

Form No:HCJD/C-121  
**ORDER SHEET**  
**IN THE LAHORE HIGH COURT**  
**MULTAN BENCH, MULTAN**  
**JUDICIAL DEPARTMENT**

W.P. No.6239 of 2023

**Muhammad Hanif Versus The Federation of Pakistan and others**

S.No. of order/proceeding.	Date of order/proceeding	Order with signature of Judge, and that of parties or counsel, where necessary.
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30.5.2023 Muhammad Imran Ghazi, Advocate for the petitioner.  
 Mr. Tariq Manzoor Sial, Advocate/Legal Advisor FBR.

Application No. 65798 Learned counsel for the petitioner submits that  
 Date of presentation ..... respondent No.5 has issued a notice under section 120(3) of  
 of Application 30.5.23 the Income Tax Ordinance, 2001 dated 27.3.2023  
 Date of Receipt of fee ..... requisitioning documentation based on section 7-E which is  
 No. of pages ..... characterized as deficiency; that such stance is entirely  
 Copy of ..... unjustified in the wake of authoritative judicial  
 Under ..... pronouncements qua said provision; that petitioner has  
 Registration ..... submitted reply objecting to the admissibility/tenability of the  
 Agency .....  
 Court of .....  
 Total .....  
 Name of Copy 16.23 notice, however, no response is given till date and the  
 Date of Receipt of File ..... concern is that such perceived inaction may not trigger  
 Date of preparation 16.23 adverse consequences qua petitioner's otherwise allegedly  
 Date of issuance of Copy 16.23 validly filed returns. Legal Advisor FBR has also been heard.

*J 11/6/23*

Petitioner is directed to appear before **respondent No.5** with a certified copy of this Order on **01.6.2023** at **11:00 a.m.** Said respondent shall decide the objections contained in the reply to the impugned notice submitted by the petitioner through a **reasoned** and **speaking** order preferably within **05 working days** of above-mentioned date in accordance with law. Till respondent's decision within stipulated time as observed supra, no adverse step/measure shall be taken based on the impugned notice dated 27.3.2023.

EXAMINER COPY SUPPLY SECTION  
 AUTHORIZED BY  
 OF QANUN-I-SHEHADAT UNDER 1984  
 TRUE COPY  
 EXAMINER COPY BRANCH  
 LAHORE HIGH COURT  
 MULTAN BENCH MULTAN

**Disposed of.**

(RASAAL HASAN SYED)  
 JUDGE