIVIL JURISDICTION**

INCOME TAX APPEAL NO.1515 OF 2019

The Pr. Commissioner of Income Tax-Central,
Pune

... Appellant

Versus

P. N. Gadgil and Co [Silver]

.... Respondent

Adv. Akhileshwar Sharma, for the Appellant.
None for the Respondent.

**CORAM : M. S. KARNIK &
S. M. MODAK, JJ.**

DATE : 29th JANUARY, 2026

P.C. :

1. The tax effect in this Appeal is less than Rs.2 Crores.
However, Mr. Sharma reports no instructions.
2. Accordingly, we dispose of this Appeal on the ground of
low tax effect by keeping question of law open.
3. However, if at a later stage, it is found that the tax effect
is greater than Rs.2 Crores or that the Appeal falls within any of
the exceptions, the Appellant will have the liberty to apply for
revival/restoration.

(S. M. MODAK, J.)

(M. S. KARNIK, J.)