

**HIGH COURT FOR THE STATE OF TELANGANA
AT HYDERABAD**

**TUESDAY, THE TWENTY FIRST DAY OF APRIL
TWO THOUSAND AND TWENTY SIX**

:PRESENT:

**THE HONOURABLE SRI JUSTICE P.SAM KOSHY
AND
THE HONOURABLE SRI JUSTICE NARSING RAO NANDIKONDA**

WP NO: 12548 OF 2026

Between:

Madhavi Dantuluri.

.....Petitioner

AND

1. Assistant Commissioner of Income Tax, Central Circle - 3(1), Hyderabad Aayakar Bhavan, Opp. LB Stadium Basheerbagh, Hyderabad, Telangana - 500004
2. National Faceless Assessment Centre, Room No. 402, 4th Floor, Mayur Bhawan, Connaught Lane Connaught Place, New Delhi - 110001
3. Commissioner of Income Tax (Appeals), Hyderabad- 11 5th Floor, D-Block, IT Towers, 10-2-3, AC Guards, Hyderabad, Telangana 500004

.....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 Writ of Certiorari or any other appropriate writ or direction to set aside the.

(a) Digitally Signed Notice u/s. 143(2) of the Act vide DIN and Notice No. ITBA/AST/S/143(2)/2023-24/ 1060531905(1) dated 06.02.2024 issued by Respondent No. 1 in Exhibit P1,

(b) Digitally signed Assessment Order u/s. 143(3) of the Act bearing DIN and Order No. ITBA/AST/S/143(3)/2024-25/1072217930(1) dated 16.01.2025 passed by Respondent No. 1 in Exhibit P2, and

(c) Appellate Order u/s 250 of the Act bearing DIN and Order No. ITBA/APL/M/250/2025-26/ 1078804985(1) dated 23.07.2025 passed by Respondent No. 3 in Exhibit P3.

and all other consequential actions, penal and recovery proceedings for being illegal, arbitrary, unlawful and violative of the provisions of the Income-tax Act, 1961 and Articles 14 and 19(1)(g) of the Constitution of India and to pass

A. NO: 2 OF 2026

Petition under Section 151 of C.P.C praying that in the circumstances stated in the affidavit filed in support of the writ petition, the High Court may be pleased to stay the operation of and all recovery and penal proceedings in pursuance of Digitally Signed Notice u/s. 143(2) of the Act vide DIN and Notice No. ITBA/AST/S/143(2)/2023-24/1060531905(1) dated 06.02.2024 issued by Respondent No. 1 in Exhibit P1, Digitally signed Assessment Order u/s. 143(3) of the Act bearing DIN and Order No. ITBA/AST/S/ 143(3)/2024-25/1072217930(1) dated 16.01.2025 passed by Respondent No. 1 in Exhibit P2, and Appellate Order u/s 250 of the Act bearing DIN and Order No. ITBA/APL/M/250/2025-26/1078804985(1) dated 23.07.2025 passed by Respondent No. 3 in Exhibit P3 and pass any such other order or orders as the Hon'ble Court may deem fit and proper in the circumstances of the case, as the Petitioner, being fastened with huge additions to its returned income as a result of the Impugned Assessment Order and Impugned Appellate Order, both of which suffer from various legal and factual infirmities, would suffer irreparable hardship if coercive recovery is continued, whereas no prejudice will be caused to the Revenue if recovery is stayed, pending disposal of WP No 12548 of 2026, on the file of the High Court.

The petition coming on for hearing, upon perusing the petition and the affidavit filed in support thereof and upon hearing the arguments of SRI T. PRADYOTH, COUNSEL REPRESENTING SRI SANTOSH SAGAR KAPILAVAI Advocate for the Petitioner and SRI N. PRAVEEN REDDY SENIOR STANDING COUNSEL FOR INCOME TAX DEPARTMENT appears for the Respondents, the Court made the following.

ORDER:

Mr. N. Praveen Reddy, learned Senior Standing Counsel for the Income Tax Department, accepts notice on behalf of the respondents.

List this matter along with WP.No.5469 of 2026.

In the meantime, all further proceedings pursuant to the impugned orders/impugned notices shall remain stayed

**SD/- P. C. SULEKHA DEVEI
ASSISTANT REGISTRAR**

//TRUE COPY//

SECTION OFFICER

To,

- 1. The Assistant Commissioner of Income Tax, Central Circle - 3(1), Hyderabad Aayakar Bhavan, Opp. LB Stadium Basheerbagh, Hyderabad, Telangana - 500004.**
- 2. The National Faceless Assessment Centre, Room No. 402, 4th Floor, Mayur Bhawan, Connaught Lane Connaught Place, New Delhi - 110001**
- 3. The Commissioner of Income Tax (Appeals), Hyderabad- 11 5th Floor, D-Block, IT Towers, 10-2-3, AC Guards, Hyderabad, Telangana 500004.**
(Addressees 1 to 3 BY SPAD)
- 4. The Section Officer, Writ (DB) High Court at Hyderabad.**
- 5. One CC to SRI SANTOSH SAGAR KAPILAVAI Advocate [OPUC]**
- 6. Two spare copies.**

HIGH COURT

**PSK, J
&
NNR, J**

DATED: 21-04-2026

LIST THIS MATTER ALONG WITH WP.NO.5469 OF 2026.

ORDER



WP.No.12548 of 2026

STAY