



CWP-2961-2025

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**IN THE HIGH COURT OF PUNJAB & HARYANA
AT CHANDIGARH**

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CWP-2961-2025

Date of Decision : 25.02.2026

SHIV SHANKAR RAI

.... PETITIONER

V/S

DEPUTY COMMISSIONER OF INCOME TAX, CIRCLE 4, LUDHIANA
AND OTHERS

.... RESPONDENTS

CORAM : HON'BLE MRS. JUSTICE LISA GILL**HON'BLE MR. JUSTICE RAMESH CHANDER DIMRI**

Present : Mr.Nikhil Goyal, Advocate
for the petitioner (through VC).

Mr. Ranvijay Singh, Sr. Standing Counsel with
Ms. Nikita Garg, Jr. Standing Counsel and
Mr. Vidul Kapoor, Jr. Standing Counsel
for the respondents.

LISA GILL, J. (Oral)

1. Prayer in this writ petition is for quashing adjustment of refund of AY 2024-25 amounting to Rs.96,27,350/- against the outstanding demand for AY 2021-22 by respondents No.1 and 2, through adjustment challan serial number 26385, 32438 and 33756 dated 10.01.2025. Further prayer is for directing the respondents to release refund of Rs.96,27,350/- along with statutory interest and exemplary costs.

2. Learned counsel for petitioner submits that during pendency of this writ petition, appeal filed by petitioner challenging order dated



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27.12.2022 in respect to assessment year 2021-22 has since been decided by the Appellate Authority on 13.02.2026 whereby demand from the petitioner has been reduced from Rs.13,09,35,023/- to Rs.13,09,350/-. Therefore, it is prayed at this stage, that the amount so reduced and adjusted qua the assessment year 2024-25 be released; appellate order dated 13.02.2026 be given effect to.

3. Learned counsel for respondents on instructions from respondent No.1 submits that order dated 13.02.2026 shall be given effect to within a period of 06 weeks.

4. In view thereof, learned counsel for petitioner does not press this writ petition.

5. Writ petition is accordingly dismissed as not pressed. However, it is directed that necessary steps be taken by the concerned authority to give effect to order dated 13.02.2026 within the time period as stated before us.

(LISA GILL)
JUDGE

(RAMESH CHANDER DIMRI)
JUDGE

25.02.2026*anju*

Whether speaking/reasoned	: Yes/No
Whether Reportable	: Yes/No