

IN THE SUPREME COURT OF INDIA

ORIGINAL WRIT JURISDICTION

M.A. NO.901 OF 2021

IN

WRIT PETITION (CRL.) NO.199 OF 2013

IN THE MATTER OF:

People's Union for Civil Liberties ...PETITIONER/APPLICANT

VERSUS

Union of India & Others ...RESPONDENTS

**REJOINDER AFFIDAVIT ON BEHALF OF THE
PETITIONER/APPLICANT**

WITH

I.A. NO. _____ OF 2021:

**APPLICATION SEEKING EXEMPTION FROM FILING DULY
AFFIRMED REJOINDER AFFIDAVIT**

ADVOCATE-ON-RECORD FOR THE PETITIONER/APPLICANT:

APARNA BHAT

INDEX

S. NO.	PARTICULARS	PAGE NO.
1.	Rejoinder affidavit on behalf of the Petitioner / Applicant.	1-15
2.	I.A. NO. _____ OF 2021 Application seeking exemption from filing duly affirmed rejoinder affidavit along with affidavit.	16-19

1

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PETITIONER/APPLICANT

I, Dr. V. Suresh, S/o K.S. Veeraraghavan, aged about 61 years, R/o 458, 8th South Cross Street, Kapaleeshwarar Nagar, Neelankarai, Chennai - 600115 do hereby solemnly affirm and state on oath as under:-

1. That I am the National General Secretary for the Petitioner/Applicant Organisation and as such I am well conversant with the facts and circumstances of the case and in that capacity I am duly competent to swear to the present affidavit.
2. That after carefully going through the Counter Affidavit filed on behalf of the Union of India, I am submitting the present Rejoinder Affidavit for kind consideration of this Hon'ble Court.
3. That the issue involved in the present Application is quite significant: ensuring effective administration of justice and preserving the Rule of Law: Whether the Judgment of this Hon'ble Court in **Shreya Singhal v. UOI (2015) 5 SCC 1** has been complied with? Whether the steps taken by the UOI are adequate? What steps need to be



2

taken for effective implementation of the Judgment in ***Shreya Singhal*** to avoid wrongful investigation and prosecution? Finally, what steps should be taken to ensure that the Judgments of this Hon'ble Court passed in important cases touching protection of legal and constitutional rights of the people, are effectively implemented. This Rejoinder Affidavit has been divided into three parts for the sake of clarity:

A. STEPS TAKEN BY THE UNION OF INDIA, WHETHER ADEQUATE;

B. DIRECTIONS REQUIRED FOR EFFECTIVE IMPLEMENTATION OF THE JUDGMENT IN *SHREYA SINGHAL*, AND;

C. HOW EFFECTIVE IMPLEMENTATION OF THE JUDGMENTS OF THIS HON'BLE COURT CAN BE ENSURED.

A. STEPS TAKEN BY THE UNION OF INDIA, WHETHER ADEQUATE

4. That humble submission of the Applicant is that the steps taken by the Ministry of Electronics and Information Technology ("MeitY") towards ensuring effective implementation of this Hon'ble Court's Judgment in ***Shreya Singhal v. Union of India (2015) 5 SCC 1*** are far from adequate. A summary of actions taken by the Respondents as detailed in their Counter Affidavit, is as follows:

- a. Publication of ***Shreya Singhal*** on the MeitY website. (Para 6)
- b. Letter dated 21.09.2016 written to the Ministry of Home Affairs ("MHA") requesting them to intimate Chief Secretaries of all States/UTs, Law Enforcement Agencies. (R-1, Pg.12)



- c. Letter dated 11.01.2019 written by MeitY to the Chief Secretaries of all States, Administrators of all Union Territories and DG Police of all States/UTs. (R-2, Pg.13)
 - d. Reminder letter dated 06.03.2019 sent by MeitY following this Hon'ble Court's Order dated 15.02.2019 to the Chief Secretaries of all States, Administrators of all Union Territories and DG Police of all States/UTs. (R-3, Pg.17)
 - e. Letters dated 13.07.2021 sent by MeitY to the MHA and the Chief Secretaries of all States and Administrators of all Union Territories requesting to sensitize police departments; to immediately withdraw the cases booked under Section 66A and to ensure and confirm that no case is presently registered under Section 66A. (R-4 & R-5, Pgs.23-25)
 - f. Letter dated 14.01.2019 sent by the MHA to the Chief Secretaries of all States and Administrators of all Union Territories to confirm that the Judgment in **Shreya Singhal** has been implemented in its totality. (R-6, Pgs.36-37)
 - g. Follow-up letters dated 30.01.2019 and 01.04.2019 sent by the MHA. (R-7 & R-8, Pgs.38-39)
 - h. Letter dated 14.07.2021 sent by the MHA to the Chief Secretaries of all States and Administrators of all Union Territories and the DGPs of all States/Union Territories to sensitize the police department; for strict compliance of the Judgment and withdrawal of all cases booked under Section 66A and that all police stations be directed not to register cases under Section 66A. (R-9, Pg.40)
5. That besides the above, in Para 13 of the Counter Affidavit, the UOI has said that 'Police' and 'Public Order' are State subjects and that primary responsibility rests with the State. Similarly, for cyber crime offenders, law enforcement agencies are responsible.



6. That it may be pointed out that the Applicant had earlier moved M.A. No.3220/2018 seeking implementation of the Judgment in **Shreya Singhal**. After response was filed by the Union of India, it was disposed of by an Order dt.15.02.2019 directing the UOI to make available copy of the Judgment to the Chief Secretaries of all the State Governments and Union Territories as well as to sensitize the police departments. (Pgs.45-46 of the present M.A.)
7. That in spite of the said direction, the needful was not done thereby compelling the Applicant to again move the present Application. It is humbly submitted that UOI ought not to have shirked its responsibility by pleading that responsibility lies with the States as well as with law enforcement agencies. In view of the fact that the present Application involves the question of enforcement of this Hon'ble Court's Judgment which is binding on the UOI and others, the UOI has to play a sincere and pro-active role to ensure the implementation.
8. The Respondent has, for instance, referred to letters dated 14.01.2019 (**Annexure R-6 at Pgs.36 and 37**) and 30.01.2019 (**Annexure R-7 at Pg.38**), wherein they requested Chief Secretaries of all States/Administers of Union Territories to furnish data for prosecutions invoking Section 66A after 24.03.2015 in terms of the earlier M.A. No.3220/2018. However, Respondent No.1 has neither placed on record nor made public the responses they received to the said letters. In fact, a perusal of the said table at Para 12 of the Counter Affidavit reflects a mechanical reproduction of the stand that the States have complied with the directions of this Hon'ble Court. However, the averments in the Application that prosecutions continue unabated in spite of these steps, is uncontroverted. For example, even though the Respondent No.1 has received a response from the State of Rajasthan, it is clear from the Application that as many as 100 cases under Section 66A remain pending in the



said State. In this situation, where full compliance of the Judgment in ***Shreya Singhal*** has not been brought on record by the Respondent, seeking disposal of the Application trivializes the large scale violation of the right to freedom of speech and expression as well as the right to fair trial of the citizens at large. Therefore, for effective implementation of the Judgment in ***Shreya Singhal***, further directions are required to be passed.

B. DIRECTIONS REQUIRED FOR EFFECTIVE IMPLEMENTATION OF THE JUDGMENT IN SHREYA SINGHAL

9. That the expression "authorities" in Article 144 has to be given the widest amplitude to include all members of the executive and judiciary, in view of the settled position of law and the need to uphold the dignity of courts, the majesty of the law, and to prevent any interference in the administration of justice. It has been defined to include civil institutions such as the Bar Council of India [See **Supreme Court Bar Assn. v. Union of India, (1998) 4 SCC 409, Para 79**], the Army [**D.S. Grewal v. Vimmi Joshi, (2009) 2 SCC 210, Para 24**] and judicial institutions such as the High Courts [**CCE v. Dunlop India Ltd., (1985) 1 SCC 260, Para 6** and **Tirupati Balaji Developers P (Ltd.) vs. State of Bihar, (2004) 5 SCC 1, Para 8**].
10. That this Hon'ble Court in **M.L. Sachdev v. Union of India (1991) 1 SCC 605** while holding that "under Article 144 of the Constitution all authorities, civil and judicial in the territory of India are required to act in aid of the Supreme Court", made the following important observations:

"10. As we have pointed out, Shri A.N. Verma is a senior administrative officer and should have taken appropriate care to strictly comply with the direction of this Court. This Court on an earlier occasion pointed out that courts



constitute an inbuilt mechanism within the framework of the Constitution for purposes of social audit and to ensure compliance of the Rule of Law. In enforcing compliance of orders of this Court and in punishing for lapses in the matter of compliance by invoking the power of contempt, this Court seeks only to ensure that the majesty of this institution may not be lowered and the functional utility of the constitutional edifice may not be rendered ineffective. This Court expects the Union of India to exhibit the most ideal conduct for others to emulate.” (Emphasis supplied)

11. That in **Kantaru Rajeevaru v. Indian Young Lawyer Association (2020) 2 SCC 1**, this Hon’ble Court considered the difficulty in implementing a decision of the Constitution Bench. The dissenting opinion espoused the legal position in this regard, after examining provisions in the Constitution and decisions of this Hon’ble Court, and clarified that “authorities” under Article 144 of the Constitution has to be given the widest possible meaning, to include all judicial and executive authorities. It was further held that the failure to implement decisions of the constitutional court threatens the Rule of Law framework in entirety. The relevant paragraphs of the said decision are as under:

“52. The position under our constitutional scheme is that the Supreme Court of India is the ultimate repository of interpretation of the Constitution. Once a Constitution Bench of five learned Judges interprets the Constitution and lays down the law, the said interpretation is binding not only as a precedent on all courts and tribunals, but also on the coordinate branches of Government, namely, the legislature and the executive. What follows from this is that once a judgment is pronounced by the Constitution Bench and a decree on facts follows, the said decree must be obeyed by all persons bound by it. In addition, Article 144 of the Constitution mandates that all persons who exercise powers over the citizenry of India are obliged to aid in enforcing orders and decrees of the Supreme Court. This then is the constitutional scheme by which we are



governed — the rule of law, as laid down by the Indian Constitution.

[...]

79. The Constitution places a non-negotiable obligation on all authorities to enforce the judgments of this Court. The duty to do so arises because it is necessary to preserve the rule of law. If those whose duty it is to comply were to have a discretion on whether or not to abide by a decision of the court, the rule of law would be set at naught. Judicial remedies are provided to stakeholders before a judgment is pronounced and even thereafter. That, indeed, is how the proceedings in review in the present case have been initiated. Hence arguments have been addressed, exchanged between counsel and considered with the sense of objectivity and fairness on which the judicial process rests. These remedies within a rule of law framework provide recourse to all those who may be and are affected by the course of a judicial decision. When the process is complete and a decision is pronounced, it is the decision of the Supreme Court and binds everyone. Compliance is not a matter of option. If it were to be so, the authority of the court could be diluted at the option of those who are bound to comply with its verdict.”

(Emphases Supplied)

12. This Hon'ble Court also discussed the importance of executive authority of the State aiding implementation of court orders in **Daroga Singh v. B.K. Pandey (2004) 5 SCC 26**. The assistance of the executive is necessary for the survival of rule of law. The relevant paragraph of the said decision is as under:

“33.....For the survival of the rule of law the orders of the courts have to be obeyed and continue to be obeyed unless overturned, modified or stayed by the appellate or revisional courts. The court does not have any agency of its own to enforce its orders. The executive authority of the State has to come to the aid of the party seeking implementation of the court orders. The might of the State



must stand behind the court orders for the survival of the rule of the court in the country. Incidents which undermine the dignity of the courts should be condemned and dealt with swiftly.....” (Emphasis supplied)

13. That as far as directions/requests to the High Courts and other Courts is concerned, in **Voluntary Health Assn. of Punjab v. Union of India (2013) 4 SCC 1**, this Hon’ble Court directed disposal of cases regarding PCPNDT Act, 1994 as follows:

“9.11. The various courts in this country should take steps to dispose of all pending cases under the Act, within a period of six months. Communicate this order to the Registrars of various High Courts, who will take appropriate follow-up action with due intimation to the courts concerned.”

A similar relief may be granted in the instant case.

14. That the High Courts may also play an important role in implementation through exercise of their supervisory jurisdiction over trial courts within their territory. For instance, the Delhi High Court in **Court on its own motion v. Yogesh Sharma, 1986 RLR 348** quashed cases under Section 309 IPC pending in the trial Courts within its jurisdiction. The High Courts, in the present case can exercise their *suo motu* jurisdiction by calling for the records of all cases pending before the trial Courts within its jurisdiction under Section 66A and to quash them.

15. That in view of the above, and in order to ensure that this Hon’ble Court’s Judgment in **Shreya Singhal** is effectively implemented, in addition to the steps taken by the Respondents, the Petitioner/Applicant submits the following suggestions for this Hon’ble Court’s kind consideration. These steps include dealing with



cases already registered and pending before various courts at different stages as well as for ensuring that no further cases get registered:

- a. Direct the Respondents to collect the details of the cases registered by the Police/Law Enforcement Agencies under Section 66A of the IT Act since the pronouncement of the Judgment in ***Shreya Singhal*** by co-ordinating with the Chief Secretaries/DGPs of the States and Union Territories.
- b. In cases where the case is at the stage of investigation, direct the Director General of Police in the States and the Administrators/Lieutenant Governors in the cases of Union Territories to forthwith drop further investigation under Section 66A.
- c. In cases where charge sheet under Section 173 Cr.P.C. has been filed and the cases are pending before the District Courts for framing of charge or trial, request the Chief Justices of all the High Courts to issue advisories to all the subordinate courts (both Sessions Courts and Magistrate Courts) to drop all charges/trial under Section 66A and discharge the accused.
- d. Direct all the High Courts (through Registrar Generals) to communicate to all the District Courts and Magistrates that forthwith there should be no cognizance taken under the repealed Section 66A of the IT Act.
- e. Direct each High Court (through Registrar Generals) to put in place a complaint mechanism by which any person in the state against whom a case under Section 66A of the IT Act is pending may directly approach the trial Court where the



case is pending or the concerned High Court for speedy redressal.

- f. Direct the DGPs of all the States/Administrators of all the UTs to initiate disciplinary action against the Police/Law Enforcement Agencies that are found to be registering cases under the repealed Section 66A of the IT Act hereinafter.
- g. Allow the High Courts to initiate *suo motu* contempt proceedings against those responsible for registering a case under Section 66A or for investigating it or for prosecuting it in spite of being informed that Section 66A has been struck down.
- h. Direct the DGPs of all States and Union Territories to communicate to all police stations within their respective jurisdictions to display a notice that Section 66A of the IT Act has been struck down by this Hon'ble Court in ***Shreya Singhal*** and that no case under the said provision can be registered.
- i. Direct the Respondents to ensure that Doordarshan and All India Radio make quarterly announcements in major vernacular languages informing the public that Section 66A of the IT Act is no longer in force in light of the judgment in ***Shreya Singhal***. [Ref: **Navtej Singh Johar v. Union of India (2018) 10 SCC 1 @ Para 370**]
- j. Direct the Respondents to ensure publication in major vernacular language newspapers on quarterly basis informing the public that Section 66A of the IT Act is no longer in force in light of the judgment in ***Shreya Singhal***. [Ref: **Navtej Singh Johar v. Union of India (2018) 10 SCC 1 @ Para 370**]



- k. Direct the Respondents to ensure that all official and commercial versions of the IT Act that are hereinafter published (online or offline) do not include the complete text of Section 66A and inform the reader that said provision stands repealed in light of the judgment in ***Shreya Singhal***.

Illustration: [66A- Struck down vide Judgment of the Supreme Court dated 24th March, 2015 in *Shreya Singhal v. Union of India* (Writ Petition (Crl.) No. 167 of 2012)]

- l. Direct the National Judicial Academy and the State Judicial Academies to incorporate this Hon'ble Court's Judgment in ***Shreya Singhal*** as part of the training imparted to judges [Ref: **Aparna Bhat v. State of Madhya Pradesh** (Criminal Appeal No. 329 of 2021) Judgment dated 18.03.2021 @ Para 47]
- m. Direct the UOI to ensure that all police training colleges both at the National Level and the State Levels will mandatorily advise all trainees about the Judgment and the fact that Section 66A of the IT Act has been repealed and can no longer be invoked.
- n. Ensure that the above (except points (l. and m.) are complied with in a time bound manner, ***not later than October 31, 2021***.

C. HOW EFFECTIVE IMPLEMENTATION OF THE JUDGMENTS OF THIS HON'BLE COURT CAN BE ENSURED

16. That the Application raises a larger question about implementation of the Judgments of this Hon'ble Court which are binding on all the authorities and Courts under Articles 141, 142 and 144 of the Constitution. Non-implementation of the Judgment has a serious



12

repercussion on the administration of justice as well as the Rule of Law, as mentioned above. Besides **Shreya Singhal**, there are so many instances where in spite of binding Judgments of this Hon'ble Court, its violation continues because of carelessness, apathy, negligence and abuse of authority deliberately or sometimes on account of political pressures.

17. That few instances of non-compliance are:

- i) **D.K. Basu v. State of W.B. (1997) 1 SCC 416**, this Hon'ble Court laid down guidelines to be followed in all cases of arrest and detention. It was clearly mentioned that failure to comply with the guidelines shall apart from rendering the official concerned liable from departmental action, also render him liable to be punished for contempt of court and the proceedings for contempt of court may be instituted in any High Court of the country having territorial jurisdiction over the matter (vide Para 36);
- ii) **Arnesh Kumar v. State of Bihar and Another (2014) 8 SCC 273** – In this case, this Hon'ble Court laid down guidelines to make Section 41 Cr.P.C. effective and that no mechanical arrest are made where the cognizable offence is punishable with imprisonment for a term which may be less than 7 years or which may extend to 7 years. This Hon'ble Court directed that a copy of the Judgment may be forwarded to the Chief Secretaries as also the DGPs of the State Governments and the Union Territories and the Registrar Generals of all the High Courts for ensuring compliance (vide Paras 10, 11 and 13);
- iii) **PUCL and Another v. State of Maharashtra and Others (2014) 10 SCC 635** – This Hon'ble Court laid down the guidelines to be followed in the matters of investigating police encounters (vide Para 31). In Para 33, it was directed that the



guidelines “must be strictly observed in all cases of death and grievous injury in police encounters by treating them as law declared under Article 141 of the Constitution.”;

- iv) **Vishaka and Others v. State of Rajasthan and Others (1997) 6 SCC 241** – This Hon’ble Court laid down guidelines for effective enforcement against sexual harassment at workplaces. It was directed that the guidelines be treated as law declared under Article 141 of the Constitution. However, in **Medha Kotwal Lele and Others v. UOI and Others (2013) 1 SCC 297**, it was found that Vishaka guidelines were not followed by the States as well as the employers in private and public sectors which defeated the very objective and purpose of the guidelines.
- v) In spite of this Hon’ble Court’s order in **Laxmi v. Union of India (2014) 4 SCC 427** banning over the counter sale of acid, such sale is still continuing in parts of India.
- vi) In spite of this Hon’ble Court’s directions in **Aparna Bhat v. State of Madhya Pradesh** (Criminal Appeal No. 329 of 2021) [Judgment dated 18.03.2021], accused persons in rape cases are being granted bail on the grounds that the accused and complainant agreed to marry each other [See: **State v. Mukarram Khan**, Bail Matter No. 1390/2021, Patiala House Court, New Delhi].

18. That the following submissions may be considered by this Hon’ble Court for effective implementation of the directions given in important cases which ought to be implemented by all the Agencies/Courts to protect the legal and fundamental rights of the people:

- a. That in all important cases where this Hon’ble Court is of the view that the directions given in the Judgments ought to be



implemented strictly, it can direct the Registry to send a copy to the concerned authorities (viz: Chief Secretaries, DGPs of all the States, Administrators of all UTs, all High Courts and District Courts, Jail Authorities etc.) asking them to file a compliance affidavit within reasonable time.

- b. That in addition to the above, accountability may be fixed on the authorities responsible for its implementation. This Hon'ble Court may further direct initiation of disciplinary action as well as the contempt proceedings for contumacious inaction or deliberate violation.
- c. That this Hon'ble Court may direct that the Judgment will be a part of training in the National Judicial Academy/State Judicial Academies. In addition, depending upon the directions, it should also be included in the training courses of administrative services/police services.
- d. That this Hon'ble Court may also direct/request all High Courts to create a mechanism for effective communication to the District Courts and Magistrates, within their respective jurisdictions, of the directions passed by this Hon'ble Court.
- e. Direct/request all the High Courts to communicate to District Courts and Magistrates that there should be no cognizance taken under the repealed provision in cases where a statute or a provision in a statute is struck down.
- f. Direct the UOI to prepare advisories and a document summarizing the directions passed by this Hon'ble Court which can be displayed in prominent places in police stations/public places and instruct DGPs of all States and Union Territories to ensure that the same is displayed at all the police stations.
- g. Direct the Union of India to ensure that Doordarshan and All India Radio make quarterly announcements in major



15

vernacular languages informing the public about the directions issued by this Hon'ble Court.

- h. Direct the Union of India to ensure publication in major vernacular language newspapers on quarterly basis informing the public about the directions issued by this Hon'ble Court.
- i. In cases where a statute or a provision has been struck down, direct the Respondents to ensure that all official and commercial versions of the statute that are published (online or offline) after the pronouncement of the Judgment **do not include** the complete text of the repealed provision and inform the reader that said provision stands repealed in light of the concerned Judgment.
- j. Direct Union of India through its department of publication to publish in the Gazette of India summaries of all the judgements where a provision in the statute has been struck down or read down as unconstitutional;

19. That this Hon'ble Court may consider passing such other directions in addition to the above suggestions, as it deems fit.



DEPONENT

VERIFICATION

Verified that the contents of paragraph 1 to 19 of my above affidavit are true to my knowledge and belief, no part of it is false and nothing material has been concealed therefrom.

Verified on 30TH July, 2021 at Chennai.



DEPONENT

IN THE SUPREME COURT OF INDIA
ORIGINAL WRIT JURISDICTION
M.A. NO. 901 OF 2021
IN
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IN THE MATTER OF:

People's Union for Civil Liberties ...PETITIONER / APPLICANT

VERSUS

Union of India &Ors. ...RESPONDENTS

APPLICATION SEEKING EXEMPTION FROM FILING DULY
AFFIRMED REJOINDER AFFIDAVIT

TO
THE HON'BLE CHIEF JUSTICE OF INDIA
AND HIS LORDSHIP'S COMPANION JUSTICES OF THE
HON'BLE SUPREME COURT OF INDIA

THE HUMBLE APPLICATION
OF THE ABOVE NAMED
PETITIONER / APPLICANT

MOST RESPECTFULLY SHOWETH:

1. That the Petitioner / Applicant is filing the accompanying rejoinder affidavit in response to the counter affidavit filed by the Respondents on 26.07.2021.

2. That it is prayed that in the prevailing circumstances of the COVID-19 pandemic, exemption from filing duly affirmed and notarized rejoinder affidavit be granted for the time being.
3. That the present Application is bona fide and made in the interest of justice.

PRAYER

In the facts and circumstances, it is most respectfully prayed that this Hon'ble Court may be pleased to:

Grant exemption from filing duly affirmed and notarized rejoinder affidavit in the prevailing circumstances;

Take on record the scanned rejoinder affidavit;

Pass such other order(s) as this Hon'ble Court may deem fit and proper in the facts and circumstances of the case.

**AND FOR THIS ACT OF KINDNESS, THE PETITIONER /
APPLICANT AS IN DUTY BOUND SHALL EVER PRAY.**

Filed by:



APARNA BHAT

Advocate-on-Record for the Petitioner / Applicant

Place: New Delhi

Filed on: 30.07.2021

18

IN THE SUPREME COURT OF INDIA

ORIGINAL WRIT JURISDICTION

M.A. NO. 901 OF 2021

IN

WRIT PETITION (CRL.) NO. 199 OF 2013

IN THE MATTER OF:

People's Union for Civil Liberties

...PETITIONER / APPLICANT

VERSUS

Union of India & Ors.

...RESPONDENTS

AFFIDAVIT

I, Dr. V. Suresh, S/o K.S. Veeraraghavan, aged about 61 years, R/o 458, 8th South Cross Street, Kapaleeshwarar Nagar, Neelankarai, Chennai - 600115 do hereby solemnly affirm and state on oath as under:-

1. That I am the National General Secretary for the Petitioner / Applicant Organisation and as such I am well conversant with the facts and circumstances of the case and in that capacity I am duly competent to swear to the present affidavit.
2. That I have read and understood the contents of the accompanying Application(s) and I say that the contents of the same are true and correct to the best of my knowledge and belief and nothing material has been concealed therefrom.
3. That the annexures are true copies of their respective originals.



DEPONENT

VERIFICATION

Verified that the contents of paragraph 1 to 3 of my above affidavit are true to my knowledge and belief, no part of it is false and nothing material has been concealed therefrom.

Verified on 30th July, 2021 at Chennai.

A handwritten signature in black ink, appearing to be 'PS' followed by a long horizontal stroke.

DEPONENT