

IN THE INCOME TAX APPELLATE TRIBUNAL
AHMEDABAD "D" BENCH

**Before: DR. BRR Kumar, Vice President
And Shri T. R. Senthil Kumar, Judicial Member**

**S.P No. 05/Ahd/2026
(in ITA No. 2002/Ahd/2024)
Assessment Year: 2021-22**

Schneider Electric Infrastructure Limited Milestone 87, Vadodara Halol Highway Village Kotambi, Post Office Jaroad, Vadodara-391510, Gujarat, India PAN: AAPCS6078Q (Appellant)	Vs	The Deputy Commissioner of Income Tax, Circle-2(1)(1), Vadodara (Respondent)
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**Assessee Represented: Ms. Tanya, A.R.
Revenue Represented: Shri Kamlesh Makwana, CIT-DR**

Date of hearing : 09-02-2026
Date of pronouncement : 09-02-2026

आदेश/ORDER

PER : DR. BRR KUMAR, VICE PRESIDENT:-

This Stay Application is filed by the assessee seeking to stay on collection/recovery of the outstanding demand aggregating to Rs.13,82,91,940/-, impugned in its appeal before this Tribunal in ITA No. 2002/Ahd/2024 relating to the Asst. Year 2021-22.

2. This demand is pursuant to the rectification order and giving effect to Ld. CIT(A)'s order reducing the disputed demand from Rs. 21,46,21,719/- to Rs.13,82,91,940/-. The assessee sought complete stay as the tax demand on the grounds that the issues are covered and hearing in due at the earliest date. Ongoing through the financials, it is hereby directed that assessee shall pay 20% of the disputed tax demand of Rs.13,82,91,940/- within two weeks from the date of this order.

3. On reporting compliance, no recovery action can be affected by the department. The stay application stands disposed of with the above directions.

Order pronounced in the open court on 09-02-2026

Sd/-
(T.R. SENTHIL KUMAR)

JUDICIAL MEMBER *True Copy*
Ahmedabad : Dated 09/02/2026

आदेश की प्रतिलिपि अग्रेषित / Copy of Order Forwarded to:-

1. Assessee
2. Revenue
3. Concerned CIT
4. CIT (A)
5. DR, ITAT, Ahmedabad
6. Guard file.

Sd/-
(DR. BRR KUMAR)
VICE PRESIDENT

By order/आदेश से,

उप/सहायक पंजीकार
आयकर अपीलीय अधिकरण,
अहमदाबाद