

IN THE SUPREME COURT OF INDIA  
CIVIL APPELLATE JURISDICTION

CIVIL APPEAL NO. 176 OF 2016

DIRECTOR OF INCOME TAX (IT)-I

APPELLANT (s)

VERSUS

M/S. SUMITOMO MITSUI BANKING CORPORATION RESPONDENT(s)

WITH

CIVIL APPEAL NO.7330 OF 2016

THE COMMISSIONER OF INCOME TAX  
(INTERNATIONAL TAXATION)-4

APPELLANT (s)

VERSUS

M/S. SUMITOMO MITSUI BANKING CORPORATION RESPONDENT(s)

O R D E R

Mr. Rustom B. Hathikhanawala, learned counsel for the respondent(s) has circulated a letter in Civil Appeal Nos.176 of 2016 and 7330 of 2016 stating therein that the disputes had been settled under the "*Vivad se Vishwas*" Scheme.

The learned counsel has submitted that the Union of India has withdrawn similar matters in which disputes had been settled under this Scheme.

Accordingly, Civil Appeal Nos.176 of 2016 and 7330 of 2016 are dismissed as withdrawn by recording the statement of the learned counsel, Mr. Rustom B. Hathikhanawala.

..... J.  
(L. NAGESWARA RAO)

..... J.  
(ANIRUDDHA BOSE)

NEW DELHI  
AUGUST 10, 2021

ITEM NO.4 Court 6 (Video Conferencing)

SECTION XIV-A

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

Civil Appeal No(s). 1262/2016

DIRECTOR OF I.T NEW DELHI

Appellant(s)

VERSUS

M/S MITSUBHISHI CORP.

Respondent(s)

WITH

C.A. No. 1256/2016 (X)

C.A. No. 1268/2016 (XIV-A)

C.A. No. 1271/2016 (III)

C.A. No. 1272/2016 (XIV-A)  
( FOR APPLICATION FOR TAGGING/DETAGGING ON IA 103435/2020  
IA No. 103435/2020 - APPLICATION FOR TAGGING/DETAGGING)

C.A. No. 1372/2016 (XIV-A)

C.A. No. 1338-1341/2016 (XIV-A)

C.A. No. 1323/2016 (XIV-A)

C.A. No. 1324/2016 (XIV-A)

C.A. No. 1325/2016 (XIV-A)

C.A. No. 1326-1331/2016 (XIV-A)

C.A. No. 1322/2016 (XIV-A)

C.A. No. 1342/2016 (XIV-A)

C.A. No. 176/2016 (III)

C.A. No. 7330/2016 (III)

SLP(C) No. 26610/2017 (XIV)  
(FOR ADMISSION and I.R. and IA No.91875/2017-CONDONATION OF DELAY  
IN FILING)

SLP(C) No. 21415/2018 (XIV)

(FOR EXEMPTION FROM FILING C/C OF THE IMPUGNED JUDGMENT ON IA 102906/2018  
IA No. 102906/2018 - EXEMPTION FROM FILING C/C OF THE IMPUGNED JUDGMENT)

SLP(C) No. 29895/2018 (XIV)  
(FOR ADMISSION and I.R. and IA No.151848/2018-CONDONATION OF DELAY IN FILING)

C.A. No. 64/2019 (XIV-A)  
(FOR ADMISSION and I.R. and IA No.180261/2018-CONDONATION OF DELAY IN FILING)

C.A. No. 1793/2019 (XIV-A)  
(FOR ADMISSION and I.R. and IA No.26468/2019-CONDONATION OF DELAY IN FILING)

Diary No(s). 42745/2019 (IX)

IA No. 197795/2019 - CONDONATION OF DELAY IN FILING)  
SLP(C) No. 915/2020 (IX)

C.A. No. 3886/2014 (XIV-A)

C.A. No. 3884/2014 (XIV-A)

C.A. No. 3883/2014 (XIV-A)

C.A. No. 1295-1299/2016 (XIV-A)  
( FOR EXEMPTION FROM FILING C/C OF THE IMPUGNED JUDGMENT ON IA 1/2014 - EXEMPTION FROM FILING C/C OF THE IMPUGNED JUDGMENT)

C.A. No. 1301/2016 (III)

C.A. No. 1303-1307/2016 (XIV-A)

C.A. No. 1311-1312/2016 (XIV-A)

C.A. No. 1314/2016 (XIV-A)

C.A. No. 1310/2016 (XIV-A)

SLP(C) No. 11304/2021 (IV-A)  
(FOR ADMISSION and I.R.)

SLP(C) No. 10814/2021 (IV-A)  
(FOR ADMISSION and I.R.)

SLP(C) No. 11098/2021 (IV-A)  
(FOR ADMISSION and I.R..)

Date : 10-08-2021 This appeal was called on for hearing today.

**CORAM :**

**HON'BLE MR. JUSTICE L. NAGESWARA RAO**  
**HON'BLE MR. JUSTICE ANIRUDDHA BOSE**

**For the parties**

**Mr. Deepak Chopra, Adv.**  
**Mr. Harpreet Singh Ajmani, Adv**  
**Mr. Ashwarya Sinha, AOR**  
**Mr. Alok K Singh, Adv**  
**Ms. Shubhi Sharma, Adv**

**Mr. B. V. Balaram Das, AOR**

**Mr. Neeraj Shekhar, AOR**

**Mr. K.M Natraj, Ld. ASG**  
**Mr. Kumar Shashank, Adv.**  
**Mr. Manish Pushkarna, Adv.**  
**Mr. Sughosh Subramaniam, Adv.**  
**Ms. Swarupma Chaturvedi, Adv.**  
**Mr. Zoheb Hossain, Adv.**  
**Mr. Udai Khanna, Adv.**  
**Mr. Raj Bahadur Yadav, AOR**

**Mrs. Anil Katiyar, AOR**

**Mr. Anil Kumar, Adv.**  
**Mr. Kamal Mohan Gupta, AOR**

**Mr. Aarohi Bhalla, Adv.**  
**Ms. Sujata Kurdukar, AOR**

**Mr. Satyen Sethi, Adv.**  
**Ms. Sujata Kurdukar, AOR**

**Mr. Sachit Jolly, Adv**  
**Mr. Anish Kapur, Adv**  
**Mr. Rohit Garg, Adv**  
**Ms. Disha Jham, Adv**  
**Mr. Kunal Dutt, Adv**  
**Ms. B. Vijayalakshmi Menon, AOR**

**Ms. Mahua Kalra, AOR**

**Mr. Niraj Sheth, Adv**  
**Mr. Rustom B. Hathikhanawala, AOR**

**Mr. Udit, Adv.**  
**Ms. Kavita Jha, AOR**

Mr. Siddharth Vasudev, Adv.

Mr. T. V. S. Raghavendra Sreyas, AOR

Mr. Salil Kapoor, Adv.

Mr. Sumit Lalchandani, Adv.

Ms. Ananya Kapoor, Adv.

Mr. Sanat Kapoor, Adv.

Ms. Souma Singh, Adv.

Ms. Payal Awarup, Adv.

Mr. Praveen Swarup, AOR

Mr. Nishant Thakker, Sr. Adv.

Ms. Jasmine Amsadvalla, Adv.

Mr. Kishore Kunal, AOR

Mr. Manish Rastogi, Adv.

Mr. M.S.Syali, Sr. Adv.

Mr. Mayank Nagi, Adv.

Mr. Tarun Singh, Adv.

Mr. Pulkit Verma, Adv.

Mr. Mahua Kalra, Adv.

Mr. Rameshwar Prasad Goyal, AOR

Mr. M.S.Syali, Sr. Adv.

Mr. Mayank Nagi, Adv.

Mr. Tarun Singh, Adv.

Mr. Pulkit Verma, Adv.

Mr. Mahua Kalra, AOR

Mr. H. Raghavendra Rao, AOR

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

C.A.Nos.1262/2016, 1256/2016, 1268/2016, 1271/2016, 1272/2016, 1338-1341/2016, 1323/2016, 1324/2016, 1325/2016, 1326-1331/2016, 1322/2016, 1342/2016, SLP(C)Nos.26610/2017, 29895/2018, SLP(C)DIARY No.42745/2019, SLP(C)No.915/2020, C.A.No.3884/2014, 1295-1299/2016, 1301/2016, 1303-1307/2016, 1311-1312/2016, 1314/2016 and 1310/2016

Delay in SLP(C)Diary No.42745/2019 is condoned.

Leave granted in SLP(C)Nos.26610/2017, 29895/2018, 915/2020 and SLP(C)Diary No.42745/2019.

Heard learned counsel for the parties.

Arguments concluded.

Judgment reserved.

C.A.Nos.176/2016 & 7330/2016

The Civil Appeals are dismissed as withdrawn in terms of the signed order.

Pending application(s), if any, shall stand disposed of.

SLP(C)No.21415/2018, C.A.Nos.64/2019, 1793/2019, 3886/2014, 3883/2014, SLP(C)Nos.11304/2021, 10814/2021 & 11098/2021

De-tag and list on 21.09.2021

CIVIL APPEAL NO.1372/2016

List on 12.08.2021.

(NIRMALA NEGI)

COURT MASTER (SH)

(JAGDISH KUMAR)

COURT MASTER(SH)

(ANAND PRAKASH)

BRANCH OFFICER

(Signed order in Civil Appeal Nos.176/2016 and 7330/2016  
is placed on the file)