

**WP NO. 10390/2026 (T - IT)**

**IN THE HIGH COURT OF KARNATAKA AT BENGALURU**

[MATHIKERE SAMPANGI RAMAIAH RAJARAM, VS. ASSESSMEN  
UNIT AND ANOTHER]

09.06.2026

(VIDEO CONFERENCING / PHYSICAL HEARING)

CORAM: HON'BLE MR. JUSTICE B M SHYAM PRASAD

**ORAL ORDER**

Sri Annamalai S., the learned counsel for the petitioner, is heard on the grant of *ad interim order*.

The petitioner has called in question the Assessment Order dated 19.03.2026 relevant to the assessment year 2024-25. The petitioner is issued with Show Cause Notice refusing deduction under Section 54F and Section 54B of the Income Tax Act, 1961 [for short, '*the Act*'] observing that an assessee can claim deduction only under either of these provisions or under Section 54EC of the Act. The assessment is concluded accordingly. Sri Annamalai S. proposes to argue that the proposition in the Show Cause Notice differs from the proposition upon which the assessment is concluded.

Be that as it may, the learned counsel submits that the assessment is concluded on the footing that Section 54EC,

Section 54F and Section 54B of the Act are exclusive and an assessee cannot be allowed deductions under these provisions concurrently but this would be contrary to the settled law that these provisions are not mutually exclusive and an assessee could be entitled to deductions under these provisions. In fact, the learned counsel places on record a copy of the order by the Income Tax Appellate Tribunal, Hyderabad Bench.

On perusal of the records, and in consideration of the submissions subject to the say of the respondents, the interim order is granted as prayed for calling upon Sri. Y. V. Raviraj, a learned senior standing counsel for the authorities, to take notice for the respondents and secure instructions by the next date of hearing.

The office is directed to re-list this petition on **24.06.2026.**

**(B M SHYAM PRASAD)**  
**JUDGE**

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List No.: 3 Sl No.: 5