IN THE SUPREME COURT OF INDIA

(CIVIL APPELLATE JURISDICTION)

REVIEW PETITION (CIVIL) No _____ OF2019

IN

CIVIL APPEAL NOS. 10866-10867 OF 2010

[Seeking review of the impugned judgment and final order dated November 9, 2019 passed by this Hon'ble Court rendered in Civil Appeal Nos. 10866-10867 of 2010.]

IN THE MATTER OF:

(MEMO OF PARTIES ARE COMMON IN BOTH APPEAL)

To,
The Hon'ble Chief Justice of India
And His Companion Judges
Of the Supreme Court of India

The humble Petition of the Petitioners above named

1. The present Review Petition is being filed against the Final Judgement and Order dated 09.11.2019 passed by the Hon'ble Supreme Court of India in *M Siddiq (D) Thr Lrs Versus Mahant Suresh Das & Ors* whereby the Hon'ble Supreme Court was pleased to grant the following order:

> *"805. We accordingly order and direct as follows:*
> *1) (i) Suit 3 instituted by Nirmohi Akhara is held to be barred by limitation and shall accordingly stand dismissed;*
> *(ii) Suit 4 instituted by the Sunni Central Waqf Board and other plaintiffs is held to be within limitation. The judgment of the High Court holding Suit 4 to be barred by limitation is reversed; and*
>
> *(iii) Suit 5 is held to be within limitation.*
> *2) Suit 5 is held to be maintainable at the behest of the first plaintiff who is represented by the third plaintiff. There shall be a decree in terms of prayer clauses (A) and (B) of the suit, subject to the following directions:*
>
> > *(i) The Central Government shall, within a period of three months from the date of this judgment, formulate a scheme pursuant to the powers vested in it under Sections 6 and 7 of the Acquisition of Certain Area at Ayodhya Act 1993. The*

scheme shall envisage the setting up of a trust with a Board of Trustees or any other appropriate body under Section 6. The scheme to be framed by the Central Government shall make necessary provisions in regard to the functioning of the trust or body including on matters relating to the management of the trust, the powers of the trustees including the construction of a temple and all necessary, incidental and supplemental matters;

(ii) Possession of the inner and outer courtyards shall be handed over to the Board of Trustees of the Trust or to the body so constituted. The Central Government will be at liberty to make suitable provisions in respect of the rest of the acquired land by handing it over to the Trust or body for management and development in terms of the scheme framed in accordance with the above directions; and

(iii) Possession of the disputed property shall continue to vest in the statutory receiver under the Central Government, untill in exercise of its jurisdiction under Section 6 of the Ayodhya Act of 1993, a notification is issued vesting the property in the trust or other body.

3 (i) Simultaneously, with the handing over of the disputed property to the Trust or body under clause 2 above, a suitable plot of land admeasuring 5 acres shall be handed over to the Sunni Central Waqf Board, the plaintiff in Suit 4.

(ii) The land shall be allotted either by:

(a) The Central Government out of the land acquired under the Ayodhya Act 1993; or

(b) The State Government at a suitable prominent place in Ayodhya; The Central Government and the State Government shall act in consultation with each other to effectuate the above allotment in the period stipulated.

(iii) The Sunni Central Waqf Board would be at liberty, on the allotment of the land to take all necessary steps for the construction of a mosque on the land so allotted together with other associated facilities;
(iv) Suit 4 shall stand decreed to this extent in terms of the above directions; and

(v) The directions for the allotment of land to the Sunni Central Waqf Board in Suit 4 are issued in pursuance of the powers vested in this Court under Article 142 of the Constitution.
4) In exercise of the powers vested in this Court under Article 142 of the Constitution, we direct that in the scheme to be framed by the Central Government, appropriate representation may be given in the Trust or body, to the Nirmohi Akhara in such manner as the Central Government deems fit.
5) The right of the plaintiff in Suit 1 to worship at the disputed property is affirmed subject to any restrictions imposed by the relevant authorities with respect to the maintenance of peace and order and the performance of orderly worship.
806. All the appeals shall stand disposed of in the above terms. Parties are left to bear their own costs."

(The Impugned Judgement is annexed herewith as Annexure P -1)

2. The Petitioners are not the original parties to the suit; however, they are deeply aggrieved by the judgement passed by this Hon'ble Court. The petitioners in this review petition, belong to various Indian faith traditions (including Hindu, Muslim, Sikh, Christian, Buddhist, Jain, apart from people with atheist and agnostic convictions), and are bound by their shared profound commitment to the morality of the Indian constitution.

3. The Petitioners are of the firm belief that the judgement passed by this Hon'ble Court errs in both fact and law, and through this Review Petition the Petitioners seek to bring to the fore these errors apparent and assist the court in rectifying these errors.

4. The Judgement from its beginning paragraphs has referred to the litigating parties as 'the Hindus' and 'the Muslims'. It is pertinent to mention, the Vishwa Hindu Parishad, a militant Hindutva outfit and close

affiliate of the Rashtriya Swayamsevak Sangh, does not represent Hindus at large, any more than the Uttar Pradesh Sunni Central Board of Waqf represents India's Muslims at large. However, there is no avoiding that this age-old title dispute of the Babri Masjid Ram Janmabhoomi has become a dispute adjudicating the respective constitutional rights of Hindu and Muslim people of the country. And by taking up this appeal, the Hon'ble Supreme Court of India has taken upon itself the crucial responsibility of adjudicating on and upholding the secular principles of our Constitution.

5. The Petitioners, as concerned citizens of the country, have been aggrieved by the judgment that was passed by this Hon'ble Court on 9th November, 2019, as it has violated the same secular principles of the Constitution that it sought to uphold, by choosing to give exclusive ownership of the disputed land to the Hindu parties, for building of the Ram Temple, while rewarding the Muslim parties with a poor compensation of a plot of land admeasuring five acres elsewhere.

6. The Petitioners believe that this case has a critical bearing and profound implication across generations for the upholding of many fundamental rights, including the right of equality, of life, and of freedom of worship, and therefore they believe that every citizen of India has the right, and indeed the duty, to intervene in order to seek steps to defend and uphold their constitutional rights, to preserve the secular and democratic character of the Indian republic.

7. This Hon'ble Court in **National Textile Corporation Ltd. v. Nareshkumar Badrikumar Jagad & Ors**, [**2018 SCC OnLine SC 2573**] referred to the power of the Supreme Court under Article 137 of the Constitution, which states, "*subject to the provisions of any law made by Parliament or any rules made under Article 145, the Supreme Court shall have power to review any judgment pronounced or order made by it.*" The Court upheld that third parties to a proceeding that consider themselves aggrieved may take recourse to the remedy of a review petition. It was mentioned that according to Section 114 of the Code of Civil Procedure "*any person considering himself aggrieved*" would have locus to file a review petition. It was stated as follows:

> *"18. Order XLVII of CPC restates the position that any person considering himself aggrieved can file a review petition. Be that as it may, the Supreme Court exercises review jurisdiction by virtue of Article 137 of the Constitution which predicates that the Supreme Court shall have the power to review any judgment pronounced or order made by it. Besides, the Supreme Court has framed Rules to govern review petitions. Notably, neither Order XLVII of CPC nor Order XLVII of the Supreme Court Rules limits the remedy of review only to the parties to the judgment under review. Therefore, we have no hesitation in enunciating that even a third party to the proceedings, if he considers himself an aggrieved person, may take recourse to the remedy of review petition. The quintessence is that the person should be aggrieved by the judgment and order passed by this Court in some respect."*

Question of Possession

8. There was grave inconsistency in the Court claiming that there was no evidence of Muslim prayer in the inner structure between 1528 and 1857, while accepting that the mosque existed for over 450 years. As asserted by leading historian Irfan Habib, 'The possibility of the Babri Masjid having had no Muslims to pray in it during Mughal times is a simple piece of judicial fancy.

9. In the opening paragraph of the judgment, the court states that the 'Hindu community' believes that the disputed site was 'the birthplace of Lord Ram, the incarnation of Lord Vishnu'. This is simply not true. Some Hindus may believe that Ram was born at that precise location, and others do not. It is entirely true that Hindus believe that Lord Ram was born in Ayodhya, but there is a diversity of beliefs if the Ayodhya of his birth is in fact present-day Ayodhya. And even within present-day Ayodhya, there are multiple sites which residents claim to be where Lord Ram was born. On what grounds does the court privilege one 'faith and belief' that Ram was born at the site of land under the central dome of the demolished mosque over the 'faith and belief' of innumerable other Hindus that Ram was born elsewhere?

10. Professor Romila Thapar has opined that " there was some confusion about the location of Ayodhya. Hindu texts have spoken of it as being on the banks of the Sarayu river. But Buddhist texts refer to it on the banks of the Ganges. So, is it a mistake on the part of the Buddhist texts? Which is unlikely because Ayodhya was a big enough town for them to know whether it was on the Ganges or on the Sarayu. And Ayodhya was made into an important city with trade links. Now in the Gupta period there is evidence that they were looking for Ayodhya, and the city of Saket which was on the Sarayu was designated as being Ayodhya. This was done on the basis of some early references to Saket and Ayodhya being very close together - to Saket being almost a suburb of Ayodhya. But, the evidence is clear that there was concern about the location of Saket and Ayodhya and Saket was henceforth from the Gupta period referred to as Ayodhya. This is a bit of historical clarification that might be of some interest'.

11. Dr Romila Thapar continues: 'When was Saket identified as Ayodhya? Now if one argues that Saket was identified as Ayodhya in the Gupta period then where would the *Janmabhoomi* have been? In Saket or in Ayodhya? This is a question that needs an answer. The Buddhist texts seem to refer to the present day location of Ayodhya as Saket which is why they put Ayodhya on the Ganges. They refer to the capital of Kosala as Saket. And then in the Gupta period it is said that Saket is Ayodhya. So this raises a very fundamental question about the location of the *Janmabhoomi.* Buddhist texts also refer to Ram as the son of Dasharatha but Dasharatha is consistently called the king of Banaras. Now this is an interesting - I mean it can be a mistake, a lot of scribes and writers make mistakes about their geography, they were not very good - but the interesting point is that the king of Banaras is a kind of idiom that these Jatakas use, the Buddhist texts, the Jataka texts as they are called. Everybody now and again have a prince called the Prince of Banaras, he's called the King of Banaras and so on. That they don't specify that Dasharatha is the King at Ayodhya and of Kosala is strange because they do know the city of Ayodhya, they do know Kosal, they do talk about Dakshin Kosala, Uttar Kosala and so on. So, its not as if they don't know that. But they don't associate Ram with Ayodhya. They associate him with, quite wrongly, the King of Banaras. But there is a discrepancy in the

Buddhist texts and in the Hindu texts and that discrepancy I think has not been considered in the judgement."

12. Despite having reiterated that the case was to be decided purely as a property suit between the parties, the Court framed the dispute from the very first paragraph of its judgment to be one between two religious communities. Unfortunately, as stated earlier, throughout the course of the judgment, the Court consistently described the dispute as one between "Hindus" and "Muslims". In doing so, the Court seriously misconstrued the nature of the legal dispute, the legal submissions of the parties, and the role of religious identity in it, by assuming that all Hindus and Muslims in the country are homogenous communities who share the views of the respective parties to the dispute. In doing so the Court has violated the secular framework of the Constitution of India. As constitution-minded persons from various faith and no-faith backgrounds, the petitioners take serious objection to the Court treating the case to involve their religious faith and identity.

13. The Court on evidence found that there was no conclusive evidence on either side to show ownership of the disputed land as a composite whole. It was held that Hindus were able to show exclusive possession of the outer courtyard before 1857, whereas Muslims failed to show similar exclusive possession of the inner courtyard before 1857. However, it maintained that both failed to establish exclusive possession of the land as a composite whole; even so, Hindus were awarded full title. This reasoning of the court was legally deficient and manifestly unjust.

14. Specifically, the Court was wrong because it used differential standards of proof for both parties. It held that 'the Muslims' had failed to prove that they had exclusive possession of the inner courtyard, however it was enough in the case for 'the Hindus' to show that they believed that the Ram Janamsthan lay under the central dome of the mosque. Evidence was required for the so-called Muslim parties to the dispute, whereas for the so-called Hindu parties an assertion of faith and belief was enough. The Court ruling in favour of one party in this scenario is without any legally reasonable ground.

15. The Court, on the basis of preponderance of probabilities and evidence, ruled that the Muslim parties were unable to show on-going Islamic worship within the inner compound from 1528 to 1856. But neither were the issues in the case framed to adduce such evidence nor did any of the parties, including the Muslim parties, invited to adduce such evidence. In fact, the Court itself noted that such historical questions such as the date of the construction of the mosque "would essentially make no difference to the submissions of the rival sides. The plaintiffs in Suit 4 have stated before this Court that the records on which they place reliance in regard to their claim of worship, use and possession commence around 1860. This being the position, the precise date of the construction of the mosque is a matter which has no practical relevance to the outcome of the controversy having regard to the pleadings in Suits 4 and 5 and the positions adopted by the contesting Hindu and Muslim parties before this Court." In light of this, the Court accepted that the case involved adducing evidence of worship around 1860. Thus, there is a contradiction in the ruling of the Court for relying on the absence of evidence before this date, which was neither required not done by any parties concerned.

16. It was held by the Court that the ASI report established that the Babri Masjid was not built on empty land, however they were not able to establish the nature of the underlying structure. There was no evidence of the underlying structure being a Ram Mandir. But by allowing the conversation to be about what lies below, it further exposes other religious structures as many places in the country which may have been destroyed and rebuilt many times under different dynasties. This section of the judgement contravenes the constitutional premise that there are no sound legal and constitutional grounds to try to correct the alleged, possible and established wrongs of history in the 21st century. If there is, who will decide where this will end? Will these 'correctives' apply to other disputed places of worship? And further, how far in history should we go? And why we should select some histories and not others to rectify? Even more importantly, what in our constitution and law justifies these judicial choices?

17. Furthermore, the very fact, as the Court has noted, is that inter-community discord and riots had continuously occurred. The Court itself notes that, "The disputed site has been a flash point of continued conflagration over decades. In 1856-57, riots broke out between Hindus and Muslims in the vicinity of the structure." As the Court accepts, these incidents led to the British building a grill-brick fence, conclusively suggesting that there was a continuing Muslim worship at the disputed site, or at least in the inner compound.

18. The Court's determination of evidence suffers from patent contradiction. While it is true that the travelogues of foreign travelers do mention that Hindus revered the site of the complex, they do not on any account suggest that Muslims did not use the site as a religious place of worship. Hence the Court's reliance on these materials cannot ipso facto indicate what it has inferred them to mean, that is, an absence of Muslim worship until 1857.

19. Furthermore, the accounts of the European Travelers has to be viewed with the same skepticism as we would view any other historical document along with an understanding of the time spent in the country, and knowledge of local language and culture. Without acknowledging this, they can be simply dubbed as tourists who are recounting the stories as stated to them by the locals. It is also important to note that even they talk about the place Ayodhya and not the exact site of worship.

Rewarding Criminal Act for Civil Gains

20. There lies an inherent contradiction in the judgment inasmuch as it recognizes the act of the destruction of Babri Masjid as illegal and yet, legitimizes the collective motive of the mob that caused the destruction by directing the construction of the Temple in its place. It is pertinent to recognize that the orders passed would not have been possible if the Babri Masjid was still standing today. The judgment is therefore unsustainable in light of various illegal acts committed by different militant Hindutva outfits to dispossess the Muslims of their place of worship.

21. The Hon'ble Court has failed to consider the settled principle of law that a tainted cause of action cannot be sustained or decreed in a civil suit. The judgement fails to adjudicate the impact of the said illegal acts upon the cause of action of the Hindu parties, that is tainted by acts of trespass/ destruction of property. It further makes itself complicit in the illegality, by directing all parties towards the very ends, that were sought through and would not have been possible without the commission of the said illegal acts. Consequently, this Hon'ble Court has enabled the Hindu parties to take benefit of their illegal actions which is also prohibited by settled rule of *nullus commodum capere potest de iniuria sua propria* (no man can take advantage of his own wrong). The review petitioners quote the judgement of this Hon'ble court in **Indore Development Authority v. Shailendra, (2018) 3 SCC 412 at page 511**, in this regard:

> *"It is a settled proposition that one cannot be permitted to take advantage of his own wrong. The doctrine commodum ex injuria sua nemo habere debet means convenience cannot accrue to a party from his own wrong. No person ought to have advantage of his own wrong. A litigant may be right or wrong. Normally merit of lis is to be seen on date of institution. One cannot be permitted to obtain unjust injunction or stay orders and take advantage of own actions. Law intends to give redress to the just causes; at the same time, it is not its policy to foment litigation and enable to reap the fruits owing to the delay caused by unscrupulous persons by their own actions by misusing the process of law and dilatory tactics."*

22. That this Hon'ble Court has failed to consider the basic principle that no person can derive a benefit out of an illegality. While the judgment correctly recognizes and condemns the several illegalities committed by various militant Hindutva outfits at Babri Masjid , in furtherance of their communal agenda to build the temple in that exact spot, the operative paragraphs of the judgment overlooks the fact that the illegality perpetuated by the mob was a pre requisite to, give anyone the sanction to build Ram Mandir. The judgement thus violates the principles of natural justice by directing the construction of the temple without administering justice for the illegal act of the destruction of the masjid.

23. This Hon'ble Court has utterly failed to consider that settled principle of law i.e. *ex dolo malo non oritur actio* (no right of action can have its origin

in fraud). By failing to effectively adjudge and adjudicate upon the various illegal acts done in furtherance of the goal to build a temple upon the disputed site, and then ordering the said construction themselves, the Hon'ble Court has willingly allowed for a fraud not just on the Muslim parties to the dispute but on the Constitution of India. The collective motive of the mob in bringing down the Babri Masjid in 1992 and the cause of action of the Hindu parties, reinforce and cannot be viewed exclusive of one another. The actions of the above said Hindutva outfits, now valorized by the impugned judgment, were calculated to bypass the rule of law, as the destruction of the Masjid can never find legal sanction in the secular ethos of India. The directions given by the impugned judgment are morally abhorrent and constitutionally invalid in light of the fact that, if the mosque were still standing ,the directions in effect would amount to a Supreme Court order to demolish a historical structure as well as a betrayal of the secular ethos of the constitution, by ordering a construction of a Mandir in its place. While the judgement, effectively declares the destruction of the masjid illegal, it proceeds to conduct a miscarriage of justice, by not adjudicating upon the causes, effects and perpetrators of the crime, and treating the destruction as an inevitability of the Hindu's faith in Ram Janmabhoomi, a movement highjacked by communal politics. The Review Petitioner thus relies on the dictum of Lord Mansfield in Holman v Johnson (1775) 1 Cowp. 341 at page 343:

> *"The principle of public policy is this; ex dolo malo non oritur actio. No Court will lend its aid to a man who founds his cause of action upon an immoral or an illegal act. If, from the plaintiff's own stating or otherwise, the cause of action appears to arise ex turpi causa, or the transgression of a positive law of this country, there the Court says he has no right to be assisted. It is upon that ground the Court goes; not for the sake of the defendant, but because they will not lend their aid to such a plaintiff. So if the plaintiff and defendant were to change sides, and the defendant was to bring his action against the plaintiff, the latter would then have the advantage of it; for where both are equally in fault, potior est conditio defendentis." (See also Kedar Nath Motani v Prahlad Rai and Ors., AIR 1960 SC 213 at para 14; Immani Appa Rao and Ors. V Gollapalli Ramalingamurthi and Ors., AIR 1962 SC 370).*

24. The court thus errs in providing justice for the act of the Masjid destruction that was allegedly done in the name of unshakable faith in Ram Janmabhoomi. It condemns yet rewards the actions of the said Hindu outfits by taking it upon themselves to direct the construction of the very thing, that the Masjid was desecrated and demolished for.

25. That this Hon'ble Court failed to consider the settled principle of law i.e. *commodum ex injuria sua nemo habere debet* – a wrongdoer should not be enabled by law to take any advantage from his actions. By overlooking the impact of the wanton acts of trespass and destruction, upon the claim of the Hindu parties to the dispute, the court in effect legitimizes majoritarian mob justice as a violent but acceptable outlet of communal sentiment. The observations of the court condemning such acts are nullified by the final directions given, made possible only due to the abovesaid illegal actions of desecration, trespass and demolition of the masjid, now valorized as a necessary measure to build the Ram Temple and restore Hindu integrity against Muslim invaders. By framing these questions of law along with feudal communal concerns of a movement unduly influenced by politics, this court has contributed to undoing the secular ethos of the country in public imagination.

26. This Hon'ble Court has disregarded the settled and basic principle of law, that no person should not be able to take advantage of his/her wrongful actions. Actions such as damaging the domes in 1934, desecrating the Babri masjid in 1949 and the demolition of the Babri Masjid in 1992, were calculated illegal acts aimed toward challenging the rule of law and the authority of this court by inflaming irrational communal passions regarding the alleged existence of the Ram Mandir. However, this Court, while condemning the said challenge to its authority, and rejecting all their prayers on technical grounds, fails to hold the responsible parties accountable for their actions and instead rewards their ill thought sentiment with a government sanctioned plan, to complete the work they started.

27. That the Orders passed by this Hon'ble Court have allowed the concerned militant Hindutva outfits to take advantage of their illegal actions such as placing the idol under the central dome on the intervening night of December 23/24 1949 which were done to further manufacture a cause of action. The Hon'ble Court fails to consider this act in light of the settled principle of law i.e. *ex turpis causa non oritur actio* (from a dishonorable

cause an action does not arise). (Please See **Narayanamma v Govindappa, (2019) SCCOnline SC 1260) .**The resulting cause of action of the parties purporting to represent Hindu interests has been tainted with the illegality of the above mentioned acts, thus violating the basic principle of law that any party seeking relief from this court must approach it with clean hands. The judgment has thus failed to consider, much less adjudicate upon the impact that the attempts to communalize this matter has on the claim of the parties purporting to represent Hindu interests. The repeated violations of the status quo and the orders of this court, were a product of the irrational communal passions that were drummed up by parties with vested interests, who sought to attribute their illegal actions to unshakable faith in Lord Ram, which they clearly placed above the authority of the Supreme Court. Even though the judgment dated 9th November, admonishes these parties for their actions, that violate several fundamental constitutional tenants, the court has not placed any weightage upon its own observations and proceeded to not only condone, but actually reward the actions of these parties who failed to approach the court with clean hands.

28. While the freedom to practice one's religion is a fundamental right enshrined in the Constitution of India, there continues to be a rather limited understanding of its place in the constitutional and legal framework of the country as well as the reasonable restrictions placed upon it. Any attempts to manipulate these traditions of social bargains with religious deities, through claims of building the Ram Mandir, for the purpose for claiming superiority over another community or for the purposes of garnering votes, violate constitutional norms and should be curbed at its very root. If allowed to fester, they take the form of irrational communal sentiments or attempts to subvert the judicial process. However, this court has failed to consider that the Ram Mandir - Babri Masjid issue has been used as socio political fodder for decades, by parties and organziations such as the BJP, RSS, VHP, the Bajrang Dal and other individuals purporting to represent Hindu interests, for vote bank politics and to increase enmity between Hindu and Muslim communities. The matter was communalized by these parties to the extent that the current ruling disposition of the Bharatiyta Janata Party promised the construction of the Ram Mandir in its manifesto leading up to the 2019 Lok Sabha Elections thereby tacitly disrespecting the jurisdiction of the Hon'ble

Supreme Court in deciding whether or not a Ram Mandir could be built at the site on which the Babri Masjid had stood; thereby attempting to subvert and unduly influence the ongoing judicial process regarding the same. The faith-based claim eventually sought to reduce a religious deity revered by millions to a juristic personality, for the purposes of claiming title to a small piece of land. Such a movement could not have been sustained, without the concerned parties arousing irrational communal passions, by projecting the alleged destruction of the Ram Mandir and the construction of the Babri Masjid as a sign of the Muslim minority dominance of the Hindu majority population of India, thereby trying to gain legal sanction for populist majoritarian sentiment. Unfortunately, despite the fact that the said parties failed to approach this court with clean hands, this Hon'ble court has not only entertained but in effect granted their pleas with a few amendments.

Violation of Article 15

29. The Supreme Court has given more importance to the faith of one community over the faith of another community which violates Article 15 of the Constitution which says that the State shall not differentiate on the basis of religion. The Supreme Court has erred by placing higher value on the "faith" of the Hindus while dismissing the practice of "faith" by the Muslims. To justify this, the Court has given higher credence to the "faith" of Hindus which have not been asked to justify their faith or produce evidence of the same while the Muslim parties have been asked to provide proof of practice, belief and ownership.

30. This is in contradiction to the judgement of the Hon'ble Supreme Court on the Sabrimala issue wherein the Supreme Court opined that the faith of every community has to be tempered against the constitutional framework of justice, equality and rights.

31. Justice Chandrachud in **Indian Young Lawyers Assocation and Ors v. State of Kerala and Ors** (2018 SCC On Line SC 1690) has opined that:

> *"1. The Preamble to the Constitution portrays the foundational principles: justice, liberty, equality and fraternity. While defining the content of these principles, the draftspersons laid out a broad*

canvass upon which the diversity of our society would be nurtured. ***Forty two years ago, the Constitution was amended to accommodate a specific reference to its secular fabric in the Preamble. Arguably, this was only a formal recognition of a concept which found expression in diverse facets, as they were crafted at the birth of the Constitution. Secularism was not a new idea but a formal reiteration of what the Constitution always respected and accepted: the equality of all faiths.*** *Besides incorporating a specific reference to a secular republic, the Preamble divulges the position held by the framers on the interface of religion and the fundamental values of a constitutional order. The Constitution is not – as it could not have been - oblivious to religion. Religiosity has moved hearts and minds in the history of modern India. Hence, in defining the content of liberty, the Preamble has spoken of the liberty of thought, expression, belief, faith and worship. While recognising and protecting individual liberty, the Preamble underscores the importance of equality, both in terms of status and opportunity. Above all, it seeks to promote among all citizens fraternity which would assure the dignity of the individual.*

*3. The four founding principles are not disjunctive. Together, the values which they incorporate within each principle coalesce in achieving the fulfilment of human happiness. The universe encompassed by the four founding principles is larger the sum total of its parts. The Constitution cannot be understood without perceiving the complex relationship between the values which it elevates. So, liberty in matters of belief, faith and worship, must produce a compassionate and humane society marked by the equality of status among all its citizens. The freedom to believe, to be a person of faith and to be a human being in prayer has to be fulfilled in the context of a society which does not discriminate between its citizens. Their equality in all matters of status and opportunity gives true meaning to the liberty of belief, faith and worship****.*** ***Equality between citizens is after all, a powerful safeguard to preserve a common universe of liberties between citizens, including in matters of religion****.*

Combined together, individual liberty, equality and fraternity among citizens are indispensable to a social and political ordering in which the dignity of the individual is realized. Our understanding of the Constitution can be complete only if we acknowledge the complex relationship between the pursuit of justice, the protection of liberty, realization of equality and the assurance of fraternity. Securing the worth of the individual is crucial to a humane society.

7. Yet, the right to freedom of religion is not absolute. For the Constitution has expressly made it subject to public order, morality and health on one hand and to the other provisions of Part III, on the other. The subjection of the individual right to freedom of religion to the other provisions of the Part is a nuanced departure from the position occupied by the other rights to freedom recognised in Articles 14, 15, 19 and 21. While guaranteeing equality and the equal protection of laws in Article 14 and its emanation, in Article 15, which prohibits discrimination on grounds of religion, race, caste, sex or place of birth, the Constitution does not condition these basic norms of equality to the other provisions of Part III. Similar is the case with the freedoms guaranteed by Article 19(1) or the right to life under Article 21. The subjection of the individual right to the freedom of religion under Article 25(1) to the other provisions of Part III was not a matter without substantive content. ***Evidently, in the constitutional order of priorities, the individual right to the freedom of religion was not intended to prevail over but was subject to the overriding constitutional postulates of equality, liberty and personal freedoms recognized in the other provisions of Part III."***

32. The faith of the community cannot override the faith of another community and the practices of two faiths cannot and should not be compared as the expression of that faith can also differ. By placing a higher value to the faith of the Hindus who have essentially been given the benefit of assumption merely by stating that their faith is in that area as done by the Hindus. Interestingly, this belief is not without doubt (as has been expressed by eminent historians such as Professor Romila Thapar and Professor Irfan Habib, mentioned above inter alia.) The

historical documents that have been relied upon by this Hon'ble Court also do not completely dismiss the faith the Muslims or contradict the presence of the Mosque in that period of history. Therefore, even if historicity has to be looked at for this decision it cannot be discounted from the lens of Constitutional principles of equality and freedom of religion

Differential standards of proof

33. The Court in the conclusion on title of its judgment, weighed the proof adduced by both parties showing their worship on the disputed land over the centuries. However, when coming to a decision, it unfairly placed a higher value on one side to the dispute over another. The balance of probabilities was erroneously said to be in favour of the Hindus, based on the fact that they had proved to be worshipping in the outer courtyard since 1857, but also proved to worship in the inner courtyard prior to 1857, thereby stating that the Muslim parties had failed to prove exclusive possession of the inner courtyard. However, the Court failed to appreciate that neither parties had proved exclusive ownership of the land. Therefore, by providing exclusive ownership of the disputed land to the Hindu worshippers, and completely excluding Muslim worshippers from access to the land, the faith of one of the communities was consequently regarded higher than the other, thereby violating the secular principle embedded in the Constitution of India.

34. In the conclusion of the judgment, the Court stated as follows:

"797. On the balance of probabilities, there is clear evidence to indicate that the worship by the Hindus in the outer courtyard continued unimpeded in spite of the setting up of a grill-brick wall in 1857. Their possession of the outer courtyard stands established together with the incidents attaching to their control over it.

798. As regards the inner courtyard, there is evidence on a preponderance of probabilities to establish worship by the Hindus prior to the annexation of Oudh by the British in 1857. The Muslims have offered no evidence to indicate that they were in exclusive possession of the inner structure prior to 1857 since the date of the construction in the sixteenth century. After the setting up of the grill-brick wall, the

structure of the mosque continued to exist and there is evidence to indicate that namaz was offered within its precincts. The report of the Waqf Inspector of December 1949 indicates that Muslims were being obstructed in free and unimpeded access to mosque for the purposes of offering namaz. However, there is evidence to show that namaz was offered in the structure of the mosque and the last Friday namaz was on 16 December 1949. The exclusion of the Muslims from worship and possession took place on the intervening night between 22/23 December 1949 when the mosque was desecrated by the installation of Hindu idols. The ouster of the Muslims on that occasion was not through any lawful authority but through an act which was calculated to deprive them of their place of worship. After the proceedings under Section 145 of CrPC 1898 were initiated and a receiver was appointed following the attachment of the inner courtyard, worship of the Hindu idols was permitted. During the pendency of the suits, the entire structure of the mosque was brought down in a calculated act of destroying a place of public worship. The Muslims have been wrongly deprived of a mosque which had been constructed well over 450 years ago."

35. There were certain inconsistencies on the part of the Court, by coming to this conclusion. The Court, on the one hand, agreed that the Babri Masjid was constructed in 1528 under the command of Babur, however it was held that there was no account by the Muslims of possession, use or offer of *namaz* in the mosque between the date of construction and 1856-57. It was held by the Court that for a period of over 325 years which elapsed since the date of construction of the mosque until the setting up of a grill brick wall by the British, the Muslims had not adduced evidence to establish the exercise of possessory control over the disputed site.

36. The questioning of the use of the mosque from the time of its construction till the time the British constructed the wall in 1857, dividing the areas of worship between the two communities, is manifestly incorrect. Judicial notice under Section 57 of the Indian Evidence Act ought to have been taken of the fact that the existence of a mosque meant that prayers were held within the mosque, unless proved to the contrary. The belief that the mosque that was built on the orders of a Mughal ruler, historically believed to be a devout Muslim, in the time of the sovereign rule of the

Mughals, was not used for offering prayers would have been a departure from the norm. To use the phrase adopted by the Hon'ble Court in this ruling, the 'preponderance of probability' was certainly that there was uninterrupted prayers in the Babri Masjid from the time of its construction to 1857. No formal proof ought to have been required for this under Section 56 of the Indian Evidence Act. By asking for proof of worship in this time, the Court was *shutting the judicial eye to the existence of facts and matters in a sense as an insult to common sense, thereby reducing the judicial process to a meaningless and wasteful ritual*, as was mentioned in the case of **Onkar Nath v The Delhi Administration. [1977 AIR 1108].**

37. In the case of **Onkar Nath v The Delhi Administration [1977 AIR 1108]** one of the points urged before the Supreme Court of India was whether the courts were justified in taking judicial notice of the fact that on the date when the appellants delivered their speeches, a railway strike was imminent and that such strike was in fact launched on May 8, 1974. It was held as follows:

> "*The list of facts mentioned in Section 57 of which the Court can take judicial notice is not exhaustive and indeed the purpose of the section is to provide that the Court shall take judicial notice of certain facts rather than exhaust the category of facts of which the Court may in appropriate cases take judicial notice. Recognition of facts without formal proof is a matter of expediency and no one has ever questioned the need and wisdom of accepting the existence of matters which are unquestionably within public knowledge. (See Taylor, 11th Edn., pp. 3-12; Wigmore, Section 2571, footnote; Stephen's Digest, notes to Article 58; Whitley Stokes' Anglo-Indian Codes, Vol. II, p. 887.) Shutting the judicial eye to the existence of such facts and matters is in a sense an insult to commonsense and would tend to reduce the judicial process to a meaningless and wasteful ritual. No court therefore insists on formal proof, by evidence, of notorious facts of history, past or present.*"

38. It was legally unreasonable for the Muslim parties to be required to prove that a negative fact by adding positive evidence. The Court did not provide reasoning for believing that there were no prayers that were held in the mosque, hence it ought to have taken judicial notice of the fact that prayer were offered in the mosque. Under Section 56 of the Indian

Evidence Act, where judicial notice has been taken by the Court, no evidence ought to be provided for the same.

39. The Court relied on 'clear evidence' of Hindu worship in the outer courtyard, while they stated that with regard to the inner courtyard for the Hindus there was evidence on a preponderance of probability that the Hindus worshipped there, whereas Muslims have "*offered no evidence to indicate that they were in exclusive possession of the inner structure prior to 1857".* The Court held in its judgment that the Muslim account of worship prior to 1856 was conspicuously silent as opposed to the accounts of worship being offered by the Hindus. This is not in line with the historical account provided by the Court of the communal riots that took place in 1856-57 which resulted in the colonial administration setting up a grill-brick wall to bring about a measure of peace between the conflicting claims of the two communities. Communal riots caused by the conflicting claims ought to have been enough proof that there were issues raised by both communities regarding the offering of prayers at the disputed site. The Court should have come to the conclusion that this was enough to prove that the Muslims were offering prayers prior to 1856-57.

40. The incongruity of reasoning of the judgment is clear from the fact that the Court accepted that neither of the parties were able to claim exclusive possession of the inner courtyard of the disputed site. Despite this, the Court decided in favour of one of the parties over the other, with no convincing reason for doing so. The Court clearly used differential standards of proof for both parties. The Court ruling in favour of one party in this scenario was without any legally reasonable ground.

41. In order to come to the conclusion that it did, in favour of the Hindu worshippers, the Court relied on accounts of travellers such as Joseph Tieffenthaler, who visited the region in between 1743-1785 William Finch, who visited the region in 1608-11 and Montgomery Martin, all of whose findings were used to back the claim of the Hindu parties. While their findings did indicate that Hindus believed Ayodhya was the birthplace of Ram, and therefore a place of holy worship, the Court failed to account for the equally valid presence of the Mosque of Babur in Oudh all of the accounts of these travellers. The mention of the mosque by the travellers,

in the absence of mentioning that it was an abandoned mosque, is enough to indicate that prayers were being carried out there, thereby refuting the argument of the Court stating that there was not enough evidence of worship prior to 1857.

42. Further, the Court agreed that there was an exclusion of Muslims from worship and possession which took place on the intervening night between 22/23 December 1949 when the mosque was desecrated by the installation of Hindu idols. This was a gross violation of the sanctity of the mosque, and ought to have been punished severely.

"The ouster of the Muslims on that occasion was not through any lawful authority but through an act which was calculated to deprive them of their place of worship. After the proceedings under Section 145 of CrPC 1898 were initiated and a receiver was appointed following the attachment of the inner courtyard, worship of the Hindu idols was permitted. During the pendency of the suits, the entire structure of the mosque was brought down in a calculated act of destroying a place of public worship. The Muslims have been wrongly deprived of a mosque which had been constructed well over 450 years ago."

43. The Court acknowledged the wrongs done to the Muslims that worshipped at the Babri Masjid by the Hindu worshippers that desecrated the mosque. However, by rewarding it with the title suit and erroneously offering the Muslim parties a compensation of 5 acres elsewhere of land to the Sunni Central Waqf Board, the Court failed to ensure that justice was done.

44. The Court claimed that there were indications that despite the division by the colonial government of the disputed land, the Hindus continued to worship from the inner courtyard. This claim was backed up by the fact that in March 1861, Mohd Asgar and Rajjab Ali joined in complaining against the erection of a chabutra without permission near Babri Masjid, and other such instances where the Hindu worshippers violated the sanctity of the Muslim place of worship. These were several instances of attempted desecration of the place of worship of the Muslims which the Court erroneously used as evidence of Hindu worship, and ultimately in the conclusion to show that the inner courtyard was being accessed by Hindus and therefore granting the exclusive title to the Hindu parties.

> *"The documentary evidence also shows that the setting up of the railing did not as a matter of fact result in an absolute division of the inner and outer courtyards as separate and identified places of worship for the two communities. Soon after the incident of November 1858 in which the Nihang Singh is alleged to have organised a hawan puja and to have erected a symbol of —Sri Bhagwan within the premises of the mosque is the commencement of a series of episodes indicating that the exclusion of the Hindus from the inner courtyard was neither accepted nor enforced a matter of ground reality."*

45. The Muslim parties by confining their worship to the inner courtyard were respecting the sanctity of the Hindu beliefs and worship; however, the same respect was not accorded to them. The Court has incorrectly ended up holding this attempt at peaceful co-existence against the Muslim parties by excluding them from the ownership of the disputed land completely.

46. The Court relying on documentary evidence, repeatedly cited instances of the Hindu worshippers violating the sanctity of the segregated spaces for worship that was a direction by the colonial government in the erection of the railing after the riots in 1856-57, as an indication of the stronger belief and faith of the Hindu worshippers, and give their claim over the inner courtyard a higher footing. The Court held as follows:

> *"The riots of 1934 and the events which led up to 22/23 December 1949 indicate that possession over the inner courtyard was a matter of serious contestation often leading to violence by both parties and the Muslims did not have exclusive possession over the inner courtyard. From the above documentary evidence, it cannot be said that the Muslims have been able to establish their possessory title to the disputed site as a composite whole."*

47. This Court in its final conclusion, identifies the acts of 22/23 December, 1949, as the desecration of the mosque and holds that it was in violation of the Muslim's rights to worship in the mosque. However, the claim made in the abovementioned statement incorrectly indicates that the act of the

desecration of the mosque was seen as a righteous assertion of claim by the Hindu parties over the mosque area of worship, thereby holding the faith of the Hindus over the desecration of the mosque.

Constitutional Morality

48. The Constitution envisioned a role for the State within the framework of Constitutional Morality to ensure that every branch would adhere to the rule of law. The Court was envisioned as the custodian of the Constitution responsible for protecting people from violations by other branches and reinvesting the faith of the people that Constitutional values shall not just be a dream but actionable for every person including minorities.

49. This view has been expressed in **Manoj Narula v. Union of India [(2014) 9 SCC 1]**, held that:

> **"***75. The principle of constitutional morality basically means to bow down to the norms of the Constitution and not to act in a manner which would become violative of the rule of law or reflectible of action in an arbitrary manner. It actually works at the fulcrum and guides as a laser beam in institution building. The traditions and conventions have to grow to sustain the value of such a morality. The democratic values survive and become successful where the people at large and the persons in charge of the institution are strictly guided by the constitutional parameters without paving the path of deviancy and reflecting in action the primary concern to maintain institutional integrity and the requisite constitutional restraints. Commitment to the Constitution is a facet of constitutional morality."*

50. **Justice Puttaswamy (Retd) and Anr v. Union of India [(2018) SCC OnLine SC 1642]** that:

> *"786. Constitutional morality requires a government not to act in a manner which would become violative of the rule of law. Constitutional morality requires that the orders of this Court be complied with, faithfully. This Court is the ultimate custodian of the Constitution. The limits set by the Constitution are enforced by this Court. Constitutional morality requires that the faith of the citizens in the constitutional courts of the country be maintained. The importance of the existence of courts in the eyes of citizens has been highlighted in Harper Lee's classic*

"To Kill a Mockingbird": "But there is one way in this country in which all men are created equal—there is one human institution that makes a pauper the equal of a Rockefeller, the stupid man the equal of an Einstein, and the ignorant man the equal of any college president. That institution, gentlemen, is a court. It can be the Supreme Court of the United States or the humblest J.P. court in the land, or this honorable court which you serve. Our courts have their faults, as does any human institution, but in this country our courts are the great levelers, and in our courts all men are created equal." (Emphasis supplied)

Many citizens, although aggrieved, are not in a condition to reach the highest Court. The poorest and socially neglected lack resources and awareness to reach this Court. Their grievances remain unaddressed. Such individuals suffer injury each day without remedy. Disobedience of the interim orders of this Court and its institutional authority, in the present case, has made a societal impact. It has also resulted in denial of subsidies and other benefits essential to the existence of a common citizen. Constitutional morality therefore needs to be enforced as a valid response to these arbitrary acts. Non-compliance of the interim orders of this Court is contrary to constitutional morality. Constitutional morality, as an essential component of the rule of law, must neutralize the excesses of power by the executive…. Deference to the institutional authority of the Supreme Court is integral to the values which the Constitution adopts. The postulate of a limited government is enforced by the role of the Supreme Court in protecting the liberties of citizens and holding government accountable for its transgressions. The authority of this Court is crucial to maintaining the fine balances of power on which democracy thrives and survives. The orders of the Court are not recommendatory – they are binding directions of a constitutional adjudicator. Dilution of the institutional prestige of this Court can only be at the cost of endangering the freedom of over a billion citizens which judicial review seeks to safeguard."

51. In **Navtej Singh Johar vs Union Of India Ministry Of Law And Justice [(2018) SCC OnLine SC 1350],** the Hon'ble Court places a

burden on the Courts to drive every aspect of life to adhere to the Constitutional values.

> *"111. The concept of constitutional morality is not limited to the mere observance of the core principles of constitutionalism as the magnitude and sweep of constitutional morality is not confined to the provisions and literal text which a Constitution contains, rather it embraces within itself virtues of a wide magnitude such as that of ushering a pluralistic and inclusive society, while at the same time adhering to the other principles of constitutionalism. It is further the result of embodying constitutional morality that the values of constitutionalism trickle down and percolate through the apparatus of the State for the betterment of each and every individual citizen of the State."*

52. In this context the decision of this Hon'ble Court which, despite the caveats of the Hon'ble Court to the contrary, in effect gives primacy to faith over Constitutional principles of justice, equality and non-discrimination is jarring. The Supreme Court had the option of simply deciding this narrowly as a title dispute over a small piece of land in the small town of Ayodhya. But in actuality it was not simply a title dispute, nor even a contest between a medieval mosque, now razed, with a grand temple, still imagined. It was a dispute about what kind of country this is and will be in the future, to whom does it belong, and on what terms must people of different identities and beliefs live together in this vast and teeming land. Since the case has critical bearing and profound implications across generations of the upholding of many fundamental rights, of equality, of life, and of freedom of worship, once again every citizen of India has the right and indeed the duty to intervene to seek steps of defend and uphold their constitutional rights, and preserve the secular democratic character of the Indian Republic.

Judicial Overreach

53. Article 142 of the Constitution of India states that "The Supreme Court in the exercise of its jurisdiction may pass such decree or make such order as is necessary for doing complete justice in any cause or matter pending before it, and any decree so passed or orders so made shall be enforceable throughout the territory of India in such manner as may be prescribed by or under any law made by Parliament and, until provision

in that behalf is so made, in such manner as the President may by order prescribe."

54. It has been held by the Supreme Court that an order which it makes under Article 142 in order to do complete justice between the parties must not only be consistent with the fundamental rights, guaranteed by the Constitution but it cannot even be inconsistent with the substantive provisions of the relevant statutory laws - *Prem Chand vs Excise Commissioner AIR 1963 SC 996, Kamala Devi vs Hem Prabha, AIR 1989 SC 1602, Union Carbide Corporation vs Union of India AIR 1992 SC 248, N A Mohammed Kasim vs Sulochna AIR 1995 SC 1624, Delhi Electricity Supply Undertaking vs Basanti Devi (1999) 8 SCC 229*

55. In Part Q of the judgment, the Supreme Court has directed the Central Government to vest the right, title and interest in a Trust as per section 6 and 7 of Acquisition of Certain Area at Ayodhya Act 1993 and formulate a scheme. It further goes on to list out what the scheme must entail and states that the said Trust would construct the temple as per this scheme. This is in contravention of the Section 7(2) of the Act, which states that

> *"In managing the property vested in the Central Government under Section 3, the Central Government or the authorised person shall ensure that the position existing before the commencement of this Act in the area on which the structure (including the premises of the inner and outer courtyards of such structure), commonly known as the Ram Janma Bhumi-Babri Masjid stood in village Kot Ramchandra in Ayodhya, in Pargana Haveli Avadh, in tehsil Faizabad Sadar, in the district of Faizabad of the State of Uttar Pradesh is maintained."*

56. The Central Government has also been directed to give "appropriate representation" to Nirmohi Akhara in the management of the Trust, despite dismissing Nirmohi Akhara's claim to the title. In addition to being vague, it is clear overreach of the power of the Supreme Court under Article 142.

57. Direction to construct a temple and mandating inclusion of Nirmohi Akhara which is a Hindu religious denomination is also against the principle of secularism.

58. Article 142 gives very wide powers to the Supreme to do "complete justice" but this power is supplementary in nature. But in this case,

Supreme Court has given a much wider interpretation of Article 142, practically raising the provision to the status of a new source of substantive power for itself. Eminent jurist M. P. Jain in his commentary, Indian Constitution Law (Volume I, Seventh Edition [2018]) writes, "this extraordinary power of the Court cannot be used, even with the width of its amplitude to build a new edifice where none existed earlier, by ignoring express statutory provisions dealing with a subject and thereby achieve something indirectly which cannot be achieved directly."

59. According to the Rule of Harmonious Construction of interpretation of statutes an interpretation that makes the enactment a consistent whole should be adopted. Therefore Article 142 should be read along with the other aspects of the Constitution, like secularism and separation of powers of the legislature, executive and the judiciary. Both of these are also part of the basic structure of the Constitution as decided in S. R. Bommai vs Union of India (AIR 1994 SC 1918) and Keshavananda Bharti vs State of Kerala ((1973) 4 SCC 225)

60. The plenary jurisdiction under Article 142 is the residual source of power which Supreme Court may draw upon as necessary only when it is just and equitable to do so, and in particular to ensure the observance of the due process of law, to do complete justice between the parties, while administering justice according to law. In this case it is neither just nor equitable for the highest court of a secular democracy to instruct the government to build a temple on the site in question. It is even more striking that while it directs the government to build a temple at the disputed site, it gives no instructions to the government to rebuild the mosque demolished at the disputed site through a grievous act of mass crime which resulted in rioting around the country and the loss of an estimated 2000 human lives.

61. In comparable democracies like South Africa too, judicial overreach is held in disdain and the importance of courts not transgressing their boundaries and overtaking the role of executive or legislature is emphasized. Judge Davis of in the case of *Mazibuko v The Speaker of the National Assembly and Others* (CCT 115/12) [2013] ZACC 28; 2013 (6) SA 249 (CC); 2013 (11) BCLR 1297 (CC) (27 August 2013) held that

> "Courts do not run the country, nor were they intended to govern the country. Courts exist to police the

constitutional boundaries... Where the constitutional boundaries are breached or transgressed, courts have a clear and express role. Only when the Constitution has been transgressed."

62. A world renowned judicial statesman and the late Chief Justice Ismail Mohamed of South Africa said: "The independence of judiciary and the legitimacy of its claim to credibility and esteem must in the last instance rest on the integrity and the judicial temper of the judges, the intellectual and emotional equipment they bring to bear upon the process of adjudication, the personal qualities of character they project, and the parameters they seek to identify on the exercise of judicial power. Judicial power is potentially no more immune from vulnerability to abuse than legislative or executive power but the difference is this: the abuse of legislative or executive power can be policed by an independent judiciary but there is no effective constitutional mechanism to police the abuse of judicial power. It is therefore crucial for all judges to remain vigilantly alive to the truth that the potentially awesome breath of judicial power is matched by the real depth of judicial responsibility. Judicial responsibility becomes all the more onerous upon judges constitutionally protected in a state of jurisprudential solitude where there is no constitutional referee to review their own wrongs."

PRAYER

In the circumstances set forth above, it is therefore respectfully prayed that this Hon'ble Court may be pleased to:

a) Institute a full Bench for hearing the Review Petition, in recognition of the fact that this is not merely a title dispute but a contestation about the core of India's constitutional morality, and the principles of equal citizenship, secularism, justice, rule of law and fraternity; and

b) Pass any other or further orders as may be deemed fit and proper in the interest of justice.

THROUGH:

COUNSEL FOR THE PETITIONERS

DRAWN BY:
SUROOR MANDER, ANKITA RAMGOPAL,
ADITI SARASWAT, ADVOCATES

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