

**PFL/2025****February 19, 2025**

**To**  
**BSE Limited**  
Phiroze Jeejeebhoy Tower  
Dalal Street,  
Mumbai – 400 001

**Sub: Clarification letter in furtherance of Disclosure under Regulation 30 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.**

Dear Sirs/Madam,

This is further to our disclosure letter dated February 18, 2025 pursuant to Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”).

We have received your email dated February 19, 2025 requiring fresh corporate announcement and additional details as per applicable SEBI Circular. We may clarify that the Special Leave Petition (“SLP”) was filed by Principal Commissioner of Income Tax Central 4 with the Hon’ble Supreme Court of India against the Order passed by Hon’ble High Court of Bombay.

We may further submit that we did not get notice of hearing when the Hon’ble Supreme Court dismissed the said SLP by passing an ex-parte order pronounced on January 15, 2025. We came to know from the website [www.taxmann.com](http://www.taxmann.com) only on February 18, 2025 where this order was posted.

The disclosure in the required format and copy of Order passed by Hon’ble Supreme Court of India are attached for your records.

We hope you will find the above in order.

Thanking you,

Yours Faithfully,  
**For Patanjali Foods Limited**

**Ramji Lal**  
Gupta

Digitally signed  
by Ramji Lal  
Gupta  
Date: 2025.02.19  
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**Ramji Lal Gupta**  
**Company Secretary**

**Encl.: Annexure I**

### Annexure I

Details as required under Para B of Part A of Schedule III of SEBI Listing Regulations are given below:

S. No.	Particulars	Details
i.	Brief details of litigation viz. name(s) of the opposing party, court/tribunal/agency where litigation is filed, brief details of dispute/litigation;	The Income Tax Department ("Deptt.") had raised pre-Corporate Insolvency Resolution process (CIRP) demands of Rs. 186 crores on the Company for various assessment years. While the orders raising such demands were challenged by the Deptt. before the Hon'ble NCLT ("NCLT") and the NCLT quashed such demand notices. The Deptt. had preferred a Writ Petition which was dismissed by the Hon'ble Bombay High Court. The Deptt. had filed a Special Leave Petition against the order of the Hon'ble High Court of Bombay which was dismissed by Hon'ble Supreme Court of India.
ii.	Expected financial implications, if any, due to compensation, penalty etc.	The demands of Rs. 186 crores for pre-Corporate Insolvency Resolution process (CIRP) period raised by Income Tax Deptt. has been quashed by Hon'ble Supreme Court of India.
iii.	Quantum of claims, if any	Not applicable

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[2025] 170 taxmann.com 752 (SC)[15-01-2025]

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**INCOME TAX/IBC : SLP dismissed against order of High Court that notice under section 148 issued by revenue to assessee-company after approval of resolution plan by NCLT for a period prior to closing date, was invalid and bad in law**

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[2025] 170 taxmann.com 752 (SC)

SUPREME COURT OF INDIA

Pr. Commissioner of Income-tax Central 4

v.

**Patanjali Foods Ltd.\***

PAMIDIGHANTAM SRI NARASIMHA AND MANOJ MISRA, JJ.  
SPECIAL LEAVE PETITION (CIVIL) DIARY NO(S). 54337 OF 2024†  
JANUARY 15, 2025

**Section 148 of the Income-tax Act, 1961, read with section 31 of the Insolvency and Bankruptcy Code, 2016 - Income Escaping Assessment - Issue of notice for (Illustrations) - High Court by impugned order held that where pursuant to resolution plan approved by NCLT, all claims of Governmental Authorities including income-tax dues were to stand fully and finally discharged and settled, notice under section 148 issued by revenue to assessee-company after approval of resolution plan by NCLT for a period prior to closing date, was invalid and bad in law - Whether SLP filed by revenue against said impugned order was to be dismissed - Held, yes [Para 3][In favour of assessee]**

#### **CASE REVIEW**

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SLP dismissed against *Principal Commissioner of Income-tax v. Patanjali Foods Ltd.* [2024] 161 taxmann.com 675 (Bombay) (para 3)

**N. Venkatraman, A.S.G. Raj Bahadur Yadav, AOR, Udai Khanna, V. Chandrashekhara Bharathi, H.R. Rao and Ms. Ira Singh, Advs. for the Petitioner.**

#### **ORDER**

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1. Delay condoned.
2. In view of the observations made in paragraph nos. 3 and 4 of the order impugned before us, we are not inclined to interfere.
3. The Special Leave Petition is, accordingly, dismissed.

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\*In favour of assessee.

† Arising out of order passed by High Court of Bombay in *Principal Commissioner of Income-tax v. Patanjali Foods Ltd.* [2024] 161 taxmann.com 675 (Bombay)