FORM NO. 35 [See rule 45]

Appeal to the Joint Commissioner (Appeals) or the Commissioner of Income-tax (Appeals)

e-Filing Anywhere Anytime
Income Tax Department, Government of India

Personal Information :	
Name of Entity	GV RESEARCH CENTERS PRIVATE LIMITED
PAN	AAHCG4562D
TAN	-
Address	5-4-187/3 AND 4, SOHAM MANSION, 2ND FLOORHYDERABAD, Secunderabad, Secunderabad H.O, Telangana, INDIA, 500003
Mobile No.	9121282860
STD code	
Landline No.	
Email Address	it_d@modiproperties.com
Whether notices/communication may be sent on email?	Yes

Order against which Appeal is filed :		
1.	Assessment year in connection with which the appeal is preferred/ Enter financial year in case appeal is filed against an order where assessment year is not relevant	
	Year Type	Assessment Year
	Assessment Year/Financial Year	2023-24
	From (A.Y)	-
	To (A.Y)	-
	Date of search	-
2.	Details of the order appealed against	

a.	Section and sub-section of the Income-tax Act,1961	143(1)
b.	Date of Order	08-Jan-2024
c.	Date of service of Order/Notice of Demand	08-Jan-2024
3.	Income-tax Authority passing the order appealed against	APR-C-(52)(1)

Pending Appeal :

4.	Whether an appeal in relation to any other assessment year/ financial year is pending in the case of the appellant with any Joint Commissioner (Appeals) or Commissioner (Appeals)	No

Sl. No.	Income-tax Authority passing the order appealed against	Joint Commissioner (Appeals) or Commissioner (Appeals), with whom the appeal is pending	Appeal Number	Date of filing of appeal	Assessment year/ financial year in connection with which the appeal has been preferred	Section and Sub-section of the Income-tax Act, 1961, under which the order appealed against has been passed	Date of Such Order
				No Records Added			

Appeal Details :

5.	Section and sub-section of the Income-tax Act,1961 under which the appeal is preferred	246A
6.	If appeal relates to any assessment	Yes
(a)	Amount of Income Assessed (in Rs.)	₹ 1,44,00,583
(b)	Total Addition to Income (in Rs.)	₹ 0
(c)	In case of Loss, total disallowance of Loss in assessment (in Rs.)	₹ 0
(d)	Amount of Addition/Disallowance of Loss disputed in Appeal (in Rs.)	₹ 0
(e)	Amount of Disputed Demand (in Rs.) - Enter Nil in case of Loss	₹ 31,62,955
7.	If appeal relates to penalty:	No
(a)	Amount of penalty as per Order (in Rs.)	-

(b) Amount of penalty disputed in Appeal (in Rs.)	-

Details of Taxes paid :

8.	Where a return has been filed by the appellant for the assessment year in connection with which the appeal is filed, whether tax due on income returned has been paid in full	Yes
8.1.	If reply to 8 is Yes, then enter details of return and taxes paid	
	(a) Acknowledgement number	465677391301023
	(b) Date of filing	30-Oct-2023
	(c) Total tax paid	₹ 74,24,579
9.	Where no return has been filed by the appellant for the assessment year, whether an amount equal to the amount of advance tax as per section 249(4)(b) of the Income-tax Act, 1961 has been paid	No
9.1.	If reply to 9 is Yes, then enter details	

Sl. No.	BSR Code	Date of payment	Challan Serial Number	Amount
		No Records Added		

Total	-

10.	If the appeal relates to any tax deductible under section 195 of the Income-tax Act, 1961 and borne by the deductor, details of tax deposited under section 195(1)	Not Applicable

Sl. No.	BSR Code	Date of payment	Challan Serial Number	Amount
		No Records Added		

Total	-

Statement of facts, Grounds of Appeal and additional evidence :

11.	Statement of Facts	
	Facts of the case in brief (not exceeding 1000 words)	Refer Annexure 1
	List of documentary evidence relied upon	

Sl. No.	Document Name	Description	Documentary Evidence
1	Annexure 1	Statement of Facts	-

12.	Whether any documentary evidence other than the evidence produced during the course of proceedings before the Income-tax Authority has been filed in terms of Rule 46A	No
12.1.	If reply to 12 is Yes, furnish the list of such documentary evidence	

Sl. No.	Document Name	Description	Documentary Evidence
		No Records Added	

13. Grounds of Appeal (each ground not exceeding 100 words)

Sl. No.	Relevant section (s) of IT/ Act	Issue	Ground of Appeal
1	143(1)	Learned Assessing Officer has allowed credit for tax deducted at source, only for a sum of Rs. 875,138 instead of Rs. 74,24,579 claimed by the Appellant in its return of income.	Refer Annexure 2

Appeal filing details :

14.	Whether there is delay in filing appeal	No
15.	If reply to 14 is Yes, enter the grounds for condonation of delay (not exceeding 500 words)	
16.	Details of Appeal Fees Paid	

Sl. No.	BSR Code	Date of payment	Challan Serial Number	Amount
1	0909090	02-Feb-2024	09090	1000

17.	Address to which notices may be sent to the appellant	**5-4-187/3 AND 4, SOHAM MANSION, 2ND FLOOR, Secunderabad, Secunderabad H.O, HYDERABAD, Telangana,**

India - 500003

I, **TEJAL SOHAM MODI** the appellant, do hereby declare that what is stated above is true to the best of my information and belief. It is also certified that no additional evidence other than the evidence stated in row 12.1 above has been filed.

IP Address:	**183.83.237.43**
Date:	**02-Feb-2024**
Place:	**Hyderabad**

From: communication@cpc.incometax.gov.in
Sent: 06 February 2024 20:21
To: it_d@modiproperties.com
Subject: PAN : AAXXXXXX2D; Form No. 35 ; Acknowledgement

Form No. 35 ; Acknowledgement

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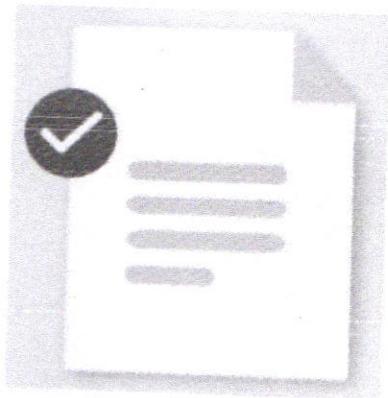
Income Tax Department, Government of India

Name : GV RESEARCH CENTERS PRIVATE LIMITED
PAN : AAXXXXXX2D | A.Y. : 2023-24

Status
35 submitted successfully

Acknowledgement Number
933523160060224

Date of Acknowledgement Number
06-Feb-2024



The Form No.35 - Appeal to the Joint Commissioner (Appeals) or the Commissioner of Income-tax (Appeals) for Assessment Year 2023-24 has been successfully submitted.

If you have not done this transaction, please contact the help-desk 1800 103 0025, 1800 419 0025 immediately.

Regards,
e-Filing Team,
Income Tax Department

The Income Tax Department does not seek any of the following information. Do not part with such information.

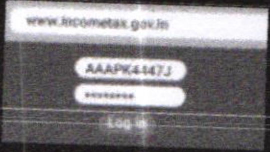
User name | Password | ATM Details | Credit cards

Do not respond to emails soliciting such information.

To ensure your email ID accepts the mail from e-Filing Team, add communication@cpc.incometax.gov.in to your white list/safe sender list. Else, your mailbox filter or ISP (Internet Service Provider) may stop you from receiving emails from us.

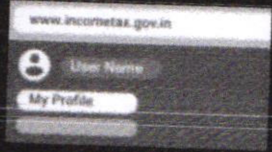
To update your email ID,

1



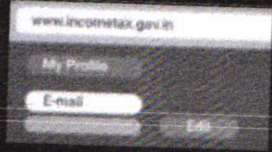
Log on to www.incometax.gov.in with your PAN and Password.

2



Please click on 'My Profile' against your Name.

3



Enter e-mail ID & other details.

This communication is computer-generated and please do not reply. For any queries, please contact

1800 103 0025, 1800 419 0025

Annexure 1

STATEMENT OF FACTS

GV Research Centers Private Limited

GV Research Centers Private Limited (here-in-after referred to as 'the Appellant'), is a Company incorporated on 12 September 2018. The Company is engaged in the business construction, development and leasing of research labs and research facilities.

The Appeallant filed its Return of Income for the Assessment Years (here-in-after referred to as 'AY') 2023-24 on 30th October 2023 vide acknowledgement number 465677391301023 declaring a total income of Rs. 1,44,00,580. During the AY, the Appellant has received Rs. 4.59 Cr towards reimbursement of water and electricity expenses and the same is recorded in books of accounts net of expense incurred. The customer of the Appellant has deducted tax at source on payment of the aforementioned reimbursement, which is reflecting in Form 26AS. The Appellant filed its return of income disclosing the net reimbursement income, which is nil, and claiming credit for the tax deducted at source by the customer as appearing in Form 26AS.

The Appellant has received an intimation u/s 143(1) dated 8 January 2024, wherein the Learned Assessing Officer (here-in-after referred to as 'Ld. AO') has allowed credit for tax deducted at source, only for a sum of Rs. 875,138 instead of Rs. 74,24,579 claimed by the Appellant in its return of income.

Aggrieved by the above intimation, an appeal is being filed to CIT(A).

For GV Research Centers Private Limited

Soham Satish Modi
Director
DIN: 00522546

Place: Hyderabad
Date: 02th February 2024

Annexure 2

GROUNDS OF APPEAL

GV Research Centers Private Limited

Each of the grounds given below is independent and without prejudice to the other grounds of appeal preferred by the Appellant.

1. On the facts and in the circumstances of the case, the denial of credit for tax deducted at source by the Learned Assessing Officer (here-in-after referred to as 'Ld. AO') are unjustified, erroneous and unsustainable. We request that the Ld. AO be directed to give appropriate relief in accordance with law.

2. The Ld. AO erred in law and in facts in concluding that the Appellant has not offered the corresponding income to tax and accordingly, restricting the credit for tax deducted at source by applying the provisions of Rule 37BA

The Appellant prays for leave to add, alter, vary, omit, substitute or amend the above grounds of appeal, at any time before or at, the time of hearing, of the appeal, to enable the learned Commissioner of Income tax (Appeals) to decide this appeal according to law.

For GV Research Centers Private Limited

Soham Satish Modi
Director
DIN: 00522546

Place: Hyderabad
Date: 02th February 2024