

IN THE HIGH COURT OF DELHI AT NEW DELHI
(IN THE MATTER OF PUBLIC INTEREST LITIGATION)

W.P. (C) No. _____ of 2019

IN THE MATTER OF: -

Prateek Sharma and Anr

...Petitioner

Vs.

Union of India

...Respondent

INDEX

| S Nos. | Particulars | Page Nos | C Fees |
|--------|---|----------|--------|
| 1. | Listing proforma | | |
| 2. | Court fees | | |
| 3. | Urgent Application | | |
| 4. | Notice of Motion | | |
| 5. | Synopsis and List of dates | | |
| 6. | Memo of Parties | | |
| 7. | Writ Petition under Article 226 of the Constitution of India with affidavit. The present Petition is filed, seeking a writ of Mandamus be issued to the Respondents herein for the proper construction, maintenance and upkeep of footpaths in the NCT area and also to issue the writ of mandamus for the construction of assistive pathways for blind and other specially abled people. | | |
| 8. | Prayer | | |
| 9. | ANNEXURE P-1 True Copy of the RTI sent to Respondent No. 1 | | |
| 10. | ANNEXURE P-2 | | |

| | | | |
|-----|---|--|--|
| | True Copy of the receipt of the complaint filed with Respondent No.2 | | |
| 11. | ANNEXURE P-3 True copy of the representation sent to the Respondent No.3 | | |
| 12. | ANNEXURE P-4 True copy of the representation sent to the Respondent No.4, the reply by Respondent No.4, and the reply of the Petitioner to Respondent No.4 | | |
| 13. | ANNEXURE P-5 True copy of the reminder sent to Respondent No.3 and Respondent No.4 | | |
| 14. | ANNEXURE P-6 Coloured photos of footpaths in Delhi NCR area. | | |

Petitioner

Through

Filed By -

Petitioners - in - Person

NEW DELHI

DATE-

IN THE HIGH COURT OF DELHI AT NEW DELHI
(IN THE MATTER OF PUBLIC INTEREST LITIGATION)

W.P. (C) No. _____ of 2019

IN THE MATTER OF: -

Prateek Sharma and Anr

...Petitioner

Vs.

Union of India

...Respondent

COURT FEES

Petitioner

Through

Petitioners - in - Person

NEW DELHI

DATE-

IN THE HIGH COURT OF DELHI AT NEW DELHI
(IN THE MATTER OF PUBLIC INTEREST LITIGATION)

W.P. (C) No. _____ of 2019

IN THE MATTER OF: -

Prateek Sharma and Anr

...Petitioner

Vs.

Union of India

...Respondent

URGENT APPLICATION

Deputy Registrar

High Court of Delhi, New Delhi

Sir,

Will you kindly treat the accompanying petition and application as an urgent one in accordance with the High Court Rules and Orders.

The grounds of urgency are as prayed in the prayer clause of the Petition and the accompanying application.

It is prayed that the matter be listed on _____.

Yours Faithfully,

Petitioner

Through

Petitioners-in- Person

NEW DELHI

DATE-

IN THE HIGH COURT OF DELHI AT NEW DELHI
(IN THE MATTER OF PUBLIC INTEREST LITIGATION)

W.P. (C) No. _____ of 2019

IN THE MATTER OF: -

Prateek Sharma and Anr

...Petitioner

Vs.

Union of India

...Respondent

NOTICE OF MOTION

Ld. Counsels for Respondents,
Delhi High Court, New Delhi

Sir,

The enclosed writ petition by the Petitioner is coming up for hearing on

Petitioner

Through

Petitioners- in - Person

NEW DELHI
DATE-

IN THE HIGH COURT OF DELHI AT NEW DELHI
(IN THE MATTER OF PUBLIC INTEREST LITIGATION)

W.P. (C) No. _____ of 2019

IN THE MATTER OF: -

Prateek Sharma and Anr ...Petitioner

Vs.

Union of India ...Respondent

MEMO OF PARTIES

1. Prateek Sharma
S/o - Dalip Sharma
Address - B-8/1, Paryawarn Complex, Sai-du-lajab
Neb Sarai, New Delhi -110030 ...Petitioner No. 1
2. Diksha Singh
D/o- Ramvir Singh
Address - A29/2, 3rd Floor New Gupta Colony, Street no.11
New Delhi -110009Petitioner No.2

Versus

1. Union Of India
(i) Ministry of Housing and Urban Affairs
(Through, Director General
Central Public Works Department,
A-Wing, Room no - 101
Nirman Bhawan
New Delhi
PIN-110011.....Responden No.1

2. North- Delhi Municipal Corporation

Commissioner 4th Floor, Civic Centre, JLN Marg ,

District: New Delhi , New Delhi , Delhi.....Respondent No.2

3. New Delhi Municipal Corporation,

Through Chairman, NDMC

NDMC Head Office, Palika Kendra,

Parliament Street, New Delhi-110001.....Respondent No.3

4. Public Works Department

Through, The Engineer-in-Chief,

MSO Building, IP Estate, New Delhi- 110002...Respondent No.4

Petitioner

Through

NEW DELHI

DATE-

Petitioners-in- Person

IN THE HIGH COURT OF DELHI AT NEW DELHI
(IN THE MATTER OF PUBLIC INTEREST LITIGATION)

W.P. (C) No. _____ of 2019

IN THE MATTER OF: -

Prateek Sharma and Anr ...Petitioner

Vs.

Union of India ...Respondent

SYNOPSIS AND LIST OF DATES

The present Petition is filed, seeking a Writ of Mandamus be issued to the Respondents herein for the proper construction, maintenance and upkeep of footpaths in the Delhi NCR area, and also seeking any other appropriate writ be issued to the Respondents, for the construction of footpaths with assistive pathways for the blind and specially abled individuals, in accordance with the provision that have been envisaged in “THE RIGHTS OF PERSONS WITH DISABILITIES ACT, 2016” and that the provisions laid down in the same are complied with, by the Respondents and that the rights enshrined in the above stated Act and the Constitution of India can be excised by all irrespective of any physical or mental impediments. Furthermore, the Petition is filed seeking a Writ be issued to the Respondents, for removal of any blockades and/or construction debris and/or any other kind of debris from the footpaths and also for the proper barricading of the footpath in order to deter the motorist from using the said footpath as roads and is also seeking enforcement of regulation to restrict parking of vehicles on footpaths. Further, seeking a Writ of Mandamus or any other appropriate writ for the proper covering of potholes on and around the footpaths and that the same be done in a time bound manner, that the erection of light poles and electricity poles not be in an unplanned manner and that a mechanism be brought into place to bring synergy in the functioning of the Municipalities and other Civic Boards.

LIST OF DATES & EVENTS

| Date | Event |
|--------------------------------|---|
| --.--.1854 | The Central Public Works Department was established, as an agency to carry out and execute public work and construction. |
| 26.01.1950 | The Constitution of India was enacted. |
| --.--.1994 | The NDMC Act was passed and the municipality was set-up |
| 13.01.2012 | The MCD was divided into three civic bodies namely ; North Delhi Municipal Corporation, South Delhi Municipal Corporation and East Delhi Municipal Corporation |
| 27.12.2016 | The Rights of Persons With Disability Act 2016, was enacted |
| 16.07.2019 | RTI filed with Central Public Works Department, Respondent No.1 |
| 20.08.2019 | Online Complaint filed with North-DMC Respondent No.2 with pictures of the concerned area via complaint no. NorthDMC/2019/08/010048067396 |
| 20.08.2019 to 21.08.2019 | Representation sent to New Delhi Municipal Corporation, Respondent No.3 and Public Works Department Respondent No.4, the Respondent No.4 was pleased to send us a reply to the same email enquiring about specific areas with the issue. On 21.08.2019, the Petitioners had replied to the query via email. |
| 27.08.2019 | RTI Appeal filed with the Respondent No.1 |
| 10.09.2019 | A reminder was sent to Respondent No.2 and Respondent No.3. |
| --.10.2018 | Present Writ Petition |

IN THE HIGH COURT OF DELHI AT NEW DELHI
(IN THE MATTER OF PUBLIC INTEREST LITIGATION)

W.P. (C) No. _____ of 2019

IN THE MATTER OF: -

Prateek Sharma and Anr

...Petitioner

Vs.

Union of India

...Respondent

WRIT PETITION UNDER ARTICLE 226 OF THE CONSTITUTION OF INDIA SEEKING A WRIT OF MANDAMUS OR ANY OTHER TO DIRECT THE RESPONDENTS HEREIN TO CONSTRUCT AND MAINTAIN FOOTPATHS IN THE AREA OF DELHI AND NCR REGION. SEEKING A WRIT/ORDER/DIRECTION IN THE NATURE OF WRIT OF MANDAMUS OR ANY OTHER WRIT/ORDER/DIRECTION IN THE SIMILAR NATURE BE ISSUED TO THE RESPONDENTS FOR THE ENFORCEMENT OF THE RIGHTS OF ALL CITIZENS UNDER THE CONSTITUTION OF INDIA AND UNDER THE 'THE RIGHTS OF PERSONS WITH DISABILITY ACT 2016' FOR THE CONSTRUCTION OF FOOTPATH AND PATHWAYS TO PROVIDE FOR UNHINDERED ACCESSIBILITY TO ROADS AND OTHER PUBLIC PLACES AND TO REMOVE BLOCKADE IF ANY, DUE TO ENCROACHMENT OR LACK OF MAINTENANCE WHICH MAY ACT AS A HINDRANCE IN THE FREE MOVEMENT OF CITIZENS, AND DIRECT ALL THE RESPONDENTS TO PASS NECESSARY DIRECTIONS AND TAKE NECESSARY ACTIONS TO THE SAME.

TO,

The Hon'ble Chief Justice of the Delhi High Court

And to the Companion Justices of the said Court

The humble Petitioner of this Petition

MOST RESPECTFULLY SHOWETH AS UNDER:

1. That the Petitioners are bonafide students of the Law Centre-1, Delhi University. The Petitioners are public spirited individuals. The Petitioners believes that it is their duty to set into motion the legal process when grave issues which affect the society at large are brought to their notice which, in their opinion, if ignored will cause a miscarriage of justice. It is this duty that they seek to perform in the instant case.
2. The present Petition is filed before this Hon'ble Court for seeking guidelines in order to the Respondents herein for the hitherto construction of assistive pathways, construction of footpaths and the clearance of the said footpaths from any/all encroachment in the region of Delhi NCR , or in the alternative; seeking a writ/order/direction in the nature of writ of mandamus or any other writ/order/direction in the similar nature be issued to the respondents to construct the assistive pathways and where such pathways have been created, to maintain and clear them of any/all encroachment, to construct and maintain footpaths and ; direct the respondents to pass necessary directions for the effective implementation of the provisions under The Rights of Persons with Disability Act 2016.
3. The writ petition to the effect of the writ petitioners has no malafide/personal interest in the litigation and the petition is not guided by self-gain or for gain of any other

person/institution/body and that there is no motive other than of public interest in filing the writ petition.

4. The Petitioners herein are concerned about the apathy and the condition in which the National Capital footpaths have been allowed to wither away with no maintenance and upkeep. Such negligence has been causing impediment to the free movement of citizens, therefore violating the rights conferred to the individuals under Article 19 of the Constitution and the rights given to the citizens under The Rights of Persons with Disability Act 2016 (hereinafter referred to as the Act)
5. That the said footpaths have either been encroached by motorist or the same have become parking lots for motorists. That the said footpaths have also seen encroachment by shop owners and local vendors, therefore leaving no space for the pedestrian, which in turn have to complete their commute by walking on the roads, and therefore putting themselves at risk.
6. That where such footpaths have been created they either have seen damage by the civic bodies themselves and/or have yet not been reconstructed due to jurisdictional issues over repair and reconstruction therefore impeding the free movement of all citizens
7. That the assistive pathways are required to be created as they function as the guiding apparatus for blind and other specially

abled individuals, that lack of such assistive pathways near educational institutions, hospitals and other important public places is hindering the quality of life and thereby violating the principle of Dignity of Life as enshrined under Article 21 of the Constitution.

8. That the conditions of footpaths in the region of Delhi NCR has fatally affected the lives of the citizens and thereby have caused citizens to suffer physical injuries, the said injuries are caused by the lack of proper signage on the footpath and lighting around the said area.
9. That lack of proper maintenance has also led to withering away of the said footpaths which in turn has led to only patches of footpath been left usable.
10. That the Petitioner had filed an online complaint with the Respondent No.2 via complaint id NorthDMC/2019/08/010048067396 on 20.08.2019. Annexure P2
11. That the Petitioners had sent a complaint/representations to Respondent No.3 via an email dt.20.08.2019. Annexure P3
12. That the Petitioners have informed/complained the same to the Respondents No.4 herein via email dated 20.08.2019, to which the Respondent No 4 had sent a reply on 20.08.2019 and had sought the details of the specific area to which were sent to the Respondent No 4 on the 21.08.2019. Annexure P4

13. That the Petitioners have also sent a reminder email to the Respondent No.3 and Respondent No.4 via email dt 10.09.2019. Annexure P5.
14. That the Petitioner has also Annexed herewith the coloured photos of the various areas of Delhi NCR for the perusal of this Hon'ble Court. Annexure P6
15. That the present Petition has been filed in the interest of citizens in general and children/minors/students/youth in specific. The above-mentioned citizens are incapable of accessing the Court themselves due to lack of awareness, paucity of time and resources among other reasons.
16. The present Petition may affect the rights and protection guaranteed to all citizens under the constitution and the provisions of the Act.

BRIEF FACTS OF THE CASE: -

17. That petition is filed under Article 226 of the Constitution of India seeking a writ of mandamus or any other, to direct the respondents herein to construct and maintain the footpaths in the areas of Delhi and NCR region. A writ/order/direction in the nature of writ of mandamus or any other writ/order/direction in the similar nature be issued to the respondents for the enforcement of the rights of all citizens under the Constitution of India and under the 'The Rights of Persons with Disability

Act 2016' for the construction of footpaths and pathways to provide for unhindered accessibility to roads and other public places and to remove blockade and barrier if any due to encroachment or lack of maintenance which may act as a hindrance in the free movement of citizens, and direct all the respondents to pass necessary directions to take necessary actions to the same.

18. An RTI was also filed with the Central Public Works Department on 16.07.2019 via RTI registration no. CPWDD/R/2019/50174 seeking information about the funds and the complaints received by them in regards to the footpath maintenance and construction. However, the concerned authorities have not replied to the same. Due to which the Petitioners had filed an RTI appeal . Annexure P1
19. A complaint was also filed on the online portal of the Respondent 2, on which no action has been taken till today. The complaint id for the same is NorthDMC/2019/08/010048067396. Annexure P2
20. That the Petitioners had also sent a letter via email to the Chairperson NDMC dt 20.08.2019 , apprising him of the condition of the footpaths. However, the same has not been replied to till date. Annexure P3
21. That a letter dated 20.08.2019 was sent to the Public Works Department via an email, wherein the Petitioners had submitted

to the authorities the condition of the footpaths in their area. The Department was pleased to reply on the same day i.e. on 20.08.2019 seeking information of specific areas where such problems existed. In response to this query the Petitioner had sent an email dt 21.08.2019 sending the details of the said area. However, after which no action has taken place. Annexure P4

22. The Petitioners have sent a reminder email dt. 10.09.2019, apprising the Respondent No.3 and Respondent No.4 Annexure P5

23. That the Petitioners also prayed in the representations that the Respondents may take urgent steps to remedy the said difficulties and impediments caused due to the current condition of the footpaths.

24. That it is submitted the Petitioners have no personal/vested interest in the present Petition, expect for getting this to the notice before this Hon'ble Court that the respondents herein have failed to address the issue so far.

25. That no efforts have been made so far by the Respondents No. 1 to Respondent No. 4 to remedy the said situation even after providing them with complaints and reminders.

26. That the conditions of the footpaths are in deplorable condition especially around the areas of Chattra Marg, New Gupta, Colony, Vijay Nagar, Sheikh Sarai, and majorly around all college areas, hospitals and other public places

27. That this writ petition is, therefore, being filed on the following, amongst other, GROUNDS: -

A. BECAUSE as per Article 19(1)(d) of the Constitution of India, “*to move freely throughout the territory of India;*” and such a right is only subjected to reasonable restrictions as envisaged in Article 19(5) “*Nothing in sub clauses (d) and (e) of the said clause shall affect the operation of any existing law in so far as it imposes, or prevent the State from making any law imposing, reasonable restrictions on the exercise of any of the rights conferred by the said sub clauses either in the interests of the general public or for the protection of the interests of any Scheduled Tribe*”

B. BECAUSE The Rights of Persons with Disability Act 2016 has created specific provisions for the inclusion of specially abled. Specifically in Section 40, wherein - “*The Central Government shall, in consultation with the Chief Commissioner, formulate rules for persons with disabilities laying down the standards of accessibility for the physical environment, transportation, information and communications, including appropriate technologies and systems, and other facilities and services provided to the public in urban and rural areas.*”

- C. BECAUSE The Rights of Persons with Disability Act 2016 has created specific provisions for the inclusion of specially abled. Specifically in Section 41, wherein - *“(1) The appropriate Government shall take suitable measures to provide,—*
- (a) facilities for persons with disabilities at bus stops, railway stations and airports conforming to the accessibility standards relating to parking spaces, toilets, ticketing counters and ticketing machines;*
 - (b) access to all modes of transport that conform the design standards, including retrofitting old modes of transport, wherever technically feasible and safe for persons with disabilities, economically viable and without entailing major structural changes in design;*
 - (c) accessible roads to address mobility necessary for persons with disabilities.*
- (2) The appropriate Government shall develop schemes programmes to promote the personal mobility of persons with disabilities at affordable cost to provide for,—*
- (a) incentives and concessions;*
 - (b) retrofitting of vehicles; and*
 - (c) personal mobility assistance..”*

D. BECAUSE in the case of Rajive Raturi vs. Union of India (UOI) and Ors.(2018)2SCC413 *“Right to dignity, which is ensured in our Constitutional set up for every citizen applies with much more vigour in case of persons suffering from disability and, therefore, it becomes imperative to provide such facilities so that these persons also are ensured level playing field and not only they are able to enjoy life meaningfully, they contribute to the progress of the nation as well.”*.

E. BECAUSE in the United Nations Convention on the Rights of Persons with Disabilities under Article 9 and Article 10

Article 9- Accessibility

1. To enable persons with disabilities to live independently and participate fully in all aspects of life, States Parties shall take appropriate measures to ensure to persons with disabilities access, on an equal basis with others, to the physical environment, to transportation, to information and communications, including information and communications technologies and systems, and to other facilities and services open or provided to the public, both in urban and in rural areas. These measures, which shall include the identification and elimination of obstacles and barriers to accessibility, shall apply to, inter alia:

(a) Buildings, roads, transportation and other indoor and outdoor facilities, including schools, housing, medical facilities and workplaces;

(b) Information, communications and other services, including electronic services and emergency services.

2. States Parties shall also take appropriate measures:

(a) To develop, promulgate and monitor the implementation of minimum standards and guidelines for the accessibility of facilities and services open or provided to the public;

(b) To ensure that private entities that offer facilities and services which are open or provided to the public take into account all aspects of accessibility for persons with disabilities;

(c) To provide training for stakeholders on accessibility issues facing persons with disabilities;

(d) To provide in buildings and other facilities open to the public signage in Braille and in easy to read and understand forms;

(e) To provide forms of live assistance and intermediaries, including guides, readers and professional sign language interpreters, to facilitate accessibility to buildings and other facilities open to the public;

(f) To promote other appropriate forms of assistance and support to persons with disabilities to ensure their access to information;

(g) To promote access for persons with disabilities to new information and communications technologies and systems, including the

(h) To promote the design, development, production and distribution of accessible information and communications

technologies and systems at an early stage, so that these technologies and systems become accessible at minimum cost.

Article 10

F. *Right to life - States Parties reaffirm that every human being has the inherent right to life and shall take all necessary measures to ensure its effective enjoyment by persons with disabilities on an equal basis with others.*

G. Because the Hon'ble Supreme Court has recognized the international convention and statutes - Vishaka v. State of Rajasthan (1997) 6 SCC 241 the Court gave detailed guidelines and laid down as:

“18. Accordingly, we direct that the above guidelines and norms would be strictly observed in all workplaces for the preservation and enforcement of the right to gender equality of the working women. These directions would be binding and enforceable in law until suitable legislation is enacted to occupy this field ...”

H. BECAUSE in Union of India v. ADR (2002) 5 SCC 294 this Hon'ble Court said,

“20. However it is equally settled that in case the Act or Rules are silent on a particular subject and the authority implementing the same has constitutional or statutory power to implement it, the Court can necessarily issue directions or orders on the said

subject to fill the vacuum or void till the suitable law is enacted.”

- I. BECAUSE of the apathetic negligence of the Respondents and the condition of the footpath, walkways and pathways hindrance is caused in the exercise of fundamental rights enshrined under Article 19 (1)(d)
 - J. BECAUSE the act of the Respondents is an unreasonable restriction on the exercise of the Fundamental Right under Article 19(1)(d)
 - K. BECAUSE the act of the Respondents is violative of Fundamental Right to live with dignity as enshrined under Article 21.
- 28. That the Petitioners have not filed any writ petition in any other court or any other petition of similar nature in any court of law apart from the instant writ petition before this Hon'ble Court.
 - 29. That the Petitioners herein have the means and is in a position to pay the costs, if any, imposed by the Hon'ble Court.
 - 30. That the present Petition under Article 226 of the Constitution of India is the appropriate remedy and no other equally efficacious remedy is available to the Petitioner given the far-reaching public interest.

PRAYER

It is, therefore, most respectfully prayed that this Hon'ble Court may be pleased to:

1. To pass an order/direction to the Respondents to take immediate steps for the maintenance and upkeep of the existing footpaths.
2. To pass an order/direction to the Respondents to take immediate steps for construction of assistive/tactile pathways on the existing footpaths.
3. To pass an order/direction to the Respondents to take immediate steps for the construction of new footpaths with assistive/tactile pathways.
4. To pass an order/direction to the Respondents to take immediate actions to remove and free the footpaths of all encroachments and blockades.
5. Issue a writ/order/direction in the nature of writ of mandamus or any other writ/order/direction in the similar nature to the Respondents to take immediate steps for the maintenance and upkeep of the existing footpaths.
6. Issue a writ/order/direction in the nature of writ of mandamus or any other writ/order/direction in the similar nature to the Respondents to take immediate steps for construction of assistive/tactile pathways on the existing footpaths
7. Issue a writ/order/direction in the nature of writ of mandamus or any other writ/order/direction in the similar nature to the

Respondents to take immediate steps for the construction of new footpaths with assistive/tactile pathways.

8. Issue a writ/order/direction in the nature of writ of mandamus or any other writ/order/direction in the similar nature to the Respondents to take immediate actions to remove and free the footpaths of all encroachments and blockades.
9. To pass any other order in the interest of justice.

Petitioner

Through

Petitioners-in-person

NEW DELHI
DATE-

IN THE HIGH COURT OF DELHI AT NEW DELHI
(IN THE MATTER OF PUBLIC INTEREST LITIGATION)

W.P. (C) No. _____ of 2019

IN THE MATTER OF:

Prateek Sharma and Anr ...Petitioner

Vs.

Union of India ...Respondent

A F F I D A V I T

I, Sh. Prateek Sharma s/o Dalip Sharma aged about 24 years, resident of New Delhi having residential abode at B-8/1, Paryawarn Complex Saidulajab, New Delhi -110030 do hereby solemnly affirm and declare as under:

1. I have filed the present petition as a Public Interest Litigation and I have gone through the Delhi High Court (Public Interest Litigation) Rules, 2010 and do hereby affirm that the present Public Interest Litigation is in conformity thereof.
2. I have no personal interest in the litigation and neither myself nor anybody whom I know would in any manner benefit from the relief sought in the present litigation save as a member of the General Public. This petition is not guided by self gain or gain of any person, institution, body and there is no motive other than of public interest in filing this petition.
3. The contents of the accompanying Petition including list of dates and synopsis, grounds (___ to ___), contents from Para No. 1 to Para No. ___ are true and correct to the best of my knowledge and the last para is Prayer to this Hon'ble Court.
4. I have done whatsoever inquiry/investigation which was in my power to do, to collect all data/material which was available and which was relevant for this court to entertain the present petition. I further confirm that I have not concealed in the present petition any data/material /information which may have enabled this court to form

an opinion whether to entertain this petition or not and/or whether to grant any relief or not.

5. That the deponent has not filed such or similar Petition, earlier, in this Hon'ble Court or in any other Court, nor such a Petition is pending before any Hon'ble Court.

DEPONENT

VERIFICATION:

Verified at New Delhi on this ___the day of _____, 2018 that the contents of my above affidavit are true and correct to my knowledge; no part of it is false and nothing has been concealed therein.

DEPONENT

IN THE HIGH COURT OF DELHI AT NEW DELHI
(IN THE MATTER OF PUBLIC INTEREST LITIGATION)

W.P. (C) No. _____ of 2019

IN THE MATTER OF:

Prateek Sharma and Anr

...Petitioner

Vs.

Union of India

...Respondent

A F F I D A V I T

I, Diksha Singh d/o Ramvir Singh aged about 24 years, resident of New Delhi having residential abode at A 29/2, New Gupta Colony, Street No.11, New Delhi 110009 do hereby solemnly affirm and declare as under:

6. I have filed the present petition as a Public Interest Litigation and I have gone through the Delhi High Court (Public Interest Litigation) Rules, 2010 and do hereby affirm that the present Public Interest Litigation is in conformity thereof.
7. I have no personal interest in the litigation and neither myself nor anybody whom I know would in any manner benefit from the relief sought in the present litigation save as a member of the General Public. This petition is not guided by self gain or gain of any person, institution, body and there is no motive other than of public interest in filing this petition.
8. The contents of the accompanying Petition including list of dates and synopsis, grounds (___ to ___), contents from Para No. ___ to Para No. ___ are true and correct to the best of my knowledge and the last para is Prayer to this Hon'ble Court.
9. I have done whatsoever inquiry/investigation which was in my power to do, to collect all data/material which was available and which was relevant for this court to entertain the present petition. I further confirm that I have not concealed in the present petition any data/material /information which may have enabled this court to form an opinion whether to entertain this petition or not and/or whether to grant any relief or not.

10. That the deponent has not filed such or similar Petition, earlier, in this Hon'ble Court or in any other Court, nor such a Petition is pending before any Hon'ble Court.

DEPONENT

VERIFICATION:

Verified at New Delhi on this ___th day of _____, 2018 that the contents of my above affidavit are true and correct to my knowledge; no part of it is false and nothing has been concealed therein.

DEPONENT

