



IN THE HIGH COURT OF JUDICATURE AT MADRAS

DATED: 20-08-2026

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THE HON'BLE MR JUSTICE SENTHILKUMAR RAMAMOORTHY

**WP Nos. 32110 & 32128 of 2026
and W.M.P.Nos.35316, 35320, 35335 & 35336 of 2026**

M/s.Sri Ramajayam Exports
(Represented by its Proprietor Mr.Lakshmanan
Periyasamy)
1-15, Puliampatti Post, Pochampalli Taluk
Valasagoundanur, Krishnagiri
Tamil Nadu -635 203.

..Petitioner(s)

Vs

The Assistant Commissioner ST (FAC)
Krishnagiri -II Assessment Circle,
Hosur Division.

..Respondent(s)

PRAYER in W.P.No.32110 of 2026: Writ Petition filed under Article 226 of
The Constitution of India praying for the issuance of a Writ of Certiorari,
calling for the records on the files of the Respondent herein in Form GST DRC
07 vide Reference No. ZD330526253931C along with its detailed order vide
GSTIN 33ADXPL5384J1ZU/2020-21 both dated 26.05.2026 for the tax period
Apr 2020- Mar 2021, quash the same.



PRAYER in W.P.No.32128 of 2026: Writ Petition filed under Article 226 of

The Constitution of India praying for the issuance of a Writ of Certiorari, calling for the records on the files of the Respondent herein in Form GST DRC 07 vide Reference No. ZD330526255019E along with its detailed order vide GSTIN 33ADXPL5384J1ZU/2021-22, both dated 26.05.2026 for the tax period Apr 2021 - Mar 2022 and quash the same.

For Petitioner(s):
in both WP's

Mr.K.A.Parthasarathy

For Respondent(s):
in both WP's

Mr.I.Dinesh,
Additional Government Pleader (Tax)

COMMON ORDER

In these writ petitions, orders imposing GST on seigniorage / royalty are challenged on the ground of breach of principles of natural justice.

2. Learned counsel for the petitioner relies on an earlier order of this Court dated 17.04.2026 in W.P.No.15121 of 2026.



3. Mr.I.Dinesh, learned Additional Government Pleader (Tax), accepts notice for the respondent.

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4. In similar cases, wherever an assessment order has been issued, such order has been set aside subject to the condition that the petitioner remits 10% of the tax demanded under such order. On instructions, learned counsel for the petitioner agrees to remit 10% of the tax demand under the orders impugned herein. He has made an endorsement to that effect on the bundle.

5. Since the legal issue as to whether GST may be imposed on seigniorage is pending consideration before the Hon'ble Supreme Court, any order passed pursuant to this remand shall be subject to the outcome of proceedings before the Supreme Court. Therefore, such order shall not be implemented until the decision of the Supreme Court is received.

6. With these observations, the orders impugned herein are set aside and these matters are remanded for re-consideration, subject to the condition that the petitioner remits 10% of the tax demand within ***thirty days*** from the date of receipt of a copy of this order. After providing a reasonable opportunity to the petitioner, fresh orders shall be issued within ***three months*** from the date of remittance of 10% of the tax demand by the petitioner.



7. These writ petitions are disposed of on the above terms. There shall be no order as to costs. Consequently, the connected writ miscellaneous petitions are closed.

20-08-2026
(2/2)

Index: Yes/No
Speaking/Non-speaking order
Neutral Citation: Yes/No
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To

The Assistant Commissioner ST (FAC)
Krishnagiri -II Assessment Circle,
Hosur Division.



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WP Nos. 32110 & 32128 of 2



SENTHILKUMAR RAMAMOORTHY, J.

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