OD – 20

ORDER SHEET
IN THE HIGH COURT AT CALCUTTA
SPECIAL JURISDICTION [INCOME TAX]
ORIGINAL SIDE

ITAT/207/2026
IA NO: GA/1/2026
PRINCIPAL COMMISSIONER OF INCOME TAX 2, KOLKATA
VS
M/S JAGMAG MERCANTILES PRIVATE LIMITED

BEFORE :
THE HON'BLE JUSTICE RAJARSHI BHARADWAJ
And
THE HON'BLE JUSTICE SUDIP DEB
Date: 25th September, 2026

Appearance:
Ms. Sanjukta Gupta, Adv.
Ms. Sukanya Dutta, Adv.
…for appellant.

Mr. Swapna Das, Adv.
Mr. Siddharth Das, Adv.
…for respondent.

The Court: Heard learned counsels for the parties.

Learned counsel for the appellant submits that the tax effect in this case is Rs.17,07,225/- which is below the tax limit as prescribed in the CBDT Circular No.9/2024 dated 17th September, 2024 and Circular No.5 of 2024 dated 15th March, 2024 but the case falls within the exceptional category under para 3.1(h) as per CBDT Circular No.5 of 2024 dated 15th March, 2024.

We have perused the application, the assessment order, appellate order of the learned Commissioner of Income Tax and the order of the learned Tribunal dated January 14, 2026 for the Assessment Year 2014-2015. We do not find any reason to

entertain this appeal where the appellant has not clearly suggested which exceptional clause as read in para 3.1(h) as per CBDT Circular No.5 of 2024 dated 15th March, 2024 is applicable in the present appeal. As such, this appeal and the connected application IA No.GA/1/2026 are dismissed as the tax effect in this matter is below Rs. 2 crores.

(RAJARSHI BHARADWAJ, J.)

(SUDIP DEB, J.)

sd/