

REPLY OF NOTICE UNDER SECTION 222 OR 223 FOR RECOVERY PROCEEDINGS

From,

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Dated

To,

The Tax Recovery Officer,

Circle/Ward

Dear Sir/Madam,

Subject : Reply of Your Notice u/s 222 for recovery proceedings.

My client is in receipt of your Notice dated u/s 222 of the Income-tax Act for Assessment Year in Form No. 57 with regard to the certificates directing him to make payment of Rs.....within 15 days.

In this context, I have been instructed to make the following submission :

That, the amount of income-tax amounting to Rs. for assessment year shown to be in arrear in the above certificate has in fact been paid by my client on A copy of the paid challan enclosed for your perusal and doing the needful.

Regarding the demand for assessment year, I would like to inform you that the matter was in appeal before CIT(Appeals) , and recently an order has been passed on in consequence of which the demand will be considerably reduced. I have requested the A.O. also to give the appeal, effect, the case of my client (copy of letter enclosed) .

Consequent upon the payment of tax already made as mentioned in para 1, and the relief in appeal as per para 2 above, the amount of interest may please be modified.

In respect of the demand pertaining to assessment year, I would like to inform you that, the appeal is pending before the CIT(Appeals) and is likely to be heard soon. Moreover, the issues raised in appeal are identical to the issues already decided in appeal vide CIT(Appeals) order dated for assessment year in which my client has got substantial relief.

Therefore, I would request you to stay the recovery proceedings till due disposal of the said appeal, which would be just and proper in the circumstances of my client's case.

Considering the overall facts and circumstances of the case, you are requested to reduce/modify the amount mentioned in the certificate in respect of assessment years and meanwhile, it is urged that the recovery proceedings may kindly be kept in abeyance.

Assuring you of full cooperation on behalf of my client.

Thanking you

Yours faithfully

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