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W.P.No.24994 of 2025

IN THE HIGH COURT OF JUDICATURE AT MADRAS

DATED : 21.07.2025

Coram

The Honourable **Mr.Justice Krishnan Ramasamy**

W.P.No.24994 of 2025

and

WMP Nos. 28163 and 28164 of 2025

M/s.Ceedeeyes Infrastructure Solutions Pvt. Ltd.,
Rep. by its General Manager:R.Subramanian,
No.42, Park Wood Apartment, 2nd Main Road,
Gandhi Nagar, Adyar, Chennai-600 020.

...Petitioner

Vs.

1. The Assistant Commissioner of GST & Central Excise,
Adyar Division, Chennai South Commissionerate,
No.692, MHU Complex, 3rd Floor, Nandanam,
Anna Salai, Chennai- 600 035.
2. Deputy Commissioner of GST & CE,
Group-IV, Circle-IV,
Audit-II Commissionerate
No.692, MHU Complex, 6th Floor,
Anna Salai, Nandanam, Chennai-600 035.

...Respondents



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Prayer : Writ Petition filed under Article 226 of the Constitution of India praying for the issuance of a Writ of Certiorari to call for the records relating to the Show Cause Notice No.84/2025-GST (DC) dated 13.06.2025 (DIN 20250659XS0000998759) issued by the 2nd respondent and to quash the same as contrary to law, contrary to the decision of this Court.

For Petitioner : Mr.J.Anand

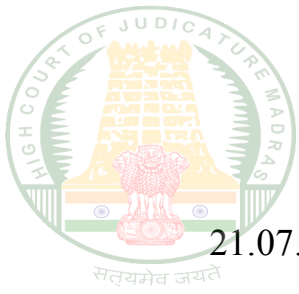
For Respondents : Mr.B.Ramanakumar
Senior Standing Counsel

ORDER

Mr.B.Ramanakumar, learned Senior Standing Counsel takes notice on behalf of the respondents. With consent, the main Writ Petition is taken up for final disposal at the stage of admission itself.

2. The challenge in this Writ Petition is to the order dated 13.06.2025 passed by the respondents and to quash the same.

3. The issues involved in this writ petition pertain to bunching of show cause notices/orders as well as other issues. This Court in a batch of writ petitions in W.P.Nos.29716/2025 etc., batch vide order dated



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21.07.2025 passed the order, quashing the show cause notices/orders. The

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operative portion of the said order is extracted hereunder:

“28. In view of the above discussion, this Court pass the following orders:

(i) The GST Act permits only for issuance of show cause notice based on the tax period. Therefore, if the annual return is filed, the entire year would be considered as a tax period and accordingly, the show cause notice shall be issued based on the said annual returns.

(ii) If show cause notice is issued before the filing of annual returns, the same can be issued based on the filing of monthly returns;

(iii) If show cause notice is issued after the filing of annual returns or after the commencement of limitation, the said notice shall be issued based on the annual returns with regard to the relevant financial year.

(iv) No show cause notice can be clubbed and issued for more than one financial year since the same is impermissible in law.

(v) In these cases, without any jurisdiction, the impugned show cause notices/orders came to be



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issued/passed for more than one financial year, which is impermissible in law and hence, the same is liable to be quashed. Accordingly, the impugned show cause notices/orders stand quashed based on the aspect of clubbing of show cause notices for more than one financial year.”

4. As far as the issue pertains to clubbing of show causes notices and passing of consequential assessment orders are concerned, this writ petition stands allowed in the light of the aforesaid order passed by this Court on 21.07.2025. With respect to all other issues, it is open to the Department to issue independent show cause notice in accordance with law.

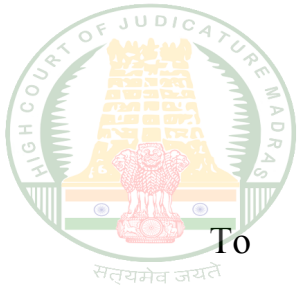
5. With the aforesaid observations, this Writ Petition stands disposed of. No costs. Consequently, connected Miscellaneous Petitions are closed.

21.07.2025

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Index : yes/no

Neutral Citation : yes/no



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To

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Krishnan Ramasamy,J.,

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