BEFORE THE COMMISSIONER INLAND REVENUE APPEAL-IV KARACHI

M/s. [redacted] (Private) Limited
Plot No.A-453, [redacted] ------------------------------------
APPELLANT

VS

Assistant/Deputy Commissioner-IR
Unit-05, Range-B, Zone-I, MTO,
Karachi. --
RESPONDENT

STAY APPLICATION UNDER SECTION 128(1A) OF THE INCOME TAX ORDINANCE, 2001 – TAX YEAR 2022

It is most respectfully stated as under;

1. That an illegal tax/default/surcharge of Rs. 35,854,194/- was created through an impugned Order-in-Original (OIO) having bar Code No. [redacted] dated 24-02-2026 passed under section 161(1) of the Income Tax Ordinance 2001 **('the Ordinance')**.
(Impugned order is annexed as "Annexure-A".)

2. That the recovery notice in respect thereof under section 138(1) of the Ordinance bearing bar code No. [redacted] dated 25/03/2026 was issued by the Respondent/Department to the Appellant/Taxpayer.
(Recovery notice under section 138(1) is annexed as "Annexure-B".)

3. That being aggrieved, the applicant has filed an appeal under Section 127 of the Ordinance, which is pending adjudication before your honour and the grievances against the impugned assessment order were duly spelled out in the grounds of appeal and are to be considered as part and parcel of this application.
(Ground of Appeal is annexed as "Annexure-C".)

4. That unless a recovery proceedings are stayed, the Respondent/Department will cause and undue hardship and irreparable loss to the Appellant/Taxpayer.

5. That the Appellant/Taxpayer has an arguable case both on factual as well as on legal plain and balance of convenience also favors the Appellant/Taxpayer.

PRAYER

In view of the above submission, it is prayed that;

i) The disputed demand may kindly be stayed till disposal of this appeal.
ii) Any other relief, which is deemed proper by this August forum may also be allowed.

[redacted]

Appellant