

ITEM NO.39

COURT NO.11

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) No(s). 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 INTELLIGENCE (HQS) & ORS.

Petitioner(s)

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

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. 253459/2023 - PERMISSION TO FILE ADDITIONAL DOCUMENTS/FACTS/ANNEXURES & IA No. 95899/2023 - 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 183995/202)

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)

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)

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)
 (IA No. 146408/2024 - STAY APPLICATION)
 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
 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 DOCUMENTS/FACTS/ANNEXURES)
 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 AND 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. 406/2025 (X)
 FOR ADMISSION
 (IA No. 103371/2025 - STAY APPLICATION)
 W.P. (C) No. 412/2025 (X)
 FOR ADMISSION

(IA No. 103843/2025 - EX-PARTE STAY)

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

FOR ADMISSION

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

FOR ADMISSION

W.P.(C) No. 467/2025 (X)

FOR ADMISSION

T.C.(C) No. 36/2025 (III)

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

T.C.(C) No. 37/2025 (XVI)

FOR ADMISSION

T.C.(C) No. 41/2025 (IV-A)

FOR ADMISSION

T.C.(C) No. 39/2025 (IV-A)

FOR ADMISSION

T.C.(C) No. 40/2025 (IV-A)

FOR ADMISSION

T.C.(C) No. 38/2025 (IV-A)

FOR ADMISSION

Date : 20-05-2025 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. Bharat Raichandani, Adv.

Mr. Aneesh Mittal, AOR

Mr. Mahesh Raichandani, Adv.

Mr. Lalitendra Gulani, Adv.

Ms. Sneha Ghose, Adv.

Ms. M Sarada, Adv.

Mr. Rajeev Gulani, AOR

Mr. Devansh Srivastava, AOR

Mr. Prateek Chadha, A.A.G.

Mr. D. L. Chidananda, AOR

Mr. N. Venkataraman, A.S.G.
 Mr. Gurmeet Singh Makker, AOR
 Mr. Udai Khanna, Adv.
 Mr. V. C. Bharathi, Adv.
 Mr. Chitvan Sinhal, Adv.

Mr. Devanshu Yadav, Adv.
 Mr. Deepak Singh, Adv.
 Ms. Anzu. K. Varkey, AOR
 Ms. Rohini Musa, AOR
 Mr. Kavim Gulati, Sr. Adv.
 Mr. Rajat Bose, Adv.
 Mr. Ankit Sachdeva, Adv.
 Ms. Shohini Bhattacharya, Adv.
 Mr. S. S. Shroff, AOR

Mr. Kavim Gulati, Sr. Adv.
 Mr. Ninad Laud, Adv.
 Mr. Parag Rao, Adv.
 Ms. Ishani Shekhar, Adv.
 Mr. Guruprasad Naik, Adv.
 Mr. Dcosta Ivo Manuel Simon, AOR

Mr. Harish N Salve, Sr. Adv.
 Mr. V Sridharan, 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. Chetan Nayantara Rai, Adv.
 Mr. L Badri Narayanan, Adv.
 Mrs. Sanjanthi Sajan Poovayya, Adv.
 Ms. Sanjanthi Sajan Poovayya, Adv.
 Ms. Chetna Nayantara Rai, Adv.
 Ms. Raksha Agarwal, Adv.
 Ms. Nitum Jain, Adv.
 Ms. Anisha Arya, Adv.

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

Mr. Jay Savla, Sr. Adv.
 Ms. Amrita Kumari, AOR
 Mr. Nirmal Devnani, Adv.

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

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

Mr. Arvind Datar, Sr. Adv.
 Mr. Vivek Reddy, Sr. Adv.
 Mr. Mahesh Agarwal, Adv.
 Mr. Vipin Jain, Adv.
 Mr. Alok Yadav, 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. Mukesh Kumar Maroria, AOR
 Mr. Naveen Hegde, AOR
 By Courts Motion

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. Gopal Sankaranarayanan, Sr. Adv.
 For M/s. PLR Chambers And Co., AOR

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.

Mr. Shubham Singh, 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. Sarthak Nema, Adv.

Mr. Awanish Kumar, Adv.

Ms. Udit 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

Dr. Abhishek Manu Singhvi, Sr. Adv.

Mr. Harish Salve, Sr. Adv.

Mr. Vikram Nankani, Sr. Adv.

Mr. Gopal Sankaranarayanan, 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.

Mr. Rohan Satija, Adv.

Ms. Gunjan Pande, Adv.

Mr. Tejas Raghav, Adv.

Mr. Yash Johri, Adv.

Ms. Chetna Rai, Adv.

Mr. Saurav Sunil, Adv.

Ms. Trisha Chandran, Adv.

Ms. Shivani Vij, 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 Sayta, Adv.
 Mr. Onkar, Adv.
 Mr. Vidushpat Singhania, Adv.
 Mr. Rajat Mittal, AOR
 Mr. Rishabh Prasad, Adv.
 Mr. Harsh Makhija, Adv.
 Mr. Arjyadeep Roy, Adv.
 Mr. Suprateek Neogi, Adv.
 Ms. Anishka Gupta, Adv.
 Mr. Priyanshu, Adv.

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

Ms. Smiti Verma, Adv.
 Mr. Pranay Shridhar Chitale, AOR
 Ms. Beleena Biju, Adv.
 Mr. Samyak Jain, Adv.
 Mr. Nimish Sharma, Adv.

Mr. Bharat Gupta, AOR

Mr. Anand Varma, AOR

Mr. Amit Anand Tiwari, Sr. A.A.G.
 Mr. Sabarish Subramanian, AOR
 Ms. Devyani Gupta, Adv.
 Mr. Vishnu Unnikrishnan, Adv.
 Ms. Jahnavi Taneja, Adv.
 Ms. Tanvi Anand, Adv.
 Mr. Veshal Tyagi, Adv.
 Ms. Arpitha Anna Mathew, Adv.
 Mr. Danish Saifi, Adv.

For Respondent(s) :

Mr. Dhruv Mehta, Sr. Adv.
 Ms. Priitha Srikumar Iyer, AOR
 Mr. Sankeerth Vittal, Adv.
 Mr. Abhyudaya Shishodia, Adv.
 Mr. Dhruv Garg, Adv.

Mr. Shubhranshu Padhi, AOR

Mr. Harish N Salve, Sr. Adv.
 Mr. V Sridharan, 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. Akhil Anand, AOR
Mr. Tarun Dua, AOR
Ms. Rohini Musa, AOR

Mr. Vivek Reddy, Sr. Adv.
Mr. Mahesh Agarwal, Adv.
Ms. Sayaree Basu Mallik, Adv.
Mr. Rishi Agrawala,, Adv.
Mr. Abhinabh Garg, Adv.
Mr. Alok Yadav, Adv.
Mr. Ankur Saigal, Adv.
Mr. Anshuman Srivastava, Adv.
Ms. Bedotroyi Gupta, Adv.
Mr. Victor Das, Adv.
Mr. E. C. Agrawala, AOR
Mr. Nanda Gopal Cuddapah, Adv.
Ms. Deepshika Mishra, Adv.
Ms. Saachi Awate, Adv.

Mr. Bhakti Vardhan Singh, AOR
Mr. Gurmeet Singh Makker, AOR
Mr. Mukesh Kumar Maroria, 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. Bhupinder Singh Dalal, Adv.
Ms. Soumyadeep Chatterjee, Adv.
Ms. Aishwarya Tandon, Adv.

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. Yoowanka Rymbai, Adv.

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

Mr. D. L. Chidananda, AOR

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.

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. Pramod Tiwari, Adv.
Mr. Vivek Tiwari, Adv.
Mr. Bhoopesh Pandey, Adv.
Ms. Priyanka Dubey, Adv.
Mr. Amit Kumar Pandey, Adv.
Mr. Bhavya Goyal, Adv.

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

List the matters for further arguments on 21-5-2025 as
part-heard.

(VISHAL ANAND)
ASTT. REGISTRAR-cum-PS

(POOJA SHARMA)
COURT MASTER (NSH)