

INSTRUCTIONS: 1. DO NOT WRITE OUTSIDE THE BOXES. 2. WRITE IN BLOCK CAPITAL LETTERS. 3. ONE CHARACTER IN EACH BOX. 4. DO NOT Staple the Sheet.

IN THE HIGH COURT OF DELHI AT NEW DELHI

Case Type

Number

Year

WRIT

OF 2020

IN THE MATTER OF:-

NAME A D P S S R E A D S A N R

..... PLAINTIFF /
PETITIONER

VS

NAME G O U T . O F N C T D E L H I . S A N R

..... DEFENDANT /
RESPONDENT

1 (a) Case Category

N.A.

(b) Case Category

2 Date of Impugned order

N.A.

3 (a) Similar Matter

Case Type / Number

N.A.

4 Statute Involved

CONSTITUTION OF INDIA

Criminal Matters - Code 100 to 105

FIR No.

N.A.

FIR Date

Police Station

Service Matters - Code 500 to 505

Department / Authority /
Organization etc.GOVT. OF NCT DELHI
M.C.D.

Motors Accident Claim Matters - Code 600

Insurance Company

N.A.

Lawyers Code

D-60 / 95

IN THE HIGH COURT OF DELHI AT NEW DELHI
(CIVIL ORIGINAL JURISDICTION)
W.P.(C) No. /2020

PUBLIC INTEREST LITIGATION:

IN THE MATTER OF:

Akhil Dilli Prathmik Shikshak Sangh (Regd.) & Anr

....Petitioners

Vs

Govt. of NCT, Delhi & Ors

...Respondents

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Dated: 4-11-2020
New Delhi

Ranjit Sharma
4-11-2020
Ranjit

Giriraj Sharma
PETITIONERS

RANJIT SHARMA
Advocate for the petitioner
Supreme Court Bar Lib-II
New Delhi-1
Mob. No. 9818493174, 9643504184

e-mail advranjitsharma2013@gmail.com

:: Verify e-Court Fee Receipt

Receipt Details

Note : This Receipt has been generated 0 days ago.

Government of NCT OF DELHI e-Court Fee Receipt

Issue Date & Time	:	03-NOV-2020 19:12:06
Name of The Acc	:	RANJIT SHARMA
Location	:	NCT OF DELHI
Receipt Type	:	Court Fee Receipt
Name of Litigant	:	AKHIL DILLI PRATHMIK SHIKSHAK SANGH (REGD.) & ANR
e-Court Fee Receipt No	:	DLCT0306K2012T670
e-Court Fee Amount	:	135 (Rupees One Hundred Thirty-Five Only)
Status	:	Not Locked

[Back](#)

IN THE HIGH COURT OF DELHI AT NEW DELHI
(CIVIL ORIGINAL JURISDICTION)
W.P.(C) No. /2020

PUBLIC INTEREST LITIGATION

IN THE MATTER OF:

Akhil Dilli Prathmik Shikshak Sangh (Regd.) & Anr

....Petitioners

Vs

Govt. of NCT, Delhi & Ors

...Respondents

NOTICE OF MOTION

To,

The Standing Counsel
Govt. of N.C.T, Delhi
Chamber No.....
High Court of Delhi

Sir,

Kindly acknowledge receipt of a copy of the PIL being filed herewith. The petition is likely to be listed for admission hearing on 11-2020.

Thanking You,

Ranjit Sharma
4-11-2020 **PETITIONERS**

***Dated: 4-11-2020
New Delhi***

***RANJIT SHARMA ADVOCATE
Supreme Court Bar Lib-II
New Delhi-1
Mob.No.9818493174, 9643504184***

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IN THE HIGH COURT OF DELHI AT NEW DELHI
(CIVIL ORIGINAL JURISDICTION)
W.P.(C) No. /2020

PUBLIC INTEREST LITIGATION:

IN THE MATTER OF:

Akhil Dilli Prathmik Shikshak Sangh (Regd.) & Anr

....Petitioners

Vs

Govt. of NCT, Delhi & Ors

...Respondents

URGENT APPLICATION

To,

The Registrar,
High Court of Delhi

Sir,

Kindly treat the above matter urgent under the High Court of Delhi
Rules.

Thanking You,

Re Sabas
4-11-2020
Ranjit
4-11-2020

Dated: 4 /11/2020
New Delhi

PETITIONERS
RANJIT SHARMA ADVOCATE
Supreme Court Bar Lib-II
New Delhi-1
Mob.No.9818493174, 9643504184

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IN THE HIGH COURT OF DELHI AT NEW DELHI
(CIVIL ORIGINAL JURISDICTION)

W.P.(C) No. /2020

PUBLIC INTEREST LITIGATION

MEMO OF PARTIES

IN THE MATTER OF:

1. Akhil Dilli Prathmik Shikshak Sangh (Regd.)
A Representative body of the Primary School
Teachers in Delhi, through,
its General Secretary R.C. Dabas
at Jagdish Mishra Shikshak Bhawan
41, Institutional Area, D- Block
Janakpuri, New Delhi -58
2. Giri Raj Sharma
S/o Ram Chander Sharma
R/o J-166, Old Roshanpura, Nazafgarh,
New Delhi-43

....Petitioners

Vs

1. Govt. of NCT, Delhi
Through the Principal Secretary Finance
At New Secretariat, ITO, Delhi-1
2. North Delhi Municipal Corporation
Through the Commissioner,
Civic Centre JLN Marg, New Delhi-2
3. South Delhi Municipal Corporation
Through the Commissioner,
Civic Centre JLN Marg, New Delhi-2
4. East Delhi Municipal Corporation
Through the Commissioner,
Udyog Sadan, Patparganj Industrial Area
New Delhi-92

.....Respondents

Dated: 4 /11/2020
New Delhi

R. C. Dabas
4-11-2020
Ranjit
PETITIONER
RANJIT SHARMA ADVOCATE
Supreme Court Bar Lib-II
New Delhi-1
Mob.No.9818493174, 9643504184

5
IN THE HIGH COURT OF DELHI AT NEW DELHI

(CIVIL ORIGINAL JURISDICTION)

W.P.(C) No. /2020

PUBLIC INTEREST LITIGATION

IN THE MATTER OF:

Akhil Dilli Prathmik Shikshak Sangh (Regd.) & Anr

....Petitioners

Vs

Govt. of NCT, Delhi & Ors

...Respondents

CERTIFICATE

It is certified that the petitioner has filed complete records concerning with the issues involved in the petition and inaction on the part of the respondents regarding providing cashless medical treatment to the retired teachers/employees of North, South & East DMC and no other records other than the same have been filed along with the Writ Petition/PIL.

R. C. Sarbas *G. R. Sarbas*
4-11-20 4-11-2020
PETITIONERS

Dated: 4-11-2020
New Delhi

Ranjit
RANJIT SHARMA
Advocate for the petitioner
Supreme Court Bar Lib-II
New Delhi-1
Mob. No.9818493174, 9643504184

LIST OF DATES & SYNOPSIS

The erstwhile Municipal Corporation of Delhi provided for cashless medical facility to its retired teachers/employees.

2012-The Corporation was bifurcated into three namely, South, North and East DMCs with a common Health Department for all three Corporations. The Corporations, has taken subscription premium from the retired teachers and employees for extending cashless medical facility.

2020-Despite the retired employees having deposited the premium the Corporations are yet to extend to them the cashless medical facility. The employees are required to first report to the Health Department and after obtaining the referral from the Department they can seek medical treatment from the approved Hospital. Not only this, if the approved Hospital advises surgery the retired employee is required to revert back to the Health Department for approval and only then, the actual treatment will start. In emergency cases such a procedure is not only cumbersome but also likely to prove fatal. The problem does not end here. The Hospitals do not provide cashless treatment. The employees have to deposit money first and seek reimbursement from the Health Department of MCD later which takes a huge time. This act of the M.C.D is

absolutely unfair and illegal. During this Corona Virus Pandemic period a large number of retired employees who did not receive pension on time had to face extreme hardships in arranging money for their treatment as the Hospitals did not provide cashless treatment. The petitioner no.2 in the present case got his wife treated for heart ailment in BLK super Speciality Hospital in Delhi on 8-9-2020 and had to arrange Rs.1,39,000/- to pay to the Hospital for treatment of his wife as she had suffered heart attack on 7-9-2020. He had deposited Rs.39,000/- as premium in 2010 on his retirement. He was issued Identity Card for cashless medical facility by the Corporation and yet he had to pay money to the Hospital. The medical bill submitted by him to the South DMC is yet to be reimbursed to him. He, however, is not the only sufferer there are many other retired employees running from office to office to get reimbursement of their medical bills which the three Corporations have kept pending under various objections.

Petitioners, therefore, seek this Hon'ble Court's kind indulgence in the matter so that the cashless medical facility is extended to the retired teachers/employees of MCD.

4-11-2020- Hence, this Writ Petition (PIL).

IN THE HIGH COURT OF DELHI AT NEW DELHI
(CIVIL ORIGINAL JURISDICTION)
W.P.(C) No. /2020

PUBLIC INTEREST LITIGATION

IN THE MATTER OF:

1. Akhil Dilli Prathmik Shikshak Sangh (Regd.)
A Representative body of the Primary School
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at Jagdish Mishra Shikshak Bhawan
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S/o Ram Chander Sharma
R/o J-166, Old Roshanpura, Nazafgarh,
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Vs

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At New Secretariat, ITO, Delhi-1
2. North Delhi Municipal Corporation
Through the Commissioner,
Civic Centre JLN Marg, New Delhi-2
3. South Delhi Municipal Corporation
Through the Commissioner,
Civic Centre JLN Marg, New Delhi-2
4. East Delhi Municipal Corporation
Through the Commissioner,
Udyog Sadan, Patparganj Industrial Area
New Delhi-92

.....Respondents

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**A WRIT PETITION IN PUBLIC INTEREST UNDER ARTICLE 226
R/W ARTICLES 14 AND 21 OF THE CONSTITUTION OF INDIA
FOR ISSUANCE OF AN APPROPRIATE WRIT/ DIRECTION/
ORDER IN THE NATRUE OF MANDAMOUS DIRECTING THE
RESONDENTS TO PROVIDE CASHLESS MEDICAL SERVICES
TO THE RETIRED TEACHERS/EMPLOYEES AND FURTHER
DIRECTION TO THE RESPODNENTS TO REIMBURSE THE
PENDING BILLS ON ACCOUNT OF MEDICAL TREATMENT.**

To,

Hon'ble the Chief Justice and His
Lordship's companion justices of
Hon'ble the High Court of Delhi

The humble petition of the
petitioner above-named

MOST RESPECTFULLY SHOWETH:

1. That the petitioners state that they have no personal interest in the matter and that the petition is not guided by the motive of self-gain or for gain of any other Person/Institution/Body and that there is no motive other than of public interests in filing the present writ petition.
2. That the petitioner no.1 is a registered body of Teachers in Delhi and is very much active in acting in furtherance of interest of teachers and students. Recently, petitioner filed W.P.(C) No.3394/2020 for direction to pay the salary of teachers working under the North DMC. The petition was dismissed in limine against which petitioner filed LPA No.158/2020, which has been suo motu converted into PIL and numbered as W.P.(C) No.3833/2020. The North Delhi Municipal Corporation has not paid pension to the retired teachers for the last four months. The

petitioner has filed WP (C) No.5533/2020. The pension for the month of April was paid on 6-10-2020 despite the order of this Hon'ble Court. The South DMC and East DMC have also not been paying pension on time, as a result of which the retired teachers some of whom are at advance age are facing enormous difficulties in meeting their expenses. Additionally, the retired teachers and employees of all three M.C.Ds are not being provided with cashless medical services despite collecting subscription from them. Since, the Corporations have not paid the bills of the approved/empanelled hospitals, the retired employees of the Corporation have been facing extreme difficulties in getting medical treatment. Since, their pension is not released on time their difficulties get aggravated. It is significant to state here that as pension has not been released to them since May, 2020 the retired employees are undergoing extreme difficulties and are forced to depend upon their children.

It is, further significant to state here that even the procedure adopted for treatment in approved hospitals is cumbersome. In every case the patient has to obtain referral from the Health Department of MCD for treatment in the hospital. Moreover, if the hospital advises surgery or any other major medical act the patient is required to relate back to the Health Department for approval and only then, the patient is treated. In emergency cases such a procedure is bound to result in fatality. For an instance, petitioner no.2 Shri Giriraj Sharma retired as Principal from the Education Department of MCD in 2010. He deposited Rs.39,000/- as subscription money for cashless medical relief which is evident

from the receipt dt.4-8-2010 (**Annexure P1**). He was issued Identity Card dt.4-8-2010 (**Annexure P2**) valid up to life time. Now, in 2020 his wife suffered heart attack in September, 2020 on account of which she required urgent medical treatment. Petitioner no.2 could not go to the Hospital approved directly; he had to seek referral from the Health Department of MCD. He got the referral slip on 7-9-2020 where after, he consulted BLK Super Speciality Hospital, Pusa Road, New Delhi. The doctor advised placing of stents in heart for which the petitioner could not give his nod by himself. He had to revert back to the Health Department of Municipal Corporations of Delhi and then the patient was treated on 8-9-2020. The Hospital, however, did not provide her cashless medical treatment. The petitioner ran back to MCD for immediate help but without any result. Finally, the petitioner had to deposit Rs.1,39,563/- for treatment of his wife, which is evident from the bill dt.8-9-2020 (**Annexure P3**). For this purpose the petitioner had to seek financial help from his friend and his son.

3. That the petitioners submit that the present writ petition is for the benefit of a large number of retired teachers and employees of the MCDs who are either individually litigating on the issue or are in the process of filing litigation for reimbursement of medical bills. The bills are kept pending by the Corporation for months raising myriad objections which defeats the purpose of cashless medical treatment. The Delhi Govt. provides cashless medical treatment to its employees which is actually cashless. Under MCD the retired employees are being forced to spend their own money and thereafter run from pillar to post to get the reimbursement of

money. This practice being followed by the MCD is not actually cashless.

4. That the respondents likely to be affected by the orders sought in the writ petition have been impleaded as respondents. The petitioners state that to their knowledge, no other persons/bodies/institutions are likely to be affected by the orders sought in the writ petition.
5. That the petitioners state that it is an association of teachers registered under the Societies Registration Act, with its office address at Akhil Dilli Prathmik Shikshak Sangh (Regd.) A Representative body of the Primary School, Teachers in Delhi, through, its General Secretary R.C. Dabas at Jagdish Mishra Shikshak Bhawan, 41, Institutional Area, D- Block, Janakpuri, New Delhi -58 and it has the means to pay the costs, if any imposed by the court and it undertakes to pay the same.
6. That the Municipal Corporation of Delhi follows the rules and regulations of the Government of N.C.T, Delhi. Presently, it is divided into three parts namely, SDMC, NDMC and EDMC. It has its own source of revenue through property tax etc. and other municipal taxes and for other things it is dependent upon aids from the Government of NCT, Delhi. There is a common Health Department for all three MCDs.
7. That the petitioners have submitted several representations including the one dt.26-12-2019 (**ANNEXURE P4**) and staged dharna and demonstration for regular payment of salary, pension on time and provision of cashless medical service but their effort

has not paid any dividend. In fact, the petitioners have come to know that the empanelled Hospitals have been refusing cashless medical treatment because their bills have not been defrayed. Thus, the retired employees of M.C.D have been tied hand and foot and left at the crossroads by the Corporations. They are neither given pension nor cashless medical treatment. During this pandemic some of them have died due to non-availability of immediate medical treatment. This act on the part of the M.C.Ds is extremely cruel and unbecoming of an ideal employer.

8. That the retired teachers of North DMC are particularly facing immense problems in meeting their daily expenses. Some of them have medical problems, which require urgent treatment and care. These employees do not have any other source of livelihood other than their pension and the facility of cashless medical treatment. But, they are denied even this bare minimum. In legal terms the act of the M.C.D amounts to an act of fraud and criminal breach of trust.
9. That the issues involved in the present case are common to all retired teachers working under the North, South & East DMCs and therefore, individual teachers who are quite large in number have not been individually made parties to the present petition. Besides, this Hon'ble Court is already seized of the issue regarding payment of salary to the teachers and pension of retired employees of M.C.D in W.P.(C) No.3833/2020, 5033/2020, 533/2020 and 6532/2020.

10. **GROUND**

- I. Because the act of the MCD in not providing cashless medical facilities to the retired employees despite collecting the premium amount from them is not only the breach of their fundamental right to life but also a criminal act of fraud and breach of trust. These retired employees are denied pension on time and also medical treatment in need. The act of the M.C.D is extremely cruel and inhuman.
 - II. Because denial of pension and cashless medical facility to the teachers and other employees by the respondents has caused immense problems not only for them but for their dependants as well. They are faced with the situation of starvation. They cannot get proper treatment for themselves or their dependants. In Harjinder Singh Vs Punjab State ware housing corporation (2010) 3SCC, 192, the Hon'ble Supreme Court held that if a man is deprived of his livelihood, he is deprived of all his fundamental/ constitutional rights. Denial of salary/pension and cashless medical services to teachers and other employees in the present case has taken away all their rights.
 - III. Because a common order on the issue involved in the case will check proliferation of litigation.
11. That no petition likes the present one is pending adjudication before this Hon'ble Court or any other court.
 12. That the petitioners do not have any other adequate efficacious remedy.

PRAYER

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

- i. issue an appropriate writ/order/direction in the nature of mandamus directing the respondents to provide cashless medical services to the retired teachers and employees of three MCDs namely South, North and East, who have deposited the subscription fees for the purpose and further direction to the respondents to reimburse the medical bills of the retired employees on account of medical treatment without delay.

AND/OR

- ii. pass such other order/s as may be deemed fit and proper.

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

Rexaban, Ghant
4-11-2020 4-11-2020

PETITIONERS

Ranjit

RANJIT SHARMA, ADVOCATE
SUPREME COURT BAR-LIBRARY -II
NEW DELHI

NEW DELHI
DATED: 4-11-2020

Mob: 9818493174, 9643504184

IN THE HIGH COURT OF DELHI AT NEW DELHI
(CIVIL ORIGINAL JURISDICTION)
W.P.(C) No. /2020

PUBLIC INTEREST LITIGATION:

IN THE MATTER OF:

Akhil Dilli Prathmik Shikshak Sangh (Regd.) & Anr

....Petitioners

Vs

Govt. of NCT, Delhi & Ors

...Respondents

AFFIDAVIT

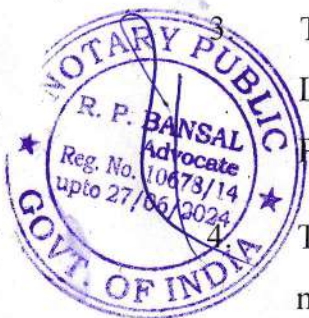
I, R.C Dabas, S/O Late Ram Sharan Dabas, aged about 63 years, General Secretary of the Akhil Dilli Prathmik Shikshak Sangh, at Jagdish Mishra Shishak Bhawan 41, Institutional Area, D-Block, Janakpuri, New Delhi-58 do hereby, solemnly affirm and declare as under:

1. That I am General Secretary of the petitioner and therefore, well-conversant with its facts and circumstances and authorized to swear this affidavit.

2. That I have filed the present petition as a Public Interest Litigation.

That I have gone through the Delhi High Court (Public Interest Litigation) Rules, 2010 and do hereby affirm that the present Public Interest Litigation is in conformity thereof.

That the Petitioner has no personal interest in the litigation and neither myself nor anybody in whom the petitioner is interested would in any manner benefit from the relief sought in the present



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litigation save as a member of the general public. This petition is not guided by self gain or gain of any person, institution, body and there is no motive other than of public interest in filing this petition.

5. I have done whatsoever inquiry/investigation which was in my power to do, to collect all data/material which was available and which was relevant for this court to entertain the present petition. I further confirm that I have not concealed in the present petition any date/material information which may have enabled this court to form opinion whether to entertain this petition or not and/or whether to grant any relief or not.

R. C. Sahas
DEPONENT

VERIFICATION:

Verified at New Delhi on this 4th day of November, 2020 that the contents of this affidavit contained in paras 1-5 are true and correct to the best of my knowledge and nothing material has been concealed therefrom.

Ranjit Singh
Identified by D-60995

R. C. Sahas
DEPONENT



Certified that the above named Deponent
Identify by Shri Smt.
Solemnly affirmed before me at Delhi
S. No.
The contents of the affidavit which have
been read & explained to me are true and
correct
Notary

Ranjit Singh
F-3 NOV 2020



दिल्ली नगर निगम

MUNICIPAL CORPORATION OF DELHI



Form CI-1

Visit us at : www.mcdonline.gov.in

रसीद / RECEIPT

NO.: AA

51151

नाम/Name *Ch. K. Sharma*

दिनांक/Date

6/18/10

पता/Address

J-166 Old Rohtaspur N.D. 43

विभाग/Department

CHMO/ae

सम्पर्क/Contact No.

क्षेत्र/Zone

Nazafgarh

उद्देश्य/Purpose

Medical Reimbursement

Below mentioned amount received, will be credited to the concerned accounts.

लेखाशीर्ष/Head of A/c

विवरण/Particulars

राशि/Amount

41-192

Medical Reimbursement for Patients

39000



राशि (शब्दों में)/Amount (In words):

Thirty Nine Thousand only

कुल/Total: 39000

नकद/चैक/डीडी नं./Cash/Cheque/DD No.:

बैंक/Bank:

शाखा/Branch:

चैक भुगतान स्वीकृत होने की स्थिति में।

Cheques subject to realisation/authorisation.

*Sopra*Signature of
Personnel Issuing Receipt
with Name & Designation

T.C

Amexurse P2 19

परिवार के फोटोग्राफ के लिए स्थान
SPACE FOR FAMILY PHOTOGRAPH

संख्या
No. 11049

पी.पी.ओ. संख्या 16039-Z
P.P.O. No. 16039-Z

OLD CARD No. - 8967



Jaigarh Zone



Entitlement: ~~SEMI PRIVATE~~
~~General/Semi/Private/Private~~
(Strike out which is not applicable)

दिल्ली नगर निगम : स्वास्थ्य विभाग
(निगम पेंशनभोगियों की स्वास्थ्य योजना)
MUNICIPAL CORPORATIONS OF DELHI
HEALTH DEPARTMENT
(Municipal Pensioner's Health Scheme)

परिचय-पत्र
IDENTITY CARD

Medical Centre opted Bijwasan Rs.

Last Basic Pay drawn 18910 + 5400 GP = 24310 =

Contribution deposited Rs. 39000/-

vide G-8 No. 51151 Dated 4.8.2010

Dy. Director of Edu.

Najafgarh Zone

NDMC/SDMC/EDMC

(Strike out which is not applicable)

Date of Issue 04.8.2010

वैधता-तिथि

Valid upto Life Time

T.C

पूरा नाम

1. Name in full GIRI RAJ SHARMA

***परिवार का ब्यौरा**

*DETAILS OF FAMILY

वह अंतिम विभाग, जिसमें कर्मचारी कार्यरत था

2. Department in which last employed Education

Deptt. Nafaygarh zone

निवास स्थान का पता

3. Residential Address J-166 OLD

ROSHAN PURA (Najafgarh) N.D-43

पेंशनभोगी के हस्ताक्षर अथवा अंगूठे का निशान

4. Signature or Thumb Impression of

Pensioner

नाम Name	जन्म-तिथि Dt. of Birth	सम्बन्ध Relationship
Smt. 1. Rajwati Devi	19 15.12.55	wife
2. Veena	10-7-1957 10-7-1979	Widow Daughter
3.		
4.		
5. 18		

परिवार' से अभिप्राय सी.एस. (एम.ए.) नियम, 1944 के अन्तर्गत परिभाषित अनुसार ही है।

The meaning of 'FAMILY' is the same as defined under CS(MA) Rules, 1944

प्रतिष्ठित **Dr. Arun Kumar Jain** जारी करने वाले अधिकारी * Director of Ed
ऑफिस (नि. एड. क्षेत्र) Medical Officer (जी. एड. वि. अधिकारी)
Counselling Cell, DHA (New B) Nalagarh Zone
C.A.M.O. (D.D.O.) M.P.C. www.r

M.P. (TH)—Job 1205—2,000—1-5-2018—
www.mcdonline.gov.in

T.C

PAN No: AAATL0242R Ret No: DGHS/NH/803

In- patient bill (Summary)

GSTIN : 07AAATL0242R2ZE

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I.P. No. : 20/316880	Original	Bill No. : IPCA21/118082
MRD No. : 793516		Bill Date : 08/09/2020 04:19
Patient Name : Mrs. Rajwati Devi		Consultant : Dr. Naresh Kumar Goyal/Dr Arvind Sethi/Dr Anunai Srivastava
Gender/Age : Female/64 Yr		D.O.A : 05/09/2020 21:18
Contact No : 9818990717		D.O.D : 08/09/2020 16:19
Address : J-166, OLD ROSHAN PURA NAJAFGARH NEW DELHI NEW DELHI, New Delhi		Bed No/Ward : MBU16/MULTI BED UNIT 4F
Payer : MCD (MUNICIPAL CORPORATION of Delhi) including NDMC SDMC		Billing Category : SIX BEDDED
Sponsor : MCD (MUNICIPAL CORPORATION of Delhi) including NDMC SDMC		SAC Code : 990311
Payer GSTIN :		Approval Identity No :
Payer Address : E-4, block, 7th floor, Dr. S P M Civic-centre, J N Marg, NEW DELHI New Delhi		

S#	Particulars	Gross Amt	Net Amt	Pat Amt	Payer Amt
1	Pathology	4675.00	4675.00	4675.00	0.00
2	Surgery /Procedure / Investigation /Packages	99303.00	99303.00	99303.00	0.00
3	IMPLANTS	23625.00	23625.00	23625.00	0.00
4	Consumable	3050.00	3050.00	3050.00	0.00
5	Pharmacy	8910.00	8910.00	8910.00	0.00
		139563.00	139563.00	139563.00	0.00
	Bill Settled				
			Gross Amount		139563.00
			Net Amount		139563.00
			Amount Received Rs. (-)		139563.00
			Final Approved Amount (-)		
			Balance		0.00
Net Amount In Words:(Rs.) One Lakh Thirty Nine Thousand Five Hundred Sixty Three only					

Advance/Payment Details

Receipt/Ref no	Receipt/Ref Date	Received/Ref Amt	Adjusted Amount	Mode
AD21/38712	05/09/2020 21:17	50000.00	50000.00	Debit Card
AD21/39002	07/09/2020 14:27	80000.00	80000.00	Credit Card
AD21/39386	08/09/2020 16:18	9563.00	9563.00	Debit Card

Patient's/Attendant's Signature

Authorised Signatory



T.C

For Health Care Services at Home-Lab Tests, Medicine Delivery, ICU@home, Nursing & more - Call Max@Home 8744888888

Note: All uncollected and unclaimed hard copies of diagnostic reports and films, shall be retained by the hospital for a period of two months from the date of final reporting. No Claims shall be entertained post expiry of prescribed period.

BLK Super Speciality Hospital, Pusa Road, New Delhi-110005 (India)

Annexure P4

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अखिल दिल्ली प्राथमिक शिक्षक संघ

सम्बद्ध

(पंजी एवं मान्यता प्राप्त)

अखिल भारतीय प्राथमिक शिक्षक संघ/ विश्व अध्यापक संघ

प्रांतीय कार्यालय :

निगम विद्यालय, सी 5-ए, जनकपुरी, नई दिल्ली 110058

फोन : 011-20481756, 8800303701

ईमेल generalsecretary.adpss@gmail.com



राष्ट्रीय कार्यालय :

41, इन्स्टिट्यूशनल एरिया, डी-ब्लॉक, जनकपुरी

नई दिल्ली-110058, फोन : 28520671

ईमेल aiptfindia@yahoo.com

To,

Shri Amit Shah, Hon'ble Minister of Home Affairs, Govt. of India, New Delhi

Shri Arvind Kejriwal, Hon'ble Chief Minister, Govt. of Delhi

Smt. Varsha Joshi, Hon'ble Commissioner, North Delhi Municipal Corporation, New Delhi

Gynesh Bharti, South Delhi Municipal Corporation
Commissioner East Delhi Municipal Corporation

Payment of arrear bills pending since past 5 years and releasing of salary/pension on time and cashless medical treatment.

Respected Sir/Madam

Akhil Dilli Prathmik Shikshak Sangh (ADPSS) is an organization of about 25000 Primary Teachers from the schools run by various local bodies and Government of Delhi. ADPSS is affiliated to All India Primary Teachers, AIPTF is further affiliated with Education International, an organization of about 3 crore teachers from 171 countries.

Your kind attention is drawn towards the pending arrear bills of North Delhi Municipal Corporation School teachers which are still pending since past 5 years. These arrear bills are related to MACP, Children Education Allowances, Bonus, Medical Reimbursement, LTC and GPF advances. Presently the teachers of North MCD have not been paid their salaries since October 2019. Besides this, teachers have never been paid their salaries on time since past 5 years. The retired teachers have also not been receiving pension on time for the last five years. Even the arrears of the benefits of the VIIth Pay Commission have not been released to the teachers and the pensioners. All three Corporations have collected subscription for providing

T.C

cashless medical treatment to the retired employees but such facility is not provided actually. As a result, retired teachers and employees of MCD run from pillar to post for medical treatment and reimbursement of bills takes months and in some cases even years. If the cashless medical treatment as promised by the MCD will solve the problem of the retired employees.

You are requested to personally look into the matter and direct the concerned authorities for releasing the salary/pension on last day of every month and clear all pending bills at earliest. You are further requested to ensure that the approved/empanelled Hospitals provide cashless medical treatment to the retired teachers/employees.

We shall be thankful to you for your kind initiative for the welfare of teachers of the Corporations.

Thanking You

Naveen
Naveen Kumar

Deputy General Secretary
(Akhil Dilli Prathmik Shikshak Sangh)
8901271615

26.12.2019

T-C

IN THE HIGH COURT OF DELHI AT NEW DELHI

(CIVIL ORIGINAL JURISDICTION)

CMP No. /2020

IN

W.P.(C) No. /2020

PUBLIC INTEREST LITIGATION:

IN THE MATTER OF:

Akhil Dilli Prathmik Shikshak Sangh (Regd.) & Anr

....Petitioners

Vs

Govt. of NCT, Delhi & Ors

...Respondents

**APPLICATION FOR EXEMPTION FROM FILING CERTIFIED
COPY OF ANNEXURES/DOCUMENTS U/S 151 CPC**

To,

Hon'ble the Chief Justice and His
Lordship's companion justices of
Hon'ble the High Court of Delhi.

The humble application of the
petitioner above-named

MOST RESPECTFULLY SHOWETH:

1. That along with this application the petitioners are filing PIL setting out in detail the facts and circumstances of the case and the same may be treated as a part of this application for the sake of brevity and avoidance of repetitions.
2. That the petitioners at present do not have certified copy of the documents/annexures which have been filed along with the Writ

Petition. Nevertheless, the petitioners undertake to file certified copy of the documents as and when they are required by this Hon'ble Court.

PRAYER

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

- i) exempt the petitioners from filing certified copies of documents/orders in the interest of justice;

AND/OR

- ii) pass such other order/s as may be deemed fit & proper.

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

Dated: 4-11-2020
New Delhi

R. C. Sabar, Grey
4-11-2020
Ranjit PETITIONERS
RANJIT SHARMA
Supreme Court Bar Lib-II
New Delhi-1
Mob.No.9818493174, 9643504184

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IN THE HIGH COURT OF DELHI AT NEW DELHI
(CIVIL ORIGINAL JURISDICTION)

CMP No. /2020

IN

W.P.(C) No. /2020

PUBLIC INTEREST LITIGATION:

IN THE MATTER OF:

Akhil Dilli Prathmik Shikshak Sangh (Regd.) & Anr

....Petitioners

Vs

Govt. of NCT, Delhi & Ors

...Respondents

AFFIDAVIT

I, R.C Dabas, S/O Late Ram Sharan Dabas, aged about 63 years, General Secretary of the Akhil Dilli Prathmik Shikshak Sangh, at Jagdish Mishra Shishak Bhawan 41, Institutional Area, D-Block, Janakpuri, New Delhi-58 do hereby, solemnly affirm and declare as under:

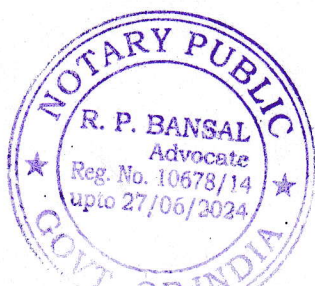
1. That I am General Secretary of the petitioner and therefore, well-conversant with its facts and circumstances and authorized to swear this affidavit.
2. That the accompanying application has been drafted under my instructions which has been explained to me both in Hindi and Vernacular and I have understood them fully and I say that the averments made therein are true on the basis of the records and believed to be correct.

Identified by R.C. Dabas
12/6/25

R.C. Dabas
DEPONENT

VERIFICATION:

Verified at New Delhi on this the 4th day of November, 2020 that the contents of the affidavit contained in paras 1-2 are true and correct to the best of my knowledge and belief.



Certified that the above Named Deponent
Identify by Shri Smt.....
Solemnly affirmed before me at Delhi
S. No.....
The contents of the affidavit which have
been read & explained to me are true and
correct
Notary

R.C. Dabas
DEPONENT

13 NOV 2020

अखिल दिल्ली प्राथमिक शिक्षक संघ

सम्बद्ध

(पंजी एवं मान्यता प्राप्त)

अखिल भारतीय प्राथमिक शिक्षक संघ/ विश्व अध्यापक संघ

प्रांतीय कार्यालय :

निगम विद्यालय, सी ई-ए, जनकपुरी, नई दिल्ली 110058

फोन : 011-20481756, 8800303701

ईमेल generalsecretary.adps@gmail.com



राष्ट्रीय कार्यालय :

41, इन्स्टिट्यूशन एरिया, डी-ब्लॉक, जनकपुरी

नई दिल्ली-110058, फोन : 28520671

ईमेल aipfIndia@yahoo.com

RESOLUTION

At its meeting held on 27-10-2020 the Executive Committee resolved that in the common/general interest of the retired teachers under North, South & East DMC, who have been deprived of cashless medical treatment by the MCD appropriate legal action should be initiated by filing appropriate petition before the Hon'ble High court of Delhi or any other court.

Resolved on this the 27th day of October, 2020

Le. Sabar

General Secretary

General Secretary

Akhil Delhi Prathamik Shikshak Sangh

RZ-F-34, Gandhi Market

West Sagar Pur N. Delhi-46

Am C Arvind Kr. Mishra

President

President/General Secretary/Treasurer

Akhil D P S West Shikshak Sangh

अखिल दिल्ली प्राथमिक शिक्षक संघ ²⁸

सम्बद्ध

(पंजी एवं मान्यता प्राप्त)

अखिल भारतीय प्राथमिक शिक्षक संघ/ विश्व अध्यापक संघ

प्रांतीय कार्यालय :

निगम विद्यालय, सी 5-ए, जनकपुरी, नई दिल्ली 110058

फोन : 011-20481756, 8800303701

ईमेल : generalsecretary.adps@gmail.com



राष्ट्रीय कार्यालय :

41, इन्स्टिट्यूशनल एरिया, डी-ब्लॉक, जनकपुरी

नई दिल्ली-110058, फोन : 28520671

ईमेल : aipfindia@yahoo.com

LETTER OF AUTHORITY

Shri R.C.Dabas, the General Secretary, Akhil Dilli Prathamik Shikshak Snagh, Regd., is, hereby, authorized to file petition in Delhi High Court or any other court for seeking relief of cashless medical treatment to the retired teachers/employees of MCD.

27-10-2020

(Signature of Arvind Kumar Muck)
President

President/General Secretary/Treasurer
Akhil Dilli Prathamik Shikshak Sangh
Shubhash Sundar

Akhil Dilli Prathmik Shikshak Sangh Regd. & Anr Vs Govt. of N.C.T.D & Ors

1 message

Ranjit Sharma <advranjitsharma2013@gmail.com>

Tue, Nov 3, 2020 at 8:59 PM

To: standingcounselgnctd@gmail.com, Bhavna Kataria, adv 8588089272 R1

Cc: divyappande@gmail.com - D. P Pandey, adv for R2 9818077123

Bcc: closdmc@gmail.com, vsharmaalo@gmail.com — Gaurang Kaurth for R4, 9810810005

↓
Shakshi Saini Adv for R3 - 9873193027

Kindly find attached and acknowledge receipt of advance copy of the petition being filed herewith.

 Akhil Dilli Prathmik.pdf
17566K

T-c

HIGH COURT OF DELHI AT NEW DELHI

W.P(C)

/2020

30

In re: AKHIL DILLI PRATHMIK SHIKSHAK SANGH (RESD) & ANR

Vs

GOVT OF NCT, DELHI & ANR

Respondents

KNOW ALL to whom these present shall come that I/we the above named
Petitioner/Applicant/Appellant do hereby appoint (Herein after called the advocate/s) to be my/our
Advocate in the above noted case
Authorized him:-

Ranjit Sharma, Advocate

Supreme Court Bar Lib-II, New Delhi-1

Enrolment No.D-60/1995

Mob. No.9818493174

To act, appear and plead in the above-noted case in this Court or in any other Court in which the same may be tried or heard and also in the appellate Court including High Court subject to payment of fees separately for each Court by me/ us. To sign, file verify and present pleadings, appeals cross. objections or petitions for execution review, revision, withdrawal, compromise or other petitions or affidavits or other documents as may be deemed necessary or proper for the prosecution of the said case in all its stages. To file and take back documents to admit and/or deny the documents of opposite party. To withdraw or compromise the said case or submit to arbitration any differences or disputes that may arise touching or in any manner relating to the said case. To take execution proceed

The de;
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own acts,

And I/

hearings and will indemnify the Advocate. And I/we the undersigned do hereby agree not to hold the advocate or his substitute responsible for the result of the said case. The adjournment costs whenever ordered by the Court shall be of the Advocate which he shall receive and retain himself. And I /we the undersigned do hereby agree that in the event of the whole or part of the fee agreed by me/us to be paid to the Advocate remaining unpaid he shall be entitled to withdraw from the prosecution of the said case until the same is paid up. The fee settled is only for the above case and above Court. I/We hereby agree that once the fee is paid. I /we will not be entitled for the refund of the same in any case whatsoever. If the case lasts for more than three years, the advocate shall be entitled for additional fee equivalent to half of the agreed fee for every addition three years or part thereof.

IN WITNESS WHEREOF I/We do hereunto set my /our hand to these presents the contents of which have been understood by me/us on this the day of .2020.

Accepted subject to the terms of fees.

Advocate

Ranjit
Ranjit

Client

Akhil Delhi Prathmik Shiksha Sangh
R2-18-24, Gandhi Market
West Sagar Pur N. Delhi-46

Client

Ghanshyam
Ghanshyam
Ghanshyam