

IN THE SUPREME COURT OF INDIA
CRIMINAL ORIGINAL JURISDICTION
WRIT PETITION (Cr) NO. _____ OF 2020

IN THE MATTER OF:

Anoop Prakash Awasthi

Petitioner in Person

VERSUS

State of Uttar Pradesh

.....Respondent

PAPER BOOK

(for index please see in side)

With

IA No. _____ 2020

An application seeking permission to file the Writ Petition without a notarized/attested affidavit

IA No. _____ 2020

An application seeking exemption to file official translation of Annexure P-9

IA No. _____ 2020

An application seeking permission to file the Writ Petition and argue in person

ADVOCATE FOR THE PETITIONER:

ANOOP PRAKASH AWASTHI (in person)

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NOT A BATCH MATTER

PROFORMA FOR FIRST LISTING

A-1

SECTION II

The case pertains to (Please tick/check the correct box):

- Central Act: (Title) (i) Article 32/21 of the Constitution of India
- Section: N.A.
- Central Rule: (Title) N.A.
- Rule No(s) N.A.
- State Act: (Title) N.A.
- Section: N.A.
- State Rule: (Title) N.A.
- Rule No(s). N.A.
- Impugned Interim Order: (Date) N.A.
- Impugned Final Order /Decree: NA
- High Court: (Name) NA
- Names of Judges: NA
- Tribunal/ Authority: (Name} NA
- 1. Nature of matter: Criminal
- 2. (a) Petitioner/ appellant No. 1: Anoop Prakash Awasthi
- (b) e-mail ID:
- (c) Mobile phone number:
- 3. (a) Respondent No. 1: State of Uttar Pradesh
- (b) e-mail ID:
- (c) Mobile phone number:
- 4. (a) Main category classification: 817 (criminal matters)
- (b) Sub classification: Writ Petitions (Criminal) and Writ Petitions filed as PIL pertaining to criminal investigations/prosecution
- 5. Not to be listed before: N.A.

6. (a) Similar disposed of matter with citation,

if any & case details: Criminal Appeal No. 1165 of 2019, Pramod
Suryabhan Pawar vs State of Maharashtra & Anr
dated 21.08.2019

(b) Similar pending matter with case details: No similar matter pending to
the knowledge of petitioner

7. Criminal Matters: Yes

(a) Whether accused/convict has surrendered: N.A.

(b) FIR No. NA Date: 02/03 July 2020

(c) Police Station: Chaubepur Kanpur, Uttar Pradesh

(d) Sentence Awarded: N.A.

(e) Period of sentence undergone including period of detention/ custody
undergone: N.A.

8. Land Acquisition Matters: No

(a) Date of Section 4 notification: N.A.

(b) Date of Section 6 notification: N.A.

(c) Date of Section 17 notification: N.A.

9. Tax Matters: State the tax effect: N.A.

10. Special Category (first petitioner/ appellant only): NA

Senior Citizen>65 years SC/ST Woman/child

Disabled Legal aid case In custody

11. Vehicle Number (in case of Motor Accident Claim matters): N.A.

Date: 10.07.2020

Petitioner in Person
(Name: Anoop Prakash Awasthi)

SYNOPSIS AND LIST OF DATES

Shall we close our hon'ble courts, prosecution agencies and dismantle the system of administration of criminal justice as the trigger happy cops in the state of Uttar Pradesh do not need them and believe only upon their fire power when taking any adversary or outlaw in their custody? The morning news of another encounter has given a chill in the spine of well meaning persons who trust police as part of criminal justice administration as custodian of upholding the rule of law in the legal way. The incident dated 02.07.2020 at village Bikru, Kanpur, U.P. leading to martyrdom/killing of 8 police personnel has resulted in series of encounters where 6 accused persons have been killed with the latest casualty being the kingpin Vikas Dubey who was arrested/surrendered before the Mahakal Mandir in the city of Ujjain, Madhya Pradesh on 09.07.2020 and killed in cold blooded manner in an apparently staged encounter in the morning of 10.07.2020 at Barra Kanpur while in police custody. The half century old observation of Hon'ble Justice A.N. Mulla has again become relevant wherein he said "There is not a single lawless

group in the whole of the country whose record of crime comes anywhere near the record of that single organised unit which is known as the Indian police force. The police force in Uttar Pradesh is an organised gang of criminals". The rule of law cannot be restored by actions of state machinery as outlaw while dealing with an outlaw in their custody. There is likelihood of police actions being motivated as the killing has resulted in eliminating the crucial witness to the police-criminal-politician nexus in the state of UP. An exemplary action and big reform is needed to let the citizens have the confidence that might is not right and they are not living in medieval draconian authoritative state but under a state governed by rule of law. The law enforcement agency of the Uttar Pradesh Police is required to be told in clearest and toughest terms that they are not above law and film script of staged encounters cannot be overlooked.

That the subject Public Interest Litigation is being filed for the purpose of seeking a direction for (i) judicial inquiry of each encounter killing done by the police department of Respondent State of Uttar Pradesh post the incident dated 02.07.2020 leading

to martyrdom/killing of 8 police personnel in the night hours in the village of Bikru, PS Chaubepur, district Kanpur, Uttar Pradesh while trying to nab the Respondent No. 2, Vikas Dubey, tagged with over 60 criminal cases against his name and who is captured from Ujjain, Madhya Pradesh on 09.07.2020. and killed in Kanpur in an alleged police encounter on 10.07.2020 (ii) and investigation of the entire incident by an independent central agency like CBI or NIA or any Court monitored body.

It is submitted that by destroying the crime scene with the help of JCB machines and killing the aids of Vikas Dubey, the UP Police has more been active in destruction of evidence and showing immediate good work than breaking the police-criminal-politician nexus and furthering an impartial investigation leading to prosecution of the accused criminals.

Prior and after the unfortunate incident dated 02.07.2020, UP police has relentlessly acted unprofessionally in revenge and anger. In the furtherance of their unprofessionalism, they went to the crime scene unprepared, without proper intelligence inputs, weapons and search lights and once 8 casualties happened,

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they are further acting in most unprofessional manner in destroying and erasing the entire house of Vikas Dubey to ground and destroying all vehicles parked therein leading to complete destruction of evidence and dismantling of crime scene. They are further on killing spree and have killed till date at least 5 associates of Vikas Dubey and now killed the kingpin in alleged encounters veracity of which are yet to be established as the same looks like a film script.

This hon'ble Court in the matter of Om Prakash and Ors. vs. State of Jharkhand, (2012) 12 SCC 72 has said "*It is not the duty of the police officers to kill the accused merely because he is a dreaded criminal. Undoubtedly, the police have to arrest the accused and put them up for trial. This court has repeatedly admonished trigger happy police personnel, who liquidate criminals and project the incident as an encounter. Such killings must be deprecated. They are not recognized as legal by our criminal justice administration system. They amount to State sponsored terrorism.*"

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It is submitted that killing is legal only during war. Right to life and personal liberty is guaranteed and protected for every individual whether citizen or non citizen under Article 21 of the Constitution of India and any life can be taken only by the procedure established by law. In no other circumstances howsoever grave that may be, except on the pretext of self defense, life can be taken by any agency be it a law enforcement agency or not?

That the country has a history of fake encounters and Uttar Pradesh is especially notorious in that with thousands of encounters and hundreds of killing officially taken as achievement of police. But it is a dangerous trend, not to forget the killing of 12 personnel in district Gonda of Uttar Pradesh on 12th March 1982 where 12 persons including a Deputy Superintendent of Police was killed while catching a dacoit and same was later found to be a fake encounter cum killing spree staged by the police personnel, subordinate SHO of a police station, to settle personal score with deputy SP and in which clean chit was initially given to police and later on the intervention of this Hon'ble CBI inquiry was conducted and after 31 year of the incident, in 2013, 3 police

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personals were given capital punishment and five others sentenced to imprisonment for life.

Something similar has happened in Kanpur. An entire police station of Chaubepur is under suspicion, suspension and shunting. The ATS chief of Uttar Pradesh on the day of incident (now shunted) is under scanner due to alleged inaction against Vikas Dubey/Vinay Tiwari SHO of Chaubepur, despite specific input and written request by the martyred/deceased DSP Devendra Mishra. Deceased Viaks Dubey was not only himself a politician but also found to have access to every political party in power. The escape from Kanpur despite being searched by thousands of police personnel and arrest in the distant city of Ujjain in the state of Madhya Pradesh can't be a miracle but a well aided escape. The killing of Vikas Dubey during morning hours of 10.07.2020 looks like an attempt of putting curtain on this nexus. All those who are responsible in the process are required to be put to task. The evil nexus of Police-criminal-politician is involved in the process which is required to be broken to establish the authority of rule of law. Police is however, hurt,

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wounded and behaving like an organized group of law less persons.

Police has first dismantled the entire house of Vikas Dubey by using JCB machine after one day of crime and thus acted not only illegally but also erased the crime scene destroying the material evidence and chances of the recreation of the crime scene. And while doing so, they have not acted under any law and hence the destruction of the house property and vehicles parked is completely illegal. It is submitted that the power provided under section 47 of the Code of Criminal Procedure, 1971 is limited to the extent of breaking door of passage for ingress in case of making arrest and section 100 thereof mandates the duty of the Persons in charge of closed place to allow search but such cold blooded destruction of property of crime scene after one day of incident is not only unprofessional but a case of utter lawlessness by a law enforcement agency.

It is further submitted that the weapons used in the crime of killing of eight police personnel at village Bikhru, Kanpur are as per media reports, the sophisticated weapons like AK-47 and INSAS

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rifles and a terror angle to the entire episode also needs to be investigated to establish how the weapons are procured.

It is submitted that the UP police is the victim, investigator as well as affected party of the incident and since the issue involves a broader nexus where the main accused (now deceased) was also accused of several other criminal activities and had a history of clean acquittal even in the murder of a state minister in a police station and hence it requires to be investigated by an independent agency to lead it to a logical conclusion.

Hence this Petition.

02.07.2020 In the intervening night of 2/3 July 2020, in a police raid at Bikru Village, Kanpur, Uttar Pradesh, eight police personnel of the raiding party were killed in an ambush with armed miscreants who are stated to be Vikas Dubey and his associates. It is submitted that as per media reports about 60 criminal cases are registered against Vikas Dubey in various police stations in Kanpur, U.P.

- 03.07.2020 Police killed Prem Prakash Pandey , (a senior citizen, inside whose house the DSP Mr. Devendra Mishra leading the raiding party was hiding for safety) and Atul Dubey, mama and cousin respectively of Vikas Dubey in an encounter at Kanpur.
- 05.07.2020 House of Vikas Dubey is completely destroyed and thus crime scene is completely erased leading to destruction of crucial evidence.
- 08.07.2020 UP Police shoots in an encounter one Amar Dubey allegedly the third member of the Vikas Dubey gang.
- 08.07.2020 On the same day two police personals Vinay Tiwari, SHO of Chaubepur Police Station and KK Sharma SI are arrested for tipping off gangster.
- 09.07.2020 UP Police shoots in an encounter two persons namely Prabhat Mishra and Praveen Dubey

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allegedly the 4th and 5th member of the Vikas Dubey gang.

09.07.2020 Vikas Dubey is arrested/surrenders in the campus of Mahakal mandir at Ujjain, Madhya Pradesh.

09.07.2020 At about 7.41 pm in the evening, India TV an important Hindi news channel of national outreach runs several captions on its screen "Vikas will die, date, time, place all fixed." "Death is waiting for Vikas, it is confirmed." "big news about to come on Vikas". "It is order of Yogi Adityanath, as Vikas crosses border" "death waiting for Vikas" "Vikas will die, Kanpur will see, date time and place all fixed"

10.07.2020 While in custody of UP Police in transit remand from M.P to Kanpur, Uttar Pradesh at a place Barra in Kanpur City, Vikas Dubey is killed in an encounter in complete defiance of rule of law.

10.07.2020 Hence this petition

IN THE HON'BLE SUPREME COURT OF INDIA

(CIVIL ORIGINAL JURISDICTION)

PUBLIC INTEREST LITIGATION WRIT PETITION (CRIMINAL)

NO. _____ OF 2020

(A PETITION UNDER ARTICLE 32 OF THE CONSTITUTION OF INDIA PRAYING FOR A WRIT OF MANDAMUS OR ANY OTHER APPROPRIATE WRIT/S OR ORDER/S APPOINTING A CENTRAL AGENCY LIKE CENTRAL BUREAU OF INVESTIGATION (CBI) OR A COUNTER TERRORISM AGENCY LIKE NATIONAL INVESTIGATION AGENCY (NIA) OR ANY COURT MONITORED BODY TO PROBE THE POLICE-CRIMINAL-POLITICIAN NEXUS IN THE KILLING OF 8 POLICE PERSONNEL IN UTTAR PRADESH ON 2ND JULY 2020 AND EVERY KILLING IN ENCOUNTER BY THE POLICE OF THE GANG MEMBERS OF VIKAS DUBEY INCLUDING HIS OWN KILLING ON 10.07.2020)

IN THE MATTER OF:

Anoop Prakash Awasthi,

. ... Petitioner

VERSUS

State of UP

Through its Director General of Police,
Police Headquarters, 9th Floor, Tower 2,
Gomtinagar Ext., Shahid Path, Lucknow,
Email dgprcontrol-up@nic.in, Mob. 9454400101

Respondents

All respondents are contesting respondents

WRIT PETITION UNDER ARTICLE 32 OF THE CONSTITUTION OF INDIA PRAYING FOR A WRIT OF MANDAMUS OR ANY OTHER APPROPRIATE WRIT/S OR ORDER/S APPOINTING A CENTRAL AGENCY LIKE CENTRAL BUREAU OF INVESTIGATION (CBI) OR A COUNTER TERRORISM AGENCY LIKE NATIONAL INVESTIGATION AGENCY (NIA) OR ANY COURT MONITORED BODY TO PROBE THE POLICE-CRIMINAL-POLITICIAN NEXUS IN THE KILLING OF 8 POLICE PERSONNEL IN UTTAR PRADESH ON 2ND JULY 2020 EVERY KILLING IN ENCOUNTER BY THE POLICE OF THE GANG MEMBERS OF VIKAS DUBEY INCLUDING HIS OWN KILLING ON 10.07.2020

To,

The Hon'ble the Chief Justice of India and His Companion
Justices of the Hon'ble Supreme Court of India.

The Petition of the Petitioner above named

MOST RESPECTFULLY SHEWETH:

1. The present Writ Petition under Article 32 of the Constitution of India is being filed by the Petitioner to enforce fundamental rights, particularly the Right to Life and Personal Liberty (Article 21) which includes right to free and fair investigation of any crime guaranteed by the Constitution and adherence to due process of law in the course thereof.

ARRAY OF PARTIES:

2. The Petitioner is an Advocate on Record of this Hon'ble Court and registered with Bar Council of Delhi at D- and residing at Delhi and domicile of Uttar Pradesh and a citizen of India. He is a public spirited person and utterly disturbed by brutal nexus of police-criminal-politicians in the State of Uttar Pradesh. Petitioner

Anoop Prakash Awasthi Advocate dated 19.01.2015 is attached herewith and marked as **Annexure P-1** at page 20

3. The Petitioner does not have any personal interest or any persona gain or private motive or any other oblique reason in filing this Writ Petitioner in Public Interest.

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4. The Petitioner has not been involved in any other civil or criminal or revenue litigation, which could have legal nexus with the issues involved in the present Petition.
5. The Respondent is the State of Uttar Pradesh, represented by the Director General of Police, at Police Headquarters, 9th Floor, Tower 2, Gomtinagar Ext., Shahid Path, Lucknow, Email:- dgpcontrol-up@nic.in, Mob. 9454400101 who is head of the various department of police in the state of Uttar Pradesh.
6. Respondent is state and hence subjected to writ jurisdiction. That since state machinery of police department of Uttar Pradesh is involved which is not only an influential institution but also the an interested party and because the issues raised in the Petition has pan Indian influence over the functioning of the police machinery across the country, for a proper and effective adjudication of the issues involved in the petition the High Court of Allahabad in the State of Uttar Pradesh is not approached and the Petitioner in person has moved to this Hon'ble Court.

7. FACTS OF THE CASE

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- 7.1 The Petitioner firmly believes that the Indian constitution guarantees life and liberty, justice and equality for all persons. Therefore, he has moved this Writ Petition under Article 32 of the Constitution of India, which seeks to invoke the most salient fundamental right, the right to life guaranteed under Article 21. The petition pertains to the ongoing encounters in the state of Uttar Pradesh after the killing of eight police personnel at Village Bikru, PS Chaubepur, Kanpur, UP in an ambush with criminals wherein till date six persons are killed in various police encounters.
- 7.2 That in the intervening night of 2/3 July 2020, in a police raid at Bikru Village, Kanpur, Uttar Pardesh, eight police personnel of the raiding party were killed in an ambush with armed miscreant who are stated to be Vikas Dubey and his associates. A true copy of the news clipping of Hindustan times dated 03.07.2020 with the caption "8 policemen out to nab

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dreaded criminal killed in firing in UP's Kanpur is enclosed herewith as **Annexure P-2** at page 21.

7.3 That on 03.07.2020 UP Police killed Prem Prakash Pandey , (a senior citizen, inside whose house the DSP Mr. Devendra Mishra leading the raiding party was hiding for safety) and Atul Dubey, mama and cousin respectively of Vikas Dubey in an encounter at Kanpur. True copy of the news clipping of the New Indian Express with the caption "two close aides of criminal Vikas Dubey killed in second face-off with UP Police" dated 03.07.2020 is enclosed herewith as **Annexure P-3** at page 22

7.4 House of Vikas Dubey was completely destroyed and thus crime scene is completely erased leading to destruction of crucial evidence in the matter by the UP Police. True copy of the news clipping of Hindustan Times dated 05.07.2020 with the caption "Kanpur gangster Vikas Dubey's house demolished" is enclosed herewith as **Annexure P-4** at page 23 to 25.

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- 7.5 On 08.07.2020, UP Police shoots in an encounter one Amar Dubey allegedly the third member of the Vikas Dubey gang. True copy of the news clipping of 'the Wire' dated 08.07.2020 with the caption UP Police shoot dead a third member of Vikas Dubey's gang is enclosed herewith as **Annexure P-5** at page 26 to 29.
- 7.6 That on 08.07.2020 itself same day two police personals Vinay Tiwari, SHO of Chaubepur Police Station and KK Sharma SI were arrested on allegation of tipping off gangster. True copy of the news clipping of the India Today magazine with caption " Vikas Dubey case: Chaubepur SHO, SI arrested for tipping off gangster" dated 08.07.2020 is enclosed herewith as **Annexure P-6** at page 30 to 31.
- 7.7 That on 09.07.2020, UP Police shoots in an encounter two persons namely Prabhat Mishra and Praveen Dubey allegedly the 4th and 5th member of the Vikas Dubey gang. True copy of the news

clipping of Hindustan Times dated 09.07.2020 with the caption "2 more aides of Kanpur gangster Vikas Dubey shot dead" is enclosed herewith as **Annexure P-7** at page 32 to —

7.8 On 09.07.2020, Vikas Dubey is arrested/surrenders in the campus of Mahakal mandir at Ujjain, Madhya Pradesh. True copy of the NDTV news clipping with the caption "after 5-day run, gangster Vikas Dubey arrested at Madhya Pradesh Temple" dated 09.07.2020 is enclosed herewith as **Annexure P-8** at page 33 to 34.

7.9 On 09.07.2020, at about 7.41 pm in the evening, India TV an important Hindi news channel of national outreach runs several captions on its screen " Vikas will die, date, time, place all fixed." "Death is waiting for Vikas, it is confirmed." "big news about to come on Vikas". "It is order of Yogi Adityanath, as Vikas crosses border" "death waiting for Vikas" " Vikas will die, Kanpur will see, date time and place all fixed" True copy of the screen shot of the India TV Caption

Vikas will die, date, time, place all fixed with its true translated copy is enclosed herewith as **Annexure P-9** at page 35 to 36.

7.10 That on 10.07.2020, while in custody of UP Police in transit remand from Ujjain, Madhya Pradesh to Kanpur, Uttar Pradesh at a place Barra in Kanpur City, Vikas Dubey is killed in an encounter in complete defiance of rule of law. True copy of the India Today magazine news clipping "Vikas Dubey killed in encounter in Kanpur" is enclosed herewith as **Annexure P-10** at page 37 to 38

8. In the light of aforementioned following issues/question of law have arisen for the kind consideration of this Hon'ble Court:-

- i) Whether the law enforcement agency of the UP police is above law and believes in killing in encounter than prosecuting criminals in complete defiance of Article 21 of the Constitution of India which guarantees that life and liberty of individuals

shall not be taken except according to the procedure established by law?

- ii) Whether extra-judicial killings by the state law enforcement agency, bypassing the entire criminal justice administration poses a threat to rule of law?
- iii) Whether the act of police in first elimination the crime scene and then eliminating the gang of criminals despite catching them alive and thus destroying complete chain of evidence to the crime requires judicial scrutiny to unfold the cover of broader conspiracy which may involve the top police men and political persons of the state of U.P.?
- iv) Whether the killing of Vikas Dubey is done in revenge and in cold blooded manner and same requires investigation by an independent agency as India TV news already reported the police plan of killing Vikas Dubey atleast 12 hours before the encounter?
- v) Whether mandatory independent judicial inquiry is required to every encounter killing done by the police or any other state agency?

- vi) Whether the case at hand is a fit case for judicial intervention by this Hon'ble Court leading broader reforms for infusing professionalism and accountability in police machinery in the entire country?
- vii) Whether use of sophisticated arms like AK-47 and Insas rifles and vicious nexus police-criminal-politicians requires the investigation from a terror angle which could effectively be done by Central Bureau of Investigation or counter terrorism agency like National Investigation Agency?

9. GROUNDS:-

- A. Because the rule of law is fundamental guiding principle of healthy functioning of any democratic society.
- B. Because if trigger happiness attitude of cops is not put under check, it will lead to anarchy.
- C. Because life can be taken only by a procedure established by law as guaranteed by Article 21 of the Constitution of India and any deviation therefrom by

state does not give healthy signals to the society and same is essentially a crime altogether.

D. Because subject petition is being filed ultimate objective off ensuring professionalism and adherence to rule book by the police machinery.

E. Because this Hon'ble court in the matter of Om Prakash and Ors. vs. State of Jharkhand, (2012) 12 SCC 72 has clearly said "*It is not the duty of the police officers to kill the accused merely because he is a dreaded criminal. Undoubtedly, the police have to arrest the accused and put them up for trial. This court has repeatedly admonished trigger happy police personnel, who liquidate criminals and project the incident as an encounter. Such killings must be deprecated. They are not recognized as legal by our criminal justice administration system. They amount to State sponsored terrorism.*"

- F. Because the case at hand is a rough example of state anger and state terrorism.
- G. Because such trigger happy attitude of cops if not checked may lead to killing of any citizen only on the perceived not of him/her being involved in a crime.
- H. Because judicial inquiry is needed to break the larger conspiracy behind the incident and same is further needed to break open the dreaded police-criminal-politician nexus to the crime at hand.
- I. Because the encounters in the incident killing six persons from time to time are suspicious in nature and requires judicial probe.
- J. Because, revenge cannot replace justice howsoever grave and instigating the crime may be.
- K. Because the India TV news already reported the police plan of killing Vikas Dubey atleast 12 hours before the encounter which gives clear hints of the killing of Vikas

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Dubey is done in revenge and in cold blooded manner and same requires investigation by an independent agency.

L. Because use of sophisticated arms like AK-47 and Insas rifles and vicious nexus police-criminal-politicians requires the investigation from a terror angle which could effectively be done by Central Bureau of Investigation or counter terrorism agency like National Investigation Agency.

M. Because this Hon'ble Court is true custodian of the rule of law in the country and on many occasions taken tough stand to set things right.

10. The Petitioner has filed this Petition for directions to protect and safeguard fundamental rights of individuals under Article 21 of the Constitution, since the Petitioner has no alternate efficacious remedy but to approach this Hon'ble Court under Article 32 of the Constitution of India for the reliefs prayed for herein.

11. The Petitioner has for the first time filed this Petitioner in respect of the subject-matter, i.e., for issuance of directive under Article 21 of the Constitution.
12. That the petitioner is not aware of any other petition pending before this Hon'ble Court on the issues involved in the present petition.
13. That this Hon'ble Court has the jurisdiction to entertain and try this Petition.
14. That the Petitioner craves leave to alter, amend or add to this Petition.
15. That the Petitioner seeks leave to rely on documents, a list of which, along with true typed copies has been annexed to this Petition
16. That this Petition has been made bona fide and in the interest of justice.

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17. That the Petitioner has not filed any other Petition before this Hon'ble Court or before any other Court seeking the same relief.

18. That due to the hardship caused due to pandemic Covid-19, the petition is being filed without attestation of the affidavit and without requisite court fee. Petitioner undertakes to file the physical copies of the documents relied upon in the petition, deficit court fee or other charges at the earliest and do the needful as and when normalcy returns or as may be directed by this Hon'ble Court.

PRAYER

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

- i) Issue a writ of mandamus or any other appropriate writ/s or order/s appointing a central agency like Central Bureau of Investigation (CBI) or a counter terrorism agency like National Investigation Agency

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(NIA) or any court monitored body to investigate/probe and prosecute the police-criminal-politician nexus in the killing of 8 police personnel in Uttar Pradesh on 2nd July 2020 and every killing in encounter by the police of the gang members of Vikas Dubey including his own killing on 10.07.2020.

- ii) Pass such other orders as may be deemed fit in the facts and circumstances of this case.

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

Drawn and Filed By:
Anoop Prakash Awasthi,
AoR (in person)

Place: New Delhi

Drawn and filed On:- 10.07.2020