HIGH COURT FOR THE STATE OF TELANGANA
AT HYDERABAD

TUESDAY, THE FOURTEENTH DAY OF JULY
TWO THOUSAND AND TWENTY SIX

:PRESENT:

THE HONOURABLE THE CHIEF JUSTICE SRI APARESH KUMAR SINGH
AND
THE HONOURABLE SRI JUSTICE G.M. MOHIUDDIN

WP NOS: 12047, 12052, 12127, 12128, 12130, 12132, 12133 AND 12134 OF 2026

W.P. No. 12047 OF 2026

Between:

1. M/s Synchrony International Services Pvt. Ltd., Represented by its Director, Mr. Chintan Chawla, S/o Mr. Suresh Chander Chawla, Aged about 52 years, having its registered office at Plot No. 2, Phase No. 1, Survey No. 83/1, 2nd to 4th Floor, Unit 2 and 3, Orwell Building, Parcel 3, Knowledge City Road, Hyderabad Rangareddy, Telangana 500081.

2. Mr. Chintan Chawla, S/o Mr. Suresh Chander Chawla, Aged about 52 years, Occupation. Director at M/s Synchrony International Services Pvt. Ltd. residing at Villa No. 51, Ramky Tranquillas, Abhyudaya Nagar, HMBS Colony, Kismatpur, Hyderabad, Telangana-500030.

.....PETITIONERS

AND

1. Assistant Commissioner (ST), STU-1 Abids Circle Office, Rooms No. 104, 1st floor, Hermitage Office Complex, Hill Fort Road, Adarsh Nagar, Hyderabad - 500 004

2. Appellate Joint Commissioner of State Tax, Secunderabad Division, V Floor, C.T. Complex, Nampally, Hyderabad - 500 001

3. Deputy Commissioner (ST), STU-1 Abids Circle Office, Rooms No. 104, 1st floor, Hermitage Office Complex, Hill Fort Road, Adarsh Nagar, Hyderabad - 500 004.

4. State of Telangana, Represented by the Principal secretary, Revenue Department (State Tax) Secretariat, Hyderabad -500004.

5. Union of India, represented by its Secretary, Ministry of Finance, North Block, New Delhi - 110001

.....RESPONDENTS

Petition under Article 226 of the Constitution of India praying that in the circumstances stated in the affidavit filed therewith, the High Court may be pleased to issue a

Writ, Order or direction, particularly one in the nature of a Writ of Mandamus, declaring the action of the Respondent No.1 in rejecting the application for the payment of interest to the Petitioner vide Deficiency Memo No. ZD361125038663F dated 12th November 2025 as illegal, arbitrary, perverse, violative of principles of natural justice and without jurisdiction, as it is passed without the authority of law, and directions to the Respondents to forthwith grant and sanction interest on delayed refund amounting to a total of INR 2,13,76,711 calculated from 60 days of the date of the filing of the First Refund Application dated 14th July 2021 till the date of final payment of the refund (at the rate of 6 Percentage towards the amounts refunded towards original application of refund, and 9 Percentage towards amounts refunded pursuant to the Appellate Authoritys orders), as per the provisions of Section 56 of the CGST Act, or to issue any other appropriate Writ or order as this Hon'ble High Court may deem fit and proper to the facts and in the circumstances of the case.

The petition coming on for hearing, upon perusing the petition and the grounds filed in support thereof and upon hearing the arguments of SRI KARAN TALWAR Advocate for the Petitioners and SRI SAI AKARSH, AGP REPRESENTING SRI SWAROOP OORILLA, SPECIAL GOVERNMENT PLEADER FOR STATE TAX for the Respondents No. 1 to 4 and SRI N. BHUJANGA RAO, DEPUTY SOLICITOR GENERAL OF INDIA for the Respondent No.5.

W.P. No. 12052 OF 2026

Between:

1. M/s Synchrony International Services Pvt. Ltd., Represented by its Director, Mr. Chintan Chawla, S/o Mr. Suresh Chander Chawla, Aged about 52 years, having its registered office at Plot No. 2, Phase No. 1, Survey No. 83/1, 2nd to 4th Floor, Unit 2 and 3, Orwell Building, Parcel 3, Knowledge City Road, Hyderabad Rangareddy, Telangana 500081.
2. Mr. Chintan Chawla, S/o Mr. Suresh Chander Chawla, Aged about 52 years, Occupation. Director at M/s Synchrony International Services Pvt. Ltd. residing at Villa No. 51, Ramky Tranquillas, Abhyudaya Nagar, HMBS Colony, Kismatpur, Hyderabad, Telangana-500030.

.....PETITIONERS

AND

1. Assistant Commissioner (ST), STU-1 Abids Circle Office, Rooms No. 104, 1st floor, Hermitage Office Complex, Hill Fort Road, Adarsh Nagar, Hyderabad - 500 004
2. Appellate Joint Commissioner of State Tax, Secunderabad Division, V Floor, C.T. Complex, Nampally, Hyderabad - 500 001
3. Deputy Commissioner (ST), STU-1, Abids Circle Office, Rooms No. 104, 1st floor, Hermitage Office Complex, Hill Fort Road, Adarsh Nagar, Hyderabad - 500 004.
4. State of Telangana, Represented by the Principal secretary, Revenue Department (State Tax) Secretariat, Hyderabad - 500004.
5. Union of India, Represented by its Secretary, Ministry of Finance, North Block, New Delhi - 110001

.....RESPONDENTS

Petition under Article 226 of the Constitution of India praying that in the circumstances stated in the affidavit filed therewith, the High Court may be pleased to issue a Writ, Order or direction, particularly one in the nature of a Writ of Mandamus, declaring the action of the Respondent No.1 in rejecting the application for the payment of interest to the Petitioner vide Deficiency Memo No. ZD361125038651K dated 12th November 2025 as illegal, arbitrary, perverse, violative of principles of natural justice and without jurisdiction, as it is passed without the authority of law, and directions to the Respondents to forthwith grant and sanction interest on delayed refund amounting to a total of INR 41,04,049 calculated from 60 days of the date of the filing of the First Refund Application dated 9th July 2021 till the date of final payment of the refund (at the rate of 6 PERCENT towards the amounts refunded towards original application of refund, and 9 PERCENT towards amounts refunded pursuant to the Appellate Authority s orders), as per the provisions of Section 56 of the CGST Act, or to issue any other appropriate Writ or order as this Honourable High Court may deem fit and proper to the facts and in the circumstances of the case.

The petition coming on for hearing, upon perusing the petition and the grounds filed in support thereof and upon hearing the arguments of SRI KARAN TALWAR Advocate for the Petitioners and SRI SAI AKARSH, AGP REPRESENTING SRI SWAROOP OORILLA, SPECIAL GOVERNMENT PLEADER FOR STATE TAX for the Respondents No. 1 to 4 and SRI N. BHUJANGA RAO, DEPUTY SOLICITOR GENERAL OF INDIA for the Respondent No.5.

W.P. NO. 12127 OF 2026

Between:

1. M/s Synchrony International Services Pvt. Ltd., Represented by its Director, Mr. Chintan Chawla, S/o Mr. Suresh Chander Chawla, Aged about 52 years, having its registered office at Plot No. 2, Phase No. 1, Survey No. 83/1, 2nd to 4th Floor, Unit 2 AND 3, Orwell Building, Parcel 3, Knowledge City Road, Hyderabad Rangareddy, Telangana 500081
2. Mr. Chintan Chawla, S/o Mr. Suresh Chander Chawla, Aged about 52 years, Occupation- Director at M/s Synchrony International Services Pvt. Ltd. residing at Villa No. 51, Ramky Tranquillas, Abhyudaya Nagar, HMBS Colony, Kismatpur, Hyderabad, Telangana-500030.

.....PETITIONERS

AND

1. Assistant Commissioner (ST), STU-1 Abids Circle Office, Rooms No. 104, 1st floor, Hermitage Office Complex, Hill Fort Road, Adarsh Nagar, Hyderabad 500 004
2. Appellate Joint Commissioner of State Tax,, Secunderabad Division, V Floor, C.T. Complex, Nampally,
3. Deputy Commissioner (ST), STU-1 Abids Circle Office, Rooms No. 104, 1st floor, Hermitage Office Complex, Hill Fort Road, Adarsh Nagar, Hyderabad - 500 004.
4. State of Telangana, Represented by the Principal secretary, Revenue Department (State Tax) Secretariat, Hyderabad - 500004.

5. Union of India, Represented by its Secretary, Ministry of Finance, North Block, New Delhi - 110001

.....RESPONDENTS

Petition under Article 226 of the Constitution of India praying that in the circumstances stated in the affidavit filed therewith, the High Court may be pleased to issue a Writ, Order or direction, particularly one in the nature of a Writ of Mandamus , declaring the action of the Respondent No.1 in rejecting the application for the interest of the Petitioner vide Deficiency Memo No. ZD3611250385992 dated 12th November 2025 as illegal, violative of principles of natural justice and without jurisdiction, as it is passed without the authority of law, and directions to the Respondents to forthwith grant and sanction interest on delayed refund amounting to a total of INR 91,51,147 calculated from 60 days of the date of the filing of the First Refund Application dated 31 March 2020 till the date of final payment of the refund (at the rate of 6PERCENTAGE towards the amounts refunded towards original application of refund, and 9 PERCENTAGE towards amounts refunded pursuant to the Appellate Authority's orders), as per the provisions of Section 56 of the CGST Act, or to issue any other appropriate Writ or order as this Honorable High Court may deem fit and proper to the facts and in the circumstances of the case.

The petition coming on for hearing, upon perusing the petition and the grounds filed in support thereof and upon hearing the arguments of SRI KARAN TALWAR Advocate for the Petitioners and SRI SAI AKARSH, AGP REPRESENTING SRI SWAROOP OORILLA, SPECIAL GOVERNMENT PLEADER FOR STATE TAX for the Respondents No. 1 to 4 and SRI N. BHUJANGA RAO, DEPUTY SOLICITOR GENERAL OF INDIA for the Respondent No.5.

W.P. NO. 12128 OF 2026:

Between:

1. M/s Synchrony International Services Pvt. Ltd., Represented by its Director, Mr. Chintan Chawla, S/o Mr. Suresh Chander Chawla, Aged about 52 years, having its registered office at Plot No. 2, Phase No. 1, Survey No. 83/1, 2nd to 4th Floor, Unit 2 an 3, Orwell Building, Parcel 3, Knowledge City Road, Hyderabad Rangareddy, Telangana 500081.

2. Mr. Chintan Chawalya, S/o. Mr. Suresh Chander Chawala, Aged about 52 years, Occupation: Director at M/s Synchrony International Services Pvt. Ltd. Residing at Villa No.51, Ramky Tranquillas, Abhyudaya Nagar, HMBS Colony, Kismatpur, Hyderabad, Telangana – 500030.

.....PETITIONERS

AND

1. Assistant Commissioner (ST), STU-1 Abids Circle Office, Rooms No. 104, 1st floor, Hermitage Office Complex, Hill Fort Road, Adarsh Nagar, Hyderabad500 004
2. Appellate Joint Commissioner of State Tax, Secunderabad Division, V Floor, C.T. Complex, Nampally, Hyderabad - 500 001
3. Deputy Commissioner (ST), STU-1 Abids Circle Office, Rooms No. 104, 1st floor, Hermitage Office Complex, Hill Fort Road, Adarsh Nagar, Hyderabad - 500 004.

4. State of Telangana, Represented by the Principal secretary, Revenue Department (State Tax) Secretariat, Hyderabad - 500004.
5. Union of India, Represented by its Secretary, Ministry of Finance, North Block, New Delhi - 110001

.....RESPONDENTS

Petition under Article 226 of the Constitution of India praying that in the circumstances stated in the affidavit filed therewith, the High Court may be pleased to issue a Writ, Order or direction, particularly one in the nature of a Writ of Mandamus, declaring the action of the Respondent No.1 in rejecting the application for the interest of the Petitioner vide Deficiency Memo No. ZD361125038563H dated 12th November 2025 as illegal, violative of principles of natural justice and without jurisdiction, as it is passed without the authority of law, and directions to the Respondents to forthwith grant and sanction interest on delayed refund amounting to a total of INR 30,31,728 calculated from 60 days of the date of the filing of the First Refund Application dated 31st December 2019 till the date of final payment of the refund (at the rate of 6 percentage towards the amounts refunded towards original application of refund, and 9 percentage towards amounts refunded pursuant to the Appellate Authority's orders), as per the provisions of Section 56 of the CGST Act, or to issue any other appropriate Writ or order as this Hon'ble High Court may deem fit and proper to the facts and in the circumstances of the case.

The petition coming on for hearing, upon perusing the petition and the grounds filed in support thereof and upon hearing the arguments of SRI KARAN TALWAR Advocate for the Petitioners and SRI SAI AKARSH, AGP REPRESENTING SRI SWAROOP OORILLA, SPECIAL GOVERNMENT PLEADER FOR STATE TAX for the Respondents No. 1 to 4 and SRI N. BHUJANGA RAO, DEPUTY SOLICITOR GENERAL OF INDIA for the Respondent No.5.

W.P. NO. 12130 OF 2026:

Between:

1. M/s Synchrony International Services Pvt. Ltd, Represented by its Director, Mr. Chintan Chawla, S/o Mr. Suresh Chander Chawla, Aged about 52 years, having its registered office at Plot No. 2, Phase No. 1, Survey No. 83/1, 2nd to 4th Floor, Unit 2 and 3, Orwell Building, Parcel 3, Knowledge City Road, Hyderabad Rangareddy, Telangana 500081.
2. Mr. Chintan Chawla, S/o Mr. Suresh Chander Chawla, Aged about 52 years, Occupation. Director at M/s Synchrony International Services Pvt. Ltd. residing at Villa No. 51, Ramky Tranquillas, Abhyudaya Nagar, HMBS Colony, Kismatpur, Hyderabad, Telangana-500030.

.....PETITIONER

AND

1. Assistant Commissioner (ST), STU-1 Abids Circle Office, Rooms No. 104, 1st floor, Hermitage Office Complex, Hill Fort Road, Adarsh Nagar, Hyderabad - 500 004
2. Appellate Joint Commissioner of State Tax, Secunderabad Division, V Floor, C.T. Complex, Nampally, Hyderabad - 500 001
3. Deputy Commissioner (ST) STU-1, Abids Circle Office, Rooms No. 104, 1st floor, Hermitage Office Complex, Hill Fort Road, Adarsh Nagar, Hyderabad - 500 004.

4. State of Telangana, Represented by the Principal Secretary, Revenue Department (State Tax) Secretariat, Hyderabad - 500004.
5. Union of India, Represented by its Secretary, Ministry of Finance, North Block, New Delhi -110001

.....RESPONDENTS

Petition under Article 226 of the Constitution of India praying that in the circumstances stated in the affidavit filed therewith, the High Court may be pleased to issue a Writ, Order or direction, particularly one in the nature of a Writ of Mandamus declaring the action of the Respondent No.1 in rejecting the application for the payment of interest to the Petitioner vide Deficiency Memo No. ZD3611250384994 dated 12th November 2025 as illegal, arbitrary, perverse, violative of principles of natural justice and without jurisdiction, as it is passed without the authority of law, and directions to the Respondents to forthwith grant and sanction interest on delayed refund amounting to a total of INR 1,07,02,997 calculated from 60 days of the date of the filing of the First Refund Application dated 26th April 2019 till the date of final payment of the refund (at the rate of 6percent towards the amounts refunded towards original application of refund, and 9percent towards amounts refunded pursuant to the Appellate Authority's orders), as per the provisions of Section 56 of the CGST Act, or to issue any other appropriate Writ or order as this Hon'ble High Court may deem fit and proper to the facts and in the circumstances of the case.

The petition coming on for hearing, upon perusing the petition and the grounds filed in support thereof and upon hearing the arguments of SRI KARAN TALWAR Advocate for the Petitioners and SRI SAI AKARSH, AGP REPRESENTING SRI SWAROOP OORILLA, SPECIAL GOVERNMENT PLEADER FOR STATE TAX for the Respondents No. 1 to 4 and SRI N. BHUJANGA RAO, DEPUTY SOLICITOR GENERAL OF INDIA for the Respondent No.5.

W.P. NO. 12132 OF 2026:

Between:

1. M/s Synchrony International Services Pvt. Ltd., Represented by its Director, Mr. Chintan Chawla, S/o Mr. Suresh Chander Chawla, Aged about 52 years, having its registered office at Plot No. 2, Phase No. 1, Survey No. 83/1, 2nd to 4th Floor, Unit 2 and 3, Orwell Building, Parcel 3, Knowledge City Road, Hyderabad, Rangareddy, Telangana 500081.
2. Mr. Chintan Chawla, S/o Mr. Suresh Chander Chawla, Aged about 52 years, Occupation. Director at M/s Synchrony International Services Pvt. Ltd. residing at Villa No. 51, Ramky Tranquillas, Abhyudaya Nagar, HMBS Colony, Kismatpur, Hyderabad, Telangana-500030.

.....PETITIONERS

AND

1. Assistant Commissioner (ST), STU-1 Abids Circle Office, Rooms No. 104, 1st floor, Hermitage Office Complex, Hill Fort Road, Adarsh Nagar, Hyderabad - 500 004.
2. Appellate Joint Commissioner of State Tax, Secunderabad Division, V Floor, C.T. Complex, Nampally, Hyderabad - 500 001.
3. Deputy Commissioner (ST), STU-1 Abids Circle Office, Rooms No. 104, 1st floor, Hermitage office Complex, Hill Fort Road, Adarsh Nagar, Hyderabad - 500 004.

4. State of Telangana, Represented by the Principal secretary, Revenue Department (State Tax) Secretariat, Hyderabad - 500004.
5. Union of India, Represented by its Secretary, Ministry of Finance, North Block, New Delhi - 110001.

.....RESPONDENTS

Petition under Article 226 of the Constitution of India praying that in the circumstances stated in the affidavit filed therewith, the High Court may be pleased to issue a Writ, Order or direction, particularly one in the nature of a Writ of Mandamus, declaring the action of the Respondent No.1 in rejecting the application for the interest of the Petitioner vide Deficiency Memo No. ZD361125038522N dated 12th November 2025 as illegal, violative of principles of natural justice and without jurisdiction, as it is passed without the authority of law, and directions to the Respondents to forthwith grant and sanction interest on delayed refund amounting to a total of INR 31,90,646 calculated from 60 days of the date of the filing of the First Refund Application dated 31st December 2019 till the date of final payment of the refund (at the rate of 6 percent towards the amounts refunded towards original application of refund, and 9 percent towards amounts refunded pursuant to the Appellate Authoritys orders), as per the provisions of Section 56 of the CGST Act, or to issue any other appropriate Writ or order as this Honourable High Court may deem fit and proper to the facts and in the circumstances of the case.

The petition coming on for hearing, upon perusing the petition and the grounds filed in support thereof and upon hearing the arguments of SRI KARAN TALWAR Advocate for the Petitioners and SRI SAI AKARSH, AGP REPRESENTING SRI SWAROOP OORILLA, SPECIAL GOVERNMENT PLEADER FOR STATE TAX for the Respondents No. 1 to 4 and SRI N. BHUJANGA RAO, DEPUTY SOLICITOR GENERAL OF INDIA for the Respondent No.5.

W.P. NO. 12133 OF 2026:

Between:

1. M/s Synchrony International Services Pvt. Ltd, Represented by its Director, Mr. Chintan Chawla, S/o Mr. Suresh Chander Chawla, Aged about 52 years, having its registered office at Plot No. 2, Phase No. 1, Survey No. 83/1, 2nd to 4th Floor, Unit 2 and 3, Orwell Building, Parcel 3, Knowledge City Road, Hyderabad Rangareddy, Telangana 500081.
2. Mr. Chintan Chawla, S/o Mr. Suresh Chander Chawla, Aged about 52 years, Occupation Director at M/s Synchrony International Services Pvt. Ltd. residing at Villa No. 51, Ramky Tranquillas, Abhyudaya Nagar, HMBS Colony, Kismatpur, Hyderabad, Telangana-500030.

.....PETITIONERS

AND

1. Assistant Commissioner (ST), STU-1 Abids Circle Office, Rooms No. 104, 1st floor, Hermitage Office Complex, Hill Fort Road, Adarsh Nagar, Hyderabad - 500 004
2. Appellate Joint Commissioner of State Tax, Secunderabad Division, V Floor, C.T. Complex, Nampally, Hyderabad - 500 001
3. Deputy Commissioner (ST), STU-1 Abids Circle Office, Rooms No. 104, 1st floor, Hermitage Office Complex, Hill Fort Road, Adarsh Nagar, Hyderabad 500 004.

4. State of Telangana, Represented by the Principal secretary, Revenue Department (State Tax) Secretariat, Hyderabad 500004
5. Union of India, Represented by its Secretary, Ministry of Finance, North Block, New Delhi 110001

.....RESPONDENTS

Petition under Article 226 of the Constitution of India praying that in the circumstances stated in the affidavit filed therewith, the High Court may be pleased to issue a Writ, Order or direction, particularly one in the nature of a Writ of Mandamus, declaring the action of the Respondent No.1 in rejecting the application for the interest of the Petitioner vide Deficiency Memo No. ZD361125038616E dated 12th November 2025 as illegal, violative of principles of natural justice and without jurisdiction, as it is passed without the authority of law, and directions to the Respondents to forthwith grant and sanction interest on delayed refund amounting to a total of INR 40,53,892 calculated from 60 days of the date of the filing of the First Refund Application dated 27th March 2021 till the date of final payment of the refund (at the rate of 6 percent towards the amounts refunded towards original application of refund, and 9percent towards amounts refunded pursuant to the Appellate Authoritys orders), as per the provisions of Section 56 of the CGST Act, or to issue any other appropriate Writ or order as this Honourable High Court may deem fit and proper to the facts and in the circumstances of the case.

The petition coming on for hearing, upon perusing the petition and the grounds filed in support thereof and upon hearing the arguments of SRI KARAN TALWAR Advocate for the Petitioners and SRI SAI AKARSH, AGP REPRESENTING SRI SWAROOP OORILLA, SPECIAL GOVERNMENT PLEADER FOR STATE TAX for the Respondents No. 1 to 4 and SRI N. BHUJANGA RAO, DEPUTY SOLICITOR GENERAL OF INDIA for the Respondent No.5.

W.P. NO. 12134 OF 2026:

Between:

1. M/s Synchrony International Services Pvt. Ltd., Represented by its Director, Mr. Chintan Chawla, S/o Mr. Suresh Chander Chawla, Aged about 52 years, having its registered office at Plot No. 2, Phase No. 1, Survey No. 83/1, 2nd to 4th Floor, Unit 2 and 3, Orwell Building, Parcel 3, Knowledge City Road, Hyderabad Rangareddy, Telangana 500081.
2. Mr. Chintan Chawla, S/o Mr. Suresh Chander Chawla, Aged about 52 years, Occupation. Director at M/s Synchrony International Services Pvt. Ltd. residing at Villa No. 51, Ramky Tranquillas, Abhyudaya Nagar, HMBS Colony, Kismatpur, Hyderabad, Telangana-500030.

.....PETITIONERS

AND

1. Assistant Commissioner (ST), STU-1 Abids Circle Office, Rooms No. 104, 1st floor, Hermitage Office Complex, Hill Fort Road, Adarsh Nagar, Hyderabad - 500 004

2. Appellate Joint Commissioner of State Tax, Secunderabad Division, V Floor, C.T. Complex, Nampally, Hyderabad - 500 001
3. Deputy Commissioner (ST), STU-1 Abids Circle Office, Rooms No. 104, 1st floor, Hermitage Office Complex, Hill Fort Road, Adarsh Nagar, Hyderabad - 500 004.
4. State of Telangana, Represented by the Principal secretary, Revenue Department (State Tax) Secretariat, Hyderabad - 500004.
5. Union of India, Represented by its Secretary, Ministry of Finance, North Block, New Delhi - 110001

.....RESPONDENTS

Petition under Article 226 of the Constitution of India praying that in the circumstances stated in the affidavit filed therewith, the High Court may be pleased to issue a Writ, Order or direction, particularly one in the nature of a Writ of Mandamus declaring the action of the Respondent No.1 in rejecting the application for the interest of the Petitioner vide Deficiency Memo No. ZD361125038583F dated 12th November 2025 as illegal, violative of principles of natural justice and without jurisdiction, as it is passed without the authority of law, and directions to the Respondents to forthwith grant and sanction interest on delayed refund amounting to a total of INR 85,51,212 calculated from 60 days of the date of the filing of the First Refund Application dated 20th March 2020 till the date of final payment of the refund (at the rate of 6percent towards the amounts refunded towards original application of refund, and 9percent towards amounts refunded pursuant to the Appellate Authority's orders), as per the provisions of Section 56 of the CGST Act, or to issue any other appropriate Writ or order as this Hon'ble High Court may deem fit and proper to the facts and in the circumstances of the case.

The petition coming on for hearing, upon perusing the petition and the grounds filed in support thereof and upon hearing the arguments of SRI KARAN TALWAR Advocate for the Petitioners and SRI SAI AKARSH, AGP REPRESENTING SRI SWAROOP OORILLA, SPECIAL GOVERNMENT PLEADER FOR STATE TAX for the Respondents No. 1 to 4 and SRI N. BHUJANGA RAO, DEPUTY SOLICITOR GENERAL OF INDIA for the Respondent No.5, the Court made the following.

COMMON ORDER:

Mr. Karan Talwar, learned counsel appears for the petitioners.

Mr. Sai Akarsh, learned Assistant Government Pleader representing Mr. Swaroop Oorilla, learned Special Government Pleader appears for State Tax.

All these writ petitions relate to the same petitioner covering the period July, 2018 to March, 2021. All these writ petitions relate to claim of interest over the amount already refunded. In respect of some tax period, the refund was made by the Refund Sanctioning Authority and in some cases, after the order of the appellate authority. Since the refunds were delayed, petitioner claimed interest in terms of Section 56 of the Central Goods and Services Tax Act, 2017 (hereinafter referred to as 'the CGST Act'). Such claims for interest have been pending before the Proper Officer since 03.06.2025.

On his refund application, Deficiency Memos have been raised. Petitioner has been compelled to approach this Court on issuance of the third Deficiency Memo which did not contain any particulars.

Learned counsel for the petitioner submits that once refund has been sanctioned, interest would be automatic for the period of delay beyond 60 days from the date of first application. Insistence upon furnishing of particulars which are not relevant or germane to the issue is only causing further interest to accrue upon the revenue.

The matter was earlier taken up on 21.04.2026 when one week time was allowed to learned Special Government Pleader for State Tax to obtain instructions. It is only today that a Memo has been filed once again indicating the deficiencies while referring to Section 16(2)(c) of the CGST Act and Rule 89(2)(m) of the Central Goods and Services Tax Rules, 2017.

Learned counsel for the petitioner submits that neither the said provision under Section 16(2)(c) of the CGST Act would apply after the refund has already been sanctioned and paid nor there would arise a case of passing of the refund claim to any other person as it is only interest on the refund already sanctioned. It is submitted that the Proper Officer without appreciating the legal position by delaying the refund of the interest is acting contrary to the interest of the Department.

Upon hearing learned counsel for the parties, in the aforesaid circumstances, let respondent No.1-Assistant Commissioner (ST), STU-1, Abids Circle Office, Room No.104, 1st Floor, Hermitage Office Complex, Hill Fort Road, Adarsh Nagar, Hyderabad, appear on the next date.

Let a copy of the order be communicated to respondent No.1 by the Registry forthwith.

Let the matter appear on 30.07.2026.

In the meantime, if there are no legal impediments in processing the claim of interest on the refund already sanctioned, the Proper Officer is at liberty to sanction the admissible interest in accordance with law.

SD/-REKHA RANI BALAGANI
ASSISTANT REGISTRAR

//TRUE COPY//

SECTION OFFICER

To,

1. The Assistant Commissioner (ST), STU-1 Abids Circle Office, Rooms No. 104, 1st floor, Hermitage Office Complex, Hill Fort Road, Adarsh Nagar, Hyderabad - 500 004
2. The Appellate Joint Commissioner of State Tax, Secunderabad Division, V Floor, C.T. Complex, Nampally, Hyderabad - 500 001
3. The Deputy Commissioner (ST), STU-1 Abids Circle Office, Rooms No. 104, 1st floor, Hermitage Office Complex, Hill Fort Road, Adarsh Nagar, Hyderabad - 500 004.
4. The Principal secretary, State of Telangana, Revenue Department (State Tax) Secretariat, Hyderabad - 500004.
5. The Secretary, Ministry of Finance, North Block, Union of India, New Delhi – 110001.

   (Addressees 1 to 5 BY SPAD)
6. One CC to SRI KARAN TALWAR Advocate [OPUC]
7. Two CCs to SPECIAL GP FOR STATE TAX, High Court at Hyderabad.[OUT]
8. Two spare copies.

HIGH COURT

HCJ
&
GMM, J

DATED: 14-07-2026

LET THE MATTER APPEAR ON 30.07.2026.

ORDER

HIGH COURT FOR THE STATE OF TELANGANA
SPECIAL CELL
21 JUL 2026
DESPATCHED

WP.Nos.12047,12052, 12127, 12128, 12130, 12132, 12133 AND 12134 of 2026

DIRECTION