

IN THE HIGH COURT OF JUDICATURE AT BOMBAY
ORDINARY ORIGINAL CIVIL JURISDICTION

WRIT PETITION NO. 421 OF 2025

Piramal Capital and Housing Finance
Limited, Mumbai : Petitioner

Versus

Assistant Commissioner of Income-tax,
Central Circle 5(4), Mumbai & ors. : Respondents

Mr Atul K Jasani, for the Petitioner.
Ms Swpna Gokhale for the Respondents-Department.

CORAM M.S. Sonak &
Jitendra Jain, JJ.
DATED: 03 March 2025

PC:-

1. The learned counsel for the parties state that they have no objection to this Bench taking up this matter upon disclosing that one of us (Jitendra Jain, J.) has shares in the Petitioner-Company.
2. Heard learned counsel for the parties.
3. This Petition relates to the Assessment Year 2018-19.
4. Learned Counsel for the parties state that similar Petitions have been admitted by this Court. The learned Counsel for the Petitioner refers to the decision of the coordinate Bench of this Court in **J D Printers Pvt Ltd Vs. The**

Income Tax Officer – 15 (1)(2) and Ors¹ which was admitted on 10 September 2024 and interim relief was also granted.

5. Accordingly, we issue Rule in this Petition. The learned Counsel for the Respondent-Department waives service after Rule.

6. Pending final disposal of this Petition, there shall be a stay to the impugned notice under Section 148 of the Income Tax Act, 1961 and other proceedings arising under the said notice.

7. Tag this matter with Writ Petition No.12187 of 2024.

8. Liberty to the parties to apply after appropriate orders are passed by the Hon'ble Supreme Court and/or final decision of the Hon'ble Supreme Court in the challenge to this Court's decision in **Hexaware Technologies Limited Vs. Assistant Commissioner of Income Tax and 4 Ors.²**

(Jitendra Jain, J)

(M.S. Sonak, J)

¹ Writ Petition No. 12187 of 2024

² (2024) 464 ITR 43