ORDER SHEET

IN THE HIGH COURT OF SINDH AT KARACHI

ITRA 121 of 2025

DATE	ORDER WITH SIGNATURE OF JUDGE(S)

1. For orders on office objection No.11.
2. For orders on CMA No.847/2025.
3. For orders on CMA No.848/2025.
4. For hearing of main case.

06.08.2026

Mr. Arshad Hussain Shehzad, advocate for the applicant.
Mr. Faheem Raza Khuhro, advocate for the respondent.

Learned counsel proposes following questions for determination:

1. Whether under the facts of the case, the respondent No. 3 was correct in applying the provision for prorated expenses under Section 67 in a case where income is declared under more than one heading and expenses are reported separately?

2. Whether under the fact of the case the respondent No. 3 was justified in applying apportionment of expenses in a situation where a segmented computation of income, receipts, and expenditures has been reported?

Learned counsel states that these questions have already been answered by the honourable Supreme Court in favour of applicant and against the respondent department by judgment dated 12.11.2025 passed in CPLA 3169 of 2022 [*Coca Cola Pakistan Ltd. Lahore v. Commissioner Inland Revenue, Lahore*]. Learned counsel further states that the aforementioned judgment is squarely binding upon this Bench. Learned counsel for the respondent articulates no cavil to the aforesaid.

In view hereof, and in mutatis mutandis application of authority cited, the questions are answered in favour of the applicant and against the respondent department. Reference application stands disposed of in the aforesaid terms.

A copy of this decision may be sent under the seal of this Court and the signature of the Registrar to the learned Appellate Tribunal, as required per section 133(8) of the Income Tax Ordinance, 2001.

Judge

Judge

Khuhro/PS