

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. 06/Ahd/2026
(in ITA No. 289/Ahd/2026)
Assessment Year: 2022-23**

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: Shri Rohit Tiwari, with
Ms. Tanya, A.Rs
Revenue Represented: Shri Abhijit, Sr.DR**

Date of hearing : 13.02.2026
Date of pronouncement : 13.02.2026

आदेश/ORDER

PER : DR. BRR KUMAR, VICE PRESIDENT:-

This Stay Application is filed by the assessee seeking stay on collection/recovery of the outstanding demand aggregating to **Rs. 17,12,36,410/-**, which is the subject matter of appeal before this Tribunal in **ITA No. 289/Ahd/2026 for Assessment Year 2022-23**.

2. Considering the facts and circumstances of the case and after going through the financial position of the assessee, it is directed that the assessee shall pay **20% of the disputed tax demand** in two installments, as under:

First installment: 10% on or before **26.02.2026**

Second installment: 10% on or before **26.03.2026**

3. On reporting compliance with the above directions, no coercive recovery action shall be taken by the Department till disposal of the appeal.

4. In the result, the Stay Application is **disposed of** in the above terms.

Order pronounced in the open court on 13.02.2026
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Sd/-
(T.R. SENTHIL KUMAR)
JUDICIAL MEMBER

Sd/-
(DR. BRR KUMAR)
VICE PRESIDENT

Ahmedabad : Dated

(True Copy)
13.02.2026

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.

By order/आदेश से,

उप/सहायक पंजीकार
आयकर अपीलीय अधिकरण,
अहमदाबाद