IN THE HIGH COURT OF PUNJAB AND HARYANA AT CHANDIGARH

CWP No. 2304 of 2022
Date of decision : April 18, 2026

Anil Goel

...... Petitioner

Versus

Union of India and another

...... Respondents

CORAM : HON'BLE MR. JUSTICE DEEPAK SIBAL
HON'BLE MS. JUSTICE LAPITA BANERJI

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Present :- Mr.Vishav Bharti Gupta, Advocate
for the petitioner
(Through Video Conferencing).

Ms. Urvashi Dhugga, Senior Standing Counsel,
for the respondent-Income Tax Department.

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DEEPAK SIBAL, J (Oral)

1. At the outset, learned counsel for the revenue concedes that in terms of the law laid down by the Supreme Court in ***Union of India and others Vs. Ashish Agarwal (2023) 1 SCC 617*** the impugned notice dated 31.03.2021, dispatched to the petitioner on or after 01.04.2021, for the assessment year in question, under Section 148 of the Income Tax Act, 1961 (for short- the Act) be treated as notices under Section 148A(b) of the Act.

2. The above concession satisfies learned counsel for the petitioner. Accordingly, the present petition is disposed of with a direction to the respondent-revenue to proceed from the stage of the

afore notices, in terms of the procedure laid down under Section 148A(b) of the Act.

3. Needless to add that in the course of the afore proceedings the petitioner shall be at liberty to raise all possible pleas/defences that may be available to it, in accordance with law.

(DEEPAK SIBAL)
JUDGE

(LAPITA BANERJI)
JUDGE

April 18, 2026
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Whether speaking/reasoned **Yes/No**
Whether Reportable : **Yes/No**