



IN THE HIGH COURT OF JUDICATURE AT MADRAS

DATED: 15-07-2026

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THE HON'BLE MR JUSTICE SENTHILKUMAR RAMAMOORTHY

**WP No. 25554 of 2026
and W.M.P.Nos.27888 & 27889 of 2026**

Tvl.ANUPRIYA MILK AGENCY,
Represented by its Proprietor Thangasamy,
GSTIN 33BKVPTS8699A1Z9,
54-19 2021, 2nd Street,
Kodi Kambam Ranganathapuram,
Tiruppur - 641607

..Petitioner(s)

Vs

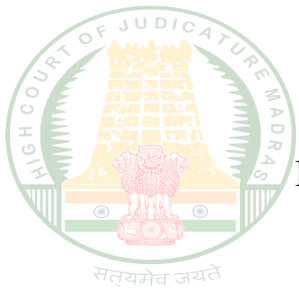
The Assistant Commissioner (ST) (FAC)
Tiruppur Lakshmi Nagar Assessment circle,
Commercial taxes Building, Tiruppur

..Respondent(s)

PRAYER: Writ Petition filed under Article 226 of The Constitution of India praying for the issuance of a Writ of Certiorarified Mandamus, call for the records on the file of the respondent in GSTIN 33BKVPT9699A1Z9 /2021-22 dated 17.11.2025 for the assessment year 2021-22 passed by the Respondent under section 73 of TNGST Act 2017 and to quash the same as cryptic, non-speaking, illegal, arbitrary, wholly without jurisdiction and direct the respondent to pass assessment order afresh after affording opportunity of being heard.

For Petitioner(s):

Mr.R.Ajithkumar



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WP No. 25554 of 2



For Respondent(s):

Ms.G.Dhana Madhri,
Government Counsel (Tax)

ORDER

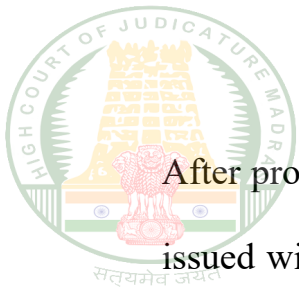
An order dated 17.11.2025 is assailed on the ground that the petitioner did not have a reasonable opportunity to contest the tax demand on merits.

2. Ms.G.Dhana Madhri, learned Government Counsel (Tax), accepts notice on behalf of the respondent.

3. On perusal of the impugned order, it is evident that such order was issued without hearing the petitioner. The writ petition has been filed after the period of limitation expired.

4. On instructions, learned counsel for the petitioner agrees to remit 25% of the disputed tax demand as a condition for remand. An endorsement to that effect has been made on the bundle.

5. Subject to the condition that the petitioner remits 25% of the disputed tax demand within *thirty days* from the date of receipt of a copy of this order, the impugned order is set aside and the matter is remanded for re-consideration.



After providing a reasonable opportunity to the petitioner, a fresh order shall be issued within **three months** from the date of remittance of 25% of the disputed tax demand.

6. The writ petition is disposed of on the above terms. Consequently, connected writ miscellaneous petitions are closed. There shall be no order as to costs.

15-07-2026

Index: Yes/No
Speaking/Non-speaking order
Neutral Citation: Yes/No
RNA

To

The Assistant Commissioner (ST) (FAC)
Tiruppur Lakshmi Nagar Assessment circle,
Commercial taxes Building,
Tiruppur



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WP No. 25554 of 2



SENTHILKUMAR RAMAMOORTHY, J.

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