

IN THE HIGH COURT OF DELHI AT NEW DELHI

CIVIL ORIGINAL JURISDICTION

CIVIL WRIT PETITION NO. OF 2021

IN THE MATTER OF:

Deepa Joseph

...Petitioner

Versus

The Commissioner of Police & Anr.

...Respondent

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Filed Through:



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New Delhi,
Date: 24/09/2021

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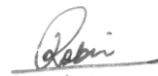
URGENT APPLICATION

Sir,

Will you be kindly treat this accompanying application as an urgent one in accordance with High Court Rules and Order.

The grounds of urgency are as per the facts stated in the petition.

Filed Through:



Robin Raju
Blessan Mathews
Advocates
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Tis Hazari, New Delhi-110054
Ph:- 9910940402
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...Respondents

MEMO OF PARTIES**IN THE MATTER OF:**

1. Deepa Joseph
R/o 870/C-4,
Moon Star Apartment
Shalimar Garden Extension-1,
Sahibabad, Near Dayanand Park,
Ghaziabad,
Uttar Pradesh-201001

...Petitioner

Versus

1. The Commissioner of Police
Police Headquarters, MSO building,
IP Estate,
New Delhi-110002
2. Bar Council of Delhi
2/6, Siri Fort Institutional Area,
Khel Gaon Marg,
New Delhi-110049

...Respondents

Filed Through:



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Blessan Mathews
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Ch:- A/6, Police Chowki Line,
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IN THE MATTER OF:

Deepa Joseph

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Versus

The Commissioner of Police & Anr.

...Respondents

SYNOPSIS AND LIST OF DATES

This Civil Writ Petition filed by the Petitioner for a direction to the Respondents to take requisite measures that ensures safety and security of the District Courts of Delhi where the Petitioner is primarily practicing and to also consider implementing the suggestions put forth by the Petitioner in the wake of the shocking and gory shootout inside the Rohini Court on Friday (24-09-2021) afternoon.

The Petitioner herein is an Advocate and practices in all Courts in Delhi including the District Courts of Delhi and is hence shocked that the district courts where she and thousands of fellow Advocates visit on daily basis has become so unsafe and an easy terrain for gangsters to settle scores with each other. The concern for the Petitioner is that the unlike the past, this time a shocking shootout has happened inside the court room of a district court of the Capital of India. It is also painful that a young legal professional has also got severely injured in the scary incident. This shootout inside the court again puts a big question mark on the safety and security of judges, lawyers and litigants inside the District courts in Delhi. The petitioner is filing the instant Writ as she is also from the legal fraternity and has a genuine apprehension about visiting District courts in Delhi after seeing shocking visuals and videos of the incident that were circulating on social media throughout the day. The Petitioner in short is mentally jolted by the horrifying images of Friday.

It is also worth noting that the incident of Friday is not the first of its kind in Delhi. In the recent past there have been incidents of shooting in the Dwarka Court, a firing near the Saket Court in May 2019 and earlier in 2017, an undertrial was killed after being shot inside the Rohini Court Complex. A shocking incident similar in line to the incident in Rohini Court was the killing of a Delhi Police head constable when four armed assailants open fired inside a courtroom at Karkardooma Court Complex in the year 2015.

The incident that has happened on Friday, at Rohini Court, was truly well planned. The assailants posed as lawyers and were present inside the court room before the dreaded gangster was produced before the Court. The ease with which the assailants entered into the court premises in the attire shows that they were well aware that it is easy to get access into the court by being in a lawyers attire. The Petitioner as someone who visits the istruict courts in Delhi has also seen how the Police personnel present at the court entrances more often than not step back from frisking a person who is in a lawyers attire. The point that the petitioner wishes to highlight is that the level of frisking of lawyers also needs to be made at the same level as in High Court of Delhi and the Supreme Court of India. And in the future a decision can also be taken regarding installing a biometric punching device outside the entrance gates of all the courts. The petitioner knows that there may be a section of lawyers who will not appreciate this suggestion of the petitioner, but the petitioner is making this suggestion considering the overall safety and security of judges, lawyers, court staff and litigants as a whole.

Furthermore, the Petitioner is suggesting that a strict direction may be given by this Hon'ble Court to the Respondent No.1 to instruct all the police personnel at court entrances to ensure that they check the ID Cards of each and every lawyer who enters the court premises. The Respondent no.1 should take sicplimetry action against those officers who do not implement this direction with utmost diligence and seriousness.

The Petitioner in the context of Article 21 that secures right to life, urges this Hon'ble Court to direct the Respondent no.2 to issue an advisory to all the District Bar Associations in Delhi to recommend members of their Bar to co-operate with Police personnel at the main entrance of courts. The advisory should spread the message that a lawyer's stature is not lowered by showing his/her bar council ID to the police at the main entrance gates.

It is also submitted that the Petitioner has instantly approached this Hon'ble Court as the issue raised needs urgent intervention from this Court and representations to the concerned authorities will have no immediate impact.

It is also submitted that the Hon'ble Court may also recommend suggestions from its end so that the safety and security of District Courts, its Judges, lawyers, staff and litigants is never in compromise like it has been in the recent past.

Hence the present Petition.

24.09.2021	The gory incident of the shootout at the Rohini Court premises had a gruesome effect on the minds of the petitioner and other alike. This incident is not the first of its kind, many incidents of similar kind have happened in the recent past.
24.09.2021	News 18 publishes a report on the previous incidents of shootouts at Court premises. The report puts a question mark on the security in courts.
24.09.2021	Hence this Petition is filed.

IN THE HIGH COURT OF DELHI AT NEW DELHI

CIVIL ORIGINAL JURISDICTION

CIVIL WRIT PETITION NO. OF 2021

IN THE MATTER OF:

1. Deepa Joseph
R/o 870/C-4,
Moon Star Apartment
Shalimar Garden Extension-1,
Sahibabad, Near Dayanand Park,
Ghaziabad,
Uttar Pradesh-201001

...Petitioner

Versus

1. The Commissioner of Police
Police Headquarters, MSO building,
IP Estate,
New Delhi-110002
2. Bar Council of Delhi
2/6, Siri Fort Institutional Area,
Khel Gaon Marg,
New Delhi-110049

...Respondents

**WRIT PETITION UNDER ARTICLE 226 OF THE CONSTITUTION OF INDIA,
INTER-ALIA SEEKING A WRIT OF MANDAMUS TO DIRECT THE RESPONDENTS
TO TAKE REQUISITE MEASURES THAT ENSURES SAFETY AND SECURITY OF
THE DISTRICT COURTS IN DELHI AND TO ALSO CONSIDER IMPLEMENTING
THE SUGGESTIONS PUT FORTH BY THE PETITIONER BY TREATING THE
PETITION AS A REPRESENTATION.**

To

The Hon'ble Chief Justice and
His Companion Justices of the
Hon'ble High Court of Delhi at New Delhi

The humble petition of the
Petitioner above named

MOST RESPECTFULLY SHOWETH:

This writ petition is being filed by the petitioner to pass a Writ in the nature of Mandamus seeking a writ of mandamus to direct the respondents to take requisite measures that ensure safety and security of the District Courts of Delhi.

Facts of the case:

1. The Petitioner herein is an Advocate and predominantly practices in the District Courts of Delhi. She is severely jolted by the shocking shootout inside the Rohini court on Friday (24-09-2021). The ID card issued by Bar Council of Delhi to the Petitioner is annexed herewith as **ANNEXURE P-1** at Page No. 16.
2. That the Petitioner is deeply concerned by the repeated incidents of shootouts inside court and within the court premises, and these incidents have caused a serious apprehension in her mind about her own safety while visiting district courts in Delhi.
3. That the Respondent No.1 is the head of the Delhi Police and the security personnel at District courts of Delhi come directly under his leadership. The Respondent no.2 is an autonomous statutory body constituted under Advocates Act, 1961, and has wide powers to take decisions that are in the welfare of Advocates practicing in Delhi.

4. That the incident of shootout inside the court puts a big question mark on the safety and security of judges, lawyers and litigants inside the District courts in Delhi.
5. That the incident that has happened on Friday, at Rohini Court, was truly well planned. The assailants posed as lawyers and were present inside the court room before the dreaded gangster was produced before the Court. The ease with which the assailants entered into the court premises in the attire shows that they were well aware that it is easy to get access into the court by being in a lawyers attire. The true copy of news report published by the Indian Express on 24.09.2021 titled as “Gangster Gogi, 2 from rivals gang shot dead; assailants posed as lawyers” is annexed herewith as **ANNEXURE P-2** at Page Nos. 17 to 21.
6. That the incident of Friday is not the first of its kind in Delhi. In the recent past there have been incidents of shooting in the Dwarka Court, a firing near the Saket Court in May 2019 and earlier in 2017, an undertrial was killed after being shot inside the Rohini Court Complex. A shocking incident similar in line to the incident in Rohini Court was the killing of a Delhi police head constable when four armed assailants open fired inside a courtroom at Karkardooma Court Complex in the year 2015, and these past incidents have been enumerated one report by the News 18. A true copy of the news published by News 18 on 24.09.2021, titled as “Shootout at Rohini Court Killing Gangster Gogi isn’t a first: Past instances raise questions on security” is annexed herewith as **ANNEXURE P-3** at Page Nos. 22 to 23.
7. That it is keeping the repeated incidents of shootouts in mind that the petitioner herein is submitting some suggestions that will ensure security of District Courts: -

- A. A Strict direction may be by this Hon'ble Court to the Respondent No.1 to instruct all the police personnel at court entrances to ensure that they check the ID Cards of each and every lawyer who enters the court premises.

- B. Direct Respondent No.1 make the level of security and frisking of lawyers at par with High Court of Delhi and Supreme Court of India. And also take ponder about taking a decision regarding installing biometric punching device outside the entrance gates of all the Courts.

- C. The Respondent no.1 be directed to take disciplinary action against those officers who do not implement this direction with utmost diligence and seriousness.

- D. Direct Respondent no.2 to issue an advisory to all the District Bar Associations in Delhi to recommend members of their Bar to co-operate with Police personnel at the main entrance of courts.

8. Hence this Petition.

GROUND

- (i) FOR THE REASON that Safety and security of Courts of Law is quintessential for administration of justice.

- (ii) FOR THE REASON that recurrent incidents of shootouts in court premises is causing serious fear in the minds of Petitioner and thousands of other fellow legal professionals practicing in District courts of Delhi .

- (iii) FOR THE REASON that Hon'ble Chief Justice of India has also raised concern about the incident and has asked for beefing up security in court premises.
- (iv) FOR THE REASON that it will be difficult to practice law in a unsafe court atmosphere.
- (v) FOR THE REASON that life of Ld. Judges, Lawyers, Court Staff and Litigants is all at the same time affected by repetition of such gory incidents within the court premises.
- (vi) FOR THE REASON that the intervention of this court is utmost needed for the implementation of the suggestions mentioned in the petition.
- (vii) FOR THE REASON that the Article 21 preserves the right to life and Article 19(1)(g) that grants the right to practice profession gets violated in a tense and unsafe atmosphere.
- (viii) FOR THE REASON that many Bar Associations in Delhi have also expressed serious concern on the issue and have also called to abstain from work on 25.09.2021.
- (ix) FOR THE REASON that since 2015 incidents of the nature of Friday(24.09.2021) have happened repeatedly and this clearly shows the inaction on the part of the Respondents and the same is illegal, and arbitrary, thus violating the fundamental rights of the Petitioner guaranteed under the Constitution of India.
- (x) Any other grounds that may be urged at the time of hearing with the permission of the Hon'ble Court.

9. That the present petitioner has not filed any other petition in any High Court or the Supreme Court of India on the subject matter of the present petition.
10. That the cause of action leading to filing of the instant petition has arisen within the territorial jurisdiction of this Hon'ble Court.
11. That all the respondents herein are an instrumentality of state and are functioning with instruction from Delhi hence this Hon'ble Court is having the jurisdiction to entertain the present petition.

PRAYER

In the premises aforesaid, it is humbly and respectfully prayed that this Hon'ble Court may be pleased to issue:

- (a) A writ of mandamus to direct the Respondents to take requisite measures that ensure safety and security of the District Courts of Delhi.
- (b) To direct Respondent no.1 and no.2 to consider implementing the suggestions A to D put forth in Para 7 of the body of the petition.
Alternatively,
- (c) To consider the petition as a representation and take needful steps expeditiously;
- (d) Any other relief or direction(S) as this Hon'ble Court may deem fit in the light of the facts and circumstances of the case.



PETITIONER

Filed Through:



Robin Raju
Blessan Mathews
Advocates
Ch:- A/6, Police Chowki Line,
Tis Hazari, New Delhi-110054
Ph:- 9910940402
E-mail:- rajurobin7@gmail.com

New Delhi,
Date: 24/09/2021

IN THE HIGH COURT OF DELHI AT NEW DELHI**CIVIL ORIGINAL JURISDICTION**

CIVIL WRIT PETITION NO. OF 2021

IN THE MATTER OF:

Deepa Joseph

...Petitioner

Versus

The Commissioner of Police & Anr.

...Respondents

AFFIDAVIT

I, Deepa Joseph, W/o Manoj Mathew, Aged about 46 years, R/o. 870/C-4, Moon Star Apartments, Shalimar Garden Extension-1, Sahibabad, Ghaziabad, do hereby solemnly affirm and declare as under:

1. That I am the Petitioner in the above said Writ Petition (Civil) and I am well and as such am fully conversant with the facts and circumstances of the case and hence competent to swear this affidavit.
2. That I have read the contents of the Synopsis and list of dates on Pages 5 to 7 of the Writ Petition as well as the contents of the PIL in paragraph 1 to 11 at Pages 8 to 13 and accompanying applications. I further state that the contents thereof are true and correct to my knowledge and belief.
3. That the petitioner has not filed any other or similar petition before this Hon'ble Court. There is no personal gain, private motive or oblige reason in filing the PIL.
4. That the annexures to the petition/application are true and correct copies of the respective originals.

5. That I have read the contents of this affidavit and I state that the contents thereof are true and correct to my knowledge.




DEPONENT

VERIFICATION

Verified at Delhi on this 25th day of September 2021 and state that the contents above stated are true and correct to the best of my knowledge and belief and nothing material has been concealed there from.



DEPONENT

 **BAR COUNCIL OF DELHI**
(Statutory Body Under Advocates Act, 1961)
H.O.: 2/6, Siri Fort Inst. Area, Khel Gaon Marg, New Delhi-49, Ph. : 26498356/5196
Website : delhibarcouncil.com, E-mail : barcouncilofdelhi@rediffmail.com



PROVISIONAL IDENTITY CARD

S.No. 1623/D/19 Valid Upto 22/01/2023

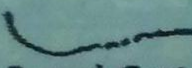
DEEPA JOSEPH

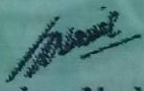
ADVOCATE


Enrolment No. D/277/2021

Date of Enrolment
23/01/2021


Ramesh Gupta
Chairman


Sanjeev Nasir
Co-Chairman


Ajayinder Sangwan
Hony. Secretary

Gangster Gogi, 2 from rival gang shot dead in Rohini court; assailants posed as lawyers

According to police, Gogi and his rival Sunil alias Tillu have been running extortion rackets in Alipur and Sonipat for years, and the constant strife between the two gangs has often ended in bloodshed.

Written by **Mahender Singh Manral** | New Delhi |

Updated: September 24, 2021 9:57:49 pm



Screengrabs of shooting inside the Rohini court

Two armed men opened fire inside Delhi's Rohini court on Friday, killing dreaded jailed gangster Jitender Maan alias **Gogi**. Members of the Delhi Police Special Cell's Counter Intelligence team, who were accompanying Gogi, shot dead the assailants, with 27 bullets in all fired inside the courtroom.

In a major security lapse, the men — believed to belong to a rival gang headed by Sunil, alias Tillu Tajpuriya — managed to sneak into the courtroom with a .38 bore pistol and another of .30 bore posing as lawyers. Gogi received five-six bullet injuries, and was taken to a nearby hospital, where he was declared dead.

Incidentally, just half an hour earlier, Tillu's lieutenant Sunil Maan had been produced in the same courtroom – No. 207 – in connection with the same murder case.



A few months ago, Gogi's associate Kuldeep alias Fajja had managed to escape from GTB Hospital while in police custody. Since then, teams of the Special Cell had been directed by the Delhi Police headquarters to accompany prominent gangsters to court hearings. Just a few days ago, a team of the Counter Intelligence had gone to Panipat with Gogi for a hearing.

According to police, Gogi and Tillu had been running extortion rackets in Alipur and Sonipat for years, and the constant strife between the two gangs often ended in bloodshed.

“A team of the Northern Range of the Special Cell was accompanying Sunil Maan, who appeared half an hour before Gogi. Around 1.15 pm, Gogi was produced in the courtroom. The two assailants, identified as Rahul, a resident of Uttar Pradesh’s Baghat, and Moris of Bakkarwala village, were standing at the entrance of the courtroom. They posed as lawyers and entered along with Gogi. Within seconds of entering, they opened fire on him from close range. Gogi received five-six bullet injuries; they fired eight-ten rounds,” said a police officer who was present in the courtroom at the time.

**The Indian Express** 
@IndianExpress 

Gangster Gogi, 2 from rival gang shot dead in Rohini court; assailants posed as lawyers

bit.ly/3AINZ8k



2:30 PM · Sep 24, 2021 

 100  18  Copy link to Tweet

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“Personnel of the Special Cell fired in retaliation. In total, eight rounds were fired by both the teams of the Special Cell. From the Northern Range of the Special Cell, Head Constable Kuldeep Hooda fired two rounds, and from the Counter Intelligence side, Head Constable Sandeep Dabas fired four rounds and Constable Rohit fired two. A third battalion also fired on the assailants with an AK-47,” an officer told *The Indian Express*, saying the two men died on the spot.

“For around 40 seconds, there was absolute chaos inside the courtroom,” the officer added. The local police were informed and Gogi was rushed to a hospital, but succumbed to the gunshot wounds.



Gangster Gogi received four bullet injuries and was taken to a nearby hospital, where he was declared dead.

A police officer who has investigated the Gogi and Tillu gangs said their rivalry dated back to their college days, when both were at Delhi University and clashed over student politics. The dispute took a violent turn in 2012, when Gogi and his associates allegedly shot at Vikas, a confidant of Tillu. In 2015, Tillu was arrested by the Sonipat police, and has been behind bars.

Later, Gogi was also nabbed by the Haryana CIA from Sonipat and handed over to the Delhi Police.

According to police, desperate to kill Tillu, Gogi had escaped from police custody in 2016 when being taken to a Haryana court for a hearing. He had killed several associates of Tillu before being re-arrested last year from Gurgaon.

Lawyers to abstain from work tomorrow

Following the incident, the Delhi Bar Association has urged the members to abstain from work on Saturday, September 25.

“In view of the call by Coordination Committee of all District Court Bar Association of Delhi, working in the court will be suspended due to revision of security norms on account of today’s unfortunate incident in Rohini Court, Delhi. All members are requested to abstain their work on September 25,” a statement from Delhi Bar Association said.

news18.com/news/india/shootout-at-rohini-court-killing-gangster-gogi-isnt-a-first-past-instances-raise-questions-on-security-4241339.html

Shootout at Rohini Court Killing Gangster Gogi Isn't a First: Past Instances Raise Questions on Security



This is not the first time that a firing in and around a Delhi court premises has claimed lives as such occurrences have been reported earlier as well

LAST UPDATED: SEPTEMBER 24, 2021, 15:50 IST

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This is not the first time that a firing in and around a Delhi court premises has claimed lives as such occurrences have been reported earlier as well

The gunning down of jailed gangster Jitender Gogi during firing at Delhi's Rohini court on Friday took the social media by storm. As per sources, Gogi who was earlier this year found operating freely from behind the bars was shot dead by rivals while being presented at the court. The firing also killed three others and left a few injured. However, this is not the first time that a firing in and around a Delhi court premises has claimed lives as such occurrences have been reported earlier as well from the national capital.

Dwarka Court Shooting

Earlier this year in the month of July, a 45-year-old man was shot dead outside an advocate's chamber in the Dwarka court complex. The pistol used to shoot the victim was recovered by the police from the advocate's chamber on the fourth floor of the court building following which four persons, including the advocate, were arrested by the police on charges of attempt to murder and destruction of evidence. Police said that the shot was fired by Pradeep, an associate of the victim on the fateful day when the group was having a party outside the chamber. The injured man was rushed to a nearby private hospital where the advocate allegedly misled the hospital staff and police by claiming that the man was shot by someone in a park outside the court compound.

Saket District Court Firing

In May of 2019, a 27-year-old man, who had gone to Saket district court for his hearing in an attempt to murder case, was gunned down in Pushp Vihar, behind the Select City Walk shopping mall. The victim, Prince Bihari was shot in his abdomen and neck and succumbed to his injuries. The Police said that the man who was headed to the shopping mall with his friends one, of them a co-accused in the attempt to murder case, after exiting the court was attacked by two men on a motorcycle who fires at him. Police suspect the murder was due to a fallout of the man's rivalry with another criminal gang of south Delhi.

2017 Rohini Court Firing

In 2017, an undertrial was killed after being shot inside Delhi's Rohini Court complex. The incident reportedly took place around 11 am in the corridor near the canteen area when Vinod was being taken back from the court. The accused who was posing as a litigant was immediately nabbed by the police and his pistol confiscated. According to initial reports, the shooting was an outcome of a rivalry between two gangs. In the same year, in April, a 38-year-old undertrial was also shot dead in the court complex.

Karkardooma Court Firing

A head constable of Delhi Police was killed and three others were injured when four armed assailants opened fire inside a courtroom at Karkardooma Court Complex in east Delhi in the year 2015. As in the Rohini court firing, this incident took place in the morning when a criminal was being produced at the courtroom. As per the police, seven rounds were fired inside the courtroom while the proceedings were on. This led to the untimely death of head constable Ram Kumar who took five bullets in his body. Another policeman was also injured in the firing who was later identified as the naib of the courtroom. The indiscriminate firing caused a huge amount of panic among the people inside the courtroom who had to run for cover. The prime target was Irfan alias Chenu who had a longstanding rivalry with a gang headed by a criminal named Nasir. The attackers are suspected to be contract killers hired by Nasir's gang.

Patiala Court Firing

In the year 2003, a man attempted to open fire and shoot at another man in the Patiala House court complex. As per reports, the incident took place in the afternoon around 2 pm near gate number 3. Even though the accused was able to escape unhurt, one of his accomplices was overpowered by the police, and a country-made weapon was seized from him.

The indiscriminate firing inside courtroom premises over the years has not only instilled fear and panic among the spectators but also reeks of an inadequate security system prevailing during court proceedings.

IN THE HIGH COURT OF DELHI AT NEW DELHI

C. M. APPL. NO. CIVIL____OF 2021

IN

WRIT PETITION (CIVIL) NO.____OF 2021

IN THE MATTER OF:

Deepa Joseph

...Petitioner

Versus

The Commissioner of Police & Anr.

...Respondents

APPLICATION SEEKING EXEMPTION FROM FILING DULY**AFFIRMED AFFIDAVIT UNDER SECTION 151 OF CPC**

To

Hon'ble the Chief Justice
and His Lordship's Companion Justices
of The Hon'ble High Court of Delhi

The humble Petition of
the Petitioner above-named

MOST RESPECTFULLY SHOWETH:

- (a) This writ petition is being filed by the petitioner to pass a Writ in the nature of Mandamus seeking a writ of mandamus to direct the respondents to take requisite measures that ensure safety and security of the District Courts of Delhi where the Petitioner is primarily practicing and to also consider implementing the suggestions put forth by the Petitioner in the wake of the shocking and gory shootout inside the Rohini Court on Friday (24-09-2021) afternoon.

- (b) The petitioner is not narrating the entire facts and circumstances leading to the filing of the present writ petition for the sake of brevity, craves leave of this Hon'ble Court to refer to the writ petition at the time of arguments.
- (c) It is humbly submitted that under the prevailing circumstances due to the uncertainty still prevailing due to COVID19 pandemic, the petitioner is preferring the present Application seeking an exemption from filing Affidavit duly affirmed.
- (d) That this application is made bonafide.

PRAYER

It is humbly prayed that this Hon'ble Court may pleased to:

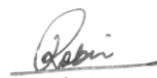
- (a) Exempt the Petitioner from filing duly affirmed affidavit;
- (b) pass such further order(s) as this Hon'ble Court deems fit and proper in the facts and circumstances of the case

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



APPLICANT

Filed Through:



Robin Raju
Blessan Mathews
Advocates
Ch:- A/6, Police Chowki Line,
Tis Hazari, New Delhi-110054
Ph:- 9910940402
E-mail:- rajurobin7@gmail.com

New Delhi,
Date: 24/09/2021

IN THE HIGH COURT OF DELHI AT NEW DELHI

CIVIL ORIGINAL JURISDICTION

CIVIL WRIT PETITION NO. OF 2021

IN THE MATTER OF:

Deepa Joseph

...Petitioner

Versus

The Commissioner of Police & Anr.

...Respondents

AFFIDAVIT

I, Deepa Joseph, W/o Manoj Mathew, Aged about 46 years, R/o. 870/C-4, Moon Star Apartments, Shalimar Garden Extension-1, Sahibabad, Ghaziabad, do hereby solemnly affirm and declare as under:

1. That I am the Applicant/Petitioner in the above said Writ Petition (Civil) and I am well and as such am fully conversant with the facts and circumstances of the case and hence competent to swear this affidavit.
2. That the accompanying Application has been drafted by the counsel as per my instructions. I have read the accompanying Application and have understood the contents thereof. That the facts stated and averments made therein are true and correct to my knowledge.



DEPONENT

VERIFICATION

Verified at Delhi on this 25th day of September 2021 and state that the contents above stated are true and correct to the best of my knowledge and belief and nothing material has been concealed there from.

A handwritten signature in blue ink, appearing to read "Depa Joseph", written over a horizontal line.

DEPONENT

IN THE HIGH COURT OF DELHI AT NEW DELHI
CIVIL ORIGINAL JURISDICTION
W.P.(C) NO. OF 2021

IN THE MATTER OF:

Deepa Joseph

...Petitioner

Versus

The Commissioner of Police & Anr.

...Respondents

KNOW ALL to whom these present shall come that I Deepa Joseph, W/o Manoj Mathew , Aged about 46 years, R/o. 870/C-4, Moon Star Apartments, Shalimar Garden Extension-1, Sahibabad, Ghaziabad, the above named PETITIONER do hereby appoint **Mr. Robin Raju & Mr. Blessan Mathews**, Off :- A/6, Police Chowki Line, Tis Hazari, New Delhi, Ent. No. D/2072/2012 (herein after called the advocate(s) to be my/our Advocate in the above-noted case authorize him: -

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 executions 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 subjects to payment of fees for each stage. 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 and differences or disputes that may arise touching or in any manner relating to the said case. To take execution proceedings.


The deposit, draw and receive money cheques, cash and grant receipts hereof and to do all other acts and things which may be necessary to be done for the progress and in the course of the prosecution of the said case. To appoint and instruct any other Legal Practitioner authorizing him to exercise the power and authority hereby conferred upon the Advocate whenever he may think fit to do so and to sign the power of attorney on our behalf. And I/We the undersigned do hereby agree to ratify and confirm all acts done by the Advocate or his substitute in the matter as my/our own acts, as if done by me/us to all intents and purpose.

And I/We undertake that I/We or my/our duly authorized agent would appear in court on all hearings and will inform the Advocate for appearance when the case is called. And I/We undersigned do hereby agree not to hold the advocate of 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 for himself.

And I/We 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 and if the case prolongs for more than 3 years the originals fee shall be paid again by me/us.

IN WITNESS WHERE OF I/We do hereunto set my/our hand to these present the contents of which have been understood by me/us on this 25th day of September 2021.

Accepted, Identified & satisfied



ROBIN RAJU
Chamber: - A/6, Police Chowki Line,
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E-mail: - rajurobin7@gmail.com
Enrl. No: - D. 2072/2012

BLESSAN MATHEWS
Chamber: - A/6, Police Chowki Line,
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Enrl. No: -



CLIENT