IN THE HIGH COURT OF JUDICATURE AT MADRAS

DATED: 17-04-2026

CORAM

THE HON'BLE MR JUSTICE C. SARAVANAN

WP No. 14866 of 2026

and WMP.Nos.16117 and 16118 of 2026

Tvl Vengadeswara Engineering Works
Rep. by its proprietor,
Narayanasamy Ravi,
No.12, Angalamman Koil Street,
Maduvankarai, Guindy,Chennai 600 032.

..Petitioner(s)

Vs

The Deputy State Tax Officer I
Alandur Assessment circle,
Room No. 352 Third Floor,
Integrated Commercial taxes and Registration
Department,
South Tower, Nandanam
Chennai 35

..Respondent(s)

Prayer : Writ Petition filed under Article 226 of the Constitution of India, for issuance of a Writ of Certiorarified Mandamus,call for the records relating to the impugned order dated 11.04.2024 vide Reference No. ZD330424086082M in Form GST DRC07 bearing GSTIN 33AIHPR3802Q1ZW pertaining to FY.2018-19 issued by the respondent as arbitrary and illegal and quash the same and further direct the respondent to redo the adjudication in accordance with law after granting opportunity of personal hearing to the petitioner and to pass

For Petitioner(s): Ms.Mitra B

For Respondent(s): Mr.C.Harsharaj,
Special Government Pleader

ORDER

Mr.C.Harsharaj, the learned Special Government Pleader, takes notice on behalf of the Respondent.

2. This Writ Petition is being disposed of at the stage of admission itself with the consent of the learned counsel for the Petitioner and the learned Special Government Pleader for the Respondent.

3. In this Writ Petition, the Petitioner has challenged the impugned Order dated **11.04.2024**, which was preceded by a Show Cause Notice in GST DRC-01 dated **05.01.2024** wherein the Petitioner was called upon to file a reply and to appear for a personal hearing. However, the Petitioner did not take advantage of the same and has thus, suffered the impugned Order dated 1**1.04.2024**.

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 long before. However, the present Writ Petition has been filed only on **23.03.2026**.

5. At this stage, the learned counsel for the Petitioner submits that the Petitioner is willing to pre-deposit **50%** of the disputed tax as a condition for *denovo* adjudication.

6. The learned counsel for the Petitioner has also made an endorsement to that effect in the Court bundle, which is extracted hereunder:-

> ***" The Petitioner admits to deposit 50% of the demanded tax within 30 days from the receipt of copy of the order "***

7. Recording the above consent, the case is remitted back to the Respondent to pass a fresh order on merits subject to the Petitioner depositing 50% of the disputed tax in cash or 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.

8. Within such time, the Petitioner shall also file a reply to the Show Cause Notice in GST DRC-01 dated 05.01.2024 together with requisite documents to substantiate the case by treating the impugned Order dated 11.04.2024 as an addendum to the Show Cause Notice dated 05.01.2024.

9. 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 if any, shall also stand automatically vacated.

10. It is made clear that bank attachment shall be lifted subject to the Petitioner depositing 50% of the disputed tax 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.

11. 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.

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

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

17-04-2026

Index: Yes/No

Speaking/Non-speaking order

Neutral Citation: Yes/No

VV

To

The Deputy State Tax Officer I
Alandur Assessment circle,
Room No. 352 Third Floor,
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Chennai 35

C.SARAVANAN, J.

VV

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