

S U P R E M E C O U R T O F I N D I A
RECORD OF PROCEEDINGS

SPECIAL LEAVE PETITION (CIVIL) Diary No(s). 25192/2026

[Arising out of impugned final judgment and order dated 28-05-2024 in ITA No. 887/2018 passed by the High Court of Delhi at New Delhi]

THE COMMISSIONER OF INCOME TAX
INTERNATIONAL TAXATION 3

Petitioner(s)

VERSUS

THE BANK OF TOKYO MITSUBISHI UFJ LTD.

Respondent(s)

(IA No. 158798/2026 - CONDONATION OF DELAY IN FILING)

Date : 26-05-2026 This matter was called on for hearing today.

CORAM : HON'BLE MR. JUSTICE PAMIDIGHANTAM SRI NARASIMHA
HON'BLE MR. JUSTICE ALOK ARADHE

For Petitioner(s) : Mr. Raghavendra P Shankar, A.S.G.
Mr. Sudarshan Lamba, AOR
Mr. Karan Lahiri, Adv.
Ms. Pallavi Mishra, Adv.
Ms. Rajeshwari Srivastava, Adv.

For Respondent(s) : Mr. Nishant Thakkar, Adv.
Mr. Nikhil Ranjan, Adv.

UPON hearing the counsel the Court made the following
O R D E R

1. Issue notice on the Special Leave Petition as well as on the application for condonation of delay.
2. Tag with SLP (C) No. 33021 of 2017.

(JAYANT KUMAR ARORA)
ASTT. REGISTRAR-cum-PS

(NIDHI WASON)
ASSISTANT REGISTRAR