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

WRIT PETITION NO. 468 OF 2026

Laqshya Media Ltd. .. Petitioner

Versus

Assistant Deputy Commissioner of
Income Tax, Circle 2(2) (1), Mumbai
& Ors. .. Respondents

Adv. Ravi Sawana, Adv. Neha Sharma, Adv. Prativa Agarwal i/b Adv. Sriram Sridharan for the Petitioner.

Adv. Abhishek Mishra for the Respondents.

CORAM: B. P. COLABAWALLA &
FIRDOSH P. POONIWALLA, JJ.
DATE: FEBRUARY 10, 2026

P. C.

1. The above Writ Petition is filed seeking a Writ of Mandamus directing Respondent No.1 to accept the Income returned by the Petitioner for Assessment Year 2014-15.

2. Initially, on the basis of certain recommendations made by the TPO under Section 92CA(3) of the Income Tax Act, 1961, the Assessing Officer first passed a Draft Assessment Order. Objections to this Draft Assessment Order were filed by the Petitioner before the DRP. Pursuant to the directions of the DRP, the Final Assessment Order was passed by the Assessing Officer. This Final Assessment Order was challenged before the ITAT. The ITAT finally decided the Appeal filed by the Petitioner vide its Order dated 17th July, 2020 and remanded the matter back to the Assessing Officer /TPO.

3. Pursuant to the Order passed by the ITAT, the TPO passed a fresh Order under Section 92CA(3), read with Section 254, on 28th September, 2022. Despite the Order passed by the TPO, no fresh Assessment Order has been passed by the Assessing Officer till date.

4. According to the Petitioner, as per the provisions of Section 153, the Assessing Officer ought to have passed the Order latest by 31st March, 2023. Since no Assessment Order has been passed till date, any assessment is now time barred according to the Petitioner. It is in view of these facts that the Petitioner seeks a mandamus directing Respondent No.1 to accept the returned income filed by the Petitioner for the Assessment Year in question, namely, Assessment Year 2014- 15.

5. The learned Advocate appearing on behalf of the Revenue submitted that he needs time to take instructions and file an Affidavit-in-

Reply, if any, to the above Writ Petition. Acceding to his request, we direct that the Affidavit-in-Reply, if any, shall be filed on or before 24th February, 2026. If the Petitioner wants to file an Affidavit in Rejoinder, it is free to do so on or before 4th March, 2026 and serve a copy of the same on the Advocates appearing on behalf of the Revenue. We now place the matter on 10th March, 2026.

6. Stand over to 10th March, 2026.

7. 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.]**