IN THE HIGH COURT OF JUDICATURE AT MADRAS

DATED: 11-02-2026

CORAM

THE HON'BLE MR JUSTICE C. SARAVANAN

WP No. 41055 of 2025
and
WMP Nos.46012 & 46016 of 2025

Interactive Data Systems Limited
Represented by its Authorised Signatory,
Mr.G.Prasada Rao,
2nd Floor, 38-A, Solai Amman kovil Street,
Ayanavaram, Chennai 600 023.

..Petitioner(s)

Vs

1. The Assistant Commissioner (ST)
   Ayanavaram Assessment Circle,
   No.1, Greams Road, Chennai-600 006

2. The State Tax Officer (ST)
   Ayanavaram Assessment Circle
   No.1, Greams Road, 3rd Floor
   PAPJM Annex Building
   Chennai 600 006.

3. Deputy Commissioner ST
   Central II Chennai Central Division
   No.1 PAPJM Buildings
   Greams Road, Chennai 600 006.

..Respondent(s)

Writ Petition filed under Article 226 of the Constitution of India, for issuance of a Writ of Certiorarified Mandamus calling for the records of the 2nd respondent in Show Cause Notice in FORM DRC-01 dated 23.11.2024 and the consequential order in GSTIN:33AACC13537P1ZC/2020-21 along with DRC-07 dated 03.02.2025 and quash the same and further direct the 2nd respondent to grant the benefit of sub-clause 16(5) to relating to Input Tax

Credit for the period 2020-21 inserted by Finance Act 2024 dated 16.08.2024 with retrospective effect from 01.07.2017.

For Petitioner(s): J.Sunil Kumar

For Respondent(s): Mr.V.Prasanth Kiran
Government Advocate.

ORDER

In this writ petition, the petitioner is before this Court against the impugned order dated 03.02.2025 in Form DRC-07 and the Show Cause Notice that preceded the impugned order in Form DRC – 01 dated 23.11.2024 for the tax period 2020-2021.

2. The case of the petitioner is that subsequently an order came to be passed on 06.02.2025, wherein an identical demand was proposed and dropped.

3. It is submitted that, post facto, the entire disputed tax is said to have been recovered from the petitioner on 24.09.2025. However, the learned Government Advocate for the respondent is unable to confirm the same.

4. Following the consistent view taken by this Court under similar circumstances, the case is remitted back to the respondent to pass a fresh order on merits, subject to the Petitioner depositing 25% of the disputed tax in cash

from the Petitioner's Electronic Cash Register within a period of 30 days from the date of receipt of a copy of this order.

5. Amount which has already recovered from the petitioner shall be adjusted towards pre-deposit of 25% of the disputed tax. If the amount which is recovered over and above 25%, which has been ordered as the required pre-deposit, no further pre-deposit should be required. This will be however subject to verification by the 2nd Respondent.

6. Within such time, the Petitioner shall also file a reply to the Show Cause Notice in Form GST DRC-01 dated 23.11.2024 together with requisite documents to substantiate the case by treating the impugned Order dated 03.02.2025 as an addendum to the Show Cause Notice dated 23.11.2024.

7. In case the Petitioner complies with the above stipulations, the 2nd 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 raised/vacated.

8. It is made clear that bank attachment shall be lifted subject to the Petitioner depositing 25% 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.

9. 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.

10. Needless to state, before passing any such order, the 2nd Respondent shall give due notice to the Petitioner.

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

11-02-2026

Index: Yes/No
Speaking/Non-speaking order
Neutral Citation: Yes/No

AV

To

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C.SARAVANAN, J.

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