

**IN THE HIGH COURT OF GUJARAT AT AHMEDABAD**  
**R/SPECIAL CIVIL APPLICATION NO. 12365 of 2025**

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NITESH HARIDAS THAKKAR  
Versus  
ASSISTANT COMMISSIONER OF INCOME TAX, DCIT/ ACIT-2(1), RKT &  
ANR.

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Appearance:  
MR FENIL H MEHTA(11663) for the Petitioner(s) No. 1  
KARAN G SANGHANI(7945) for the Respondent(s) No. 1,2

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**CORAM: HONOURABLE MR. JUSTICE BHARGAV D. KARIA**  
and  
**HONOURABLE MR. JUSTICE PRANAV TRIVEDI**

**Date : 15/09/2025**  
**ORAL ORDER**

**(PER : HONOURABLE MR. JUSTICE BHARGAV D. KARIA)**

At the request of learned advocate Mr. Fenil Mehta for the petitioner so as to enable the petitioner to challenge the similar notice of reopening for the Assessment Years 2019-20 and 2021-22, Stand over to 29<sup>th</sup> September,2025.

**(BHARGAV D. KARIA, J)**

**(PRANAV TRIVEDI, J)**

JYOTI V. JANI