

**IN THE HIGH COURT OF ANDHRA PRADESH AT AMARAVATI
(SPECIAL ORIGINAL JURISDICTION)**

**WEDNESDAY, THE TWENTY NINTH DAY OF APRIL,
TWO THOUSAND AND TWENTY SIX**



**:PRESENT:
THE HONOURABLE SMT. LISA GILL, THE CHIEF JUSTICE
AND
THE HONOURABLE SRI JUSTICE NINALA JAYASURYA**

WRIT PETITION NO: 11928 OF 2026

Between:

M/s. Vignesh Mines and Minerals, Sy. No. 742, Chandana Village, Yadiki,
Anantapuramu, Anantapuramu District, Andhra Pradesh – 515455, Rep.
by its Partner, Valukuru Neelakantaiah.

Petitioner

AND

1. The Assistant Commissioner (ST), o/o Joint Commissioner (ST),
Anantapuramu, 1st Floor, PAR Heights, above Central Bank, Gooty Road,
Ananthapuramu, Anantapuramu District, Andhra Pradesh-515001.
2. The Assistant Commissioner (ST), Tadipatri Circle, Anantapur Division,
Old SBI Building, Sanjiva Nagar, Tadipatri, Anantapur District, Andhra
Pradesh-515591.
3. The Union of India, Rep. by the Secretary (Finance), Ministry of Finance,
North Block, New Delhi- 110 001.
4. The State of Andhra Pradesh, Rep. by the Principal Secretary to the
Government, Revenue (CT) Department, Andhra Pradesh Secretariat,
Velagapudi, Guntur District, Andhra Pradesh- 522503.

5. The State of Andhra Pradesh, Rep. by the Secretary to the Government, Department of Mines and Geology, Andhra Pradesh Secretariat, Velagapudi, Guntur District, Andhra Pradesh- 522 503.

Respondents

Petition under Article 226 of the Constitution of India, is filed praying that in the circumstances stated in the affidavit filed therewith, the High Court may be pleased to issue an appropriate Writ, Order or Direction, more particularly in the nature of MANDAMUS declaring that the impugned Order Number: DIN3731122536724, dated 31-12-2025, in Form GST DRC-07, passed by the First Respondent for the Financial Year 2021-22, under S. 73 of the GST Acts, 2017, imposing Tax under Reverse Charge Mechanism, along with interest and penalty, on the Royalty/Seigniorage Fees/DMF/Merit/NMET Amount paid by the Petitioner to the Mines and Geology Department, on the Minerals mined by the Petitioner pursuant to the Mining/Quarrying Lease granted by it, which is also an unsigned order and was passed pursuant to a single authorization in Form GST INS-01, for making inspection issued by the Joint Commissioner (ST), Anantapuramu Division, without any further post-inspection authorization for making Assessment, as without jurisdiction, contrary to law, invalid, non-est, not an order in the eye of law, and illegal and consequently set aside the same by declaring that the Petitioner is not liable to pay GST on the 'Royalty' etc., paid by it to the Government;

IA NO: 1 OF 2026

Petition under Section 151 CPC., is filed praying that in the circumstances stated in the affidavit filed in support of the petition, the High Court may be pleased to grant stay of all further proceedings, including recovery of tax, interest and penalty, pursuant to the impugned Order Number: DIN3731122536724, dated 31-12-2025, in Form GST DRC-07, passed by the First Respondent for the Financial Year 2021-22, under S. 73 of the GST Acts, 2017;

The petition coming on for hearing, upon perusing the Petition and the affidavit filed in support thereof and the earlier order of the High Court dated.29.04.2026 made here in and upon hearing the arguments of Sri. G NARENDRA CHETTY, Advocate for the Petitioner and of GP FOR COMMERCIAL TAX, for the Respondent Nos.1, 2 & 4 and of GP FOR MINES & GEOLOGY, for the Respondent No.5;

The Court made the following ORDER:

“At request of learned counsel for petitioner, adjourned to 13.07.2026.

Interim order granted earlier shall continue to operate till the next date of hearing.”

//TRUE COPY//

**SD/-K.V.RAGHAVULU
ASSISTANT REGISTRAR**


SECTION OFFICER

To,

1. One CC to Sri. G NARENDRA CHETTY, Advocate [OPUC]
2. Two CCs to GP FOR COMMERCIAL TAX, High Court of Andhra Pradesh [OUT]
3. Two CCs to GP FOR MINES & GEOLOGY, High Court of Andhra Pradesh [OUT]
4. **Two Spare Copies**

TVSR

HIGH COURT

**HCJ, J
&
NJS, J**

DATED: 22/06/2026

ORDER

WP.No.11928 of 2026



INTERIM ORDER EXTENDED