

IN THE HIGH COURT OF KERALA AT ERNAKULAM

PRESENT

THE HONOURABLE THE CHIEF JUSTICE MR.S.MANIKUMAR

&

THE HONOURABLE MR. JUSTICE SHAJI P.CHALY

WEDNESDAY, THE 31ST DAY OF MARCH 2021 / 10TH CHAITHRA, 1943

WP(C).No.8601 OF 2021(S)

PETITIONERS:

- 1 K.MURALIDHARAN M.P.  
AGED 64 YEARS  
S/O.LATE K.KARUNAKARAN, CANDIDATE,  
135, NEMOM LEGISLATIVE ASSEMBLY CONSTITUENCY,  
NEMOM, THIRUVANANTHAPURAM DISTRICT,  
RESIDING AT JYOTHIS, 171A, BHAGAVATHY NAGAR,  
KOWDIAR P.O., THIRUVANANTHAPURAM - 695 003
- 2 ANAND JAYAN,  
S/O.BHASKARA PILLAI, AGED 54 YEARS, CANDIDATE,  
131, VAMANAPURAM LEGISLATIVE ASSEMBLY CONSTITUENCY,  
THIRUVANANTHAPURAM DISTRICT,  
RESIDING AT BHASKARAVILASAM, BANJ JUNCTION,  
ANAD P.O., NEDUMANGAD,  
THIRUVANANTHAPURAM
- 3 DEEPAK JOY  
S/O.P.N.JOY,  
CANDIDATE, 79,  
VYPIN LEGISLATIVE ASSEMBLY CONSTITUENCY,  
ERNAKULAM DISTRICT,  
RESIDING AT ORUVELIL, AYYAPPANKAVU,  
ERNAKULAM DISTRICT - 682018

BY ADVS.  
SRI.GEORGE POONTHOTTAM (SR.)  
SMT.NISHA GEORGE  
SRI.ARUN CHANDRAN  
SRI.J.VISHNU  
SRI.VISHNU B.KURUP  
KUM.CHITHRA P.GEORGE  
SRI.P.SUBAIR KUNJU  
SRI.A.L.NAVANEETH KRISHNAN

RESPONDENTS:

- 1 THE ELECTION COMMISSION OF INDIA  
NIRVACHAN SADAN, ASHOKA ROAD,  
NEW DELHI - 110 001  
REPRESENTED BY ITS SECRETARY
- 2 THE CHIEF ELECTORAL OFFICER, KERALA,  
ELECTION DEPARTMENT,

- 3 KERALA LEGISLATIVE COMPLEX,  
VIKAS BHAVAN P.O.,  
THIRUVANANTHAPURAM - 695033  
THE RETUNING OFFICER  
NO.135, NEMOM ASSEMBLY CONSTITUENCY,  
[JOINT REGISTRAR OF CO-OPERATIVE SOCIETIES (GENERAL)  
JAWAHAR SAHAKARANA BHAVAN  
DPI JUNCTION, THYCAUD P.O.,  
THIRUVANANTHAPURAM - 695014
- 4 THE RETUNING OFFICER  
NO.79, VYPIN ASSEMBLY CONSTITUENCY,  
[JOINT REGISTRAR OF CO-OPERATIVE SOCIETIES (GENERAL)  
COLLECTORATE, KAKKANAD,  
ERNAKULAM DISTRICT - 682 031

SRI. DEEPU LAL MOHAN, STANDING COUNSEL

THIS WRIT PETITION (CIVIL) HAVING COME UP FOR ADMISSION ON  
31.03.2021, THE COURT ON THE SAME DAY DELIVERED THE FOLLOWING:

**Dated this the 31<sup>th</sup> day of March, 2021.**

**JUDGMENT**

**S. MANIKUMAR,CJ.**

Contending *inter alia* that the polled ballot papers collected in terms of Ext. P1 Government Order dated 11.02.2021 should be kept in safe custody, that only canvass bags are used for the purpose of keeping the envelopes of polled ballots and the counter foils and that the petitioners herein are not informed about the schedule of visit, delivery and collection of postal ballots for the categorization of the votes included in Ext. P1 and further contending that it is the constitutional duty of the Election Commission of India to conduct a free and fair election which includes the preparation of a proper electoral roll making fool proof arrangements at every stage of election including the polling and counting, instant Public Interest Litigation by three of the candidates contesting election from 3 different assembly constituencies across the State of Kerala, is filed for the following reliefs:

1. Issue a Writ in the nature of Mandamus directing respondents 1 and 2 to keep all the ballots which were collected in terms of Exhibit-P1, where VVPAT machines are kept, to ensure the safety of votes.
2. Issue a writ declaring that it is the duty of the Election Commission

to preserve the polled ballot papers without giving any room for tampering after the same having exercised by the voters.

2. Added further, the petitioner has also contended that on 28.03.2021, the Returning Officer has conducted himself in a suspicious manner and some of his staffs were in his office till 11'o clock at 9 in the third floor of the building of the second petitioner's constituency namely Vamanapuram Legislative Assembly Constituency after locking from inside.

3. It is further submitted that when his presence was noticed a complaint was given to the police over phone and it was then only the second petitioner came to know that the Returning Officer was present inside the room with 5 other employees without disclosing the reason for their unusual presence in the office. It is further contended that on a verification of the mobile phone of the Returning Officer of the Vamanapuram Constituency based on Tower location it will show that the Retuning Officer was very much in his office at 11 p.m. on 28.03.2021. It is further submitted by the third petitioner, a candidate in Vypin Legislative Assembly Constituency and that the Returning Officer of that constituency was very much in his office very late along with a few others. Again it is submitted that in order to verify the manner in which the ballot papers are kept, an active worker of the party had visited the office of the Returning Officer of Nemam from where the first petitioner is

contesting that there is no safety mechanism available for keeping the votes without the same being tampered. Therefore, it is contended that the possibility of misuse of office by the Returning Officers, Assistant Returning Officers and others who are capable of overturning the result of the election was brought to the notice of the Chief Electoral Officer, Kerala-the second respondent by the leader of Opposition in the Kerala Legislative Assembly ; but, no action was taken. It is also contended that there were complaints regarding the deputation of Government officials and that persons having Left leniency had misused their office in the past and there were even complaints to the effect that the employees have opened the cover and tampered the marking in the ballot papers. It is further submitted that therefore, in order to avoid any such illegalities the Election Commission was requested to provide sealed ballot boxes and the same to be kept safe .

4. Learned counsel has also invited our attention to Ext. P1 order issued by the State Government for conduct of Kerala Legislative Assembly Elections, 2021 during Covid-19 and taken us through the guidelines in regard to visits of polling officials, briefing of electors and collection of marked ballot papers and has specifically invited our attention to paragraphs **5.6, 5.11, 5.13, 5.14 and 5.15** and they read thus:

(5.6) The candidates shall be informed about the schedule of visit for the delivery and collection of postal ballots for this category. They may, if desired, depute their authorized representatives (including BLAs), with prior intimation to the Returning Officer, to watch the process.

(5.11) While briefing the electors about the procedure of voting and formalities to be observed on their part, the polling official shall clearly explain the following points to them: -

1. Making the declaration in Form 13A and getting it attested by the poll officer himself,
2. Entering the serial number of postal ballot paper, both on Form 13A and on the smaller envelope (Form 13B)
3. Manner of marking vote, i.e by placing either cross mark or tick mark against the name of the candidate of choice.
4. Folding and placing the marked ballot in the smaller envelope and closing the envelope,
5. Placing the declaration in Form 13A, duly filled up, signed and attested along with closed envelope (Form 13B) containing the marked ballot paper inside the larger envelope (Form 13C),
6. Closing the larger envelope and handing over the same to the poll officer.

(5.13) After vote is cast on postal ballot and the

envelope in Form 13C is ready, the Poll Officials will collect the same.

(5.14) Each team of polling officials should be provided with the list of AVSC, AVPD and AVCO electors, adequate number of postal ballot papers, envelopes, pen, ink-pad (for thumb impression wherever required), glue stick for closing the envelopes, a sufficiently big canvas bag for keeping the envelopes of polled ballots and the counterfoils safely and other essential stationeries that may be considered necessary.

(5.15) Police Security cover shall be provided to the poll officers for their visits. Arrangement for videography of the proceedings at the address of AVSC/AVPD/AVCO should also be made. For this purpose, a videographer should accompany the poll officers. It shall be ensured that the secrecy of vote is not violated while carrying out the videography exercise.

5. Furthermore, learned Senior Counsel has invited our attention to **paragraph 6** of Ext. P1 Government Order dealing with deposit of envelopes containing marked ballot papers and counterfoils, which reads thus:

**6. DEPOSIT OF ENVELOPES CONTAINING MARKED BALLOT PAPERS AND COUNTERFOILS**

At the end of each day of visit by poll

officers to the address of AVSC/AVPD/AVCO electors, the envelopes in Form-13C containing postal ballot paper etc. and the counterfoils of ballot papers containing the signature/thumb impression of electors and other particulars, shall be corrected by the ARO designated of postal voting by the absentee voters. The ARO shall make arrangements to have the same delivered at the headquarters of the RO for keeping them in safe custody. The ARO shall maintain the record indicating the number of ballots sent on each day. This should also be shared with the RO daily.

6. The sum and substance of the contention advanced by the learned counsel for the petitioners is that even though sufficient safety measures are provided under the Conduct of Election Rules, 1961 and Ext. P1 Government Order the Returning Officer and his cluster of associates are reluctant to follow them thus enabling them to tamper and corrupt the election process and thereby interfere with the polled postal ballots which if allowed to be permitted would cause serious prejudice to the public at large and the democratic polity and therefore, they seek the reliefs extracted above.

7. On the other hand, Mr. Deepu Lal Mohan, learned Standing Counsel appearing for the Election Commission of India and the



Chief Electoral Officer, Kerala submitted that necessary safety precautions are undertaken by the respondents for the smooth, efficient and fair procedure to secure the postal ballots poll and sufficient precautionary measures are taken to store them in strong rooms.

8. Learned Standing counsel has also relied upon the provisions of Ext. P1 order and submitted that police security cover is provided to the poll officers for their visits and arrangement for videography of the proceedings at the address of such voters . It is also submitted that at the end of each day of visit by Poll Officers to the address of the beneficiary electors, the envelopes in form 13C containing postal ballot paper etc. and the counterfoil of ballot papers containing the signature/thumb impression of electors and other particulars is directed to be collected by the Assistant Returning Officers designated of postal voting by the absentee voters. It was also pointed out that necessary arrangements are made by appropriately instructing the Assistant Returning Officer to deliver the postal ballot papers at the Head Quarters of the Returning Officer for keeping them in safe custody and further the Assistant Returning Officer is issued with necessary direction to maintain the record indicating the number of ballot sent on each day which shall be shared with the Returning Officer on a daily

basis.

9. Learned Standing Counsel has also made available the instructions given by the Chief Electoral Officer, Kerala in regard to the issuance of the postal ballot and the safety arrangements made to store the same appropriately and they read thus:

Postal Ballots are being issued to following categories of voters:

- 1) Personnel engaged in polling duty (including police, videographers, drivers etc.).
- 2) Service personnel.
- 3) Essential service voters
- 4) Absentee voters (80 plus, Persons with Disabilities, COVID)

Detailed guidelines are issued by ECI on handling this postal ballot vide letter No.52/2021/SDR-Vol.I. dated 02.02.2021.

1. The candidate shall be informed about the schedule of visit for the delivery and collection of postal ballots. They may, if decide depute their authorised representatives with prior intimation to the Returning Officer, to watch the process.
2. Arrangement for videography of the proceedings should be made. It shall be ensured that the secrecy of vote is not violated while carrying out the videography exercise.
3. At the end of each day of visit by call officers, the envelopes in Form 12C containing postal ballot paper and the counterfoils of ballot papers shall be collected by the ARO designated of postal voting by the absentee voters.
4. The ARO shall make arrangements to have the same delivered at the Head Quarters of the Returning Officer for keeping them in safe custody. The ARO shall maintain the record indicating the number of ballots sent on each day. This should also be shared with the Returning Officer on a daily basis.

5. Returning Officer shall keep all the postal ballot received for every day in strong room for postal ballots.
6. On the day of counting the strong room for postal ballots shall be opened in the presence of the candidates or their representative present. All postal ballots will then be kept in a large steel box which will be sealed in the presence of candidates and the representatives. The box will then be carried under guard of armed CPF to the strong room for postal ballots at the counting centre. Candidates and their representatives shall be allowed to follow the vehicle carrying postal ballots.

10. Therefore, the sum and substance of the contention advanced by the learned Standing Counsel is that the contentions raised by the petitioners are mere apprehension and since necessary and adequate arrangements are made to secure the polled postal ballots without any room for tampering or correcting the same the directions as sought for by the petitioners have no legal sustenance.

11. We have heard learned Senior counsel for the petitioners Sri. George Poonthotam assisted by Adv. Arun Chandran and learned Standing Counsel for the respondents 1 and 2 Sri. Deepu Lal Mohan, and perused the pleadings and materials on record.

12. Before referring to the submissions advanced, let us consider the relevant statutory provisions. Rule 18 of the Conduct of Election Rules, 1961 speaks about persons entitled to vote

by post and it reads thus:

**"18. Persons entitled to vote by post**

The following persons shall, subject to their fulfilling the requirements hereinafter specified, be entitled to vote by post, namely:—

(a) at an election in a parliamentary or assembly constituency-

- (i) special voters;
- (ii) service voters;
- (iii) voters on election duty; and
- (iv) electors subjected to preventive detention;

(b) at an election in a council constituency—

- (i) voters on election duty;
- (ii) electors subjected to preventive detention; and
- (iii) electors in the whole or any specified parts, of the constituency if directed by the Election Commission in this behalf under clause (b) of rule 68;

(c) at an election by a assembly member-

- (i) electors subjected to preventive detention; and
- (ii) all electors if directed by the Election Commission in this behalf under clause (a) of rule 68."

Rule 21 of the Rules, 1961 speaks about electors under preventive detention and it reads thus:

**"21. Electors under preventive detention**

(1) The appropriate Government shall, within

fifteen days of the calling of an election, ascertain and intimate to the returning officer the names of the electors, if any, subjected to preventive detention together with their addresses and electoral roll numbers and the particulars about their places of detention.

(2) Any elector subjected to preventive detention may, within fifteen days of the calling of an election, send an intimation to the returning officer that he wishes to vote by post, specifying his name, address, electoral roll number and place of detention.

(3) The returning officer shall issue a postal ballot paper to every elector subjected to preventive detention whose name has been intimated to him under sub-rule (1) or under sub-rule (2)."

Rule 22 of the Rules, 1961 speaks about form of ballot paper and it reads thus:

**"22. Form of ballot paper**

(1) Every postal ballot paper shall have a counterfoil attached thereto, and the said ballot paper and the counterfoil shall be in such form, and the particulars therein shall be in such language or languages, as the Election Commission may direct.

(2) The names of the candidates shall be arranged 5 [on the postal ballot paper] in the order in which they appear in the list of contesting candidates.

(3) If two or more candidates bear the same

name, they shall be distinguished by the addition of their occupation or residence or in some other manner."

Rule 23 of the Rules, 1961 speaks about issue of ballot paper and it reads thus:-

**"23. Issue of ballot paper**

(1) A postal ballot paper shall be sent by post under certificate of posting to the elector together with—

(a) a declaration in Form 13A;

(b) a cover in Form 13B;

(c) a large cover addressed to the returning officer in Form 13C; and

(d) instructions for the guidance of the elector in Form 13D: PROVIDED that the returning officer may, in the case of a special voter or a voter on election duty, deliver the ballot paper and Forms, or cause them to be delivered, to such voter personally.

PROVIDED FURTHER that the postal ballot paper may be transmitted by the returning officer by such electronic means as may be specified by the Election Commission for the persons specified in sub-clause (ii) of clause (a) of rule 18.

(1A) Where a postal ballot paper is transmitted electronically, the provisions of this rule and rules 22, 24 and 27 shall, *mutatis mutandis*, apply.

[(2) The returning officer shall at the same time-

- (a) record on the counterfoil of the ballot paper the electoral roll number of the elector as entered in the marked copy of the electoral roll;
- (b) mark the name of the elector in the marked copy of the electoral roll to indicate that a ballot paper has been issued to him, without however recording therein the serial number of the ballot paper issued to that elector; and
- (c) ensure that that elector is not allowed to vote at a polling station.

(3) Before any ballot paper is issued to an elector at an election in a local authorities' constituency or by assembly members, the serial number of the ballot paper shall be effectively concealed in such manner as the Election Commission may direct.

(4) Every officer under whose care or through whom a postal ballot paper is sent shall ensure its delivery to the addressee without delay.

(5) After ballot papers have been issued to all the electors entitled to vote by post, the returning officer shall—

- (a) at an election in a parliamentary or assembly constituency, subject to the provisions of rule 27P, seal up in a packet] that part of the marked copy of the electoral roll which relates to service voters and record on the packet a brief description of its contents and the date on which it was sealed and send the other relevant parts of the marked copy to the several presiding officers or marking the names of electors to whom ballot papers are issued at the polling stations without however recording therein the serial numbers of the ballot papers issued to the

electors]; and

(b) at any other election, seal up in a packet the marked copy of the electoral roll and record on the packet a brief description of its contents and the date on which it is sealed.

(6) The returning officer shall also seal up in a separate packet the counterfoils of the ballot papers issued to electors entitled to vote by post and record on the packet a brief description of its contents and the date on which it was sealed."

Rule 24 of the Rules, 1961 speaks about recording of vote and it reads thus:-

**"24. Recording of Vote**

(1) An elector who has received a postal ballot paper and desires to vote shall record his vote on the ballot paper in accordance with the directions contained in Part I of Form 13D and then enclose it in the cover in Form 13B.

(2) The elector shall sign the declaration in Form 13A in the presence of, and have the signature attested by, a stipendiary magistrate or such other officer specified below, as may be appropriate, to whom he is personally known or to whose satisfaction he has been identified—

(a) in the case of a service voter, such officer as may be appointed in this behalf by the Commanding Officer of the unit, ship or establishment in which the voter or her husband, as the case may be, is employed or such officer as may be appointed in this behalf by the diplomatic or consular representative of India in



the country in which such voter is resident;

(b) in the case of a special voter, an officer not below the rank of a Deputy Secretary to Government;

(c) in the case of a voter on election duty, any gazetted officer or the presiding officer of the polling station at which he is on election duty;

(d) in the case of an elector under preventive detention, the Superintendent of the Jail or the Commandant of the detention camp in which the elector is under detention; and (e) in any other case, such officer as may be notified in this behalf by the Election Commission."

13. Part IIIA of the Rules, 1961 deals with procedure for voting by the notified class of electors. Rule 27A(a) of Part IIIA of Rules, 1961 speaks about in this Part, unless the context otherwise requires - (a) "Assistant Returning Officer", for the notified class of electors, means the Assistant Returning Officer notified by the Election Commission for the purposes of this Part.

Rule 27-E of Part III of the Rules, 1961 speaks about issue of ballot paper and it reads thus:

**"27E. Issue of ballot paper**

A postal ballot paper shall be sent by post under certificate of posting to the notified elector together with—

(a) a declaration in Form 13A;

(b) a cover in Form 13B;

(c) a large cover addressed to the Returning Officer in Form 13C; and

(d) instructions for the guidance of the elector in Form 13E:

Provided that the Assistant Returning Officer of the notified class of electors may deliver, or cause to be delivered, the ballot paper and the Forms to the notified elector personally.

(2) The Assistant Returning Officer for the notified class of electors shall at the same time—

(a) record on the counterfoil of the ballot paper the electoral roll number of the elector as entered in the marked copy of the electoral roll;

(b) mark the name of the elector in the marked copy of the electoral roll to indicate that a ballot paper has been issued to him without, however, recording therein the serial number of the ballot paper issued to that elector;

(c) ensure that the elector is not allowed to vote at a polling station.

(3) Every officer under whose care or through whom a postal ballot paper is sent shall ensure its delivery to the addressee without delay.

(4) The Assistant Returning Officer for the notified class of electors shall ensure that ballot papers are issued to all such electors whose intimation has been received in accordance with rule 27C and who are entitled to vote by post before eight days from the date of poll in the constituency and shall on expiry of the said

period of eight days keep the marked copies of the electoral rolls in sealed envelopes and record on the envelopes a brief description of its contents and the date on which it was sealed and send the sealed envelopes to the Returning Officer concerned.

(5) The Assistant Returning Officer for the notified class of electors shall also seal in a separate packet the counterfoils of the ballot papers issued to electors entitled to vote by post and record on the packet a brief description of its contents and the date on which it was sealed and send the sealed packet to the Returning Officer concerned."

Rule 27-F of the Rules, 1961 speaks about recording of vote and it reads thus:

**"27F. Recording of vote**

(1) A notified elector who has received a postal ballot paper and desires to vote shall record his vote on the ballot paper in accordance with the instructions contained in Form 13E and then enclose it in the cover in Form 13B.

(2) The notified elector shall sign the declaration in Form 13A in the presence of, and have the signature attested by, an officer authorised under sub-rule (2) of rule 27J."

Rule 27-I of the Rules, 1961 speaks about return of ballot paper and it reads thus:

**"27-I. Return of ballot paper**

(1) After a notified elector has recorded his vote

and made his declaration under rule 27F or rule 27G, he shall return the ballot paper and the declaration to the Returning Officer concerned before the hour fixed for the commencement of counting of votes.

(2) If any cover containing a postal ballot paper is received by the Returning Officer after the expiry of the time fixed in sub-rule (1), he shall note thereon the date and time of its receipt and shall keep all such covers together in a separate packet.

(3) The Returning Officer shall keep in safe custody until the commencement of the counting of votes all covers containing postal ballot papers received by him."

14. In so far as relief No.1 sought for by the petitioners is concerned, to keep the polled postal ballots in safe custody where VVPAT machines are kept, in our considered opinion the said issue is guided by Ext. P1 order issued by the State Government dated 11.02.2021. The relevant paragraphs of Ext. P1 extracted above make it clear that after vote is cast on postal ballot and the envelope in form 13C is ready the poll officials will collect the same and it is also clear that each team of polling officials is provided with the list of beneficiary electors, adequate number of postal ballot papers, envelopes, pen, ink pad etc. for closing the envelopes and a sufficiently big canvass bag for keeping the envelopes of polled

ballots and the counterfoils safely and other essential stationeries that may be considered necessary.

15. Material on record discloses that the polled postal ballots would be secured by the Returning Officer in appropriate strong rooms provided for the purpose in accordance with the directions of the Chief Electoral Officer and at the time of depositing the polled postal ballots the candidates or their authorised representatives are informed and they are entitled to witness the said event as of right, and in accordance with law. It is also pointed out that the said procedures are guided by Part III of the Conduct of Election Rules , 1961 and necessary arrangements are made to ensure that the Returning Officers and other officers connected with the election are conducting themselves in accordance with the Rules, 1961, the order issued by the Government for the purpose and other guidelines issued. We are also told by the learned Standing Counsel that adequate Central Reserve Police Force and the State Police Force would be deployed to ensure safety.

16. Having evaluated the rival submissions and analysing the Rules of Conduct of Election Rules 1961, Ext. P1 Government order dated 11.02.2021 and the information given by the learned Standing Counsel , we dispose of the writ petition directing the Chief Electoral Officer to take adequate steps to ensure that the

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polled postal ballots are stored with adequate safety and security and without any chance for tampering or corrupting the votes already cast by the beneficiary electors. We are also informed that today is the last day of securing such votes and also informed that the Chief Electoral Officer has made necessary arrangements for videography of the process of deposit of the polled postal ballots in strong rooms. The said submission is recorded and there will be a direction accordingly.

17. So far as the allegation made in the writ petition deliberated above that the Returning Officers of the Assembly Constituencies of Vamanapuram and Vypin from where the second and third petitioners are contesting have been found in their respective offices late in the night, though we do not express any opinion, we have no reason to think that the Chief Electoral Officer would not take note of the said serious allegations and do the necessary to avoid any unpleasant and serious consequences to protect the interest of the public at large.

**S. MANIKUMAR,  
CHIEF JUSTICE.**

**SHAJI P. CHALY,  
JUDGE.**

*Rv*

**APPENDIX**

PETITIONER'S EXHIBITS

EXHIBIT-P1: TRUE COPY OF THE GOVERNMENT ORDER BEARING G.O.(Rt) NO.85/2021/ELEC. DATED 11.2.2021

EXHIBIT-P2: TRUE COPY OF THE DISTRICT WISE LIST OF RETURNING OFFICERS

EXHIBIT-P3: TRUE COPY OF THE NOTIFICATION NO.52/2021/SDR/VOL.I DATED 27.2.2021 ISSUED BY THE 1ST RESPONDENT AND PUBLISHED IN THE KERALA GAZETTE DATED 1.3.2021

EXHIBIT-P4: TRUE COPY OF THE LETTER GIVEN BY SRI.RAMESH CHENNITHALA, THE LEADER OF OPPOSITION BEFORE THE CHIEF ELECTORAL OFFICER DATED 9.3.2021

EXHIBIT-P5: TRUE COPY OF THE LETTER GIVEN BY SRI.RAMESH CHENNITHALA, THE LEADER OF OPPOSITION BEFORE THE CHIEF ELECTORAL OFFICER DATED 26.3.2021

RESPONDENTS' EXHIBITS: NIL

/True Copy/

PS TO JUDGE.