

ITEM NOS.70TO74&76

COURT NO.13

SECTION IV-A

S U P R E M E C O U R T O F I N D I A
R E C O R D O F P R O C E E D I N G S

Petition for Special Leave to Appeal (C) Nos.19366-19369/2023

[Arising out of impugned final judgment and order dated 11-05-2023 in WP No. 19570/2022, WP No. 19561/2022, WP No. 20119/2022 & WP No. 20120/2022 passed by the High Court of Karnataka at Bengaluru]

DIRECTORATE GENERAL OF GOODS AND SERVICES TAX Petitioner(s)
INTELLIGENCE (HQs) & ORS.

VERSUS

GAMESKRAFT TECHNOLOGIES PRIVATE LIMITED & ORS. Respondent(s)

(IA No. 5466/2025 - APPROPRIATE ORDERS/DIRECTIONS, IA No.177433/2023 - EXEMPTION FROM FILING C/C OF THE IMPUGNED JUDGMENT, IA No. 76728/2024 - INTERVENTION APPLICATION, IA No. 153914/2024 - INTERVENTION/IMPLEADMENT, IA No. 194982/2023 - PERMISSION TO FILE ADDITIONAL DOCUMENTS/FACTS/ANNEXURES, IA No. 173396/2024 - PERMISSION TO FILE ADDITIONAL DOCUMENTS/FACTS/ANNEXURES, IA No. 167436/2024 - PERMISSION TO FILE ADDITIONAL DOCUMENTS/FACTS/ANNEXURES & IA No. 11298/2025 - STAY APPLICATION

WITH

W.P. (C) No. 1374/2023 (X)

(FOR EX-PARTE STAY ON IA 254930/2023, FOR PERMISSION TO FILE ADDITIONAL DOCUMENTS/FACTS/ANNEXURES ON IA 260848/2023)

W.P. (C) No. 1384/2023 (X)

(FOR PERMISSION TO FILE ADDITIONAL DOCUMENTS/FACTS/ANNEXURES ON IA 260847/2023)

W.P. (C) No. 268/2024 (X)

(FOR STAY APPLICATION ON IA 6832/2025)

T.C. (C) No. 24/2024 (III)

(FOR ADMISSION)

T.C. (C) No. 25/2024 (III)

(FOR ADMISSION)

T.C. (C) No. 26/2024 (III)

(FOR ADMISSION)

W.P. (C) No. 300/2024 (X)

(FOR ADMISSION)

T.C. (C) No. 27/2024 (III-A)

(FOR ADMISSION)

T.C. (C) No. 29/2024 (III)

W.P. (C) No. 350/2024 (X)

(FOR STAY APPLICATION ON IA 126042/2024 & FOR PERMISSION TO FILE ADDITIONAL DOCUMENTS/FACTS/ANNEXURES ON IA 146322/2024)

T.C. (C) No. 34/2024 (III)

(FOR PERMISSION TO FILE ADDITIONAL DOCUMENTS/FACTS/ANNEXURES ON IA 94118/2025)

T.C. (C) No. 35/2024 (III)
(FOR PERMISSION TO FILE ADDITIONAL DOCUMENTS/FACTS/ANNEXURES ON IA
94327/2025)

T.C. (C) No. 32/2024 (III)
(FOR PERMISSION TO FILE ADDITIONAL DOCUMENTS/FACTS/ANNEXURES ON IA
93983/2025)

T.C. (C) No. 30/2024 (III)
(FOR PERMISSION TO FILE ADDITIONAL DOCUMENTS/FACTS/ANNEXURES ON IA
94324/2025)

T.C. (C) No. 31/2024 (III)
(FOR PERMISSION TO FILE ADDITIONAL DOCUMENTS/FACTS/ANNEXURES ON IA
94299/2025)

T.C. (C) No. 33/2024 (III)
(FOR PERMISSION TO FILE ADDITIONAL DOCUMENTS/FACTS/ANNEXURES ON IA
94073/2025)

T.C. (C) No. 54/2024 (XIV-A)
(FOR ADMISSION)

T.C. (C) No. 36/2024 (IV-C)

W.P. (C) No. 378/2024 (X)
(FOR EX-PARTE STAY ON IA 133018/2024 & FOR STAY APPLICATION ON IA
6635/2025)

W.P. (C) No. 447/2024 (X)
(FOR STAY APPLICATION ON IA 146408/2024)

W.P. (C) No. 429/2024 (X)
(FOR STAY APPLICATION ON IA 142072/2024)

T.C. (C) No. 39/2024 (IV-A)

W.P. (C) No. 456/2024 (X)
(FOR STAY APPLICATION ON IA 150586/2024)

T.C. (C) No. 41/2024 (XVI)
(FOR ADMISSION)

T.C. (C) No. 40/2024 (XVI)
(FOR ADMISSION)

T.C. (C) No. 44/2024 (XV)
(FOR ADMISSION)

T.C. (C) No. 43/2024 (XV)
(FOR ADMISSION)

T.C. (C) No. 42/2024 (XV)
(FOR ADMISSION)

T.C. (C) No. 45/2024 (IV)
(FOR ADMISSION)

T.C. (C) No. 47/2024 (IV)

T.C. (C) No. 48/2024 (IV)

T.C. (C) No. 49/2024 (IV)
(FOR ADMISSION)
(IA No. 83508/2025 - AMENDMENT OF THE PETITION)

T.C. (C) No. 46/2024 (IV)
(FOR ADMISSION)

T.C. (C) No. 51/2024 (XIV-A)
(FOR ADMISSION)

T.C. (C) No. 53/2024 (XIV-A)
(FOR ADMISSION)

T.C. (C) No. 52/2024 (XIV-A)
(FOR PERMISSION TO FILE ADDITIONAL DOCUMENTS/FACTS/ANNEXURES ON IA 94208/2025)

W.P. (C) No. 545/2024 (X)
(FOR STAY APPLICATION ON IA 195529/2024)

W.P. (C) No. 605/2024 (X)
(FOR STAY APPLICATION ON IA 216302/2024)

W.P. (C) No. 568/2024 (X)
(FOR STAY APPLICATION ON IA 201864/2024)

W.P. (C) No. 541/2024 (X)
(FOR STAY APPLICATION ON IA 195045/2024, FOR PERMISSION TO FILE ADDITIONAL DOCUMENTS/FACTS/ANNEXURES ON IA 202455/2024, FOR CONDONATION OF DELAY IN FILING THE SPARE COPIES ON IA 216871/2024, FOR EARLY HEARING APPLICATION ON IA 292494/2024, FOR STAY APPLICATION ON IA 295633/2024 & FOR EXEMPTION FROM FILING O.T. ON IA 957/2025)

W.P. (C) No. 646/2024 (X)
(FOR STAY APPLICATION ON IA 226539/2024)

W.P. (C) No. 720/2024 (X)
(FOR ADMISSION)

W.P. (C) No. 858/2024 (X)
(FOR STAY APPLICATION ON IA 298188/2024, FOR EXEMPTION FROM FILING O.T. ON IA 298189/2024 & FOR impleading party ON IA 2285/2025)

W.P. (C) No. 50/2025 (X)
IA No. 18961/2025 - GRANT OF INTERIM RELIEF

W.P. (C) No. 51/2025 (X)
(IA No. 18980/2025 - GRANT OF INTERIM RELIEF)

W.P. (C) No. 52/2025 (X)
IA No. 19046/2025 - GRANT OF INTERIM RELIEF

W.P. (C) No. 217/2025 (X)
(FOR EX-PARTE STAY ON IA 67990/2025)

W.P. (C) No. 258/2025 (X)
(FOR EX-PARTE STAY ON IA 82900/2025)

W.P. (C) No. 272/2025 (X)

W.P. (C) No. 418/2025 (X)
(FOR ADMISSION)

T.C. (C) No. 30/2025 (XII)
(FOR ADMISSION)

T.C. (C) No. 31/2025 (XII)
(FOR ADMISSION)

T.C. (C) No. 34/2025 (XII)
(FOR ADMISSION)

T.C. (C) No. 33/2025 (XII)
(FOR ADMISSION)

T.C. (C) No. 32/2025 (XII)
(FOR ADMISSION)

T.C. (C) No. 35/2025 (XII)
(FOR ADMISSION)

C.A. No. 6124-6131/2023 (XII)
(FOR ADMISSION and I.R. and IA No.158091/2021-EXEMPTION FROM FILING C/C OF THE IMPUGNED JUDGMENT, IA No. 95899/2023 - PERMISSION TO FILE ADDITIONAL DOCUMENTS/FACTS/ANNEXURES & IA No. 253459/2023 - PERMISSION TO FILE ADDITIONAL DOCUMENTS/FACTS/ANNEXURES)

C.A. No. 6144/2023 (IV-A)

(FOR EXEMPTION FROM FILING C/C OF THE IMPUGNED JUDGMENT ON IA 46464/2022 & FOR PERMISSION TO FILE ADDITIONAL DOCUMENTS/FACTS/ANNEXURES ON IA 95890/2023)

C.A. No. 6132-6143/2023 (IV-A)

(FOR PERMISSION TO FILE ADDITIONAL DOCUMENTS/FACTS/ANNEXURES ON IA 183995/2022)

SLP(C) No. 1588-1592/2024 (XII)

(IA No. 13817/2024 - EXEMPTION FROM FILING C/C OF THE IMPUGNED JUDGMENT, IA No. 13819/2024 - EXEMPTION FROM FILING O.T. & IA No. 21856/2024 - PERMISSION TO FILE ADDITIONAL DOCUMENTS/FACTS/ANNEXURES)

Writ Petition(Civil) No.406/2025

Writ Petition(s)(Civil) No.412/2025

(FOR ADMISSION)

(IA No. 103843/2025 - EX-PARTE STAY & IA No. 110920/2025 - PERMISSION TO FILE ADDITIONAL DOCUMENTS/FACTS/ANNEXURES)

Writ Petition(Civil) No.467/2025

Transfer Case (Civil) No.36/2025

(FOR ADMISSION)

Transfer Case (Civil) No(s). 37/2025

(FOR ADMISSION)

Date : 09-05-2025 These matters were called on for hearing today.

CORAM :

HON'BLE MR. JUSTICE J.B. PARDIWALA

HON'BLE MR. JUSTICE R. MAHADEVAN

For Petitioner(s) :

Mr. Prateek Chadha, A.A.G.

Mr. D. L. Chidananda, AOR

Mr. Shubham Singh, AOR

Mr. Devanshu Yadav, Adv.

Ms. Anzu. K. Varkey, AOR

Mr. Deepak Singh, Adv.

Mr. S. S. Shroff, AOR

Mr. Lalitendra Gulani, Adv.

Ms. Sneha Ghose, Adv.

Ms. M Sarada, Adv.

Mr. Rajeev Gulani, AOR

Mr. Kavin Gulati, Sr. Adv.

Mr. Ninad Laud, Adv.

Mr. Parag Rao, Adv.

Ms. Ishani Shekhar, Adv.

Mr. Zubin Dash, Adv.

Mr. Dcosta Ivo Manuel Simon, AOR

Ms. Amrita Kumari, AOR
Mr. Nirmal Devnani, Adv.
Mr. Ravi Mishra, Adv.

Mr. Ashwin Kumar D.S., Adv.
Mr. Ishan Roy Chowdhury, Adv.
Ms. Surbhi Mehta, AOR

Mr. Vivek Reddy, Sr. Adv.
Mr. Arvind Datar, Sr. Adv.
Mr. Mahesh Agarwal, Adv.
Mr. Vipin Jain, Adv.
Mr. Alok Yadav, Adv.
Ms. Sayaree Basu Mallik, Adv.
Mr. Sayaree Basu Mallik, Adv.
Mr. Abhinabh Garg, Adv.
Mr. Nanda Gopal Cuddapah, Adv.
Mr. Rahul Unnikrishnan, Adv.
Ms. Saachi Awate, Adv.
Mr. Ramnath Prabhu, Adv.
Ms. Anjali Nair, Adv.
Ms. Nikita Mehta, Adv.
Ms. Bedotroyi Gupta, Adv.
Mr. E. C. Agrawala, AOR

Mr. Shashank Tripathi , AOR
Mr. Anand Kumar V., Adv.
Mr. Aditya Kishar Tyagi, Adv.

Mr. Balbir Singh, Sr. Adv.
Mr. Abhishek Malhotra, Sr. Adv.
Mr. Karan Sachdev, Adv.
Ms. Nishtha Chaturvedi, Adv.
Ms. Shivali Shah, Adv.
Ms. Shruti Mandora, Adv.
Mr. Shyam Gopal, AOR

By Courts Motion

Ms. Rohini Musa, AOR

Mr. Mihir Joshi, Sr. Adv.
Mr. Tushar Hemani, Sr. Adv.
Mr. Sandeep Singhi, Adv.
Ms. Vaibhavi Parikh, Adv.
Mr. Shamik Bhatt, Adv.
Ms. Anushree Prashit Kapadia, AOR
Mr. Pranay Bhardwaj, Adv.

Mr. Mukesh Kumar Maroria, AOR

Mr. Gopal Sankaranarayanan, Sr. Adv.
Mr. Suhaan Mukerji, Adv.
Mr. Adarsh Kumar, Adv.
Mr. Abhishek Manchanda, Adv.
Mr. Sayandeep Pahari, Adv.
Mr. Tanmay Sinha, Adv.
Mr. Sudipta Bhattacharjee, Adv.
Ms. Trisha Chandran, Adv.
Mr. Shourya Dasgupta, Adv.
Mr. Onkar, Adv.
Mr. Arjyadeep Roy, Adv.
Mr. Harsh Makhija, Adv.
For M/s. PLR Chambers And Co., AOR

Mr. A.R. Madhav Rao, Adv.
Mr. Mukunda Rao, Adv.
Mr. Mihir Mehta, Adv.
Mr. Jasdeep Singh Dhillon, Adv.
Mr. Prabhat Chaurasia, Adv.
Mr. Anirudh Jamwal, Adv.
Mr. Suyog Bhawe, Adv.
Mr. Jay Sayta, Adv.
For M/s MPS Legal, AOR

Mr. Bharat Raichandani, Adv.
Mr. Aneesh Mittal, AOR
Mr. Mahesh Raichandani, Adv.
Mr. Deepak Kumar Khokhar, Adv.

Mr. Avi Singh, Sr. Adv.
Mr. Vineet Bhatia, Adv.
Mr. Devansh Srivastava, AOR

Mr. Amit Anand Tiwari, Sr. A.A.G.
Mr. Sabarish Subramanian, AOR
Ms. Devyani Gupta, Adv.
Mr. Vishnu Unnikrishnan, Adv.
Mr. Danish Saifi, Adv.
Mr. Saishriya Havelia A, Adv.
Ms. Tanvi Anand, Adv.

Mr. Sarthak Nema, Adv.
Mr. Awanish Kumar, Adv.
Ms. Uditia Maindiretta, Adv.
Mr. Siddharth Kumar Sharma, Adv.
Mr. S.K. Pandey, Adv.
Mr. Chandrashekhar A. Chakalabbi, Adv.
Mr. Anshul Rai, Adv.
For M/s. Dharmaprabhas Law Associates, AOR

Ms. Srishty Kaul, AOR

Mr. Harish Salve, Sr. Adv.
Dr. Abhishek Manu Singhvi, Sr. Adv.
Mr. Vikram Nankani, Sr. Adv.
Dr. Harish Narasappa, Sr. Adv.
Mr. Rajendra Barot, Adv.
Mr. Suresh Varanasi, Adv.
Dr. Dhirajkumar Totala, Adv.
Mr. Sagnik Chatterjee, Adv.
Ms. Harsha Uppal, Adv.
Mr. Ajay Raj, Adv.
Ms. Gunjan Pande, Adv.
Mr. Rohan Satija, Adv.
Mr. Tejas Raghav, Adv.
Mr. Yash Johri, Adv.
Ms. Chetna Rai, Adv.
Mr. Saurav Sunil, Adv.
Mr. Vinayak Sharda, Adv.
Ms. Sonali Jain, AOR

Mr. Jay Sayta, Adv.
Mr. Akshat Gupta, Adv.
Ms. Yoothica Pallavi, AOR

Mr. Tarun Gulati, Sr. Adv.
Mr. Sudipta Bhattacharjee, Adv.
Mr. Jay Satya, Adv.
Mr. Onkar, Adv.
Mr. Rajat Mittal, AOR
Mr. Vidushpat Singhania, Adv.
Mr. Rishabh Prasad, Adv.
Mr. Harsh Makhija, Adv.
Ms. Aniskha Gupta, Adv.
Mr. Arjyadeep Roy, Adv.
Mr. Suprateek Neogi, Adv.
Ms. Anishka Gupta, Adv.
Mr. Priyanshu, Adv.

Mr. V. C. Bharathi, Adv.
Mr. Gurmeet Singh Makker, AOR
Mr. Udai Khanna, Adv.
Mr. Chitvan Sinhal, Adv.

Mr. Karan Talwar, Adv.
Mr. Prahlad Gadipelli, Adv.
Mr. Sandeep Sripada, Adv.
Mr. Siddhant Buxy, AOR
Ms. Shambhavi Padhye, Adv.

Mr. Shaurya Sahay, AOR

Mr. Anand Varma, AOR
Ms. Apoorva Pandey, Adv.

Mr. Tarun Gulati, Sr. Adv.
 Mr. Sudipta Bhattacharjee, Adv.
 Mr. Onkar, Adv.
 Mr. Rajat Mittal, AOR
 Mr. Rishab Prasad, Adv.
 Mr. Harsh Makhija, Adv.
 Mr. Arjyadeep Roy, Adv.
 Ms. Anishka Gupta, Adv

Mr. Harish N Salve, Sr. Adv.
 Mr. Sajan Poovayya, Sr. Adv.
 Mr. V Lakshmikumaran, Adv.
 Ms. Charanya Lakshmikumaran, AOR
 Ms. Neha Choudhary, Adv.
 Ms. Umang Motiyani, Adv.
 Mr. Ayush Agarwal, Adv.
 Mr. Mahesh Agarwal, Adv.
 Mr. L Badri Narayanan, Adv.
 Mrs. Sanjanthi Sajan Poovayya, Adv.
 Ms. Chetna Nayantara Rai, Adv.
 Ms. Sanjanthi Sajan Poovayya, Adv.
 Ms. Raksha Agarwal, Adv.
 Ms. Nitum Jain, Adv.
 Ms. Anisha Arya, Adv.

Mr. Naveen Hegde , AOR

Mr. Harish N Salve, Sr. Adv.
 Mr. V Lakshmikumaran, Adv.
 Mr. L Badri Narayanan, Adv.
 Ms. Charanya Lakshmikumaran, AOR
 Ms. Neha Choudhary, Adv.
 Ms. Nitum Jain, Adv.
 Ms. Umang Motiyani, Adv.
 Mr. Ayush Agarwal, Adv.
 Mr. Chetan Nayantara Rai, Adv.

For Respondent(s) :

Mr. Dhruv Mehta, Sr. Adv.
 Ms. Pritha Srikumar Iyer, AOR
 Mr. Pradeep Nayak, Adv.
 Mr. Sankeerth Vital, Adv.
 Mr. Abhyudaya Shishodia, Adv.
 Ms. Nandini Patil, Adv.
 Mr. Sohan Dua, Adv.
 Mr. Dhruv Garg, Adv.

Mr. Shubhranshu Padhi, AOR
 Mr. Akhil Anand, AOR

Mr. Harish N Salve, Sr. Adv.
 Mr. Sajan Poovayya, Sr. Adv.
 Mr. V Lakshmikumaran, Adv.
 Mr. Mahesh Agarwal, Adv.

Mr. L Badri Narayanan, Adv.
Ms. Charanya Lakshmikumaran, AOR
Ms. Chetna Nayantara Rai, Adv.
Ms. Neha Choudhary, Adv.
Ms. Umang Motiyani, Adv.
Mr. Ayush Agarwal, Adv.
Mrs. Sanjanthi Sajan Poovayya, Adv.
Ms. Raksha Agarwal, Adv.
Ms. Nitum Jain, Adv.
Ms. Anisha Arya, Adv.

Mr. Tarun Dua, AOR

Mr. Mahesh Agarwal, Adv.
Mr. Rishi Agrawala,, Adv.
Mr. Ankur Saigal, Adv.
Mr. Anshuman Srivastava, Adv.
Mr. Victor Das, Adv.
Ms. Deepshika Mishra, Adv.
Mr. E. C. Agrawala, AOR

Mr. Bhakti Vardhan Singh, AOR
Mr. Vikas Singh Jangra, Adv.
Mr. Pawan Kishore Singh, Adv.

Mr. Gurmeet Singh Makker, AOR
Mr. Mukesh Kumar Maroria, AOR

Mr. Abhay Anil Anturkar, Adv.
Mr. Dhtru Tank, Adv.
Mr. Aniruddha Awalgaonkar, Adv.
Mr. Sarthak Mehrotra, Adv.
Mr. Bhagwant Deshpande, Adv.
Ms. Subhi Pastor, Adv.
Ms. Surbhi Kapoor, AOR

Ms. Madhumita Bhattacharjee, AOR

Ms. Mansi Sood, Adv.
Mr. Sujoy Chatterjee, AOR

Mr. Raj Singh Rana, A.A.G.
Mr. Samar Vijay Singh, AOR
Ms. Kanika, Adv.
Mr. Makrand Pratap Singh, Adv.
Ms. Sabarni Som, Adv.
Mr. Fateh Singh, Adv.
Mr. Vaibhav Vikram Singh, Adv.
Mr. Keshav Mittal, Adv.
Mr. Rajmani Mohanty, Adv.
Mr. Rishabh Jain, Adv.
Mr. Bhupinder Singh Dalal, Adv.

Mr. Nikhil Goel, A.A.G.
Mr. Akshay Amritanshu, AOR
Ms. Drishti Saraf, Adv.
Ms. Pragya Upadhyay, Adv.
Ms. Siddhi Gupta, Adv.
Mr. Naveen Goel, Adv.
Ms. Drishti Rawal, Adv.

Mr. D. L. Chidananda, AOR

Dr. Abhishek Manu Singhvi, Sr. Adv.
Mr. Rakesh Dwivedi, Sr. Adv.
Mr. Suhaan Mukerji, Adv.
Mr. Abhishek Manchanda, Adv.
Mr. Adarsh Kumar, Adv.
Mr. L Nidhiram Sharma, Adv.
Mr. Sayandeep Pahari, Adv.
Mr. Tanmay Sinha, Adv.
Mr. Sudipta Bhattacharjee, Adv.
Mr. Eklavya Dwivedi, Adv.
Mr. Mohd. Yasir, Adv.
Mr. Onkar, Adv.
Mr. Arjyadeep Roy, Adv.
Mr. Harsh Makhija, Adv.
For M/s. PLR Chambers And Co., AOR

Dr. Vinod Kumar Tewari, AOR

Mr. Abhishek Malhotra, Sr. Adv.
Ms. Aanchal Tikmani, AOR

Mr. Pranav Sarthi, AOR

Mr. Ninad Laud, Adv.
Mr. Zubin Dash, Adv.
Mr. Dcosta Ivo Manuel Simon, AOR

Mr. Gopal Sankaranarayanan, Sr. Adv.
Mr. Prastut Mahesh Dalvi, AOR

UPON hearing the counsel the Court made the following
O R D E R

Notify these matters on Tuesday, the 13th May, 2025 for further arguments.

(VISHAL ANAND)
ASTT. REGISTRAR-cum-PS

(POOJA SHARMA)
COURT MASTER (NSH)

