

REPUBLIC OF THE PHILIPPINES
COURT OF TAX APPEALS
QUEZON CITY

KISHINCORAND CHELLANAM
(MANILA), INC.,

Petitioner,

- versus -

C.T.A. CASE NO. 659

COMMISSIONER OF INTERNAL
REVENUE,

Respondent.

X - - - - - X

MURLI KAILASH,

Petitioner,

- versus -

C.T.A. CASE NO. 660

COMMISSIONER OF INTERNAL
REVENUE,

Respondent.

X - - - - - X

LORENAL KISHINCORAND,

Petitioner,

- versus -

C.T.A. CASE NO. 661

COMMISSIONER OF INTERNAL
REVENUE,

Respondent.

X - - - - - X

K. SHERANAM & SONS,

Petitioner,

- versus -

C.T.A. CASE NO. 662

COMMISSIONER OF INTERNAL
REVENUE,

Respondent.

X - - - - - X

LACHMI SHERANAM,

Petitioner,

- versus -

C.T.A. CASE NO. 663

COMMISSIONER OF INTERNAL
REVENUE,

Respondent.

X - - - - - X

RESOLUTION -
CMA CASES NOS.
659, 660, 661,
662, & 663

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R E S O L U T I O N

In view of the "Manifestation and Motion" of
counsel for petitioners filed on April 14, 1980 that:

As authorized by this Honorable Court in
its order dated February 4, 1980, petitioners
offered to settle the above-mentioned cases by
compromise, pursuant to Section 295 of the
1977 National Internal Revenue Code, but
respondent Commissioner of Internal Revenue
entertained only the proposed settlement by
compromise of the following cases:

1. Nazli Tahilram, involving deficiency
income tax in the sum of \$23,712.00
(C.T.A. No. 660);
2. Lokumal Kishinchand, involving
deficiency income tax in the sum of
\$24,637.00 (C.T.A. No. 661);
3. K. Shewakram & Sons, involving the
sum of \$97,346.29 as deficiency
advance sales tax and income tax
(C.T.A. No. 662); and
4. Lachmi Shewakram, involving defi-
ciency income tax in the sum of
\$26,448.00 (C.T.A. No. 663).

The offer of petitioners in the said four
(4) cases (C.T.A. Cases Nos. 660-663) in the sum
of \$28,000.00 in full and complete settlement
thereof was accepted by respondent Commissioner of
Internal Revenue in his letter of March 7, 1980,
a copy of which is hereto attached as Annex A,
and the said amount was fully paid on April 18,
1980, evidenced by Official Receipt No. A4433379
issued on the same date, a copy of which is also
attached hereto as Annex B.

It is, therefore, respectfully prayed that
the said C.T.A. Cases Nos. 660-663 be now con-
sidered closed and terminated, and that peti-
tioners in said cases be relieved from any lia-
bility with respect to said cases.

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RESOLUTION -
CRA CASES NOS.
659, 660, 661,
662, & 663

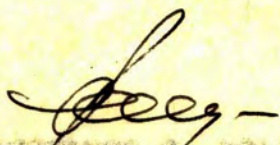
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In connection with the case of Kishinchand Chellaram (Manila), Inc. (C.T.A. Case No. 659), which remains unsettled, it is respectfully prayed that the same be set for hearing in or about the last week of May, 1968, or on any date convenient to this Honorable Court, on which date respondent be ordered to submit an accounting of proceeds of the sale of the properties of said petitioner corporation which were distrained by the Government and sold at public auction to satisfy the amount assessed against it.

AS PRAYED FOR, and without objection of respondent, let (1) C.T.A. Cases Nos. 659, 661, 662 and 663 be considered closed and terminated; and (2) C.T.A. Case No. 659, Kishinchand Chellaram (Manila), Inc. vs. Commissioner of Internal Revenue, be set for hearing in the next calendar of the Court.

SO ORDERED.

Casson City, Metro Manila, April 26, 1968



CONSTANTINO C. ROAQUIS
Associate Judge



AMANTE VILLAR
Acting Presiding Judge