

IN THE HIGH COURT OF DELHI AT NEW DELHI

(CIVIL ORIGINAL JURISDICTION)

WRIT PETITION (CIVIL) NO. _____/2019

IN THE MATTER OF PUBLIC INTEREST LITIGATION:

SHASHWAT BHARDWAJ

...PETITIONER

VERSUS

GOVT. OF NCT OF DELHI

...RESPONDENT

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SHASHWAT BHARDWAJ
PETITIONER IN PERSON

[Redacted Signature]

Delhi
Dated

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...RESPONDENT

TO,
THE DEPUTY REGISTRAR,
HIGH COURT OF DELHI
AT NEW DELHI

APPLICATION FOR URGENT HEARING

You are requested to kindly treat the accompanying petition as urgent. The grounds of urgency are- the present petition has been filed in public interest and therefore needs urgent hearing.

**SHASHWAT BHARDWAJ
PETITIONER IN PERSON**

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Delhi
Dated

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...RESPONDENT

MEMO OF PARTIES

SHASHWAT BHARDWAJ
S/O SH.ROHIT BHARDWAJ
R/O 309,KONARK APARTMENTS,

22,PATPARGANJ ROAD,I.P.EXTENSION AREA
NEW DELHI-110092

...PETITIONER

VERSUS

GOVT. OF NCT OF DELHI
THROUGH STANDING COUNSEL
REPRESENTED BY THE CHIEF SECRETARY,
DELHI

...RESPONDENT

SHASHWAT BHARDWAJ
PETITIONER IN PERSON

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Delhi
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GOVT.OF NCT OF DELHI

...RESPONDENT

SYNOPSIS AND LIST OF DATES

Article 14 of the Constitution guarantees the equal protection of laws.

Historically, the courts have held that this guarantee requires all laws

to confirm to a “reasonable classification” standard: that is, there must exist an “intelligible differentia” (between what the law covers and what it doesn’t), and that this differentia must bear a “rational nexus” with a legitimate State purpose. This, however, is a standard that accords great deference to State action, and is often insufficient to capture the full range of inequalities and disadvantages that exist in society.

Aware of the shortcomings of the reasonable classification standard, the writ courts have over the time, developed, a parallel test under Article 14 of the Constitution, requiring that State action not be “arbitrary.” The arbitrariness has itself come under severe criticism for its vagueness. Bracketing that controversy, however, it has always been unclear whether an arbitrariness challenge is limited to challenging *executive action*, or whether the Court can also strike down *laws* if it finds them to be “arbitrary”.

The instant writ petition is being preferred in public interest praying to this Hon’ble Court to exercise its writ jurisdiction under Article 226 of the Constitution of India and to issue a Writ of Certiorari quashing the arbitrary decision of the respondent of enforcing the odd-even scheme in Delhi between November 4 to 15, 2019 in blatant violation of fundamental right guaranteed by Article 14 of the Constitution of India. By way of the present petition, which has been filed in public interest, the petitioner is furthermore seeking appropriate directions to the sole respondent i.e Govt. of NCT of Delhi to set up a committee

that may, apart from senior bureaucrats, also comprise of members of the Bar, to conduct a study on the viability of the said odd even scheme and any alternate arrangement that does not violate any fundamental right and also fills the void that the said scheme fails to take into account.

That as per the report published by the leading daily “the Hindu” on October 13, 2019, the Hon’ble Chief Minister of Delhi, Sh. Arvind Kejriwal has announced that women will be exempted from the odd-even scheme that will be enforced in Delhi from November 4 to 15. However, there will be no relief for private vehicles running on CNG unlike the previous two occasions. The Delhi government is still mulling over exemption for two-wheelers from the road rationing scheme as per the said media report. This will be the third time that the scheme will be enforced in Delhi after two 15-day periods in January and April, 2016. To quote the Hon’ble Chief Minister, “Keeping the security of women in mind, we have decided to exempt women from the odd-even scheme. All vehicles being driven by a lone woman driver, a woman driver ferrying female passengers or those with women drivers and children below the age of 12 will be exempt,” It is pertinent to point out here that this is in fact, a blatant violation of the right to equality guaranteed under Article 14 of the Constitution of India .It is the submission of the petitioner, that , the State i.e. the sole respondent herein, in implementing the said scheme and enforcing it on the residents of Delhi is denying equality before law on the ground of sex and therefore the said scheme warrants it to be

struck down by this Hon'ble Court as it is clearly in violation of Article 14 of the Constituion of India. Furthermore, the rationale given by the Respondent for exempting women is vague apart from being mischievous and misconceived. That, it is apparent that the said odd even scheme is being enforced only to gain a political mileage and no legal opinion was perhaps sought even from the law department of the Respondent before formulating the said scheme.

That in a catena of judgements, the Hon'ble Supreme Court has asserted that it is the duty of the Court to strike down a law that is violating a fundamental right and that the Courts are under no obligation to wait and should act if any violation of a fundamental right is brought before it.

That, another aspect , that the Respondent has failed to contemplate while formulating the said policy is the hardship and struggle that would be faced by those professionals in Delhi who are not stationed in one office throughout the day but are required to keep travelling from one place to the other for work, throughout the day, for instance, the members of the legal fraternity It is thus submitted, that not only, members of the legal fraternity but also the litigants would be greatly prejudiced, if the said scheme is enforced. The petitioner most respectfully begs to submit that in a place like Delhi, lawyers on most days are appearing before atleast 3 courts which could include 3 different district courts and also, one district court and this Hon'ble Court, apart from the Hon'ble Supreme Court of India and in case, the

said odd even scheme is implemented, the lawyers practising before the various judicial fora would be left with a loss of livelihood as they would not be able to run from one court to the other as the public transport, in any case, is not sufficient to cater to the public and therefore, the litigant as well as the entire judicial process would suffer. It is thus, the submission of the petitioner herein that the said scheme is vague and impractical apart from being an utter blatant and willful violation of Article 14 of the Constitution of India.

Aggrieved by the blatant violation of Article 14 in the implementation of the proposed odd even scheme, the petitioner preferred a representation before the Chief Secretary of the sole respondent herein, however,it was not paid any heed to.

Hence, the present public interest litigation

October 13, 2019		Leading national daily “The Hindu” published article quoting the statement made by the Hon’ble CM of Delhi informing the media about enforcing the odd even scheme in Delhi from November 4 to 15, 2019.
October 16,2019		Aggrieved by the blatant violation of Article 14 in the implementation of the proposed odd even scheme, the petitioner preferred a representation before the Chief Secretary of the sole respondent herein, however ,it was not paid any heed to.

		Hence, the present petition in public interest.
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SHASHWAT BHARDWAJ
PETITIONER IN PERSON

[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]

Delhi
Dated

IN THE HIGH COURT OF DELHI AT NEW DELHI

(CIVIL ORIGINAL JURISDICTION)

WRIT PETITION (CIVIL) NO. _____/2019

IN THE MATTER OF PUBLIC INTEREST LITIGATION:

IN THE MATTER OF:

VIOLATION OF ARTICLE 14 OF THE CONSTITUTION OF
INDIA

AND

IN THE MATTER OF :

SHASHWAT BHARDWAJ
S/O SH.ROHIT BHARDWAJ

████████████████████

████████████████████

████████████████████

████████████████████

...PETITIONER

██████████

████████████████████092

VERSUS

GOVT. OF NCT OF DELHI
REPRESENTED BY THE
CHIEF SECRETARY,
DELHI

...RESPONDENT

WRIT PETITION IN PUBLIC INTEREST UNDER ARTICLE 226 OF THE CONSTITUTION OF INDIA FOR ISSUANCE OF AN APPROPRIATE WRIT, ORDER OR DIRECTION IN THE NATURE OF CERTIORARI AND/OR ANY OTHER APPROPRIATE WRIT, DIRECTION OR ORDER QUASING THE ARBITRARY DECISION OF THE RESPONDENT HEREIN TO IMPLEMENT THE ODD EVEN SCHEME PROPOSED TO BE ENFORCED IN DELHI AS THE SAME IS IN VIOLATION OF ARTICLE 14 OF THE CONSTITUTION OF INDIA AND WRITS/DIRECTIONS IN THE NATURE OF MANDAMUS AND ANY OTHER WRITS DIRECTING THE SOLE RESPONDENT HEREIN TO SET UP AN EXPERT COMMITTEE THAT MAY, APART FROM SENIOR BUREAUCRATS, ALSO COMPRISE OF REPRESENTATIVES OF THE BAR, TO CONDUCT A STUDY

**ON THE VIABILITY OF THE SAID ODD EVEN SCHEME
AND ANY ALTERNATE ARRANGEMENT THAT DOES NOT
VIOLATE ANY FUNDAMENTAL RIGHT AND ALSO FILLS
THE VOID THAT THE SAID SCHEME FAILS TO TAKE
INTO ACCOUNT**

To,
THE HON'BLE ACTING CHIEF JUSTICE OF DELHI AND HER
COMPANION JUDGES OF THE HON'BLE HIGH COURT OF
DELHI, AT NEW DELHI

The Humble Petition of
the Petitioner above-named

MOST RESPECTFULLY SHOWETH:

1. That the petitioner has preferred the instant writ petition in public interest. The petitioner has no 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.
2. That the petitioner has based the instant writ petition in public interest, from authentic information and documents made available through publically available documents, either obtained from the websites of the Government of NCT. Of Delhi and newspaper reports published in the leading national dailies such as The Hindu, particularly the one published on October 13, 2019 at 08:39 IST on the website of "The Hindu" newspaper. A true copy of the Article is annexed herewith as **ANNEXURE P1**.
3. That the present petition, if allowed, would benefit all those residents of the national capital territory of Delhi and particularly

those belonging to the legal fraternity and practising before the various judicial and quasi judicial fora in Delhi including those who practice law before this Hon'ble Court and who use their own private vehicles to travel daily from their residences to their workplaces and are doomed to suffer for no fault of theirs at the hands of the respondent in case, the unconstitutional decision of odd even scheme proposed to be implemented by the Respondent in Delhi from November 4 to 15 is not quashed by this Hon'ble Court. Since these persons are too numerous and have no personal interest in the matter, they are unlikely to approach this Hon'ble Court on this issue. Hence the petitioner herein is preferring this PIL. The Petitioner reiterates that he has no personal interest or axe of his to grind and without meaning of any offence to anyone would like this Hon'ble Court to consider the various issues raised herein.

4. The sole affected party by the orders sought in the present writ petition that has been preferred in the nature of public interest litigation would be the Govt. of NCT of Delhi that has been impleaded as the sole Respondent through its Chief Secretary. To the best of the knowledge of the petitioner, no other persons / bodies / institutions are likely to be affected by the orders sought in the writ petition. The petitioner, however craves the leave of this Hon'ble Court to add or delete the appropriate authorities in this writ petition to further the public cause undertaken by him and to meet the ends of justice.

5. The Petitioner is a citizen of India, a resident of Delhi and is an advocate by profession, practicing law, primarily before this Hon’ble Court and also before its subordinate judicial fora. The petitioner is enrolled with the Bar Council of Delhi having enrollment no-D/1237/2014. The petitioner is also a member of the Delhi High Court Bar Association and the membership number of the petitioner is – 12553/2014.
6. The petitioner most respectfully states that the petitioner has means to pay the cost, if any, is imposed by this Hon’ble Court.
7. The prior to the instant petition, the petitioner had filed the following public interest litigation before this Hon’ble Court –

S. No	Case Details	Status	Outcome
1.	W.P.(C) 11388/2016 SHASHWAT BHARDWAJ Vs. UNION OF INDIA	Disposed off on 07/12/2016	DISMISSED
2.	W.P.(C) 7749/2018 SHASHWAT BHARDWAJ	Disposed off vide order dated 27.07.2018	DISMISSED

	<p>Vs. GOVT. OF NCT OF DELHI & ORS.</p>		
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THE CASE IN BRIEF

8. The instant writ petition is being preferred in public interest praying to this Hon’ble Court to exercise its writ jurisdiction under Article 226 of the Constitution of India and to issue a Writ of Certiorari quashing the decision of the respondent of enforcing the odd-even scheme in Delhi between November 4 to 15, 2019 in blatant violation of fundamental right guaranteed by Article 14 of the Constitution of India. By way of the present petition, which has been filed in public interest, the petitioner is furthermore seeking appropriate directions to the sole respondent i.e Govt. of NCT of Delhi to set up a committee that may, apart from senior bureaucrats, also comprise of members of the Bar, to conduct a study on the viability of the said odd even scheme and any alternate arrangement that does not violate any fundamental right and also fills the void that the said scheme fails to take into account.
9. That as per the report published by the leading daily “the Hindu” on October 13, 2019, the Hon’ble Chief Minister of Delhi, Sh. Arvind Kejriwal has announced that women will be exempted

from the odd-even scheme that will be enforced in Delhi from November 4 to 15. However, there will be no relief for private vehicles running on CNG unlike the previous two occasions. The Delhi government is still mulling over exemption for two-wheelers from the road rationing scheme as per the said media report. This will be the third time that the scheme will be enforced in Delhi after two 15-day periods in January and April, 2016. To quote the Hon'ble Chief Minister, "Keeping the security of women in mind, we have decided to exempt women from the odd-even scheme. All vehicles being driven by a lone woman driver, a woman driver ferrying female passengers or those with women drivers and children below the age of 12 will be exempt," It is pertinent to point out here that this is in fact, a blatant violation of the right to equality guaranteed under Article 14 of the Constitution of India. It is the submission of the petitioner, that, the State i.e. the sole respondent herein, in implementing the said scheme and enforcing it on the residents of Delhi is denying equality before law on the ground of sex and therefore the said scheme warrants it to be struck down by this Hon'ble Court as it is clearly in violation of Article 14 of the Constitution of India. Furthermore, the rationale given by the Respondent for exempting women is vague apart from being mischievous and misconceived. That, it is apparent that the said odd even scheme is being enforced only to gain a political mileage and no legal opinion was perhaps sought even from the

law department of the Respondent before formulating the said scheme. That in a catena of judgements, the Hon'ble Supreme Court has asserted that it is the duty of the Court to strike down a law that is violating a fundamental right and that the Courts are under no obligation to wait and should act if any violation of a fundamental right is brought before it.

10. That the petitioner further submits that as women would have the liberty of driving vehicles, every male who has in his family a female family member possessing a valid driving license would be tempted to let his sister/daughter/wife drive and that would, in fact, act as a counterblast to the revolutionary idea thought by the Respondent. That the petitioner therefore submits that the said scheme is no solution to either the traffic situation in Delhi or the increasing levels of Air Pollution.
11. That, another aspect, that the Respondent has failed to contemplate while formulating the said policy is the hardship and struggle that would be faced by those professionals in Delhi who are not stationed in one office throughout the day but are required to keep travelling from one place to the other for work, throughout the day, for instance, the members of the legal fraternity. It is thus submitted, that not only, members of the legal fraternity but also the litigants would be greatly prejudiced, if the said scheme is enforced. The petitioner most respectfully begs to submit that in a place like Delhi, lawyers on most days are appearing before at least 3 courts which could include 3 different

district courts and also, one district court and this Hon'ble Court, apart from the Hon'ble Supreme Court of India and in case, the said odd even scheme is implemented, the lawyers practising before the various judicial fora would be left with a loss of livelihood as they would not be able to run from one court to the other as the public transport, in any case, is not sufficient to cater to the public and therefore, the litigant as well as the entire judicial process would suffer. It is thus, the submission of the petitioner herein that the said scheme is vague and impractical apart from being an utter blatant and wilful violation of Article 14 of the Constitution of India.

12. The petitioner further begs to state that in the given facts and circumstances, it is the need of the hour that directions are issued to the sole respondent herein to form an expert committee that should include apart from comprising of bureaucrats and environmental experts, representatives of the bar, so that all the valid factors are taken into consideration before enforcing a scheme of such a magnitude on the innocent residents of Delhi. It is therefore prayed accordingly.
13. The petitioner is reproducing Article 14 as enshrined in the Constitution of India for the convenience of this Hon'ble Court.

Article 14 in The Constitution Of India

EQUALITY BEFORE LAW

“The State shall not deny to any person equality before the law or the equal protection of the laws within the territory of India Prohibition of discrimination on grounds of religion, race, caste, sex or place of birth”

14. That feeling aggrieved by the proposed enforcement of the said odd even scheme, the petitioner preferred a representation addressed to the Chief Secretary of the Respondent through speed post, courier and also by email. The true typed copy of the said representation is annexed herewith as **Annexure P-2**. The tracking report of the said representation is annexed herewith as **Annexure P-3**. However, the said representation fell on deaf ears and was not paid any heed to by the Respondent, hence, the petitioner has been constrained to approach this Hon’ble Court by way of the instant writ petition in the interest of the public interest litigation.
15. The petitioner has not filed any other or similar petition before this Hon’ble Court or before the Hon’ble Supreme Court of India.
16. That the present Writ Petition in the nature of public interest litigation has been filed for bonafide and for the ends of justice.

PRAYERS:

In view of the facts & circumstances stated above, it is prayed that this Hon'ble Court in public interest may be pleased to: -

- (a) Issue a writ of Certiorari thereby, quashing the decision of the Respondent of enforcing the odd even scheme in Delhi between November 4 -15, 2019 as the same is in violation of Article 14 of the Constitution of India
- (b) Issue suitable writs/directions in the nature of mandamus and any other writs directing the sole Respondent herein to set up an expert committee that may, apart from senior bureaucrats, also comprise of representatives of the Bar, to conduct a study on the viability of the said odd even scheme and any alternate arrangement that does not violate any fundamental right and also fills the void that the said scheme fails to take into account.
- (c) any other writ, order or direction which may be deemed fit and proper under the facts and circumstances of the case and in the interest of justice be also passed in favour of the Petitioner and against the Respondent herein

SHASHWAT BHARDWAJ
PETITIONER IN PERSON

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Delhi
Dated

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

IN THE HIGH COURT OF DELHI AT NEW DELHI

(CIVIL ORIGINAL JURISDICTION)

WRIT PETITION (CIVIL) NO. _____/2019

IN THE MATTER OF PUBLIC INTEREST LITIGATION:

SHASHWAT BHARDWAJ

...PETITIONER

VERSUS

GOVT.OF NCT OF DELHI

...RESPONDENT

AFFIDAVIT

I, Shashwat Bhardwaj, S/o Sh. Rohit Bhardwaj aged about 28 years, R/o 309, Konark Apartments, 22, Patparganj Road, I.P. Extension, New Delhi-110092 do hereby solemnly affirm and declare as under:-

1. That I am the Petitioner above named and well conversant with the facts and circumstances of the case and as such I am competent to swear the present affidavit.
2. I have filed the present petition as a Public Interest Litigation.
3. 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.
4. I have no personal interest in the litigation and neither myself nor anybody in whom I am interested 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.

5. 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.

DEPONENT

VERIFICATION:

Verified at Delhi on this ____ day of October, 2019 that the contents of my above affidavit are true and correct to my knowledge. No part of it is false and nothing material has been concealed therefrom.

DEPONENT

IN THE HIGH COURT OF DELHI AT NEW DELHI

(CIVIL ORIGINAL JURISDICTION)

WRIT PETITION (CIVIL) NO. _____/2019

IN THE MATTER OF PUBLIC INTEREST LITIGATION:

SHASHWAT BHARDWAJ

...PETITIONER

VERSUS

GOVT.OF NCT OF DELHI

...RESPONDENT

NOTICE OF MOTION

Please take notice that the accompanying writ petition will be listed before the Hon'ble Court on the 23rd October, 2019 at 10:30 AM in the forenoon, or so soon thereafter as may be convenient to the Court.

New Delhi
Dated

**SHASHWAT BHARDWAJ
PETITIONER IN PERSON**

THE HINDU



Special Correspondent

New Delhi, October 13, 2019 08:38 IST

Updated: October 13, 2019 08:39 IST

more-in

No relief for private vehicles running on CNG this time, says CM Kejriwal

Chief Minister Arvind Kejriwal on Saturday announced that women will be exempted from the odd-even scheme that will be enforced in Delhi from November 4 to 15. However, there will be no relief for private vehicles running on CNG unlike the previous two occasions. The Delhi government was still mulling over exemption for two-wheelers from the road rationing scheme, he said.

This will be the third time that the scheme will be enforced in Delhi after two 15-day periods in January and April, 2016.

“Keeping the security of women in mind, we have decided to exempt women from the odd-even scheme. All vehicles being driven by a lone woman driver, a woman driver ferrying female passengers or those with women drivers and children below the age of 12 will be exempt,” Mr. Kejriwal said at a press conference here.

Explaining the non-exemption for CNG vehicles this time, the Chief Minister said it was due to complaints the government received about black marketing and misuse of CNG stickers when the scheme was enforced earlier. “We observed that the stickers used to denote CNG vehicles were sold in the black market and misused by some people to bypass the scheme. This defeats the purpose of odd-even,” he said. Undecided on two-wheelers

On two-wheelers, Mr. Kejriwal said the government was trying to “resolve the contradiction” on this issue in addition to figuring out the fines to be levied on drivers violating the provisions of the scheme.

“Two-wheelers do pollute the air and we believe they should not be exempt under odd-even. But given the number of two-wheelers in Delhi, it is impractical to take half of them off the roads. Delhi doesn't have public transport of the scale needed to do that,” he said.

The Chief Minister said an in-principle decision has been taken to stagger office timings and that experts are being consulted on it. “We will share more information when a decision is taken. Our aim is not to fine violators heavily. We request them to follow the rule... but violators will be liable to pay fines as per the amended Motor Vehicles Act. We are looking into what the quantum of fine shall be,” he said.

(CIVIL ORIGINAL JURISDICTION)

CM NO. _____ OF 2019

IN

WRIT PETITION (CIVIL) NO. _____/2019

IN THE MATTER OF PUBLIC INTEREST LITIGATION:

SHASHWAT BHARDWAJ

...PETITIONER

VERSUS

GOVT.OF NCT OF DELHI

...RESPONDENT

MOST RESPECTFULLY SHOWETH :

1. The afore-captioned writ petition has been preferred in public interest praying to this Hon'ble Court to exercise its writ jurisdiction under Article 226 of the Constitution of India and to issue a Writ of Certiorari quashing the decision of the respondent of enforcing the odd-even scheme in Delhi between November 4 to 15, 2019 in blatant violation of fundamental right guaranteed by Article 14 of the Constitution of India. By way of the present petition, which has been filed in public interest, the petitioner is furthermore seeking appropriate directions to the sole respondent i.e Govt. of NCT of Delhi to set up a committee that may, apart from senior bureaucrats, also comprise of members of the Bar, to conduct a study on the viability of the said odd even scheme and any alternate arrangement that does not violate any fundamental right and also fills the void that the said scheme fails to take into

account. The contents of the same may be read as part of the present application and the same are not repeated herein for the sake of brevity.

2. The instant application is being preferred by the petitioner under Article 226 of the Constitution of India read with Section 151 of the Code of Civil Procedure, 1908 praying for a stay on the impugned odd-even scheme during the pendency of the present petition.
3. The petitioner has made out a very good prima facie case, and the balance of convenience also lies in staying the odd even scheme that the respondent is proposing to enforce on the citizens of Delhi between November 4 to November, 15 2019. In fact, if the said scheme is not stayed, the petitioner shall be put to undue prejudice and his livelihood will get affected. The petitioner is therefore seeking that the impugned odd even scheme that is the subject matter of the present petition be stayed during the pendency of the present proceedings.
4. The present application is being filed bona-fide, and there is no reason in law why the same ought not to be allowed.

PRAYER

In view of the facts and circumstances as stated above, it is most respectfully prayed that this Court be pleased to stay the wrongful and unconstitutional odd even scheme that the respondent is proposing to

enforce on the citizens of Delhi between November 4 to November, 15 2019 during the pendency of the present proceedings.

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

Through

New Delhi
Dated

**SHASHWAT BHARDWAJ
PETITIONER IN PERSON
309, KONARK APARTMENTS, 22, PATPARGANJ
ROAD, I.P.EXTENSION AREA,
NEW DELHI -110092
TELEPHONE No.- 9717577107
EMAIL-advshashwatbhardwaj@gmail.com**

IN THE HIGH COURT OF DELHI AT NEW DELHI

(CIVIL ORIGINAL JURISDICTION)

CM NO. _____ OF 2019

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WRIT PETITION (CIVIL) NO. ____/2019

IN THE MATTER OF PUBLIC INTEREST LITIGATION:

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GOVT.OF NCT OF DELHI

...RESPONDENT

AFFIDAVIT

I, Shashwat Bhardwaj, S/o Sh. Rohit Bhardwaj aged about 28 years, R/o 309, Konark Apartments, 22, Patparganj Road, I.P. Extension, New Delhi-110092 do hereby solemnly affirm and declare as under:-

1. That I am the Petitioner above named and well conversant with the facts and circumstances of the case and as such I am competent to swear the present affidavit.
2. I have filed the present petition as a Public Interest Litigation.
3. That the accompanying application for stay is true and correct to my knowledge and belief.

DEPONENT

VERIFICATION:

Verified at Delhi on this ____ day of October, 2019 that the contents of my above affidavit are true and correct to my knowledge. No part of it is false and nothing material has been concealed therefrom.

DEPONENT