



WEB COPY



W.P.No.13226 of 2026

IN THE HIGH COURT OF JUDICATURE AT MADRAS

DATED : 07.04.2026

CORAM :

THE HONOURABLE MR.JUSTICE C.SARAVANAN

W.P.No.13226 of 2026

and

W.M.P.Nos.14488 and 14490 of 2026

Mr.K.Rangasamy,
Represented by its Proprietor
K.Rangasamy

... Petitioner

Vs.

The Assistant Commissioner (ST),
Office of the Assistant Commissioner,
Rasipuram Assessment Circle,
Rasipuram,
Namakkal.

... Respondent

Prayer: Writ Petition filed under Article 226 of the Constitution of India, for issuance of a Writ of Certiorari, to call for the records of the Respondent in the Impugned Order in GSTIN: 33AZXPR6891E1ZK/2022-2023 dated 27.03.2023 along with consequential order in FORM DRC-07 bearing Ref.No.ZD330323135793J dated 27.03.2023 for the period Apr 2022-Dec 2022 and quash the same as it is being contrary to the provisions of CGST Act, 2017.



WEB COPY



W.P.No.13226 of 2026

For Petitioner : Mr.K.Vignesh Kumar

For Respondent : Mrs.P.Selvi
Government Advocate

ORDER

Mrs.P.Selvi, learned Government Advocate takes notice for the Respondent.

2. This Writ Petition is being disposed of at the time of admission with the consent of the learned counsel for the Petitioner and the learned Government Advocate for the Respondent.

3. In this Writ Petition, the Petitioner has challenged the impugned Order bearing GSTIN: 33AZXPR6891E1ZK/2022-2023 dated 27.03.2023 along with summary of order in Form GST DRC-07 bearing Ref.No.ZD330323135793J dated 27.03.2023 of the Respondent, which was preceded by a Show Cause Notice in GST DRC-01 dated 25.02.2023 wherein the Petitioner was also called upon to appear for personal hearing. However, the Petitioner had not taken advantage of the same and thus, suffered the impugned Order dated 27.03.2023.



W.P.No.13226 of 2026

WEB COPY

4. It is noticed that the limitation for filing an appeal under Section 107 of the respective GST enactments, 2017 against the impugned Order has already expired. The present Writ Petition has been filed only on 01.04.2026.

5. At this stage, the learned counsel for the Petitioner submits that the Petitioner is willing to deposit the entire disputed tax amount as a condition for *de novo* adjudication.

6. Recording the same, the case is remitted back to the Respondent to pass a fresh order subject to the Petitioner depositing the entire disputed tax amount in cash from the Petitioner's Electronic Cash Register within a period of thirty (30) days from the date of receipt of a copy of this order.

7. Within such time, the Petitioner shall also file a reply to the Show Cause Notice in GST DRC-01 dated 25.02.2023 together with requisite documents to substantiate the case by treating the impugned Order dated 27.03.2023 as an addendum to the Show Cause Notice dated 25.02.2023.



W.P.No.13226 of 2026

WEB COPY

8. In case the Petitioner complies with the above stipulations, the Respondent shall proceed to pass a final order on merits and in accordance with law as expeditiously as possible, preferably, within a period of three (3) months of such reply / pre-deposit. Subject to the Petitioner complying with the above stipulations, the attachment of the bank account of the Petitioner shall also stand automatically vacated.

9. It is made clear that bank attachment shall be lifted subject to deposit of the entire disputed tax amount as ordered above and the Petitioner not being in arrears of any other amount for any other tax period barring the amount demanded under the impugned Order.

10. In case the Petitioner fails to comply with any of the stipulations, the Respondent is at liberty to proceed against the Petitioner to recover the tax in accordance with law as if this Writ Petition was dismissed *in limine* today.

11. Needless to state, before passing any such order, the Respondent shall give due notice to the Petitioner.



W.P.No.13226 of 2026

WEB COPY

12. This Writ Petition stands disposed of with the above observations. No costs. Connected Writ Miscellaneous Petitions are closed.

07.04.2026

Neutral Citation : Yes / No

arb

To:

The Assistant Commissioner (ST),
Office of the Assistant Commissioner,
Rasipuram Assessment Circle,
Rasipuram,
Namakkal.



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