Lexport Interpreting India for commerce

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# LEXPORT NEWSLETTER

## OCTOBER 2026 | WEEK 5

**Dear Readers,**

This weekly newsletter offers you a concise analysis of important developments, notable judgments, and noteworthy regulatory amendments and developments in the corporate and financial sectors.

This newsletter will cover updates inter alia from **Banking Laws & FEMA, Corporate Laws, Securities Laws and Capital Markets, Competition Laws, Indirect Taxes, Customs and Foreign Trade, Intellectual Property Laws, and Arbitration Laws.**

Acknowledging the significance of these updates and the need to stay informed, this newsletter provides a concise overview of the various changes brought in by our proactive regulatory authorities and the courts.

Feedback and suggestions will be much appreciated. Please feel free to write to us at mail@lexport.in.

Regards,
Team Lexport




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# Indirect Tax

**An Advocate Cannot Be Criminally Prosecuted Merely Because a Legal Opinion Turns Out Incorrect: Patna High Court**

The Patna High Court held that an advocate cannot be subjected to criminal prosecution merely because a legal opinion furnished in the course of professional duties subsequently turns out to be incorrect. However, criminal liability may arise where an advocate deliberately provides a false or misleading opinion in collusion with others to facilitate fraud.

The Court was hearing a petition filed by a UCO Bank panel advocate challenging criminal proceedings initiated against him in connection with an alleged bank loan fraud involving forged property documents. The advocate had furnished legal opinions concerning properties offered as collateral security for loans. He contended that he had advised the Bank to independently verify the original property documents and had no role in the decision to sanction or disburse the loans.

Distinguishing professional negligence from criminal liability, the Court observed that an advocate may face consequences for careless or negligent advice, including professional disciplinary proceedings. However, an error of judgment or an opinion that is subsequently found to be incorrect does not, by itself, attract criminal prosecution.

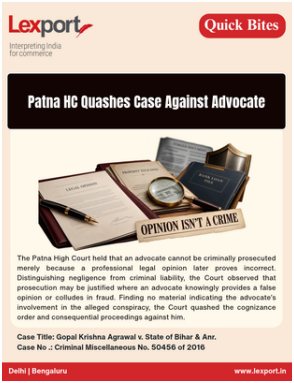
The Court clarified that criminal liability may arise where an advocate knowingly furnishes a false opinion, acts with dishonest intent, receives illegal gratification, or colludes with others to facilitate cheating or fraud.

Finding no material indicating that the advocate had participated in the alleged conspiracy or deliberately facilitated the fraud, the Court held that the essential ingredients of the alleged offences were not made out. Accordingly, it quashed the cognizance order and consequential criminal proceedings against the advocate.

Gopal Krishna Agrawal v. State of Bihar & Anr., Criminal Miscellaneous No. 50456 of 2016.



**Soumya Shrivastava**



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# Indirect Tax

**CBIC issues eight GST Circulars to streamline Registration, Adjudication, ITC and Export Refunds**

The Central Board of Indirect Taxes and Customs ("CBIC"), pursuant to the recommendations of the 57th GST Council Meeting, has issued eight circulars dated 26 October 2026, introducing clarifications and procedural reforms across GST registration, adjudication, input tax credit ("ITC"), appeals and export refunds.

Simplified Registration and Fairer Adjudication: Circular No. 257/03/2026-GST prescribes documentation requirements and restricts unwarranted queries or demands for additional documents during registration. Circular No. 258/04/2026-GST establishes guidelines for demand, adjudication and appeal proceedings, emphasising specific, evidence-based show cause notices ("SCNs"), substantiated allegations of fraud or suppression, reasoned adjudication orders, compliance with principles of natural justice and the prohibition on confirming demands beyond the SCN.

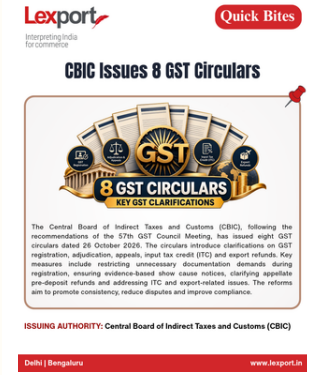
Appeal Pre-deposits and ITC: Circular No. 259/05/2026-GST clarifies the computation and refund of appellate pre-deposits, including the position that a proposed departmental appeal, without a stay, does not by itself justify withholding a refund. Circular No. 260/06/2026-GST clarifies the treatment of Input Service Distributor-related credit for turnover and refund computations. Circular No. 261/07/2026-GST addresses ITC availment by banks and NBFCs under Section 17(4). Circular No. 262/08/2026-GST clarifies ITC eligibility on demonstration vehicles under the dealer-agency model.

Export Relief: Circular No. 263/09/2026-GST recognises qualifying set-off of export receivables against import payables, in accordance with RBI directions, for determining fulfilment of the export-of-services realisation condition. Circular No. 264/10/2026-GST addresses the omission of Rule 96(10).

Collectively, these clarifications seek to reduce avoidable disputes, standardise tax administration and improve cash-flow certainty for businesses. Their practical impact will depend on consistent implementation by tax authorities.



**Soumya Shrivastava**






# Indirect Tax

CGST Amendment Rules, 2026: Comprehensive Changes to Registration, Input Tax Credit, Refunds and GST Compliance

The Central Government, vide Notification No. 05/2026–Central Tax dated 26 October 2026 [G.S.R. 919(E)], has notified the Central Goods and Services Tax (Amendment) Rules, 2026, introducing 67 numbered amendment clauses to the CGST Rules, 2017. The amendments cover registration, cancellation, input tax credit ("ITC"), refund processing, electronic credit ledger restrictions, return filing and prescribed GST forms. While the amendments generally come into force on 1 November 2026, specified provisions commence on 1 December 2026, 1 January 2027 and 1 April 2027.

1. Registration through E-Commerce Warehouses: Newly inserted Rule 14B enables eligible suppliers already registered in a State where they have a physical presence to obtain registration in another State by declaring a consenting e-commerce operator's warehouse as their principal place of business. The stated eligibility conditions include supplying goods through an e-commerce operator required to collect tax at source under Section 52, monthly output tax liability not exceeding ₹2.5 lakh on specified supplies to registered persons, and the operator's consent. The process involves prescribed applications, Aadhaar authentication and document and premises verification, alongside specified deemed-approval and withdrawal procedures.

2. Registration Amendments and Cancellation: Substituted Rule 19 revises the procedure for amending registration particulars, including prescribed timelines and officer scrutiny in specified cases. Rule 20 revises voluntary cancellation procedures, including the filing of pending returns and consideration of corresponding GSTR-3B returns where GSTR-1 or the Invoice Furnishing Facility ("IFF") has been used. Amendments to Rules 21, 21A, 22 and insertion of Rule 23A address cancellation grounds, suspension, system-driven cancellation and revocation. The system-based procedures under Rules 21A, 22 and 23A are scheduled to commence on 1 April 2027.

3. ITC and Input Service Distributor ("ISD"): Amendments to Rules 36, 39, 44, 54 and 60 revise documentation, distribution and reporting requirements concerning ISD credit and ITC reversal. These changes require businesses to review the treatment of common input services, credit distribution records and supporting documentation. The amendment to Rule 44 takes effect on 1 December 2026.



**Soumya Shrivastava**

4. Refunds of Accumulated ITC: Amendments to Rule 89 revise refund documentation and computation for specified zero-rated and inverted-duty-structure supplies. The specified 1.5-times domestic-supply cap under Rule 89(4)(C) is removed from 1 November 2026. Eligible input-service credit is included in the relevant inverted-duty-structure refund calculation for credit availed on or after 1 November 2026. Eligible capital-goods credit is introduced on a phased basis from 1 April 2027, with the prescribed formula spreading such credit over 60 months. These benefits remain subject to the applicable statutory conditions and revised computation requirements.

5. Faster Refund Processing: Rule 90 prescribes a ten-day period for issuing the refund acknowledgement in FORM GST RFD-02 or deficiency memo in FORM GST RFD-03. Where neither is issued within the prescribed period, the application is deemed acknowledged in qualifying cases. Amendments to Rules 91 and 92 facilitate system-generated provisional refund processing and refund-sanction orders, including corresponding payment processing and adjustment against outstanding demands, as applicable.

6. Electronic Credit Ledger and Other Procedural Changes: The amendments revise Rule 86A concerning restrictions on the electronic credit ledger, with specified changes effective from 1 April 2027. Amendments to Rule 86 address ledger debits for refunds. Rule 138 extends specified e-way bill provisions for rail transport to metro railway, while Rule 159 revises the prescribed documentation concerning attachment and objections.

7. Changes to GST Forms: Amendments 25–67 revise prescribed forms across the CMP, REG, GSTR, RFD, DRC and INV series. Significant changes include revised registration and cancellation forms; amendments to GSTR-6 and GSTR-6A for ISD reporting; revised refund application FORM GST RFD-01 from 1 December 2026; changes to GSTR-7A from 1 January 2027; amendments to DRC forms, including new forms relating to electronic credit ledger restrictions and objections from 1 April 2027; and the revised e-invoice schema in FORM GST INV-01 from 1 January 2027.

Practical Implications: Businesses should prepare a phased implementation plan aligned with each provision's effective date. Key priorities include reviewing multi-State e-commerce arrangements, updating registration and cancellation records, reconciling ISD credit, revisiting refund calculations and capital-goods ITC tracking, monitoring electronic credit ledger restrictions, and updating GST return, refund and e-invoicing systems.

The amendments represent a substantial procedural overhaul of GST administration. Taxpayers should examine the notification alongside the precise wording of each amended rule and prescribed form, particularly where eligibility conditions, transitional dates or system-generated procedures determine the availability of a benefit.

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# Indirect Tax

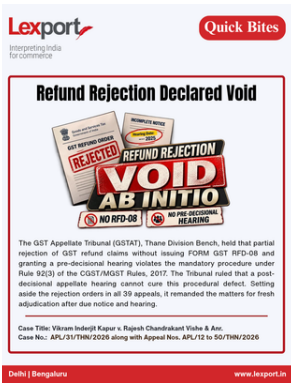
**Refund Rejection without FORM GST RFD-08 and Pre-Decisional Hearing is void ab initio: GSTAT Thane**

The Goods and Services Tax Appellate Tribunal ("GSTAT"), Thane Division Bench, in a batch of 39 appeals filed by Vikram Inderjit Kapur, Director of M/s. Lavino Kapur Cottons Pvt. Ltd., examined the validity of partial rejection of accumulated Input Tax Credit ("ITC") refund claims on the ground of ITC mismatch. The appellant, a 100% Export Oriented Unit ("EOU") engaged in manufacturing and exporting absorbent cotton, had claimed refunds under Section 16(3)(a) of the IGST Act, 2017. The refund claims were partly rejected under Section 54 of the CGST/MGST Acts, 2017, without issuance of a show cause notice in FORM GST RFD-08 or grant of an opportunity of hearing, contrary to Rule 92(3) of the CGST/MGST Rules, 2017. Although the First Appellate Authority acknowledged this procedural lapse, it upheld the rejection on the ground that the appellant had failed to produce certain invoices and capital-goods ITC details during the appellate proceedings. The appellant also relied on Notification No. 30/2020-Central Tax dated 3 April 2020 and Circular No. 142/12/2020-GST dated 9 October 2020 concerning the cumulative application of Rule 36(4) for February to August 2020. The Tribunal held that Rule 92(3), by using the word "shall" and expressly prohibiting rejection without an opportunity of hearing, mandates issuance of FORM GST RFD-08 and a pre-decisional hearing before rejecting any part of a refund claim. A post-decisional hearing at the appellate stage cannot cure this fundamental procedural defect, and an order passed in disregard of the mandatory procedure is void ab initio. Without examining the substantive merits of the ITC mismatch or the COVID-period relaxations, the Tribunal set aside the impugned Orders-in-Original and Orders-in-Appeal to the extent of refund rejection and remanded all 39 matters for de novo processing. The adjudicating authority was directed to issue a detailed, invoice-wise notice in FORM GST RFD-08, allow a reply in FORM GST RFD-09, grant a personal hearing and pass a reasoned order in FORM GST RFD-06. All 39 appeals were allowed by way of remand.

Vikram Inderjit Kapur v. Rajesh Chandrakant Vishe, Deputy Commissioner of State Tax, APL/31/THN/2026 with Appeal Nos. APL/12 to 50/THN/2026, GSTAT, Division Bench, Thane.



**Soumya Shrivastava**






# Indirect Tax

**Provisional freezing of Bank Accounts cannot be justified solely through Affidavit-In-Reply: Bombay High Court**

The Bombay High Court, in 1Pay Mobileware Private Limited v. Union of India & Ors., examined the legality of provisional attachment of bank accounts under Section 83 of the Central Goods and Services Tax Act, 2017 ("CGST Act"). The petitioner, an RBI-authorised payment aggregator, challenged the freezing of its current and escrow accounts during an investigation into alleged GST evasion connected with online money gaming activities. The authorities alleged that approximately 88 merchants using the petitioner's platform were non-existent or non-functional and were allegedly involved in such activities, with the preliminary investigation indicating substantial tax evasion. The petitioner contended that it merely provided payment aggregation services and that the escrow funds were collected from customers for settlement to merchants and other beneficiaries. The Court held that the power of provisional attachment under Section 83 is stringent and must be exercised on the basis of tangible material establishing the necessity of protecting government revenue. The impugned orders failed to identify any specific GST liability of the petitioner, explain its alleged role in the evasion, identify the relevant transactions or establish the statutory basis for attaching its property. The Court further held that the deficiencies in the attachment orders could not be cured by the department through an affidavit-in-reply, as the validity of an order must be assessed on the grounds supporting the order itself. The allegations concerning third-party merchants and the petitioner's alleged non-cooperation did not, by themselves, establish the statutory conditions for attachment. The Court also observed that funds held in the petitioner's escrow account for the benefit of merchants and other beneficiaries could not be treated as the petitioner's own property for attachment in the circumstances before it. Accordingly, the Court quashed the provisional attachment orders and the subsequent orders continuing the attachment, while leaving the authorities at liberty to pass appropriate orders in accordance with law.

1Pay Mobileware Private Limited v. Union of India & Ors., Writ Petition No. 4586 of 2026, 2026 LLBiz HC (BOM) 577, Bombay High Court.



**Soumya Shrivastava**






# Indirect Tax

**Delhi High Court declines to quash GST Show Cause Notice in alleged fake ITC network; Statutory Appeal is the appropriate remedy**

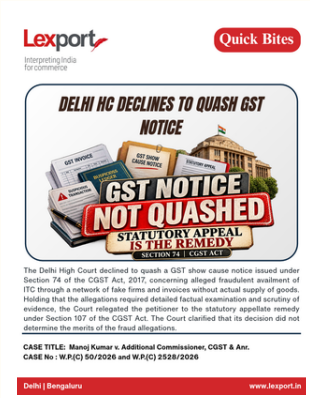
The Delhi High Court declined to exercise its writ jurisdiction in a matter involving allegations of fraudulent availment of Input Tax Credit ("ITC") through an extensive network of allegedly fake firms and invoices issued without actual supply of goods. The proceedings concerned a show cause notice issued under Section 74 of the Central Goods and Services Tax Act, 2017, in the context of an alleged wider ITC fraud involving multiple entities. The petitioner challenged the proceedings before the High Court, seeking interference with the show cause notice. The Court considered the nature of the allegations and the availability of the statutory appellate remedy under Section 107 of the CGST Act. It observed that disputes involving alleged fraudulent ITC availment and interconnected transactions may require detailed factual examination, scrutiny of documentary evidence and consideration of the findings recorded by the tax authorities. Such issues are ordinarily more appropriately examined through the statutory adjudication and appellate framework rather than in writ proceedings under Article 226 of the Constitution. Accordingly, the Court declined to interfere with the impugned proceedings and relegated the petitioner to the available statutory remedy. The decision reiterates the limited scope of writ intervention in GST disputes involving allegations of organised fake invoicing and wrongful ITC availment, particularly where the issues require factual determination by the competent authorities. The refusal to entertain the writ petition does not, by itself, constitute a final adjudication of the underlying allegations of fraudulent ITC availment.

Manoj Kumar, Proprietor, M K Steel Traders v. Additional Commissioner, Central Goods and Services Tax & Anr. W\.P.(C) 50/2026 and W\.P.(C) 2528/2026



Soumya Shrivastava






# Intellectual Property Rights

**Delhi High Court Grants Ex Parte Injunction to UPL Against Sale of Counterfeit Agrochemical Products**

The Delhi High Court granted an ex parte ad-interim injunction in favour of UPL Limited and UPL Sustainable Agri Solutions Limited, restraining Agro Orbit Hub Pvt. Ltd. and unknown sellers from dealing in unauthorised agrochemical products bearing the plaintiffs' registered trademarks. The plaintiffs alleged that the defendants were offering counterfeit and infringing products through the Agro Orbit website and mobile application, including by featuring them under "Popular Brand" and "Flash Deals".

The Court noted that an inspection of the defendant's premises in Lucknow had revealed products bearing the plaintiffs' marks, while the defendant failed to produce the requisite Principal Certificate. A Stop Sale Notice had consequently been issued. The Court also observed that the defendant, despite claiming to be an intermediary, was actively promoting the infringing products and had failed to comply with the licensing requirements under the Insecticides Act, 1968 and the Insecticides Rules, 1971.

Accordingly, the Court restrained the defendants from manufacturing, selling, advertising or otherwise dealing in the infringing products without the plaintiffs' authorisation and requisite Principal Certificate. Agro Orbit was further directed to remove the infringing listings within 72 hours and disclose details of the sellers, suppliers, bank accounts, sales and payments within four weeks.

UPL Limited & Anr. v. Agro Orbit Hub Pvt. Ltd. & Anr., CS(COMM) 1130/2026



**Anushka Tripathi**








# Intellectual Property Rights

**Bombay High Court Grants Ad-Interim Protection to "NATURAL" Against Fake Franchise Website**

The Bombay High Court found a strong prima facie case in favour of Siddhant Ice Creams LLP and its co-plaintiff, proprietors of the "NATURAL" family of marks, against unknown persons operating a counterfeit website impersonating the NATURAL Ice Cream business. The website allegedly issued forged franchise letters and emails to mislead prospective franchisees into making payments in return for purported franchise licences. The Court noted that the plaintiffs had been carrying on the business since 1984 and had built a substantial nationwide franchise network. Considering the plaintiffs' trademark registrations, business history, turnover and promotional expenditure, the Court held that a strong prima facie case was made out for ad-interim relief. Accordingly, it granted protection against infringement of the plaintiffs' registered trademarks and copyrights, as well as passing off, restraining the defendants from using the NATURAL family marks or deceptively similar marks in connection with the impugned website, emails and franchise-related communications.

Siddhant Ice Creams LLP & Anr. v. John Doe(s) & Ors., Commercial IP Suit (L) No. 328 of 2026

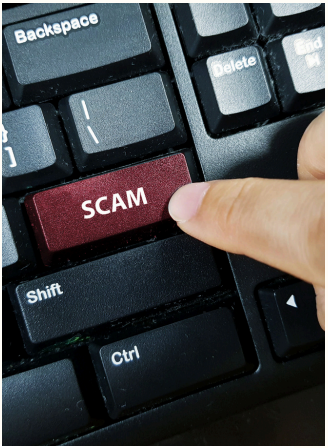


**Anushka Tripathi**









# Intellectual Property Rights

**Madras High Court Upholds Registration of "NICE" Despite Phonetic Similarity with "NISE"**

The Madras High Court dismissed Dr. Reddy's Laboratories' appeal challenging the registration of Nice Neotech Medical Systems' device mark "nice" in Class 10 for medical equipment and apparatus. Dr. Reddy's alleged that the mark was deceptively similar to its earlier registered "NISE" trademark in Class 5 and was likely to cause confusion. The Court acknowledged that "NISE" and "nice" were phonetically similar, with the only difference being the substitution of "S" with "C". However, applying the principles laid down in Cadila Health Care Ltd. v. Cadila Pharmaceuticals Ltd., it held that phonetic similarity alone was not conclusive. The competing goods differed in nature, purpose and use, while their purchasers and trade channels were also distinct. Pharmaceutical products were purchased through pharmacies, whereas specialised neonatal equipment was procured by hospitals and medical institutions through technical evaluation and specialised processes. The Court further held that Dr. Reddy's had not established a likelihood of commercial association, dishonest adoption, well-known trademark protection under Section 11(2), or passing off under Section 11(3)(a). Accordingly, the appeal was dismissed, upholding the Registrar's decision to allow registration of "nice".

Dr. Reddy's Laboratories Limited v. Registrar of Trade Marks & Anr., CMA(TM) No. 31 of 2025



**Anushka Tripathi**








# Intellectual Property Rights

**Delhi High Court Protects Kangana Ranaut's Personality Rights Against AI-Generated Deepfakes**

The Delhi High Court granted an ex parte ad interim injunction in favour of Kangana Ranaut, recognising her right to protect her name, image, likeness, voice and other personality attributes from unauthorised exploitation. The suit concerned AI-generated sexual deepfakes, morphed images and videos, fabricated speeches and false statements circulated on social media, falsely depicting her in situations and attributing statements to her.

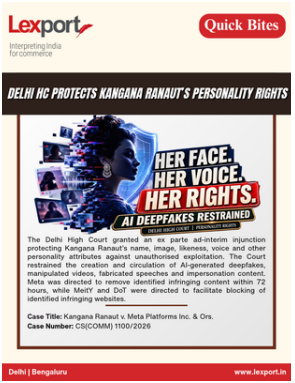
The Court observed that her established public persona carries proprietary value and that the impugned content could harm her reputation and dignity. Finding a strong prima facie case and a likelihood of irreparable injury, it restrained the defendants, including John Does, from unauthorised use of her personality attributes, dissemination of deepfakes and manipulated content, and impersonation or false claims of association with her. Meta was directed to remove the identified content within 72 hours, while the Ministry of Electronics and Information Technology and the Department of Telecommunications were directed to issue necessary directions to ISPs and TSPs to block the identified infringing websites. The Court also permitted additional infringing URLs and accounts to be notified for removal without fresh proceedings.

Kangana Ranaut v. Meta P**latforms Inc. & Ors., CS(COMM) 1100/2026**



**Anushka Tripathi**








# Intellectual Property Rights

**Delhi High Court Confirms Injunction Against Jabsons' Use of "HOT MIX" for Namkeen**

The Delhi High Court confirmed the interim injunction restraining Jabsons Foods Pvt. Ltd. from using "HOT MIX" for its namkeen products, finding it deceptively similar to the essential feature of Sunit Shah's registered "SHAH HOT MIX" label. The plaintiff had been using the mark since at least the mid-1990s, whereas Jabsons commenced its use only in October 2023.

The Court held that "HOT MIX", when considered as a composite expression, was suggestive rather than descriptive of namkeen and had prima facie acquired distinctiveness through the plaintiff's long and continuous use. It further observed that the disclaimer in the plaintiff's registration did not specifically cover "HOT MIX" and, in any event, did not affect rights acquired through prior use. Jabsons also failed to establish that the expression was common to the trade, as it produced no evidence of substantial third-party use. Since both parties prominently displayed "HOT MIX" in an identical manner on their packaging for identical goods, the Court found prima facie infringement and passing off. The addition of the house mark "JABSONS" did not negate the likelihood of confusion.

Accordingly, the Court confirmed the injunction and restrained Jabsons from using "HOT MIX" or any deceptively similar mark for namkeen and allied goods. It clarified that Jabsons could continue using its house mark and the individual words "hot" and "mix" descriptively, but not the expression "HOT MIX" as a product name or trademark. The plaintiff's injunction application was allowed, and Jabsons' application seeking vacation of the injunction was dismissed.

Sunit Shah v. M/s. Jabsons Foods Pvt. Ltd., CS(COMM) 641/2024



**Anushka Tripathi**









# Litigation

**Company Law / NCLAT / Concealment of Material Facts**

Concealment of Earlier Defective Proceedings Bars Re-Agitation of Same Claims: NCLAT

The National Company Law Appellate Tribunal (NCLAT), Principal Bench, New Delhi, has dismissed an appeal challenging the rejection of an intervention application in an oppression and mismanagement dispute, holding that the appellant's concealment of earlier proceedings seeking similar relief disentitled him from obtaining relief. The Tribunal emphasised that litigants must approach judicial forums with clean hands.

The appellant, Abhinandan Complex Private Limited and others, claimed to have invested ₹16.71 crore between 2012 and 2014 under a Memorandum of Understanding that allegedly entitled them to a 33.33% stake in Goldstone Cements Limited. They alleged that subsequent share allotments diluted their stake to 1.62%, excluding them from corporate governance and participation in a 2024 rights issue. The NCLT Guwahati Bench rejected their intervention application, including on the ground that they did not meet the shareholding eligibility requirements under Section 244 of the Companies Act, 2013, for proceedings under Sections 241–242.

The NCLAT noted that the appellant had previously filed an intervention application and a separate company petition raising similar grievances, both of which were closed after defects were not rectified under Rule 28(4) of the NCLT Rules, 2016. The Tribunal held that, once those proceedings had been closed, the appellant could not re-agitate the same relief through another company petition or intervention application. It further found that the failure to disclose the earlier proceedings amounted to intentional concealment, relying on the Supreme Court's decision in M/s Maxim India Integrated Circuit Design Pvt. Ltd. v. Andappa (D) LRs & Ors.

Accordingly, the NCLAT deprecated the appellant's conduct and dismissed the appeal as lacking merit. The order underscores that failure to cure defects in earlier proceedings, coupled with concealment of those proceedings, can prevent a litigant from pursuing the same claims afresh.

Abhinandan Complex Private Limited & Ors. v. Prakash More & Ors.

Case No.: Company Appeal (AT) No. 374 of 2026
Forum: NCLAT, Principal Bench, New Delhi






Meyank Pandey



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# Litigation

**Supreme Court Cancels Bail of Espionage Accused, Holds Non-Supply of Written Grounds of Arrest Not an Automatic Ground for Bail**

The Supreme Court allowed the State of Rajasthan's appeal and set aside the Rajasthan High Court's order granting regular bail under Section 483 BNSS to Jhabra Ram, who is accused under Sections 3 and 9 of the Official Secrets Act, 1923 and Sections 152 and 238(b) of the BNS. The High Court had granted bail solely because written grounds of arrest were not furnished before or at remand, relying on Mihir Rajesh Shah.

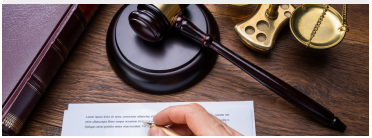
The Court accepted that communication of grounds of arrest under Article 22(1) and Section 47 BNSS is a crucial safeguard, but held that the record showed substantial and effective compliance. The accused had been served Section 8(1) OSA notices before arrest and was told the factual basis of his arrest, as the High Court itself noted from the case diary. The signed Arrest Memo, read out before two witnesses, set out the material against him, and his brother was informed by phone ten minutes after arrest. At remand he was represented by counsel who raised no objection on this score, and the Magistrate recorded that sufficient grounds existed. Applying the prejudice-oriented test from State of Karnataka v. Sri Darshan and the object of Article 22(1) explained in Kasireddy Upender Reddy, it found no demonstrable prejudice. It added that a technical objection on the mode of communication cannot override the gravity of the accusation and national security considerations in a bail application.

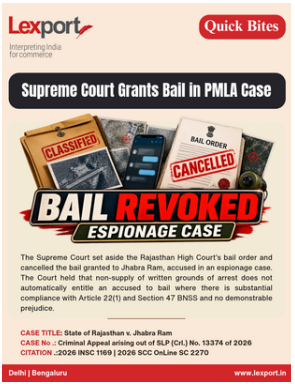
The Court set aside the High Court's order and cancelled the bail, directing Jhabra Ram to surrender within two weeks, failing which the State may take him into custody. It clarified that it expressed no opinion on the merits of the case, and pending applications were disposed of.

State of Rajasthan v. Jhabra Ram, SLP (Crl.) No. 13374 of 2026, 2026 SCC OnLine SC 2270



Maitreya Mahaley








# Litigation

**Supreme Court Declines to Clarify 2023 Ruling in Long-Running Arbitral Award Execution, Asks Law Commission to Study Enforcement of Awards**

The Supreme Court allowed Royal Construction Company's appeal against an interim order of the Delhi High Court, which had let the parties seek clarification from the Supreme Court of its 10 October 2023 judgment. The question was why the 2009 payment of the principal in rupees had not been brought to the Court's notice earlier. The Court also dismissed a miscellaneous application seeking modification of the 2023 judgment on the same ground. The underlying award dated 10 August 2002 is now more than twenty-four years old.

The Court held that the Division Bench erred in reading the scope of the earlier decision. In 2023 it was answering only the certified substantial question of law on the date for converting the awarded sum into rupees, and it held that no such date arose and that payment was to be in foreign currency. It had no occasion to examine facts about amounts deposited or withdrawn. It cannot, in the guise of clarification, assume a supervisory role over continuing execution proceedings. Once the certified question was answered, the appellate proceedings stood exhausted, and such factual issues are for the executing court and the appellate court above it.

The Court left the applicant at liberty to raise all objections on adjustment or set-off before the executing court. In an epilogue, it expressed concern at the delay, observing that the promise of arbitration remains unfulfilled if enforcement takes decades. It requested the Law Commission of India to study the statutory and procedural framework for executing arbitral awards, including domestic and foreign awards, and directed the Registry to send it a copy of the judgment.

Royal Construction Company Pvt. Ltd. v. National Projects Construction Corporation, Civil Appeal @ SLP (C) No. 14005 of 2026, with M.A. Diary No. 48152 of 2026 in C.A. No. 1991 of 2019, 2026 SCC OnLine SC 2271



**Maitreya Mahaley**








# Litigation

**Supreme Court Upholds Reopening of Assessments Against Sabharwal Brothers for AY 2008-09 and 2009-10 Over Alleged Overvaluation of Shares**

The Supreme Court dismissed the appeals of Chetan Sabharwal and Nitin Sabharwal and upheld the Section 148 notice dated 31 March 2015 reopening their assessments for AY 2008-09 and 2009-10, affirming the Delhi High Court. The notice came four years after the Section 143(3) assessment of 22 December 2010. It rested on a report of the Investigation Unit, Noida, which concluded prima facie that shares of Pawan Impex and SVIIT Software, sold under agreements of 19 October 2007 for Rs. 195 crore and Rs. 60 crore, were overvalued against the cost of their land and building. The report also found that the sale proceeds were the major source of funds for a property purchase at Sikandara Road, New Delhi.

The Court held that "reason to believe" means cause or justification, and that the AO need not have finally established escapement. The AO needs tangible material with a live link to the belief, and the sufficiency of the grounds is not justiciable. The investigation report, prepared after the assessment, was fresh material. The reasons also recorded the adjustment of gains to later years and the Section 54F claim, so the argument that overvaluation cannot cause escapement in the seller's hands failed. On change of opinion, Nitin's returns were processed only by a Section 143(1) intimation, so no opinion was formed. Chetan's 143(3) order reflected no opinion, express or implied, on the matters in the reasons, and the undervaluation had not come to light during the original inquiry.

The Court held the notice valid and recorded the principles on "reason to believe" and "change of opinion" at paragraphs 41 and 46.

Chetan Sabharwal v. Assistant Commissioner of Income Tax, Circle 28(1), New Delhi, Civil Appeal No. 13953 of 2026 (@ SLP (C) No. 20045 of 2019), with connected appeals, 2026 SCC OnLine SC 2274



**Maitreya Mahaley**








# Litigation

**Supreme Court Holds Reassessment Void for Want of Section 143(2) Notice, Rules Section 292BB Cannot Cure Non-Issuance**

The Supreme Court dismissed the Revenue's appeals against Orissa Mining Corporation Ltd. and Bijoy Kishore Mohanty and affirmed the ITAT and High Court view that reassessment orders framed without a Section 143(2) notice were vitiated. In both cases, after Section 148 notices, the assessee asked that the earlier Section 139 return be treated as the return in response, or refiled the same return. No Section 143(2) notice was issued, and the assessments proceeded on Section 142(1) notices, with the assessees participating throughout.

Relying on Hotel Blue Moon, the Court held that a Section 143(2) notice is mandatory and a sine qua non for reassessment under Section 147, and that its omission is not a curable procedural irregularity. Section 292BB, it held, deems notices that were issued but defectively served to be valid where the assessee participated, and it cannot apply where the Revenue admits no notice was issued, consistent with Laxman Das Khandelwal. An assessee who reiterates an earlier return in response to a Section 148 notice remains entitled to a Section 143(2) notice, since the Assessing Officer's obligation to call for evidence supporting the return continues. A Section 142(1) letter issued during reassessment, asking the assessee to explain the grounds, cannot substitute for it and cannot validate a proceeding that was non est.

The Court answered all three questions of law against the Revenue and dismissed the appeals as devoid of merit.

Principal Commissioner of Income Tax, Bhubaneswar v. Orissa Mining Corporation Ltd., Civil Appeal @ SLP (C) No. 14546 of 2023, with connected appeals, 2026 SCC OnLine SC 2268

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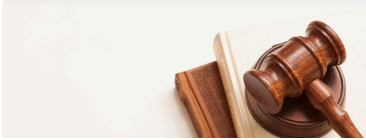
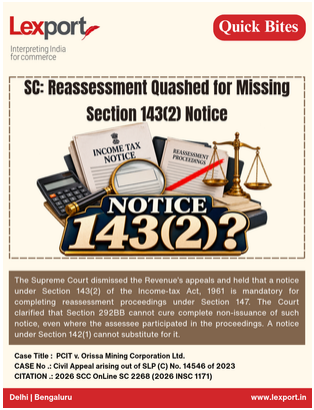
**Maitreya Mahaley**








# Litigation

**M/s Sanmati Builders v. Union of India, FAO (COMM) 95/2023 (Delhi High Court, decided on 29.10.2026)**

The Delhi High Court allowed the appeal against the Commercial Court's order setting aside an arbitral award arising from the termination of a railway works contract and forfeiture of the Earnest Money Deposit (EMD). The principal dispute concerned the introduction of two additional conditions in the detailed Letter of Acceptance dated 01.02.2017, which the contractor had promptly objected to, contending that they were not part of the original tender or its bid.

The Court held that an acceptance materially varying the terms of an offer does not, merely by being described as an acceptance, establish the other party's assent to the additional conditions. A concluded contract necessarily requires consensus on its essential terms. The Commercial Court had erred in treating the initial acceptance as conclusive without examining the subsequent conditions and the contractor's objection. The Arbitrator's conclusion that termination was premature represented a plausible view of the contractual correspondence and could not be displaced merely because another interpretation was possible under Section 34 of the Arbitration and Conciliation Act, 1996.

The Court also restored the award of ₹12.09 lakh towards alleged irrecoverable advances, observing that the Arbitrator had considered documentary material including bank statements, vouchers, income-tax returns and audited financial statements. It further held that Clause 64(6) of the GCC could not operate as an absolute bar to awarding costs under Section 31A. The rejection of the Union's counterclaim was also restored.

Law: Courts exercising jurisdiction under Sections 34 and 37 of the Arbitration and Conciliation Act cannot substitute their own interpretation or reappreciate evidence merely because another view is possible, where the arbitral tribunal has adopted a plausible view not falling within the statutory grounds for interference.



**Hardik Jain**








# Litigation

**Antara Majumdar v. Vimla Choudhary & Ors., RFA 810/2019 – Delhi High Court (29.10.2026)**

The Delhi High Court dismissed an appeal challenging the final decree in a partition suit concerning a property in Paschim Puri, Delhi. The Trial Court had declared seven legal heirs entitled to equal 1/7th shares in the property and subsequently directed that the property be sold and the proceeds distributed, since it was incapable of division by metes and bounds.

The Appellant, who had purchased the property through a registered sale deed dated 22.05.2012, contended that she was not afforded an effective opportunity to lead evidence to establish herself as a bona fide purchaser. The High Court rejected this contention, noting that she had repeatedly failed to appear before the Trial Court despite adequate opportunities and had not demonstrated sufficient cause for her absence. The Court also noted that she had not challenged the preliminary decrees declaring the respective shares of the parties.

The Court further held that the sale deed was executed after the preliminary decree dated 09.02.2011 and during the pendency of the partition proceedings. Accordingly, the doctrine of lis pendens under Section 52 of the Transfer of Property Act, 1882 applied, and the Appellant's title remained subservient to the preliminary decree, irrespective of whether she was a bona fide purchaser. Relying on Venkata Reddy v. Pethi Reddy, the Court reiterated that an unchallenged preliminary decree in a partition suit is conclusive on the matters decided therein.

The appeal was accordingly dismissed.

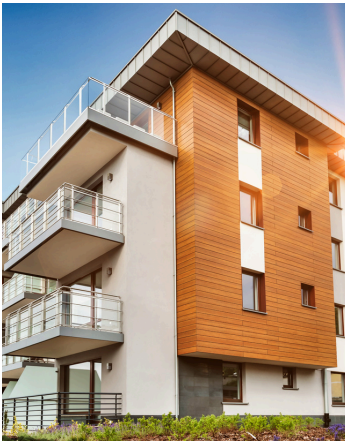
Law: A transferee pendente lite is bound by the decree passed in the pending proceedings under Section 52 TPA, irrespective of bona fides, and an unchallenged preliminary decree cannot ordinarily be reopened in an appeal against the final decree.



**Hardik Jain**





# Litigation

**Prem Prakash Modi v. Madhu Goel, RFA 68/2016 – Delhi High Court (29.10.2026)**

The Delhi High Court allowed an appeal against the dismissal of a recovery suit for ₹10 lakh advanced by the Appellant to the Respondent as a friendly loan. The Trial Court had dismissed the suit on the ground that the Appellant had failed to sufficiently establish the loan transaction, inter alia, owing to deficiencies in the pleadings and the non-proof of the bank statement and Form 16A.

The High Court observed that the Respondent, despite filing a written statement, had failed to appear thereafter, was proceeded ex parte and neither cross-examined the Appellant nor led any evidence. The Appellant's testimony that ₹10 lakh had been advanced as a friendly loan therefore remained unrebutted. The Court further noted that the Respondent had not denied receipt of the amount in the written statement, but had claimed that it was adjusted against another business transaction involving 50 bags of cloves pursuant to an amicable settlement.

The Court held that proof of the bank statement was unnecessary in the circumstances, since receipt of the ₹10 lakh was not disputed. Further, Form 16A identified the Respondent, Madhu Goel, as the deductor of tax on the interest, corroborating the Appellant's case. Having set up a defence of adjustment pursuant to a settlement, the Respondent was required to enter the witness box and establish the same. Her failure to lead any evidence meant that the defence remained unsubstantiated.

Accordingly, the Trial Court's judgment was set aside and the suit was decreed for ₹10 lakh with interest at 6% per annum from the date of institution until realization.

Law: Where receipt of the amount is not disputed and the defendant sets up a subsequent adjustment or settlement as a defence, the burden lies on the defendant to establish that defence through evidence; unrebutted testimony supported by corroborative material may suffice to establish the claim.



**Hardik Jain**








# Litigation

**Manoj Kumar, Prop. M.K. Steel Traders v. Additional Commissioner, Central GST & Anr., W.P.(C) 50/2026 and W.P.(C) 2528/2026 – Delhi High Court (28.10.2026)**

The Delhi High Court disposed of two writ petitions challenging separate orders-in-original dated 04.02.2025, raising GST demands of ₹6,14,568 and ₹2,93,53,860 respectively, in proceedings concerning alleged availment and passing on of ineligible Input Tax Credit through invoices unsupported by genuine supplies of goods.

In W.P.(C) 50/2026, the Petitioner challenged the show-cause notice under Section 74 of the CGST Act as non-speaking and lacking particulars justifying invocation of the provision. The Court found that the notice, extending to nearly 80 pages, detailed the alleged transactions, interconnected firms and modus operandi. It held that the objection did not warrant exercise of writ jurisdiction, while leaving the question of the Petitioner's liability open before the statutory appellate authority.

In W.P.(C) 2528/2026, the Petitioner contended that although the show-cause notice did not propose imposition of penalty, the adjudicating authority had imposed one in the final order. The Court declined to examine this issue in writ proceedings and left it open for consideration by the appellate authority. Importantly, it clarified that relegating the Petitioner to the appellate remedy did not amount to approval of the penalty or a finding that it was legally sustainable.

Relying on M/s G.R. Infra Projects Limited, the Court reiterated that mere use of expressions such as fraud, wilful misstatement or suppression is insufficient to invoke Section 74 without disclosure of the underlying factual particulars. However, the Court found no ground to bypass the statutory appellate remedy in the present cases. The Petitioner was permitted to seek exclusion of the period spent in writ proceedings under Section 14 of the Limitation Act, 1963.

Law: The existence of an alternative statutory remedy ordinarily warrants judicial restraint under Article 226; objections concerning the sufficiency of a Section 74 notice and the legality of a penalty may be examined by the statutory appellate authority, without the writ court expressing any final opinion on their merits.



**Hardik Jain**






# Litigation

**Thor Ventures (OPC) Private Limited v. NYEQ Technologies Private Limited, O.M.P.(I) (COMM.) 461/2026 and 462/2026 – Delhi High Court (28.10.2026)**

The Delhi High Court granted post-award interim protection under Section 9 of the Arbitration and Conciliation Act, 1996, restraining the Respondent from selling, alienating, creating third-party rights or encumbrances over two properties situated in DLF City, Gurugram, pending further proceedings. The Petitioner had entered into two Agreements to Sell dated 04.05.2019, each for ₹5.62 crore, and had paid an advance of ₹5 lakh per property. The Sole Arbitrator upheld the validity of the agreements and the authority of the signatory but denied specific performance on the ground that the Petitioner failed to establish readiness and willingness, treating the loan sanction letter issued by Pooja Finelease Limited (PFL) as a sham document.

The Court held that an unsuccessful party to arbitration is entitled to invoke Section 9 even after an award, although the threshold for establishing a prima facie case, balance of convenience and irreparable injury is higher. Relying on Home Care Retail Marts Pvt. Ltd. v. Haresh N. Sanghavi, the Court reiterated that protection may be granted in rare and compelling circumstances to prevent irreversible prejudice and preserve the efficacy of a pending Section 34 challenge.

Prima facie, the Court found that the finding treating the loan sanction letter as a sham was based on no evidence. The authenticity of the letter had not been questioned in the cross-examination of PFL's witness, and PFL's status as an RBI-registered NBFC and its net worth of ₹200 crore had not been disputed. The Court also considered that the Respondent had no other assets, the Petitioner sought only specific performance, and the amended Specific Relief Act, 1963 gives primacy to specific performance, subject to statutory exceptions.

Accordingly, the Respondent was restrained from dealing with the properties until the next date of hearing, fixed for 02.12.2026.

Law: An unsuccessful claimant may obtain post-award protection under Section 9 in rare and compelling circumstances where a prima facie case is established on a higher threshold and preservation of the subject matter is necessary to prevent irreparable prejudice and protect the efficacy of Section 34 proceedings.



**Hardik Jain**

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The Delhi High Court granted post-award interim protection under Section 9 of the Arbitration Act, restraining the respondent from transferring or creating third-party rights over two Gurugram properties. The Court held that even an unsuccessful arbitration claimant may obtain protection in rare and compelling circumstances to preserve the subject matter pending Section 34 proceedings.

CASE TITLE: Thor Ventures (OPC) Private Limited v. NYEQ Technologies Private Limited
CASE No .: O.M.P.(I) (COMM.) 461/2026 and 462/2026

Delhi | Bengaluru www.lexport.in



# Litigation

**Tender Conditions Cannot Be Enforced Rigidly Where Compliance Is Impossible: Supreme Court**

The Supreme Court has held that a bidder cannot be disqualified for failing to produce an original document where the nature of the payment method makes such production impossible. The Court observed that rigid adherence to the wording of a tender document cannot be sustained when the bidder has complied with the substantive requirement and the prescribed form of compliance makes production of an original impossible.

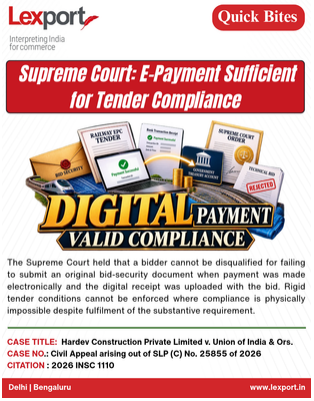
The appellant, Hardev Construction Private Limited, had submitted a bid for an EPC railway project after furnishing the bid security through the respondent authority's e-payment gateway. It uploaded the digital payment receipt along with its bid. However, its technical bid was rejected for failure to physically submit the original bid security under Clause 2.20.6(ii) of the Request for Proposal (RFP). The Patna High Court upheld the rejection.

The Court noted that the RFP permitted bid security through multiple modes, including bank guarantee, demand draft, fixed deposit receipt, banker's cheque and e-payment. Physical submission of an original was necessary for instruments such as bank guarantees and demand drafts, which could not be enforced unless the original was handed over. In the case of e-payment, however, the funds had already been transferred to the authority's account and the digital receipt uploaded. The Court distinguished Prakash Asphaltings and Toll Highways (India) Ltd. v. Mandeepa Enterprises, observing that judicial deference to the tendering authority does not extend to a perverse interpretation of tender conditions.

Setting aside the Patna High Court's order, the Supreme Court directed that the contract be awarded to the appellant, subject to submission of the bid security again after its earlier deposit had been refunded. The authorities were directed to facilitate e-payment within two weeks or permit another mode of payment within a further two weeks if technical difficulties arose. The appellant's financial bid would thereafter be opened and considered along with other bids, and the tender finalised in accordance with the remaining conditions.

Hardev Construction Private Limited v. Union of India & Ors.

Case No.: Civil Appeal arising out of SLP (C) No. 25855 of 2026
Citation: 2026 INSC 1110






Meyank Pandey



# Litigation

**Company Law / Civil Court Jurisdiction / Section 430**

**NCLT Cannot Declare Registered Sale Deed Void; Civil Court Retains Jurisdiction: Kerala High Court**

The Kerala High Court has held that the National Company Law Tribunal (NCLT) cannot declare a registered sale deed void or not binding on a company merely because the dispute involves allegations of oppression and mismanagement. Justice Easwaran S. clarified that the jurisdiction of the NCLT under Sections 241 and 242 of the Companies Act, 2013, does not extend to granting such declaratory relief.

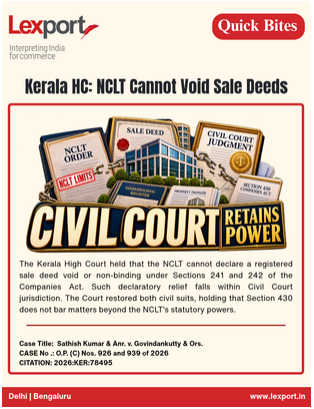
The Court was hearing two petitions challenging orders of the Commercial Court-II, Thrissur, which had rejected civil suits as barred under Section 430 of the Companies Act. The plaintiffs sought a declaration that a 2014 sale deed transferring company property was not binding on the company and its shareholders, alleging that the sale had taken place without the concurrence of the majority shareholders and on the basis of a shareholders' meeting that was never convened. They also alleged misappropriation of company funds.

The Court observed that Sections 241 and 242 empower the NCLT to adjudicate disputes concerning the management of a company and the rights of its shareholders. However, being a statutory tribunal, the NCLT can exercise only those powers conferred upon it by law. The power to grant declaratory relief, including a declaration that a registered sale deed is void and not binding on a company, remains with the Civil Court. The Court emphasised that the ouster of civil court jurisdiction under Section 430 cannot be presumed and must be supported by the specific statutory powers conferred upon the Tribunal.

Accordingly, the High Court set aside the Commercial Court's orders and restored both suits for trial before the Commercial Court-II, Thrissur. It left the question of limitation open, permitting the defendants to raise the objection before the trial court at the appropriate stage. The judgment clarifies that Section 430 does not bar civil suits seeking reliefs that fall outside the NCLT's statutory jurisdiction, even where the underlying dispute concerns the affairs of a company.

Sathish Kumar & Anr. v. Govindankutty & Ors.

Case Nos.: O.P. (C) Nos. 926 and 939 of 2026
Citation: 2026:KER:78495






Meyank Pandey



# Corporate

**Supreme Court: CoC Cannot Withdraw Approved Resolution Plan Citing Improved Financial Position of Corporate Debtor**

The Supreme Court, in Bank of India & Ors. v. S.M. Kamal Pasha & Ors., held that the Committee of Creditors (CoC) cannot withdraw its approval of a resolution plan once submitted to the National Company Law Tribunal (NCLT), merely on account of an improvement in the corporate debtor's financial position. The Court upheld the NCLAT's decision rejecting the CoC's withdrawal request in respect of a ₹172.55 crore resolution plan, observing that the improved financial position of the corporate debtor, whose opening balance increased from ₹30 crore to ₹165 crore during the pendency of approval, could not by itself justify withdrawal.

Relying on Ebix Singapore Pvt. Ltd. v. CoC of Educomp Solutions Ltd., the Court clarified that Sections 12A, 30 and 31 of the IBC, read together, permit withdrawal of insolvency proceedings only until the CoC approves the resolution plan and submits it to the adjudicating authority. The IBC provides no mechanism for subsequent withdrawal or modification by either the CoC or the successful resolution applicant.

However, the NCLT must independently examine compliance with Section 30(2) and the corporate debtor's current financial position while considering approval under Section 31(1). The Court directed the NCLT to hear the pending applications concerning approval of the resolution plan and the holding company's one-time settlement (OTS) proposal together and decide them expeditiously.



Rishav Sagar








# Corporate

**Supreme Court: Non-Signatories Can Be Joined in Arbitration If Dispute Affects Their Rights**

The Supreme Court, in Hemant D. Shah HUF & Anr. v. Chittaranjan D. Shah HUF & Ors., held that non-signatories to an arbitration agreement may be impleaded in arbitration proceedings where the outcome substantially affects their rights. A Bench of Justice J.B. Pardiwala and Justice K. Vinod Chandran observed that determining whether a non-signatory is a "veritable party" requires consideration of the facts, relationships between parties and their interests in the subject matter, rather than adopting a rigid approach.

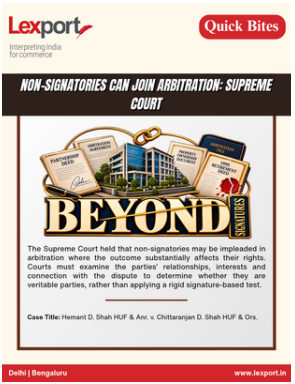
The dispute concerned a Mumbai commercial property originally owned by a partnership firm. The appellants challenged a 1995 retirement deed as forged, contending that the original partnership continued, while the third and fourth respondents, who were not signatories to the 1985 partnership deed containing the arbitration clause, had subsequently acquired rights in the property under a new partnership arrangement.

Setting aside the Bombay High Court's decision, the Supreme Court observed that if the 1995 retirement deed were declared invalid, the parties would revert to the original partnership arrangement, directly affecting the rights of the third and fourth respondents. Relying on the Constitution Bench judgment in Cox and Kings Ltd. v. SAP India Pvt. Ltd., the Court held that non-signatories who have an integral relationship with the signatories and the subject matter cannot be treated as strangers to the dispute. Accordingly, the Court modified the impugned order to recognise the third and fourth respondents as veritable parties to the arbitration.



**Rishav Sagar**








# Corporate

**NCLT Delhi Directs Shareholder and Creditor Meetings for Cyber Media–Cyber Media Research Merger**

The Delhi Bench of the National Company Law Tribunal (NCLT), comprising Judicial Member Jyotsna Sharma and Technical Member Reena Sinha Puri, has directed Cyber Media Research & Services Limited (transferor company) and Cyber Media (India) Limited (transferee company) to convene meetings of their equity shareholders and unsecured creditors to consider the proposed merger by absorption, with April 1, 2026, as the appointed date. The Tribunal dispensed with meetings of secured creditors after considering the consent affidavits submitted by them.

The proposed merger aims to consolidate the companies' marketing, technology, research, consulting, publishing and event management capabilities, reduce duplication across administrative and support functions, lower compliance costs and improve operational efficiency, decision-making and shareholder liquidity. The boards of both companies approved the scheme on January 24, 2026. Cyber Media (India) holds 38.17% equity in its subsidiary, Cyber Media Research & Services.

As neither company's equity shareholders nor unsecured creditors had furnished consent affidavits, the Tribunal directed meetings of these stakeholders through video conferencing with remote e-voting facilities. However, secured creditor meetings were dispensed with as consent affidavits represented 98.57% of the outstanding secured debt of the transferor company and 100% of that of the transferee company. Rahul Bhatnagar, IAS (Retd.), was appointed Chairperson and Sameer Ali as Scrutinizer for conducting the meetings.



Rishav Sagar








# Corporate

**NCLT Chennai Can Order Share Cancellation Without Separate Capital Reduction Application in Oppression Cases**

The Chennai Bench of the National Company Law Tribunal (NCLT), in C. Janarthanan v. Notion Press Media Private Limited & Ors., held that it can approve a settlement under Section 242(2) of the Companies Act, 2013, providing for the purchase and cancellation of a petitioner's shares and consequential reduction of share capital without requiring a separate application under Sections 66 or 68 of the Act.

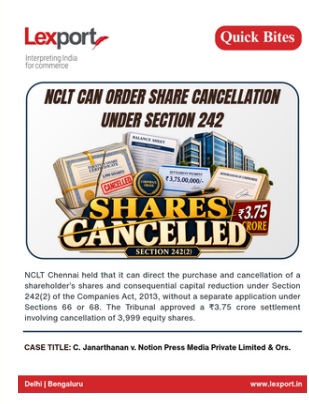
The Tribunal was considering an oppression and mismanagement petition filed by C. Janarthanan against Notion Press Media Private Limited, alleging, inter alia, unauthorised dilution of his shareholding from 33.33% to 21%, proposed transfer of 9% of his stake without compensation, manipulation of accounts and siphoning of company funds. During the proceedings, the parties arrived at a settlement under which Janarthanan agreed to surrender his 3,999 equity shares for ₹3.75 crore, to be paid from the company's own resources.

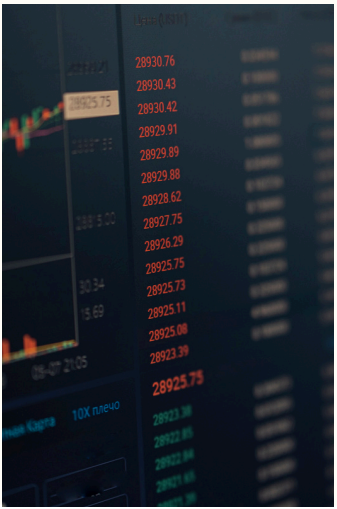
The Bench observed that Section 242(2)(b) independently empowers the Tribunal to direct a company to purchase a member's shares, while Sections 242(2)(c) and 242(2)(m) empower it to order consequential capital reduction and grant other just and equitable relief. Relying on the Supreme Court's decision in Cosmo Steels Private Limited v. Jairam Das Gupta, the Tribunal approved the Memorandum of Compromise and directed the company to cancel the shares, reduce its paid-up equity share capital accordingly and pay ₹3.75 crore to Janarthanan within seven days.



**Rishav Sagar**





# Article

**RBI's New EDF Framework: What Service Exporters and Law Firms Need to Know**

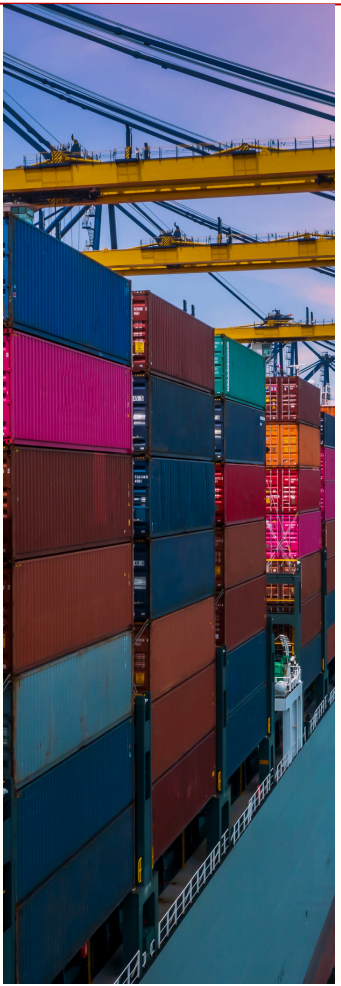
In this article, Soumya Shrivastava, Junior Associate at Lexport, highlights the significant shift introduced by the RBI's new Export Declaration Form (EDF) reporting framework for service exports, effective from 1 October 2026. The article examines how the new requirements impact service exporters, particularly law firms, partnerships, LLPs and companies providing professional services to overseas clients. It also discusses the RBI's clarification on freelancers and individuals, EDF filing timelines and procedures, bank charges, realisation of export proceeds, and the practical compliance steps businesses should take to navigate the revised FEMA framework.

Click here to read: https://shorturl.at/qCJFZ



**Soumya Shrivastava**





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Lexport is a full-service Indian law firm offering consulting, litigation and representation services to a range of clients.

The core competencies of our firm's practice *inter alia* are Trade Laws (Customs, GST & Foreign Trade Policy), Corporate and Commercial Laws and Intellectual Property Rights.

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