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

WRIT PETITION NO.3390 OF 2024

IDFC First Bank Limited — Petitioner
versus
The State of Maharashtra and others — Respondents

Mr.Prakash Shah, Senior Advocate, with Mr.Mihir Mehta, Mr.Suyog Bhave, Mr.Vikas Poojary i/by PDS Legal for Petitioner.

MsJyoti Chavan, Additional Govt.Pleader with Mr.Himanshu Takke, AGP for Respondents State.

CORAM: G. S. KULKARNI &
AARTI SATHE, JJ.

DATE: 13th March 2026

P.C.

1. Issue notice to the Respondents returnable on 9th April 2026. Ms.Chavan, learned AGP, waives service.

2. The challenge in this petition is to the impugned order passed under Section 73 of the Central Goods and Service Tax Act, 2017, dated 26th April 2024. The contention, as urged on behalf of the Petitioner, is that the impugned order is passed against a non-existent entity namely `Capital First', and the same is being implemented against the Petitioner, which is contrary to the settled position in law. The petition was urgently moved on the ground that an action has been taken to attach the bank account of the Petitioner.

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3. Learned AGP Ms.Chavan for the Respondents seeks time to place on record a reply affidavit.

4. Considering the facts of the case, we are of the prima facie opinion that the attachment of the Petitioner's bank account under the garnishee notice dated 11th March 2025 is required to be stayed. It is accordingly stayed till the parties are heard on the present proceedings after the reply affidavit is filed and appropriate orders passed. Ordered accordingly.

5. Stand over to **9th April 2026**.

6. Let the learned AGP inform the concerned officer of the present order.

(AARTI SATHE, J.) (G. S. KULKARNI, J.)

M.S.Thatte