



Moti B. Totlani

That where petitioner-legal heir of assessee- deceased had supplied death certificate of assessee to concerned officer within a short period after her demise, impugned reopening notice issued subsequently under section 148 in name of deceased was illegal and thus liable to be set aside. (Smt. Madhuben Kantilal Patel vs. Union of India - 148 taxmann.com 202 (Gujarat) dt. JANUARY 10, 2023) That where assessee had invested entire actual sales consideration received by him in purchase and construction of new house in accordance with provisions of section 54F(1), therefore provisions of section 50C were not applicable and assessee was entitled to exemption under section 54F. (Held meaning of 'full value of consideration' as referred to in Explanation to section 54F(1) is not governed by meaning of words 'full value of consideration', as mentioned in.....)