

IN THE SUPREME COURT OF INDIA
ORIGINAL CIVIL WRIT JURISDICTION

WRIT PETITION (CIVIL) NO. _____ OF 2020
(PUBLIC INTEREST LITIGATION)

IN THE MATTER OF:

Bachpan Bachao Andolan

...Petitioner

Versus

1. National Disaster Management Authority
(Through its Member Secretary)
NDMA Bhawan,
A-1 Safdarjung Enclave
New Delhi-110029
secretary@ndma.gov.in
2. Ministry of Home Affairs, UOI
(Through its Secretary)
North Block
New Delhi.
hshso@nic.in
3. Ministry of Labour and Empowerment, UOI
(Through its Secretary)
Shram Shakti Bhawan, Rafi Marg
New Delhi.
Secy-labour@nic.in
4. State of Assam
(Through its Chief Secretary)
Secretariat, Gauwhati
Assam.
5. State of Bihar
(Through its Chief Secretary)
Secretariat, Patna
Bihar.

6. State of Chhattisgarh
(Through its Chief Secretary)
Secretariat, Raipur,
Chhattisgarh.
 7. State of Jharkhand
(Through its Chief Secretary)
Secretariat, Ranchi,
Jharkhand.
 8. State of Maharashtra
(Through its Chief Secretary)
Secretariat, Mumbai
Maharashtra.
 9. State of Rajasthan
(Through its Chief Secretary)
Secretariat, Jaipur,
Rajasthan.
 10. State of West Bengal
(Through its Chief Secretary)
Secretariat, Kolkata,
West Bengal.
 11. State of National Capital Territory of Delhi,
(Through its Chief Secretary)
Secretariat, I P Estate
New Delhi.
 12. State of Telangana
(Through its Chief Secretary)
Secretariat, Hyderabad.
Telangana.
- ...Respondents

WRIT PETITION UNDER ARTICLE 32 OF THE
CONSTITUTION OF INDIA

To

The Chief Justice of India and His
Companion Judges of Hon'ble
Supreme Court of India New Delhi

The Humble Petition of the
Petitioner abovenamed

MOST RESPECTFULLY SHOWETH:

1. That the present writ petition is being filed before this Hon'ble Court under Article 32 of the Constitution of India in public interest for enforcement of fundamental rights of children under Articles 14, 19 and 21, 23, 24, 39, 43, in order to prevent them from becoming hapless victims of Human Trafficking, in the wake of and as an aftermath of the Covid-19 pandemic and the resultant extended Lockdown.
2. That the Petitioner, Bachpan Bachao Andolan (BBA) India is a Non-Governmental Organization (NGO) founded by Sh. Kailash Satyarthi, Nobel Peace Laureate, 2014 is filing the present Public Interest Litigation. The petitioner organization has its office at L-6, Kalkaji, New Delhi-110019, Telephone No. 011-49211111, 26224899, Email: info@bba.org.in, PAN No. AAATA8585E and annual income is NIL. That no Civil, Criminal or Revenue litigation, involving the petitioner, which has or could have a legal nexus with the issues involved in the present PIL. The Petitioner is registered with the Registrar of Trusts, New Delhi vide Registration No.14987.
3. That since its naissance in the year 1980, the Petitioner has worked tirelessly on issues pertaining to child rights. The modus operandi of the Petitioner is to identify, release, rehabilitate and educate children in servitude through prevention, direct intervention, coalition-building, mass mobilisation and legal action, to create a child-friendly

society. The Petitioner has been consistently raising concerns over the inhumane and diabolic treatment of children in our country since the past three decades, on multiple forums, including this Hon'ble Court and the Hon'ble High Courts on issue such as child labour, bonded labour, human and child trafficking, child sexual abuse, drugs in children, Right to Education for all children, the retrieving of missing children, providing freedom for thousands of children in servitude and helping in their successful re-integration in the society, rehabilitation and education thereof. The various initiatives undertaken by the Petitioner include investigative and public education efforts, research relating to child welfare, conducting rescues, initiating movement towards legislative reforms and organising special events to spread awareness about the illegalities that prevail due to the employment of children among other initiatives

4. That Mr. R.S. Chaurasia, Chairperson of the Petitioner Organization has been duly authorized vide resolution dated 05.02.2020 to file and pursue the present writ petition before the Hon'ble Supreme Court of India and to carry out all necessary act(s) in this behalf. A Copy of Resolution dated 05.02.2020 is annexed herewith as ANNEXURE-P-1. (Page No.
5. That the Petitioner has not filed any representation to the Respondents with regard to the issue at hand. The Petitioner does not have any personal interest in the outcome of the instant litigation and the present petition made before this Hon'ble Court is not guided by any self-gain or for the gain of any other person/institution/body. It is

further humbly submitted that this petition is filed with no other motive, save that of the general interest of the public and to protect the interests of the children of our country.

6. That the country is reeling under an unprecedented crisis in the form of Covid-19. In order to contain the spread of the disease, the Respondents have taken significant and stringent steps, most pertinently containment measures to enforce social distancing. The Respondent No.1 has issued order dated 24.03.2020 under Section 6(2)(i) of the Disaster Management Act, 2005 [hereinafter referred to as the DM Act] *inter alia* directing all Ministries of the Govt. of India and State Governments to take mandatory measures of social distancing for a period of 21 days. The period of 21 days in the aforesaid order was thereafter extended vide order dated 14.04.2020, till 3.05.2020. Ergo, essentially the entire country has been in a mandatory, enforceable lockdown since 25.03.2020, till 3.05.2020, which period may be extended further by the Respondents.
7. That since the beginning of the national lockdown, the Petitioner has been working continuously in collaboration with government and local administration for assistance in the wake of Covid 19, including, monitoring over 25,000 families (with more than 72,000 children) in rural India and enabling ration supply by linking them to government schemes, 5,000 grocery kits are being distributed in mica mining zones of Jharkhand and Bihar, 4000 kits are being distributed in Jharkhand's Koderma and Giridih and 1000 in Nawada district of Bihar, providing over 8,000 cooked meals to daily wage earners in villages of Madhya Pradesh

with help of partners, distributing over 2,500 masks in villages having a shortage, 222 most vulnerable families have directly been provided grocery kits while 137 have been linked with government schemes in Delhi, Book bank has been set up in a slum to ensure children don't lose interest in education, providing cooked meals to migrant labourers and people in need through community kitchens in Delhi, Punjab and Maharashtra, 150 migrant labourers being provided meals on a daily basis through social kitchen set up in Mukti Ashram, Rajasthan, more than 15,000 masks have been distributed to frontline health workers and others in need across the country, voluntarily offered 2 of our buildings for use as quarantine / isolation centers to the Government, rescued children living at the Petitioner's Bal Ashram home are undergoing vocational training of tailoring, along with their teachers have till date stitched over 2000 masks, being distributed not just among the villagers but also to policemen, health workers and cleanliness workers, launched a social media campaign #KeepChildrenSafeAtHome to address child abuse during the lockdown, over 2,300 children living in Child Care Institutions have been provided health care kits, shared COVID-19 do's and don'ts with around 1,500 child care institutions across the country to ensure safety of children living there, etc.

8. That it is respectfully submitted that a sizeable population of the country find themselves in abject poverty and a heightened position of vulnerability due to Covid-19 and its resultant lockdown that is now in its 6th week, and

conceivably may extend beyond the expected date of 3.05.2020. For lakhs of migrant labourers, daily wage workers, etc., the Lockdown, though surely necessary, has proved to be catastrophic. Thousands have trekked back to their villages, however it is a poignant reality that poverty and hunger awaits them as they would have migrated in the first place due to lack of work in their respective villages. Given the dire situation, many will be forced into debt at predatory interest rates. For those labourers who have been forced to remain where they are during the lockdown, the situation might be even worse, being stuck in a place with no money, no security and mostly no food. The economic crisis, increased insecurity, poverty and marginalization induced by Covid 19, are key drivers for families grasping onto straws for survival, for pushing their children into trafficking.

9. That Child trafficking is a highly organized crime worldwide. Unscrupulous traffickers, procurers and brokers take advantage of the innocence and vulnerability of marginalized sections and traffic their children. Section 370 of the Indian Penal Code, 1860, inserted vide an amendment in 2013, gives an expansive definition to Trafficking and takes within its folds anyone who recruits, transports, harbours, transfers or receives a person for the purpose of exploitation, by both direct acts such as force and surreptitious acts such as inducement. Section 370A further provides that whoever, knowingly or having reason to believe that a minor has been trafficked, engages such minor for sexual exploitation in any manner, shall be punished

with rigorous imprisonment for a term which shall not be less than five years, but which may extend to seven years. In the case of a person, instead of a minor, the punishment prescribed is five years.

10. Child trafficking is prone to manifest in two principal ways- child labour and sex trafficking. Children are trafficked first and then placed in labour either forced or for earning a sub-minimal wage or more unfortunate ones, i.e. particularly girls and young boys, are forced into sexual exploitation. Child labour is likely to be sourced from the agricultural households too, considering the deepening agrarian crisis. Once the lockdown is lifted and normal manufacturing activity resumes, factory owners will look to cover their financial losses by employing cheap labour, the easiest way of doing which is employing child labour. Numbers of street children pushed into begging will also spike.
11. That the other egregious manner of manifestation of child trafficking is sex trafficking. Underage girls will be bought and sold into prostitution. The business of commercial sexual exploitation that has faced financial loss in the face of the lockdown will look to seek to overcome this loss through high-return investments, i.e. younger girls. Another more subtle form of trafficking is child marriages, criminalized by The Prohibition of Child Marriage Act, 2006 as well as POCSO, yet prevalent.
12. That the Petitioner has been actively providing relief in the past few weeks and while doing so has received intel from its various units all over the country that on the opening of

the Lockdown, there is likely to be a massive spurt in cases of child trafficking. It has received information from multiple sources that traffickers have become active, have started approaching potential victims and families and have even started handing out advance payments for the children. The Petitioner also maintains a follow-up on children it has rehabilitated and repatriated in the past from child labour and the same report on the sudden activation of traffickers, has been received from them.

13. That the Petitioner had approached this Hon'ble Court vide WP(C) No. 75/2012 titled *Bachpan Bachao Andolan Vs. UOI and Ors.* On the issue of trafficking and missing children in India and seeking directions, such as compulsory registration of FIR for every missing child. While disposing off the said Public Interest Litigation, this Hon'ble Court had observed in its Judgment and Order dated 05.09.2017 as follows:

"It is finally submitted by learned counsel for the petitioner that in the event of a disaster, the persons who suffer the most are children. It is submitted that directions be issued to the National Disaster Management Authority (NDMA) to concentrate on the rescue and rehabilitation of children in the event of a disaster. Again, since the NDMA is not a party in these proceedings, we can only request the NDMA to look into this matter since it does appear that the submissions made by learned counsel for the petitioner are correct. The NDMA should give special attention to the children in the event of a disaster since they are the most vulnerable victims of a disaster that may strike at any time."

A copy of the Judgement and Order dated 5.09.2017 passed in WP(C) No. 75/2012 titled *Bachpan Bachao Andolan Vs. UOI and Ors.* passed by this Hon'ble Court is annexed and marked as ANNEXURE-P-2. (Page No. 31-36)

14. The Covid-19 pandemic is a “disaster” under Section 2 (d) of the DM Act, 2005. There is no gainsaying that the pandemic, the consequent lockdown and its aftermath will have a dauntingly adverse impact on children. The mandate of this Hon’ble Court to the Respondent No.1 was clear and unequivocal in case of a disaster, and this duty becomes all the more significant in view of the manic proportion and impact of Covid-19. Yet, even though the Respondent No.1 has passed a series of orders since February 2020 in the wake of Covid-19, in particular, advisories to Chief Secretaries of States on action points and steps to be taken dated 4.02.2020, 5.03.2020, 17.03.2020, 24.03.2020, 14.04.2020, among others, as per the information of the Petitioner, there do not seem to be any set of guidelines or policy or advisory specific to protecting children.
15. The Respondent No.2 has also issued various guidelines in exercise of its powers under Section 10(2) of the DM Act, 2005. Ministries of UOI have also issued directions for vulnerable classes/groups such as senior citizens, farmers, stranded tourists, etc. The Chairperson of the National Executive Committee, Respondent No.1 has been issuing directions to all Ministries/ Departments of the UOI, State and Union Territories and State and Union Authorities, in the wake of Covid-19 and the Lockdown and steps to be taken.
16. The Respondent No.1 has issued an order dated 31.03.2020 to all State Disaster Management Authorities on establishing a system of coordination and activating an NGO Coordination Cell in each District and report to the

Respondent No.1 with such information. As such, a system of coordination and sharing of intel ought to already be in place by now. A copy of the Order dated 31.03.2020 passed by the Respondent No.1 has been annexed and marked as ANNEXURE-P-3. (Page No. 37)

17. As per the mandate of the DM Act, 2005, the National Disaster Management Authority, State Disaster Management Authority in each State and District Disaster Management Authority in all districts ought to be operational. Moreover, a plan or guidelines issued by the Respondent No.1 under Section 10 of the Act, are to be implemented by the State authorities under Section 18 of the Act and further by the District Authorities under Section 30 of the Act. A District Plan for each District is provided for under Section 31. In this regard, reference is made to *Gaurav Kumar Bansal Vs UOI* reported at (2017) 6 SCC 730, whereby this Hon'ble Court has held as under:

"11. As far as the preparation of the State Plan under Section 23 of the Act is concerned, we have been informed by learned counsel for the NDMA that all States except Andhra Pradesh and Telangana have prepared a State Disaster Management Plan which is very much in place.

12. As far as the districts are concerned, it is stated that the District Disaster Management Authority has been constituted in every district under Section 25 of the Act and out of 684 districts in the country, a District Disaster Management Plan is in place in 615 districts while it is under process in the remaining districts.

13. On a review of the steps that have been taken by the NDMA, we are of opinion that there has been sufficient compliance with the provisions of the Act and it is not necessary for us to issue any particular directions. All we need say is that it is absolutely necessary for the NDMA constituted at the national level and the State Disaster

Management Authority at the State level to be ever vigilant and ensure that if any unfortunate disaster strikes there should be total preparedness and that minimum standards of relief are provided to all concerned..."

A copy of Judgment *Gaurav Kumar Bansal Vs UOI* reported at (2017) 6 SCC 730 has been annexed and marked as ANNEXURE-P-4. (Page No. 38-41)

18. It is respectfully submitted that a targeted Covid-19 response by the Respondents in the form of formulating a policy/guidelines, before opening of the Lockdown, can substantially decrease the trafficking in children. In the given circumstances it would be apposite if the Respondent No.1 is directed to formulate a policy/issue guidelines specific to preventing trafficking of children and their rescue and rehabilitation, in accordance with this Hon'ble Courts Judgement dated 5.09.2017. The Policy be then circulated to Chief Secretaries of all States, for implementation. As some Districts would be more vulnerable to trafficking, in terms of trafficking children or receiving trafficked children, a District Plan under Section 31 should address the concern, in lines of the Policy issued by the Respondent No.1.
19. It is submitted that if proactive steps are taken to put in place a system, before the lockdown is lifted, in terms of the Policy to be formulated to prevent child trafficking, the impending humanitarian crisis in the aftermath of the ongoing global health crisis can be largely prevented. If children are not prevented from being trafficked, it would be a herculean and colossal task to rescue them from the onslaught of violence and abuse they would be thrown into, after the lockdown. It is humbly submitted that an entire

generation of poor children can be at risk if the Respondents do not act with alacrity before lifting of the lockdown.

20. The Petitioner has been receiving information from all over the country fortifying its concerns. The plight of these children was highlighted by the death of a 12 year old girl in Telangana only last week. The girl walked nearly 150 km from Telangana to her native Bijapur district in Chhattisgarh, desperate because of the extended nationwide lockdown to fight coronavirus. She worked in chilli fields to earn for her family. After walking for three days, cutting through forests to avoid the highway, she collapsed and died, from what has been diagnosed as severely dehydration and malnourishment. Copy of the news report that has featured on NDTV on 21.04.2020 has been annexed and marked as ANNEXURE-P-5. (Page No. 42-43)
21. Similar complaint/plea for help has been received by the Petitioner from Vishal (name changed), a boy from Bathuara Village, Bela Block, Sitamarhi, Bihar who has explained in his letter how he was trafficked from his village to work in a factory in Ludhiana, Punjab. He and other child labourers like him were sent back to their villages for the lockdown, however the trafficker has already started pressurizing and coercing his family to send him back to work. True translated copy of the child's letter dated 18.04.2020 to the Petitioner is annexed herewith and marked as ANNEXURE-P-6. (Page No. 44-45). The same report has been received from Katihar and Sitamarhi Districts of Bihar. Families are being pressurized and coerced by the Traffickers to send

their children back to Delhi as soon as the Lockdown is lifted.

The Petitioner has written to the DM, Sitamarhi, Bihar bringing to his attention Vishal's case and seeking his urgent intervention and action along with extending all assistance. A list of these children sent by the Petitioner's ground worker is annexed herewith as ANNEXURE-P-7. (Page No. 46-47). Copy of the representation sent by the Petitioner to the DM, Sitamarhi, Bihar dated 22.04.2020 is herewith and marked as ANNEXURE-P-8. (Page No. 48)

22. On the other hand, the Petitioner has also received pleas of help from child labourers who have been abandoned by their employers and are left to fend for themselves in their places of work. Many such children are dying of hunger as no one is providing for them during the lockdown as the factories are shut. One such case is of Shahrugh (name changed) who was rescued by BBA from Delhi in 2018, when he was 15 years old and was repatriated with his family in Kathothia village in Katihar District of Bihar. He worked in a factory in Sarai Kale Khan and was engaged in embroidery work. On follow up, as is done for all repatriated child labour, it was found that he had been re-trafficked to Delhi. He informed that his employer has left and he was stuck in the lockdown without any food or essentials. The Petitioner has since been catering to his needs. Having received this information, the Petitioner has written to DM, Katihar, Bihar bringing to his attention the intel that vulnerable children in his area may be trafficked and requesting his intervention. A copy of the representation made by the Petitioner to the DM,

Katihar, Bihar, dated 22.04.2020 is annexed herewith and marked as ANNEXURE-P-9. (Page No. 49). Having received news of the problem faced by Shahrukh, the Petitioner mobilized its units and informers to prepare lists of potential child labourers/ who could be stuck in various factories and locations and are under threat of abandonment and estrangement or might already be on streets due to the lockdown. A list of such children in various locations/factories of Jaipur and Mumbai is annexed herewith and marked as ANNEXURE-P-10. (Page No. 50-53)

23. The Petitioner had received a call for protection and assistance from Nisha, (name changed) 16 year old girl, resident of Village Mondya Pahar, Police station Borio, District, Sahibganj, Jharkand, who had been trafficked to Delhi two years ago. After her rescue, she is currently staying at a shelter home in Sahibgunj. She has appealed for help from the Petitioner stating that a known trafficker is coercing and inducing her father to send her to work, and considering her family's dire situation she is afraid she would be re-trafficked. The Petitioner has sent a detailed representation to the DM of Sahibgunj, Jharkhand dated 24.04.2020 highlighting Nisha's case and seeking action against the alleged trafficker, as well as protection for Nisha, along with extending all assistance in this regard. True translated copy of the letter to the petitioner is annexed herewith and marked as ANNEXURE-P-11. (Page No. 54)). Copy of the representation sent by the Petitioner to the DM, Sahibgunj, Jharkhand dated 24.04.2020 has been

annexed herewith and marked as ANNEXURE-P-12. (Page No. 55)

24. The Petitioner has also received a complaint from a partner local organization, Aasra that families of vulnerable families in Udaipur, Rajasthan have already started receiving advance from traffickers with the promise that their children would be sent to work as child labour once the lockdown is lifted. These children mostly reside within the police station jurisdictions of Saira, Gogunda, Oogna, Jhadol, Falaiya, Kotra, Bekariya and Salumbar. According to the information received, big businessmen have deployed middlemen/traffickers in these areas to negotiate with the families to take the children back to work once lockdown is lifted, mostly to Gujarat and Maharashtra. The Petitioner has sent a detailed representation to the DM, Udaipur, Rajasthan dated 24.04.2020 informing him of the information received and seeking action against the alleged trafficker, as well as protection for the vulnerable children, along with extending all assistance in this regard. True translated copy of the complaint received from Aasra is annexed herewith and marked as ANNEXURE-P-13. (Page No. 56). Copy of the representation sent by the Petitioner to the DM, Udaipur, Rajasthan dated 24.04.2020 has been annexed herewith and marked as ANNEXURE-P-14. (Page No. 57)
25. The Petitioner has received similar complaints from two persons from Chogda Village of Sahibganj district, Jharkhand, stating inter alia that their 14 year old and 15 year old daughter respectively, are being enticed and induced by traffickers to come away with them. These

traffickers are also known to forge age proofs. The Petitioner has sent a detailed representation to the DM, Sahibgunj, Jharkhand pertaining to these two girls, dated 27.04.2020 informing him of the information received and seeking action against the alleged trafficker, as well as protection for the girls, along with extending all assistance in this regard. True translated copies of the complaints received from the fathers from Sahibgunj, Jharkhand are annexed herewith and marked as ANNEXURE-P-15. (Page No. ~~58-59~~). Copy of the representation sent by the Petitioner to the DM, Sahibgunj dated 27.04.2020 has been annexed herewith and marked as ANNEXURE-P-16. (Page No. 60-61)

26. A local newspaper in Jharkand, Awaz has recently reported a case of child trafficking at Aman Buru village in Ranchi, where two minors were about to be sold and trafficked to big cities. Four traffickers have been arrested by the police in the case. True translated copy of the newspaper report featured in Awaz newspaper, Jharkhand, is annexed herewith and marked as ANNEXURE-P-17. (Page No. 62)
27. That based on the intelligence and information collected by the Petitioner, traffickers have already become active in various areas all over the country and are tapping on the vulnerabilities of poor families by coercing or inducing them into selling/sending their children. It is of the utmost importance that this practice be nipped in the bud and a comprehensive policy be made to attack the same.
28. That the Petitioner has been able to provide some instances, enlisted hereinabove, by way of examples, however it does

not have the means, especially in light of the Lockdown, to obtain information from other districts all over the country. The Petitioner has been making endeavours to coordinate with the local administration at the places of the above mentioned instances for appropriate action and redressal, though it may not be feasible for it to reach everywhere, thereby drawing the attention of the authorities to the issue for their necessary information and action.

29. That the petitioner has not filed any petition before this Hon'ble Court praying for similar reliefs.

PRAYER

In view of the facts and circumstances stated hereinabove, it is most respectfully prayed that this Hon'ble Court may graciously be pleased to:-

- i) Issue an appropriate writ, order or direction in the nature of mandamus directing the Respondent No.1 to frame an appropriate policy/guidelines on Prevention of Trafficking in Children and their rescue and rehabilitation in the wake of Covid-19, at the earliest;
- ii) Issue an appropriate writ, order or direction directing the Respondent No. 1-3 to circulate the Policy so prepared under (i) to the Chief Secretaries of all States and Governors of all Union Territories for action and mandatory implementation;
- iii) Direct the Respondent No.2 to mandatorily direct all States to activate their Anti Human Trafficking Units to prevent and take appropriate action on child trafficking, including but not limited to identifying known and potential

traffickers, monitoring, and sharing information and intel with the Respondent No.2 as a part of coordinated response and action; and

- iv) Exempt the petitioner from filing duly affirmed affidavit in the prevailing circumstances; and
- v) Pass such other order or orders as deem fit in the facts and circumstances of the case.

AND FOR THIS ACT OF KINDNESS, PETITIONER AS IN DUTY BOUND SHALL EVER BE GRATEFUL.

SETTLED BY:

FILED BY:

(H. S. PHOOLKA)
SENIOR ADVOCATE

U (JAGJIT SINGH CHHABRA)
ADVOCATE FOR THE PETITIONER

DRAWN BY:

(PRABHSAHAY KAUR)
ADVOCATE

DRAWN ON: .04.2020
FILED ON: 29.04.2020

IN THE SUPREME COURT OF INDIA
ORIGINAL CIVIL WRIT JURISDICTION
WRIT PETITION (CIVIL) NO. OF 2020
(UNDER ARTICLE 32 OF THE CONSTITUTION OF INDIA)

IN THE MATTER OF:

BachpanBachaoAndolan

...Petitioner

Versus

National Disaster Management Authority & Ors.

...Respondents

AFFIDAVIT

1. That I am the Chairperson of the Petitioner Organization in the present Writ Petition. In my aforesaid capacity, I am well aware of the facts and circumstances of the case and thus competent to swear this affidavit.
2. I have gone through the contents of the Synopsis and List of Dates at Pages B to M and contents of accompanying Writ Petition paragraphs 1 to 29, pages 1 to 19 and accompanying application(s) which are true and correct to the best of my knowledge. I further state that the petitioner has no personal gain, private motive or oblique reason in filing the Public Interest Litigation.
3. I further state that the annexures annexed with the petition are true and correct copies of their respective originals.

DEPONENT

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VERIFICATION:

Verified at New Delhi on 28th day of April, 2020, that the contents of the affidavit are true and correct to the best of my knowledge and belief and nothing material has been concealed thereof.

R.S. Chandra

DEPONENT