

ORDER SHEET
IN THE HIGH COURT OF SINDH AT KARACHI

**CP D 6201, 6324, 6325, 6632, 6633, 6634, 6635, 6636, 6637, 6716 of 2020
CP D 635 & 782 of 2021**

| DATE | ORDER WITH SIGNATURE OF JUDGE |
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1. For order on office objection
2. For hearing of CMA No. 32848/2021
3. For hearing of CMA No. 32849/2021
4. For hearing of CMA No. 26639/2020
5. For hearing of main case

05.03.2025

Mr. Khalid Jawed Khan, advocate for the petitioner
Mr. Jam Zeeshan Ali, advocate for the petitioner
Messrs. Dr. Shahnawaz and Fawad Chand, advocates for respondent
Mr. Kashif Nazir, Assistant Attorney General

Per learned counsel for the petitioners, the grievance is that time-barred rectification notices have been issued in respect of orders passed more than 10 years ago under sections 124 and 171 of the Income Tax Ordinance, 2001 and any extension of time by F.B.R. is beyond jurisdiction. It is further added that the impugned notices seek to re-open past and closed transactions; which is beyond the scope of rectification in quasi-judicial proceedings.

Be that as it may, learned counsel state that the respective notices shall be contested before the issuing authority. They seek that notices be determined in accordance with law vide speaking orders, after providing opportunity of hearing to the respective petitioners, and pending the aforesaid no coercive action be taken against the petitioners in this regard. Learned counsel for the respondent and learned AAG articulate no cavil to the aforesaid and state that these petitions may be disposed of in the above terms. Order accordingly. Office is instructed to place copy of this order in connected matters.

Judge

Judge