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SUPREME COURT

Supreme Court's Clock Conundrum

Split Verdict on Tax Assessment Timelines for Foreign Firms

Sheikh Rayees • August 9, 2025

PUBLISHED REPORT

The Supreme Court has found itself at a timing crossroads — literally. In a high-stakes tax dispute involving Shelf Drilling Ron Tappmeyer Ltd., a foreign offshore drilling operator, two judges delivered sharply opposing views on how India's tax clock should tick when the Dispute Resolution Panel (DRP) process under Section 144C of the Income Tax Act kicks in. At the heart of the clash lies a simple but critical question:...

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