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

INCOME TAX APPEAL NO.2116 OF 2018

Madhu Gandhi : Appellant
Versus
Deputy Commissioner of Income Tax
Centre Circle – 1, Mumbai : Respondent

WITH
INCOME TAX APPEAL NO.1919 OF 2018

Chintan Gandhi : Appellant
Versus
Deputy Commissioner of Income Tax
Centre Circle – 1, Mumbai : Respondent

WITH
INCOME TAX APPEAL NO.2025 OF 2018

Hasmukh Gandhi : Appellant
Versus
Deputy Commissioner of Income Tax
Centre Circle – 1, Mumbai : Respondent

WITH
INCOME TAX APPEAL NO.2111 OF 2018

Chintan Gandhi : Appellant
Versus
Deputy Commissioner of Income Tax
Centre Circle – 1, Mumbai : Respondent

WITH
INCOME TAX APPEAL NO.2120 OF 2018

Hasmukh Gandhi : Appellant
Versus

Deputy Commissioner of Income Tax
Centre Circle – 1, Mumbai : Respondent

WITH
INCOME TAX APPEAL NO.2028 OF 2018

Hasmukh Gandhi : Appellant
Versus
Deputy Commissioner of Income Tax
Centre Circle – 1, Mumbai : Respondent

WITH
INCOME TAX APPEAL NO.2126 OF 2018

Hasmukh Gandhi : Appellant
Versus
Deputy Commissioner of Income Tax
Centre Circle – 1, Mumbai : Respondent

WITH
INCOME TAX APPEAL NO.2119 OF 2018

Madhu Gandhi : Appellant
Versus
Deputy Commissioner of Income Tax
Centre Circle – 1, Mumbai : Respondent

WITH
INCOME TAX APPEAL NO.2130 OF 2018

Chintan Gandhi : Appellant
Versus
Deputy Commissioner of Income Tax
Centre Circle – 1, Mumbai : Respondent

WITH
INCOME TAX APPEAL NO.2026 OF 2018

Hasmukh Gandhi : Appellant
Versus

Deputy Commissioner of Income Tax
Centre Circle – 1, Mumbai : Respondent

Ms Aarti Sathe & Ms Aasavari Kadam, for the Appellants in all the Appeals .
Mr P A Narayanan, for the Respondent in ITXA Nos.1919/2018, and 2111/2018
Mr. Suresh Kumar for the Respondent in ITXA Nos. 2025/2018, 2028/2018, and 2026/2018

CORAM **M.S. Sonak &**
Jitendra Jain, JJ.
DATED: **27 February 2025**

PC:-

1. Heard learned counsel for the parties.

2. These Appeals relate to the Assessment Years 2010-11, 2011-12 and 2012-13. These Appeals admitted on the following substantial questions of law :-

> A) Whether on the facts and in the circumstances of the case the Tribunal was justified in making addition on account of interest earned on alleged deposits in foreign bank account of Manichi Trust at Liechtenstein in the hands of the Appellants, wherein the Appellants were held to be a beneficiary, which were added pursuant to the re-opening proceedings for A.Y.02-03 which were not valid and not based on verifiable or authentic information, in the present assessment year and in the subsequent assessment year?

B) Whether on the facts and in the circumstances of the case and in law the Tribunal was justified in making the addition on account of interest earned on alleged deposits in foreign bank account of Manichi Trust @ Liechtenstein in the hands of the Appellants without appreciating that in A.Y. 2004-05 the said addition was deleted in the Appellants' case by C.I.T(A)?

3. Mr. Naryanan waives service on behalf of the Respondent in Appeal Nos.1919/2018, and 2111/2018.

4. Mr. Suresh Kumar waives service on behalf of the Respondent in Appeal Nos.2025/2018, 2028/2018, and 2026/2018.

5. The Appellants to serve the Respondent in rest of the Appeals.

(Jitendra Jain, J) **(M.S. Sonak, J)**