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SYNOPSIS

The petitioners, citizens of India, are invoking the jurisdiction of this Hon'ble Court in Public Interest under Article 32 of the Constitution of India to preserve and protect the fundamental rights of Hindus residing in District Mewat Nuh Haryana whose life, personal liberty and religious rights are being continuously eroded by members of Muslim community who are in dominating position and the State Government as well as District Administration and local police have failed to exercise the powers vested in them by law due to which the life and liberty of every Hindu and particularly the women and Dalits is in jeopardy and they are bound to lead life under sword of dominant group and the Fundamental Rights and the concept of welfare state remains a golden word to be only in books but having no meaning is left for a child born in Hindu society in the said area.

It is noteworthy that Muslims under the patronage of Tablighi Jammats have gradually increased their strength and now the position is that Hindu Population is decreasing and it has come down from 20% to 10-11% since the last census 2011. A number of Hindus have been forcibly converted to Islam and a number of Hindu women and minor girls have been abducted and raped. The Hindu women are not safe at all. The Muslims at a large number have committed atrocities on members of Schedule caste.

That on 31st May 2020, a four member committee after visiting the place and taking evidence of several villagers, have submitted a report dated 01.06.2020 on the ground situation of Hindus in Mewat and atrocities committed on them by Muslims to the Chief Minister of Haryana, which is alarming.

It is also relevant to mention that retired Army Generals have also visited the place to find out the truth in the allegations. General G.D Bakshi has narrated the pitiable condition of Hindus in District Mewat –Nuh which was telecast on Sudarshan News Channels.

Shri Vikas Chandra a correspondent of T.V. News Channel namely News Nation has also interviewed several villagers and their version have been telecast on the said news channel.

It is relevant to mention that T.V. News Channels namely Sudarshan and News Nation have widely broadcast the reports collected by their correspondents by placing the interviews of several villagers stating the sad story of the residents of the area but the State Government and District Administration have not awakened from their long slumber.

It will be useful to refer the case law decided by this Hon'ble Court in case of Sarbananda Sonowal vs Union of India and Another reported in 2005 (5) SCC 665 in para 17 has noted the report 08.11.1998 sent by Governor of Assam, Lt. Gen. S.K. Sinha (Retired), former Deputy Chief of Army Staff, wherein it was mentioned that :-

“The silent and invidious demographic invasion of Assam may result in the loss of the geo strategically vital districts of lower Assam. The influx of these illegal migrants is turning these districts into a Muslim majority region. It will then only be a matter of time when a demand for their merger with Bangladesh may be made. The rapid growth of international Islamic fundamentalism may provide for driving force for this demand. In this context, it is pertinent that Bangladesh has long discarded

secularism and has chosen to become an Islamic State. Loss of lower Assam will sever the entire land mass of the North-East, from the rest of India and the rich natural resources of that region will be lost to the Nation.”

“The dangerous consequences of large-scale illegal migration from Bangladesh, both for the people of Assam and more for the nation as a whole, need to be emphatically stressed. No misconceived and mistaken notions of secularism should be allowed to come in the way of doing so.”

LIST OF DATES

- | | |
|----------------------------------|---|
| 5 th Century
B.C.E | Mewat was founded as part of Ancient Kingdom Matsya. |
| 1926 | <p>Maulana Mohd. Illias established an Islamic Institution known as Tablighi Jamaat in District Mewat now named as Nuh for giving proper Islamic education to the followers of Islam to be followed in day to day life. The reason was that most of the Muslims in the area were converted from Hindus and in practical life they were continuing with the Hindu way of life.</p> <p>It is said that at that time Muslims of Mewat were used to practice dual religious rituals. Muslims were performing Nikah (Islamic wedding) as well as the Sapatapadi- Circling the fire (Hindu ritual for marriage). They also</p> |

used to worship Lord Shiva. They had a different identity than a typical Muslim. They use to wear Dhoti-Kurta and were not keeping beards.

The Neo Muslims even were not aware of the process of offering Namaz and local Mosque were used as warehouses for cattle fodder.

The name Tablighi Jamaat means a “group that propagates faith” and it was originated in the early 20th century. Affiliated to the Sunni school, members of the said group visit mosques, schools, colleges in different parts of India as well as the world to preach Islam and to promote the lifestyle of Prophet Mohammad.

After the establishment of Tablighi Jammam the Neo Muslims became fundamentalist Muslims and slowly they over powered the entire area and at present they are more than 95% in the area eliminating Hindus from the area.

- 2005 The district Mewat was created.
- 2011 According to Census 2011 the total population of Mewat District was 10,89,263. The Muslim population was estimated as 79.20%, Hindu 20.37 % and remaining 0.43% consisted of Sikhs, Buddhist, Jains Etc.
- 2016 The district Mewat was renamed as district Nuh.

01.06.2020 A committee comprising of four members namely (i) Shri Pawan Kumar a retired District Judge, (ii) Shri Devdutt Sharma, President Bar Association Sohna, (iii) Sultan Balmiki Chairman Balmiki Maha Panchayat Haryana (iv) Shri Kanaihiya Lal Arya, Vice President Arya Pratinidhi Sabha Haryana has submitted a report to the Government of Haryana after examining a number of victims describing the atrocities being committed by Muslims on members of Hindu society particularly to Dalits and downtrodden members of Hindu community.

The respondents are not taking interest to look into the miseries of the citizens residing in District Mewat-Nuh and they are bound to lead life of an animal.

16.06.2020 Hence the present Writ Petition.

IN THE SUPREME COURT OF INDIA
CIVIL ORIGINAL JURISDICTION

((Petition under Article 32 of the Constitution of India read with
Under Order XXXVIII of the Supreme Court Rules 2013))

WRIT PETITION CIVIL-PIL NO. of 2020

IN THE MATTER OF:

1. Ranjana Agnihotri
 D/o Late Rajendra Kant Agnihotri,
 R/o 512/695 Balda Road
 Nishatganj Near Nishantganj
 Police Chowki,
 Lucknow, New Hyderabad
 Uttar Pradesh-226007

2. Jitender Singh
 S/o. Sri Yaduraj Singh
 R/o Gulab Singh Purwa,
 Veerpur Vishen,
 Thesil- Gonda
 District Gonda
 Uttar Pradesh-271123

3. Shishir Chaturvedi
 S/o. Late Jugal Kishore Chaturvedi
 R/o.215/460 Ichha Bawan,
 Sabji Madi, Charbagh
 Lucknow,
 Uttar Pradesh-226001

4. Ashutosh Mishra
 S/o Sri Vidya Sagar Mishra
 R/o 1479/9 Near Meena Market,
 Indra Nagar, Lucknow
 Uttar Pradesh-226016

5. Karunesh Kumar Shukla
 S/o Sri Ram Narayan Shukla
 R/o Village-Pakri Bhikhi
 Post-Belhra, Pakri Bhikhi,

District- Basti
Uttar Pradesh-272182

...Petitioners

-Versus-

1. Union of India
Through its Secretary,
Ministry of Home Affairs,
North Block,
New Delhi-110 001
2. State of Haryana
Through Secretary Home,
Haryana Civil Secretariat, Sector-1,
Chandigarh, Pin 160001
3. Chief Secretary Haryana Government
Haryana Civil Secretariat, Sector-1,
Chandigarh, Pin 160001
4. Director General of Police
State of Haryana
Police Headquarter, Sector -6
Panchkula, Haryana-134109
5. District Magistrate/ Deputy Commissioner
Nuh Mewat,
Mini Secretariat, Nuh,
State of Haryana Pin -122001.
6. Superintendent of Police Nuh Mewat,
State of Haryana Pin-122107.

...Respondents

**PUBLIC INTEREST LITIGATION UNDER ARTICLE 32
OF THE CONSTITUTION OF INDIA TO PROTECT THE
FUNDAMENTAL RIGHTS OF THE CITIZENS OF
DISTRICT MEWAT-NUH IN THE STATE OF HARYANA
GUARANTEED UNDER ARTICLE 14, 15, 19, 21 AND 25
OF THE CONSTITUTION OF INDIA AND PRAYING FOR**

RESTORATION OF THEIR LAND AND PROPERTIES, TEMPLES, CREMATION GROUNDS, AND ALSO FOR AWARDING COMPENSATION TO THE VICTIMS AND TO CONSTITUTE A SPECIAL INVESTIGATING TEAM TO INVESTIGATE INTO THE OFFENCES OF MURDER, RAPE/GANG RAPES , KIDNAPPING, ABDUCTION , MOLESTATION AND HOUSE TRESPASS AND ENCROACHMENT ON PERSONAL AND PUBLIC PROPERTIES AND OTHER CIVIL WRONG DONE BY THE MEMBERS OF MUSLIM COMMUNITY WITH THE HINDU RESIDENTS OF THE SAID PLACE.

TO,
THE HON'BLE THE CHIEF JUSTICE OF INDIA AND
OTHER COMPANION JUSTICES OF THE HON'BLE
SUPREME COURT OF INDIA;

HUMBLE PETITION OF THE
PETITIONER ABOVENAMED;

MOST RESPECTFULLY SHEWETH;

1. That the petitioners, citizens of India, are invoking the jurisdiction of this Hon'ble Court in Public Interest under Article 32 of the Constitution of India to preserve and protect the fundamental rights of Hindus residing in District Mewat Nuh Haryana whose life, personal liberty and religious rights are being continuously eroded by members of Muslim community. Since the respondents are not taking any action, the petitioners are approaching the Hon'ble Court in the Interest and welfare of the citizens residing in Mewat Nuh area of State of Haryana

1.A That in compliance of Order XXXVIII Rule 12 (2) it is stated that necessary particulars of the Petitioners are as follows:-

(i)

(a) The petitioner No.1 is Ranjana Agnihotri, D/o Late Rajendra Kant Agnihotri Postal Address- 512/695

Balda Road, Nishatganj Near Nishantganj, Police Chowki, Lucknow, New Hyderabad Uttar Pradesh-226007, Occupation- Practising Advocate at Lucknow Bench of Hon'ble Allahabad High Court, Annual Income is- 5.5 Lacks, PAN No. AEYPA4516R, Aadhar No. 5517 0257 1683 Email id- ranjanaramjanmbhoomi@gmail.com, Mobile No. 09415076192 - In proof of Identity copy of Aadhar Card is Enclosed hereto and marked as **Annexure No. P-1.** (pages to)

(b) The petitioner No.2 is Jitender Singh, S/o Sri Yaduraj Singh Postal Address- Gulab Singh Purwa, Veerpur Vishen, Thesil- Gonda, District Gonda Uttar Pradesh-271123, Occupation- Agriculturist and Social Worker, Annual Income is- 4 Lacks, PAN No. AWKPS 2443P, Aadhar No. 4225 9131 5979, Email id- jitender.singh00013@gmail.com, Mobile No. 09599061907. In proof of Identity copy of Aadhar Card is Enclosed hereto and marked as **Annexure No. P-2.** (pages to)

(c) The petitioner No.3 is Shishir Chaturvedi, S/o Late Jugal Kishore Chaturvedi, Postal Address- 215/460 Ichha Bawan, Sabji Madi, Charbagh Lucknow, Uttar Pradesh-226001, Occupation- Practising Advocate Civil Court Lucknow, Annual Income is- 7 Lacks, PAN No. AEBPC6672F, Aadhar No. 8763 5288 1810, Email id- shishir.adv@gmail.com, Mobile No.-08542839052. In proof of Identity copy of Aadhar Card is Enclosed hereto and marked as **Annexure No. P-3.** (pages to)

- (d) The petitioner No.4 is Ashutosh Mishra, S/o Sri Vidya Sagar Mishra, Postal Address- 1479/9 Near Meena Market, Indra Nagar, Lucknow, Uttar Pradesh-226016, Occupation- Practising Advocate at Lucknow Bench of Hon'ble Allahabad High Court, Annual Income is- 2.5 Lacks, PAN No. BPAPMO151Q, Aadhar No. 9215 2046 6951 ,Email id- ashutoshsagarmishra@gmail.com, Mobile No. 09453586457. In proof of Identity copy of Aadhar Card is Enclosed hereto and marked as **Annexure No. P-4.** (pages to)
- (e) The petitioner No.5 is Karunesh Kumar Shukla , S/o Sri Ram Narayan Shukla, R/o Village-Pakri Bhikhi ,Post-Belhra, Pakri Bhikhi, District- Basti Uttar Pradesh-272182 ,Occupation- Practising Advocate, Supreme Court of India, Annual Income is- 2.5 Lacks, PAN No. DUUPS 8112 J, Aadhar No. 5231 61134226,Emailid- advkaruneshshukla@gmail.com, Mobile No.-09044933422. In proof of Identity copy of Aadhar Card is Enclosed hereto and marked as **Annexure No. P-5.** (pages to)

(i) (b):- **Facts constituting the cause of Action:-**

The Petitioners have come to know that the conditions of Hindus in Nuh- Mewat in the State of Haryana is very pitiable and the Muslims who are in dominant position in the area are forcing Hindus to embrace Islam. Hindu women including minor girl children are being raped at large scale, the Hindus are not being allowed to perform their rituals and

Muslims have even taken forceful possession of cremation grounds. The Petitioners being citizens of India are invoking the Jurisdiction of this Hon'ble Court to save the life and personal liberty of Hindus residing in District Mewat-Nuh of State of Haryana and to ensure that they are allowed to perform their worship according to Hindu custom.

- (i)(c) Since the members of Hindu community in District Nuh – Mewat are not in a position to knock the door of the court, it is the bounded duty of the petitioners to approach the Hon'ble Court to provide them Justice.
- (i)(d) The petitioners have no personal interest in the matter. They have interest in the matter as the citizens of India to do something for citizens of Nuh- Mewat, as their life, liberty, dignity, religion, worship are in peril and without the intervention of the Hon'ble Court the citizens of the said place will not be able to exercise their constitutional rights .
- (i)(e) The petitioner are not involved in any civil, criminal, or revenue litigation which could have a legal nexus with the issues involved in the present Public Litigation.
- (i)(f) The petitioners have learnt that several complaints including by Sudarshan T.V. News channel have been submitted to Haryana Government, but no action have been taken. The petitioners have not filed any separate petition before the Government-respondent authorities.

(ii) The petitioners have no personal gains in the present litigation. They have no private motive or oblique reason in filing the present Public Interest Litigation. An affidavit is being filed to this effect and same is marked as **Annexure No. P-6**.(page to)

2. **Brief of facts are as follows:-:-**

- 2.1 That Mewat was founded as part of Ancient Kingdom Matsya in 5th Century B.C.E. It is a historical region of Haryana and Rajasthan States in North-Western India. The area was ruled in intervals by Muslim Rulers after 1372 A.D. The Hindu residents had to adopt Islam but even then those converted Hindus were not following Islamic religion and practically they were continuing with their Hindu way of life.
- 2.2 That Maulana Mohd. Illiyas established an Islamic Institution known as Tablighi Jamaat in District Mewat now named as Nuh for giving proper Islamic education to the followers of Islam to be followed in day to day life. The reason was that most of the Muslims in the area were converted from Hindus and they could not adopt Muslim culture and way of life.
- 2.3 That it is said that at that time Muslims of Mewat used to practice dual religious rituals. Muslims were performing Nikha (Islamic wedding) as well as the Sapatapadi-circling the fire (Hindu ritual for marriage). They were worshipping Lord Shiva. They had a different identity than a typical Muslim. They used to wear Dhoti-Kurta and were not keeping beards.

- 2.4 That the Neo Muslims even were not aware of the process of offering Namaz and local Mosques were used as warehouses for cattle fodder.
- 2.5 That the name Tablighi Jamaat means a “group that propagates faith” and it originated in the early 20th century. Affiliated to the Sunni school, members of the group visit mosques, schools, colleges in different parts of India as well as the world, preach Islam and promote the lifestyle of Prophet Mohammad.
- 2.6 That the district Mewat was created in 2005 and was renamed as District Nuh in 2016.
- 2.7 That according to Census 2011 the total population of Mewat District was 10,89,263. The Muslim population was estimated as 79.20%, Hindu 20.37 % and remaining 0.43% consisted of Sikh, Buddhist, Jains Etc.
- 2.8 That after the establishment of Tablighi Jammaat the Neo Muslims became fundamentalist Muslims and slowly they over powered the entire area and at present they are more than 95% in the area after eliminating Hindus from the area.
- 2.9 That it is relevant to mention that there are about 431 villages in Mewat- Nuh. 103 villages have become totally devoid of Hindus. In 82 villages only 4-5 Hindu families are left.
- 2.10 That there is significant decline of Hindu population in the District Mewat Nuh giving rise to a demographic changes which will be disastrous for the unity of the Nation.
- 2.11 That it is relevant to mention that Anti National elements are very active in Mewat- Nuh area for the last 10 years

and they want to change the demographic situation of the area to pose a threat to sovereignty and integrity of India.

2.12 Because the ratio of judgment rendered by this Hon'ble Court in case of Sarbananda Sonowal vs Union of India and Another reported in 2005 (5) SCC 665 is applicable in this case which also refers para 17 the report 08.11.1998 sent by Governor of Assam, Lt. Gen. S.K. Sinha (Retired), former Deputy Chief of Army Staff. Those anti national elements in a planed manner have done the following misdeeds to achieve their goal:-

- i. A large number of Hindus have been dispossessed from their land/ Houses.
- ii. A large number of sale deeds of Hindu Properties have been got executed by Muslims in their favour by exercising force and threat.
- iii. A large number of Hindu temples have been destroyed by Muslims. Furthermore the Muslims have taken possession of such properties from Hindus forcefully and unlawfully.
- iv. The Hindus mainly schedule caste on gun point have been converted to Islam.
- v. Rape and molestation of Hindu women and girls have taken place at large scale.
- vi. Hindus are not being allowed to perform their rituals and even to perform last rites of their kiths and kins.
- vii. Muslims have taken forceful possession of public land as well as of cremation grounds from Hindus.
- viii. The District Administration and Police have been silent spectator to all the misdeeds and anti national activities of Muslims and even F.I.R's relating to

heinous crimes like murder, rape, kidnapping abduction, house trespass were not written and if lodged, no action was taken. Likewise the complaints relating to forceful conversion, illegal execution of sale deeds, loss of property, the deprivation of civil and religious rights were not entertained and no action was taken.

2.13 That on 31st May 2020, a committee comprising of four members namely (i) Shri Pawan Kumar a retired District Judge, (ii) Shri Devdutt Sharma, President Bar Association Sohna, (iii) Sultan Balmiki Chairman Balmiki Maha Panchayat Haryana (iv) Shri Kanaihiya Lal Arya, Vice President Arya Pratinidhi Sabha Haryana has submitted a report to the Government of Haryana after examining a number of victims describing the atrocities being committed by Muslims on the members of Hindu society particularly to Dalits and downtrodden members of Hindu community.

2.14 That the aforesaid committee head by Shri Pawan Kumar has given fact finding report, some of which, are being given below:-

(i) In 2017, Mewat Model School of Haryana came under the spotlight after allegations of forced conversions by the school surfaced. It was alleged that Hindu students were hustled into embracing Islam and offering namaz. Refusing to adopt Islam invited beatings from the teachers. After the matter came to light, the District Magistrate swung into action and suspended the teacher Moinuddin and warden Arif. One other teacher accused in the case

was transferred. A victim student recounted how students were slapped in the hostel for holding up against accepting Islam.

- (ii) In the year 2018, a 16-year-old girl committed suicide in Nuh area of Mewat region. Investigations then revealed that before this suicide, 8 boys abducted and raped her a few days ago. After committing such disgusting misdeeds, they left her outside her house in a blood-soaked condition. The investigation also revealed that the accused belonged to an influential family in the village. Those who started pressuring the victim's family to withdraw the case as soon as the rape complaint was filed.
- (iii) In 2018 again, there was a report of a deadly attack on the Dalit family from village Mohalka, Nagina block of Mewat. In the investigation of the matter, it was revealed that a man named Islam had been pressurizing the family of Kishan living in the village to shun their religion and accept Islam. But when Kishan's family resolutely denied converting, Islam, Taufiq, Mosim, Atru, Asmeena attacked his family with batons and rods and humiliated them with casteist slurs.
- (iv) A couple of years back, there was a case of forcible conversion, rape and abduction of a Dalit girl in Mewat. A woman named Farzana met the girl at the station after the Dalit girl left her house following a bitter quarrel with the family members. Farzana allegedly took the girl with her and gave her a new identity. The Dalit girl was purportedly fed with

beef and was forced to offer namaz. Farzana had later tried to sell the girl to a 70-year-old man named Islam for Rs 40,000. However, fortunately, the matter somehow reached the police and the victim was rescued.

- (v) In another shocking incident from 2018, a minor girl was reported to have been raped in Haryana's Mewat. According to media reports, the incident took place in Nuh's Bhandka, in which the police arrested one Aslam for barging into the house of a 14-year-old girl and raping her. Aslam, along with two other men had entered the victim's house and gang-raped her. The child's father told that his daughter was sleeping in the home when Aslam and two other boys came and raped her. When the father of the girl came into the house, he saw Aslam raping her. Aslam was caught but the remaining two somehow escaped.
- (vi) An issue of Love Jihad had come to fore in 2019 when a girl was abducted by Muslim youths- Akil Khan and Rashid in the name of Jihad. The girl was reportedly hexed before being forcibly converted. The incident stirred a state-wide outrage and communal tensions in the region flared as protesters took to the streets and blocked the Gurugram Alwar National Highway for 11 hours.
- (vii) In February 2020, a gang-rape incident with a married woman was reported in a village in Tawadu, Mewat. After the woman somehow broke out of her captivity, she accused five men of kidnapping and

gang-raping her for months. The women alleged that while she was held captive, she was administered with drugs by her captors and gang-raped. She also alleged that her kidnappers shot pornographic videos and threatened her of releasing them on the internet.

(viii) Not only women and girls but even animals were not spared from the wrath of some warped individuals in Mewat. Some time ago a case of rape of a goat had surfaced. This horrific crime was carried out in the village of Marodha in Mewat on the land of Haryana. Following the investigation, one Jafar Khan and Sahukar Khan were arrested in the case while there were a total of 8 people who had allegedly raped the goat.

(ix) In a recent case—Mahant Ramdas Maharaj, the head of Muktidham Ashram in Punhana, Mewat district of Haryana, was assaulted by a mob of Muslims with an intention of murder. Hindu organizations in support of Mahanta had told OpIndia that on the morning of Wednesday (April 29, 2020), the perpetrators accused Mahant Ramdas Maharaj of making abusive religious remarks hurting their religious sentiments. The perpetrators also threatened to chase out other Hindu saints in the region. When Mahant Ramdas Maharaj reached out to the police to file a complaint, his demand was turned down by the police officials. When OpIndia tried to seek a response from the police, Punhana police station SHO asked it to speak to the

headquarters for any information in this regard. He said he did not know about any such incident.

2.15 That the committee also examined some victims and has noted their version as follows:-

- i. Ramjilal, a resident of village Bichhor, was brutally beaten up by one Iqbal, who is father of the woman sarpanch of that village. Iqbal, along with his accomplices, cut open Ramjilal's stomach, filled it with cotton and burnt him alive. No action was taken even after the registration of named FIR. The police declared it to be a death due to lightning bolt.
- ii. On 20 April, 2020, one Haneef, along with his 10-12 accomplices, kidnapped a Dalit youth from his home at village Chundika. They beat up the youth with rods and sticks and left only when they thought he was dead. Despite registration of FIR, no action has been taken so far. Instead, pressure is being built on the complainant to retract or they would face a false case. That Dalit boy's only fault was that he had asked for his borrowed money back.
- iii. The plots allotted to the Dalits in village Kiranj were captured by Kamruddin, along with his accomplices, and till date no action has been taken on the complaint of the victims.
- iv. On April 21, 2020, Atees along with his 10-15 accomplices, blocked the way of one Rahul, who is resident of village Puleta. The group hurled caste slurs at him and assaulted his family. The police overlooked the provisions of the SC/ST Act without investigation and did not take any action.

- v. On April 7, 2020, one Asif thrashed Yogesh, a resident of village Nagina, with a stick at the latter's chemist shop, while Sakir took away Rs 22,200 from his drawer at gunpoint. Despite the FIR, no action has been taken.
 - vi. Yunus was distributing ration at his shop at Bisru village, where 25-30 men were standing there as a crowd. Vinod, a Dalit boy, who used to work as a watchman, asked them to maintain social distancing to prevent spread of COVID-19. But then one Arif abused him with caste slurs. The police has not taken any action yet.
- 2.16 That in conclusion, the above mentioned report says, "that the life of Dalit community in Mewat-Nuh today has become thorny and unbearable. Their religion, their real-estates and wealth, dignity of their womenfolk and nothing else are safe today. Even after 73 years of Independence, they have not been truly independent..."
- 2.17 That it is respectfully submitted that Aurangzeb –like brutal, barbaric, inhuman atrocities are being committed against Dalits in Mewat –Nuh.
- 2.18 That by virtue of section 3 of 'The Places of worship(special provisions) Act, 1991 Hindu public of the District Mewat Nuh is entitled to restore back the temples and religious places which have been demolished or destroyed by the members of Muslim community.
- 2.19 That the State Government and officers working under it are bound to take appropriate steps for restoring back the temples and religious places to Hindus which have been

demolished or destroyed by the members of Muslim community.

2.20 That the State Government and officers working under it are bound to recover the loss sustained to the temples and religious places of Hindus from members of Muslim community of the locality.

2.21 That Central Government is under Constitutional obligation to deploy Armed Forces/ Paramilitary Forces to protect the District Mewat Nuh from internal disturbance in exercise of powers under Article 355 of the Constitution on India

3. QUESTIONS OF LAW:

The following substantial questions of law arise for consideration of this Hon'ble court

3.1 Whether Central Government is under Constitutional obligation to deploy Armed Force / Paramilitary force to protect the District Mewat Nuh from internal disturbance in exercise of the powers vested in it under Article 355 of the Constitution of India?

3.2 Whether the State Government and all the officers working under it are under constitutional obligation to maintain public order taking the recourse of law?

3.3 Whether in the present case the respondents have failed to prevent forceful conversion of Hindus due to which there have been demographic changes in the District Mewat – Nuh posing threat to the integrity of India?

3.4 Whether the Hindus have lost their properties due to the threat exhorted by Muslims and such sale deeds are null and void?

- 3.5 Whether a State Government and officers working under it are under legal obligation to protect the fundamental rights of citizens and to take appropriate legal action in case any member of the society encroaches upon the right of others?
- 3.6 Whether Hindus are entitled to restore back their temples and religious property destroyed or demolished by Muslims in view of section 3 of Places of Worship (special provisions) Act 1991?
- 3.7 Whether the Police is bound to investigate into the offences of murder, rape/gang rapes, kidnapping, abduction, molestation and House trespass on the basis of complaint made/being made by the victims?
- 3.8 Whether Government of Haryana is bound to rehabilitate the exodus Hindus at their respective properties?
- 3.9 Whether victims of District Mewat Nuh are entitled for suitable compensation to be awarded on the basis of the report evaluating the loss sustained by each victim?

4. DECLARATION:

It is most respectfully submitted that the Petitioners further declare that they have not filed any other petition before any court or in this Hon'ble Court in respect of the subject matter of this petition.

5:- GROUND:

The writ petition is being preferred on the following grounds:

- A) Because due to atrocities and barbarian acts committed by Muslims and due to in action on the part of State Government, District Administration and Police the Hindu residents of District Mewat are not in a position to exercise

the right conferred by Articles 14, 15, 19, 21 and 25 of the Constitution of India.

- B) Because the situation of Hindus in Mewat including Hindu women and girl children has become so hazardous that it has become difficult for them to survive.
- C) Because not only the situation of Hindus but even the situation of animals have become worst in District Mewat due to atrocities committed by Muslims.
- D) Because the District administration and local police have failed to take action on the complaints lodged by victims of Mewat and they have been the silent spectator to all the misdeeds and anti-national activities of Muslims which is contrary to law and established principles of justice.
- E) Because the District administration and local police have failed to discharge their legal duty cast upon them by law and it is a case of slackness in performing duty by the officers of the State which is detrimental to public order affecting the Integrity of India.
- F) Because the District administration and local police failed to take any action when Hindus in Mewat are being continuously forced to convert and accept Islam and Hindus are constrained to live their life without dignity and personal liberty.
- G) Because the Respondent No. 2 to 5 have failed to disclose the facts of various FIRs and complaints of various heinous crimes, lodged by Hindus against Muslims for their tortures and atrocities committed on them, leave apart taking any action on the said FIRs or complaints.

- H) Because the Hindus in Mewat are unable to get justice from the local administration and police and therefore, petitioners felt their imperative duty to file the present petition for those Hindus to succour them in getting the justice.
- I) Because the local administration and police have failed to appreciate that these Muslims in Mewat can go to any extent to tarnish the life, dignity and personal liberty of Hindus. Rather it is submitted that the Muslims in Mewat have crossed their every limit in torturing and committing atrocities on Hindus especially the Hindu women and girls
- J) Because a committee comprising of four members namely (i) Shri Pawan Kumar a retired District Judge, (ii) Shri Devdutt Sharma, President Bar Association Sohna, (iii) Sultan Balmiki Chairman Balmiki Maha Panchayat Haryana (iv) Shri Kanaihiya Lal Arya, Vice President Arya Pratinidhi Sabha Haryana has submitted a report to the Government of Haryana after examining a number of victims describing the atrocities being committed by Muslims on members of Hindu society particularly to Dalits and downtrodden members of Hindu community.
- K) Because the respondents are not taking interest to look into the miseries of the citizens residing in District Mewat-Nuh and they are bound to lead life of an animal.
- L) Because according to Census 2011 the total population of Mewat District was 10,89,263. The Muslim population was estimated as 79.20%, Hindu 20.37 % and remaining 0.43% consisted of Sikh, Buddhist, Jains Etc.

- M) Because after the establishment of Tablighi Jammah the Neo Muslims became fundamentalist Muslims and slowly they over powered the entire area and at present they are more than 95% in the area after eliminating Hindus from the area.
- N) Because there are about 431 villages in Mewat- Nuh. 103 villages have become totally devoid of Hindus. In 82 villages only 4-5 Hindu families are left.
- O) Because there is significant decline of Hindu population in the District Mewat Nuh giving rise to a demographic changes which will be disastrous for the unity of the Nation.
- P) Because Anti National elements are very active in Mewat-Nuh area for the last 10 years and they want to change the demographic situation of the area to pose a threat to sovereignty and integrity of India.
- Q) Because the ratio of judgment rendered by this Hon'ble Court in case of Sarbananda Sonowal vs Union of India and Another reported in 2005 (5) SCC 665 is applicable in this case which also refers para 17 the report 08.11.1998 sent by Governor of Assam, Lt. Gen. S.K. Sinha (Retired), former Deputy Chief of Army Staff.
- R) Because in conclusion, the above mentioned report says, "that the life of Dalit community in Mewat-Nuh today has become thorny and unbearable. Their religion, their real-estates and wealth, dignity of their womenfolk and nothing else are safe today. Even after 73 years of Independence, they have not been truly independent..."

- S) Because by virtue of section 3 of 'The Places of worship(special provisions) Act, 1991 Hindu public of the District Mewat Nuh is entitled to restore back the temples and religious places which have been demolished or destroyed by the members of Muslim community.
- T) Because the State Government and officers working under it are bound to take appropriate steps for restoring back the temples and religious places to Hindus which have been demolished or destroyed by the members of Muslim community.
- U) Because the State Government and officers working under it are bound to recover the loss sustained to the temples and religious places of Hindus from members of Muslim community of the locality.
- V) Because Central Government is under Constitutional obligation to deploy Armed Forces/ Paramilitary Forces to protect the District Mewat Nuh from internal disturbance in exercise of powers under Article 355 of the Constitution of India.

PRAYERS

The petitioner therefore, most humbly prays that this Hon'ble court may be pleased to:-

- a) Issue appropriate writ order or direction constituting a special investigating team consisting of members from CBI and NIA under the supervision of retired Supreme Court Judge to make investigation into the question of forceful conversion of Hindu residents, forceful and illegal execution of sale deeds of Hindus properties, rape of Hindu women and minor girls, the encroachment made

on public land, the conditions of temples, religious places, and cremation grounds existing there and the role of concerned officers and police and slackness committed by them in discharge of their official duty;

- b) issue an appropriate writ order or direction directing the Central Government to deploy paramilitary forces in District Nuh Mewat to protect life and liberty of citizens;
- c) issue an appropriate writ, order or direction directing to respondents to rehabilitate the exodus Hindus at their respective properties;
- d) issue an appropriate writ, order or direction directing the respondents to nullify all sale deeds executed by Hindus in favour of Muslims in last 10 years under coercion and undue influence ;
- e) issue an appropriate writ, order or direction directing the respondents to restore all the temples, places of worship and cremation grounds in their original forms which have been encroached upon by any member of the society;
- f) issue an appropriate writ, order or direction directing to make investigation and take action on the F.I.R. logged by Hindu community relating to murder, rape/ gang rapes, kidnapping, abduction , molestation and House trespass;
- g) issue an appropriate writ, order or direction directing the respondents to make investigation in all the cases relating to murder, rape/gang rapes , kidnapping, abduction , molestation and House trespass on the basis of complaint being made by the victims;
- h) issue an appropriate writ, order or direction awarding suitable compensation to the victims or their family;

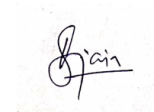
- i) issue any other and further order and/or directions be given as in the nature and circumstances of the case may require;
- j) Allow the petition with costs.

AND FOR THIS ACT OF KINDNESS, THE PETITIONER SHALL AS IN DUTY BOUND EVER PRAY.

Drawn By

FILED BY

HARI SHANKAR JAIN
Advocate



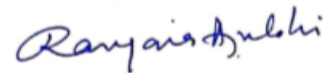
VISHNU SHANKAR JAIN
Counsel for the Petitioners

Drawn on: 15th June.2020
PLACE: NEW DELHI;
FILED ON: 16th June 2020

Interlocutory Applications at Page 41 to 44 are true as per the legal advice received and believe by me are true and correct.

3. That the contents of averments made in the writ petition are true and correct to the best of my knowledge. I say that the Annexure P-1 to P-6 contained in pages 34 to 40 produced alongwith the Writ Petition are true and correct.

4. That the averments of facts stated herein above are true to my knowledge and belief, no part of its false and nothing material has been concealed therefrom.

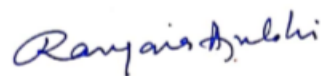


DEPONENT

VERIFICATION:

I, the above deponent hereinabove do hereby verify the contents of para 1 to 4 of this affidavit to be true and correct to the best of my knowledge and belief. I state that no part of this affidavit is false and nothing material has been concealed therefrom.

Verified at Lucknow on this day of 16th, June, 2020.



DEPONENT

APPENDIX-I**THE PLACES OF WORSHIP (SPECIAL PROVISIONS)
ACT, 1991 ACT NO. 42 OF 1991**

[18th September, 1991.]

An Act to prohibit conversion of any place of worship and to provide for the maintenance of the religious character of any place of worship as it existed on the 15th day of August, 1947, and for matters connected therewith or incidental thereto.

BE it enacted by Parliament in the Forty-second Year of the Republic of India as follows:—

1. Short title, extent and commencement.—(1) This Act may be called the Places of Worship (Special Provisions) Act, 1991.
(2) It extends to the whole of India except the State of Jammu and Kashmir.

(3) The provisions of sections 3, 6 and 8 shall come into force at once and the remaining provisions of this Act shall be deemed to have come into force on the 11th day of July, 1991.

2. Definitions.—In this Act, unless the context otherwise requires,—

(a) “commencement of this Act” means the commencement of this Act on the 11th day of July, 1991;

(b) “conversion”, with its grammatical variations, includes alteration or change of whatever nature;

(c) “place of worship” means a temple, mosque, gurudwara, church, monastery or any other place of public religious worship of any religious denomination or any section thereof, by whatever name called.

3. Bar of conversion of places of worship.—No person shall convert any place of worship of any religious denomination or any section thereof into a place of worship of a different section

of the same religious denomination or of a different religious denomination or any section thereof.

4. Declaration as to the religious character of certain places of worship and bar of jurisdiction of courts, etc.—

(1) It is hereby declared that the religious character of a place of worship existing on the 15th day of August, 1947 shall continue to be the same as it existed on that day.

(2) If, on the commencement of this Act, any suit, appeal or other proceeding with respect to the conversion of the religious character of any place of worship, existing on the 15th day of August, 1947, is pending before any court, tribunal or other authority, the same shall abate, and no suit, appeal or other proceeding with respect to any such matter shall lie on or after such commencement in any court, tribunal or other authority: Provided that if any suit, appeal or other proceeding, instituted or filed on the ground that conversion has taken place in the religious character of any such place after the 15th day of August, 1947, is pending on the commencement of this Act, such suit, appeal or other proceeding shall be disposed of in accordance with the provisions of sub-section (1).

(3) Nothing contained in sub-section (1) and sub-section (2) shall apply to,—

(a) any place of worship referred to in the said sub-sections which is an ancient and historical monument or an archaeological site or remains covered by the Ancient Monuments and Archaeological Sites and Remains Act, 1958 (24 of 1958) or any other law for the time being in force;

(b) any suit, appeal or other proceeding, with respect to any matter referred to in sub-section (2), finally decided, settled or

disposed of by a court, tribunal or other authority before the commencement of this Act;

(c) any dispute with respect to any such matter settled by the parties amongst themselves before such commencement;

(d) any conversion of any such place effected before such commencement by acquiescence; (e) any conversion of any such place effected before such commencement which is not liable to be challenged in any court, tribunal or other authority being barred by limitation under any law for the time being in force.

5. Act not to apply to Ram Janma Bhumi-Babri Masjid.—

Nothing contained in this Act shall apply to the place or place of worship commonly known as Ram Janma Bhumi-Babri Masjid situated in Ayodhya in the State of Uttar Pradesh and to any suit, appeal or other proceeding relating to the said place or place of worship.

6. Punishment for contravention of section 3.—

(1) Whoever contravenes the provisions of section 3 shall be punishable with imprisonment for a term which may extend to three years and shall also be liable to fine.

(2) Whoever attempts to commit any offence punishable under sub-section (1) or to cause such offence to be committed and in such attempt does any act towards the commission of the offence shall be punishable with the punishment provided for the offence.

(3) Whoever abets, or is a party to a criminal conspiracy to commit, an offence punishable under sub-section (1) shall, whether such offence be or be not committed in consequence of such abetment or in pursuance of such criminal conspiracy, and notwithstanding anything contained in section 116 of the Indian Penal Code (45 Of 1860), be punishable with the punishment provided for the offence.

7. Act to override other enactments.—The provisions of this Act shall have effect notwithstanding anything inconsistent therewith contained in any other law for the time being in force or any instrument having effect by virtue of any law other than this Act.

8. [Amendment of Act 43 of 1951.]—Rep. by the Repealing and Amending Act, 2001 (30 of 2001), s. 2 and the First Schedule (w.e.f. 3-9-2001).

APPENDIX-II**PROVISIONS FROM THE CONSTITUTION OF INDIA****Article 14: Equality before law.**

14. The State shall not deny to any person equality before the law or the equal protection of the laws within the territory of India.

Article 15. Prohibition of discrimination on grounds of religion, race, caste, sex or place of birth.15.

(1) The State shall not discriminate against any citizen on grounds only of religion, race, caste, sex, place of birth or any of them.

Article 19 Right to Freedom

19. Protection of certain rights regarding freedom of speech, etc.

(1) All citizens shall have the right—

(a) to freedom of speech and expression;

(b) to assemble peaceably and without arms;

(c) to form associations or unions;

(d) to move freely throughout the territory of India;

(e) to reside and settle in any part of the territory of India;

(f) [XXX]

(g) to practise any profession, or to carry on any occupation, trade or business.

(2) Nothing in sub-clause (a) of clause (1) shall affect the operation of any existing law, or prevent the State from making any law, in so far as such law imposes reasonable restrictions on the exercise of the right conferred by the said sub-clause in the interests of 4 [the sovereignty and integrity of India,] the security

of the State, friendly relations with foreign States, public order, decency or morality, or in relation to contempt of court, defamation or incitement to an offence.

(3) Nothing in sub-clause (b) of the said clause shall affect the operation of any existing law in so far as it imposes, or prevent the State from making any law imposing, in the interests of the sovereignty and integrity of India or] public order, reasonable restrictions on the exercise of the right conferred by the said sub-clause.

(4) Nothing in sub-clause (c) of the said clause shall affect the operation of any existing law in so far as it imposes, or prevent the State from making any law imposing, in the interests of 4 the sovereignty and integrity of India or public order or morality, reasonable restrictions on the exercise of the right conferred by the said sub-clause.

(5) Nothing in 1 [sub-clauses (d) and (e)] of the said clause shall affect the operation of any existing law in so far as it imposes, or prevent the State from making any law imposing, reasonable restrictions on the exercise of any of the rights conferred by the said sub-clauses either in the interests of the general public or for the protection of the interests of any Scheduled Tribe.

(6) Nothing in sub-clause (g) of the said clause shall affect the operation of any existing law in so far as it imposes, or prevent the State from making any law imposing, in the interests of the general public, reasonable restrictions on the exercise of the right conferred by the said sub-clause, and, in particular, nothing in the said sub-clause shall affect the operation of any existing law in so far as it relates to, or prevent the State from making any law relating to,—

(i) the professional or technical qualifications necessary for practising any profession or carrying on any occupation, trade or business, or

(ii) the carrying on by the State, or by a corporation owned or controlled by the State, of any trade, business, industry or service, whether to the exclusion, complete or partial, of citizens or otherwise.

Article 21 Protection of life and personal liberty.

No person shall be deprived of his life or personal liberty except according to procedure established by law

*[21A. Right to education

The State shall provide free and compulsory education to all children of the age of six to fourteen years in such manner as the State may, by law, determine.]

Article 25: Freedom of conscience and free profession, practice and propagation of religion.

(1) Subject to public order, morality and health and to the other provisions of this Part, all persons are equally entitled to freedom of conscience and the right freely to profess, practise and propagate religion.

(2) Nothing in this article shall affect the operation of any existing law or prevent the State from making any law—

(a) Regulating or restricting any economic, financial, political or other secular activity which may be associated with religious practice;

(b) Providing for social welfare and reform or the throwing open of Hindu religious institutions of a public character to all classes and sections of Hindus.

Explanation I.—The wearing and carrying of kirpans shall be deemed to be included in the profession of the Sikh religion.

Explanation II.—In sub-clause (b) of clause (2), the reference to Hindus shall be construed as including a reference to persons professing the Sikh, Jaina or Buddhist religion, and the reference to Hindu religious institutions shall be construed accordingly.

Article 355:-

Duty of the Union to protect States against external aggression and internal disturbance

It shall be the duty of the Union to protect every State against external aggression and internal disturbance and to ensure that the Government of every State is carried on in accordance with the provisions of this Constitution.

ANNEXURE P-1

भारत सरकार

Government of India



रंजना अग्निहोत्री
Ranjana Agnihotri

जन्म तिथि / DOB : 26/10/1969
महिला / Female



5517 0257 1683



भारतीय विशिष्ट पहचान प्राधिकरण

Unique Identification Authority of India

पता: D/O: राजेन्द्र कान्त
अग्निहोत्री, 512 / 695, बाल्दा रोड,
निशात गंज, निकट निशात गंज
पुलिस चौकी, लखनऊ, न्यू हैदराबाद,
उत्तर प्रदेश, 226007

Address: D/O: Rajendra Kant Agnihotri,
512 / 695, Balda Road, Nishat Ganj, Near
Nishat Ganj Police Chowki, Lucknow, New
Hyderabad, Uttar Pradesh, 226007

5517 0257 1683

1947
1800 300 1947

help@uidai.gov.in

www
www.uidai.gov.in

ANNEXURE P-2

 भारत सरकार
GOVERNMENT OF INDIA



जीतेंदर सिंह
Jitender Singh
जन्म तिथि/ DOB: 10/02/1976
पुरुष / MALE



4225 9131 5979

मेरा आधार, मेरी पहचान

 भारतीय विशिष्ट पहचान प्राधिकरण
UNIQUE IDENTIFICATION AUTHORITY OF INDIA

पता:
S/O यदुराज सिंह, तहसील
- गोंडा, गुलाब सिंह पुरवा,
बीरपुर बिसेन, गोंडा,
उत्तर प्रदेश - 271123

Address:
S/O Yaduraj Singh, TEHSEEL -
GONDA, GULAB SINGH
PURA, Beerpur bisain,
Gonda,
Uttar Pradesh - 271123

4225 9131 5979

MEERA AADHAAR, MERI PEHACHAN

ANNEXURE P-3


भारत सरकार
GOVERNMENT OF INDIA


शिशिर चतुर्वेदी
Shishir Chaturvedi
जन्म तिथि/ DOB: 12/12/1974
पुरुष / MALE



8763 5288 1810

आधार - आम आदमी का अधिकार


भारतीय विशिष्ट पहचान प्राधिकरण
UNIQUE IDENTIFICATION AUTHORITY OF INDIA™

पता:

संबोधित: जे.के. चतुर्वेदी,
215/460, इच्छा भवन
सब्जी मंडी चरबाग, राजेन्द्र
नगर, लखनऊ,
उत्तर प्रदेश - 226004

Address:
S/O: J.K.Chaturvedi, 215/460,
ICHHA BHAWAN SABJI MANDI
CHARBAGH, Rajendra Nagar,
Lucknow,
Uttar Pradesh - 226004

8763 5288 1810

 1947
1800 300 1947

 help@uidai.gov.in

 www.uidai.gov.in

 P.O. Box No. 1947,
Bengaluru-560 001

ANNEXURE P-4



भारत सरकार
GOVERNMENT OF INDIA


Ashutosh Mishra
 आशुतोष मिश्रा
 जन्म तिथि/DOB:
 23-09-1993
 पुरुष / MALE



9215 2046 6951


आधार - आम आदमी का अधिकार



भारतीय विशिष्ट पहचान प्राधिकरण
UNIQUE IDENTIFICATION AUTHORITY OF INDIA™


पता


आत्मज: विद्या सागर मिश्रा, ए - 1479 / 7,
 मीना मार्केट के पास, ए - ब्लॉक, इंदिरा
 नगर, इंदिरा नगर, लखनऊ,
 उत्तर प्रदेश-226016


Address:
 S/O: Vidya Sagar Mishra, A - 1479 / 7,
 Near Meena Market, A - Block, Indira
 Nagar, Indira Nagar, Lucknow,
 Uttar Pradesh-226016



 1947
 1800 300 1947

 help@uidai.gov.in

 www.uidai.gov.in

 P.O. Box No. 1947,
 Bengaluru-560 001

ANNEXURE P-5



The image shows the front of an Aadhaar card. At the top left is the Government of India emblem. To its right, the text "भारत सरकार" (Government of India) is written in Hindi, and "GOVERNMENT OF INDIA" is written in English. Below this, there is a portrait of a man. To the right of the portrait, the name "करुणेश कुमार शुक्ल" (Karunesh Kumar Shukla) is written in Hindi, followed by "Karunesh Kumar Shukla" in English. Below the name, the date of birth is given as "जन्म तिथि/ DOB: 04/08/1991" and the gender as "पुरुष / MALE". A QR code is located to the right of the text. At the bottom, the Aadhaar number "5231 6113 4226" is printed in large digits. Below the number, the slogan "मेरा आधार, मेरी पहचान" (My Aadhaar, My Identity) is written in Hindi.

भारत सरकार
GOVERNMENT OF INDIA

करुणेश कुमार शुक्ल
Karunesh Kumar Shukla
जन्म तिथि/ DOB: 04/08/1991
पुरुष / MALE

5231 6113 4226

मेरा आधार, मेरी पहचान



The image shows the back of an Aadhaar card, specifically the address label. At the top left is the Aadhaar logo. To its right, the text "भारतीय विशिष्ट पहचान प्राधिकरण" (Unique Identification Authority of India) is written in Hindi, and "UNIQUE IDENTIFICATION AUTHORITY OF INDIA" is written in English. Below this, the address is provided in two columns. The left column is in Hindi, and the right column is in English. At the bottom, the Aadhaar number "5231 6113 4226" is printed in large digits. Below the number, the slogan "MERA AADHAAR, MERI PEHACHAN" is written in English.

भारतीय विशिष्ट पहचान प्राधिकरण
UNIQUE IDENTIFICATION AUTHORITY OF INDIA

पता: Address:

S/O राम नारायण शुक्ल, S/O Ram Narayan Shukla,
गांव-पकरी भीखी, पोस्ट- village-pakri bhikhi, post-belhra,
बेलहरा, पकरी भिखी, बस्ती, Pakari Bhikhi, Basti,
उत्तर प्रदेश - 272182 Uttar Pradesh - 272182


5231 6113 4226

MERA AADHAAR, MERI PEHACHAN

3. That in paragraph 1A of the writ petition the petitioners have made averment in terms of Order XXXVIII Rule 12 (2)(i) of the Supreme Court Rules 2013.

4. That in compliance of Order XXXVIII Rule 12 (2)(ii) of the Supreme Court Rules 2013 this Affidavit is being filed.

5. That it is specifically stated here that there is no personal gain, private motive or oblique reason in filling the present Public Interest Litigation by the petitioners.

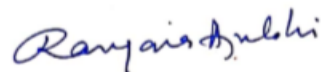


DEPONENT

VERIFICATION:

I, the above deponent hereinabove do hereby verify the contents of para 1 to 5 of this affidavit to be true and correct to the best of my knowledge and belief. I state that no part of this affidavit is false and nothing material has been concealed therefrom.

Verified at Lucknow on this day of 16th, June, 2020.



DEPONENT

It is therefore, most respectfully prayed that this Hon'ble Court may be graciously pleased to:

- a) Exempt the Petitioners from filing welfare stamp at present and allow them to file the same as soon as same becomes available;and
- b) Pass such other order or orders as this Hon'ble Court may deem fit and proper in the circumstances of the case.

**FOR THIS ACT OF KINDNESS THE PETITIONER
AS IN DUTY BOUND SHALL FOREVER PRAY.**

Filed by:



VISHNU SHANKAR JAIN
Advocate for the Petitioner

New Delhi
Date: 16.06.2020

3. That the petitioners undertake to file affidavit in support of the petition immediately on normalcy of the situation.
4. That in the interest of justice present petition may be entertained without filing notarized affidavit.

P R A Y E R

It is therefore, most respectfully prayed that this Hon'ble Court may be graciously pleased to:

- a) Exempt the Petitioners from filing notarized affidavit at present and permit him to file the same immediately on normalcy of the situation; and
- b) Pass such other order or orders as this Hon'ble Court may deem fit and proper in the circumstances of the case.

**FOR THIS ACT OF KINDNESS THE PETITIONER
AS IN DUTY BOUND SHALL FOREVER PRAY.**

Filed by:



VISHNU SHANKAR JAIN
Advocate for the Petitioner

New Delhi

Date: 16th.June 2020