

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

THURSDAY, THE TWENTY SIXTH DAY OF JUNE

TWO THOUSAND AND TWENTY FIVE

:PRESENT:

**THE HONOURABLE SRI JUSTICE P.SAM KOSHY
AND**

THE HONOURABLE SRI JUSTICE NARSING RAO NANDIKONDA

WRIT PETITION NO: 17275 OF 2025

Between:

Reputation.com India P Ltd, Represented by Director Unit No.203, 2nd Floor,
Manjeera Trinity Corporate Kukatpally Village, Balanagar Mandal, R RDistrict,
Hyderabad -500072 PAN AAHCR0882R

Petitioner

AND

1. The Assessment Unit, Income Tax Department, National e-Assessment Centre, Delhi E-Ramp, Jawaharlal Nehru Stadium, Delhi -110 003
2. The Income Tax Officer, Ward 9(1), Hyderabad Income Tax Department Income Tax Towers, Masab Tank, Hyderabad, 500 004
3. The Principal Commissioner of Income Tax -7, Hyderabad, Income Tax Department Income Tax Towers, Masab Tank, Hyderabad, 500 004
4. The Dispute Resolution Panel, Income Tax Department, A Wing, 4th Floor, KendriyaSadana, Koramangala, Bengaluru -560 034
5. The Deputy Commissioner of Income Tax Transfer, Pricing 3, Hyderabad Aayakar Bhavan, Basheer Bagh, Hyderabad 500 004
6. The Union of India, Ministry of Finance, rep by it's Secretary, New Delhi

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 an appropriate writ, order or direction more particularly one in the nature of Writ of Certiorari, calling for the records pertaining to the impugned order passed in terms of 143(3) read with sections 144C(3) and 144B of the Income Tax Act, 1961 dated 07.03.2025 issued by the Respondent No. 1 and to quash and set aside the said impugned order passed for the Assessment Year 2022-23 in DIN ITBA/AST/S/143(3)/2024-25/1074204293(1) as illegal, arbitrary, violative of principles of natural justice, with consequential relief,

IA NO: 2 OF 2025

Petition under Section 151 CPC praying that in the circumstances stated in the affidavit filed in support of the petition, the High Court may be pleased to stay all further proceedings, including penalty and recovery proceedings consequent to impugned passed in terms of 143(3) read with sections 144C(3) and 144B of the Income Tax Act, 1961 date 07.03.2025 in DIN ITB A/AST/ S/143(3) /2024-25/ 1074204293(1), Pending disposal of WP 17275 of 2025, 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 M/s.SUDHAMALLA DINESH KUMAR Advocate for the Petitioner, SRI.VIJHAY K PUNNA (SENIOR SC FOR Income Tax Department) for the Respondent Nos. 1 o 4, and the Court made the following.

ORDER:

Mr. Vijhay K. Punna, learned Senior Standing Counsel takes notice for Income Tax Department and prays for time to seek instructions.

As prayed for, post this case on 16.07.2025.

Meanwhile, there shall be stay of all further proceedings of the order dated 07.03.2025, till the next date of hearing.

**SD/- A. SRINIVAS REDDY
ASSISTANT REGISTRAR**

//TRUE COPY//



SECTION OFFICER

To,

1. The Assessment Unit, Income Tax Department, National e-Assessment Centre, Delhi E-Ramp, Jawaharlal Nehru Stadium, Delhi -110 003
2. The Income Tax Officer, Ward 9(1), Hyderabad Income Tax Department Income Tax Towers, Masab Tank, Hyderabad, 500 004
3. The Principal Commissioner of Income Tax -7, Hyderabad, Income Tax Department Income Tax Towers, Masab Tank, Hyderabad, 500 004

4. The Dispute Resolution Panel, Income Tax Department, A Wing, 4th Floor, Kendriya Sadan, Koramangala, Bengaluru - 560 034
5. The Deputy Commissioner of Income Tax Transfer, Pricing 3, Hyderabad Aayakar Bhavan, Basheer Bagh, Hyderabad 500 004
6. The Secretary, Union of India, Ministry of Finance, New Delhi (RR1 to 6 by RPAD)
7. One CC to SRI. SUDHAMALLA DINESH KUMAR Advocate [OPUC]
8. One CC to SRI. VIJHAY K PUNNA (SENIOR SC FOR ITD) Advocate [OPUC]
9. One spare copy



HIGH COURT

**PSKJ &
NNRJ**

DATED:26/06/2025

LIST ON:16.07.2025



ORDER

WP.No.17275 of 2025

STAY