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* **IN THE HIGH COURT OF DELHI AT NEW DELHI**

+ **W.P.(C) 16882/2025 & CM APPL. 69453/2025**

**EBIX TECHNOLOGIES LIMITED FORMERLY KNOWN AS
EBIXCASH LIMITED**

.....Petitioner

Through: Mr. Viksit Arora, Mr. Harsh Sethi, Mr
Ankur Garg advocate Mr. Anant
Nigam, Mr. Raghav Luthra, Advs. (M:
7066833929.

versus

**DIRECTORATE GENERAL OF GST INTELLIGENCE,
HEADQUARTERS & ORS.**

.....Respondents

Through: Mr. Harpreet Singh, SSC, CBIC with
Ms. Suhani Mathur, Mr. Jatin Gaur &
Mr. Jai Ahuja, Advs. for R-2
Mr. Ramakant Tiwari, Deputy
Director
Mr. Sanjeev Kumar, Superintendent
Ms. Chetna Bhalla & Mr. Kartik
Bhalla, Adv. Advs. for R-3/ICICI
Bank.

CORAM:

JUSTICE PRATHIBA M. SINGH

JUSTICE SHAIL JAIN

ORDER

% 11.11.2025

1. This hearing has been done through hybrid mode.
2. On the previous date of hearing i.e., 7th November, 2025, the Court had directed as under:

“[...]

19. Issue notice. Mr. Harpreet Singh, ld. SSC accepts notice.

20. Let a short affidavit be filed dealing with the allegations raised by the Petitioner by the next date of



hearing.

21. In addition, the original file of the DGGI Meerut relating to this case shall be produced on the next date of hearing i.e., 11th November, 2025 along with complete note sheets of the documents. 23. The official concerned i.e., Mr. Ramakant Tiwari, who has signed the impugned letter dated 25th September, 2025 shall remain personally present in Court on the next date of hearing in order to assist the Court as to how the said impugned letter was communicated and when.

22. In the meantime, subject to the Petitioner maintaining a balance of Rs. 1 Crore in any of the bank accounts which are attached, the Petitioner is free to operate its bank accounts in the ordinary course of business.

23. List on 11th November, 2025 in the supplementary list.

24. Let ICICI bank give effect to this order without any further impediment.

25. The Petitioner may communicate this order to the ICICI Bank.

26. Let the order be given Dasti under signatures of the Court Master.”

3. Today, Mr. Harpreet Singh, Id. SSC for Respondent No. 2, has handed over a short affidavit along with certain documents to show that the impugned Provisional Attachment letter dated 25th September, 2025 (*hereinafter, ‘impugned letter’*) was communicated to the Petitioner by speed post and was in fact, delivered to the Petitioner on 10th October, 2025 itself.

4. Thus, it is submitted by Id. SSC for the Respondent Nos. 2 that the Petitioner’s stand in the previous hearing, that they received the said impugned letter only on 4th November, 2025 is factually incorrect. In support thereof, certain documents have been filed by the Id. SSC for the Respondent



Nos. 2, which are taken on record.

5. In addition, the submission of Id. SSC for the Respondent Nos. 2 is that, insofar as attachment of all bank accounts with the same PAN number is concerned, the same is a standard form of GST DRC-22, which is the provisional attachment form under Section 83 of the Central Goods and Services Tax, 2017.

6. Ld. Counsel for the Respondent No.3 i.e., ICICI Bank has produced an order of the Bombay High Court in **Commercial Arbitration Petition (L) No. 25579/2024** titled **Ashok Kumar Goel & Anr. v. EbixCash Limited & Ors**, wherein an injunction has been granted, in an arbitration matter. The prayers that were sought are as followed:

“B. In the alternative, direct Respondents Nos. 1-3 to furnish an irrevocable bank guarantee of a nationalized bank, or such other security, in favour of the Prothonotary, Hon'ble Bombay High Court for the sum of INR 145 crore, being 80% the Enhanced Call Price redeemable by the Petitioners upon the issuance of the final award by the arbitral tribunal in SIAC Arbitration No. 80 of 2024 and up to the total sum of any amounts which the tribunal orders the Respondents to pay to the Petitioners;

xxx

E. Pass an Order of injunction restraining Respondents Nos. 1-3 from, in any manner dealing with, and / or encumbering and / or disposing off, dissipating, and / or creating third party rights and/or alienating any of the moveable or immovable properties or assets owned or belonging to Respondents Nos. 1 -3, including the assets listed in Schedule A hereto, standing in the name of Respondents Nos. 1-3 or over which Respondents Nos. 1-3 exercise any disposing power;

F. Direct the Respondents to disclose all their assets on oath, including providing further and better particulars as



to the movable and immovable properties, along with details of all the Respondents' bank accounts and the monies lying therein, receivables, shares held in any companies and any other interests in any other entity including financial statements and list of all assets of such entities, government securities, bonds, mutual funds or other securities for money, lands, houses or other buildings, goods, money, bank notes, cheques, bills of exchange, properties, valuables, whether tangible or intangible or all other saleable moveable and immovable properties belonging to the Respondents or over the profits of which the Respondents have a disposing power which they may exercise for their own benefit whether the same may be held in the name of the Respondents or held by another person in trust for them or on their behalf;"

7. Ld. Counsel for the Petitioner submits that as per the instructions received by him, the impugned letter was received for the first time on *WhatsApp* on 4th November, 2025 and not before. Further, a challenge is mounted against the speed post, for the communication of the impugned letter, which is stated to have been delivered. However, he submits that he would seek instructions in the matter.
8. Insofar as the order of the Bombay High Court in ***Ashok Kumar Goel (Supra)*** is concerned, even in respect thereof, Id. Counsel for the Petitioner submits that he wishes to seek instructions.
9. Heard. *Prima facie*, upon a perusal of the documents attached with the affidavit, including the *dak* register of the GST Department, it is evident that the impugned letter was sent to Mr. Chandan Bhardwaj, Director of Finance, M/s Ebix Technologies Ltd. at the following address: B-59A, Sector 60, Noida, Gautam Budh Nagar, Uttar Pradesh.
10. The same was booked in the *dak* register of the GST Department on 7th



October 2025, sent by speed post on 8th October 2025 and delivered on 10th October 2025. These facts were not informed to the Court correctly, on the previous date hearing and *prima facie* there was a mis-representation by the Petitioner.

11. Additionally, order of the Bombay High Court in **Ashok Kumar Goel (Supra)** is also of relevance, as movable assets would include the bank balances etc., and the same have been enjoined by the Bombay High Court *prima facie*.

12. Let an affidavit be filed by the Petitioner in response to above-mentioned averments. The affidavit shall be sworn by Mr. Chandan Bhardwaj, Director of Finance, M/s Ebix Technologies Ltd., and filed within two weeks from this order.

13. In the meantime, the previous order of this Court dated 7th November, 2025, permitting the Petitioner to operate its bank accounts stands recalled, in view of order of the Bombay High Court in **Ashok Kumar Goel (Supra)**.

14. Insofar as the GST Department is concerned, the balance of Rs.1 crore shall continue to be maintained.

15. Further, the GST Department may also communicate proper reasons to the Petitioner within one week from this order, so as to enable the Petitioner to file its reply.

16. The Petitioner is free to avail its remedies in accordance with law.

17. List on 28th November, 2025.

PRATHIBA M. SINGH, J.

SHAIL JAIN, J.

NOVEMBER 11, 2025/kk/sm