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

**WRIT PETITION NO. 5266 OF 2025**

The Hongkong & Shanghai Banking  
Corporation Limited

.. Petitioner

**Versus**

The Income Tax Officer, TDS OSD  
Circle – 2(3), Mumbai and Ors.

.. Respondents

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*Adv. Dharan V. Gandhi, a/w Ms. Aanchal Vyas, for the Petitioner.*

*Adv. Akanksha Bobhate, i/b Mr. Y.S. Bhate, for Respondent No.1.*

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**CORAM: B. P. COLABAWALLA &  
FIRDOSH P. POONIWALLA, JJ.**

**DATE: JANUARY 13, 2026**

**P. C.**

**1.** The Income Tax Department is directed to file its Affidavit in Reply to the above Writ Petition on or before 27th January 2026 and serve a copy of the same on the Advocates for the Petitioner. We now place the above matter for Ad-Interim relief on 2nd February 2026.

**2.** We make it clear to the parties that we may dispose of the above Writ Petition at that stage itself, time permitting.

**3.** In the meanwhile and without prejudice to the rights and contentions of the parties, the demand of Rs.1,34,08,390/- for Assessment Year 2008-2009 (Financial Year 2007-2008) shall not be enforced until further orders.

**4.** Stand over to 2nd February 2026.

**5.** This order will be digitally signed by the Private Secretary/ Personal Assistant of this Court. All concerned will act on production by fax or email of a digitally signed copy of this order.

**[FIRDOSH P. POONIWALLA, J.]**

**[B. P. COLABAWALLA, J.]**