

IN THE SUPREME COURT OF INDIA

CIVIL APPELLATE JURISDICTION

I.A. NO. _____ OF 2020

IN

SPECIAL LEAVE PETITION (C) NO.2456 OF 2020

IN THE MATTER OF:

Amit Sahni

.....Petitioner

VERSUS

Commissioner of Police & Ors.

.....Respondents

AND IN THE MATTER OF:

1. CHANDRA SHEKHAR AAZAD,
S/O LATE GORDHAN DASS,
R/O HARIJAN COLONY, GALI NO.2,
CHHUTMALPUR, P.S. FATEHPUR,
DISTRICT SAHARANPUR, UTTAR PRADESH
2. WAJAHAT HABIBULLAH,
S/O LATE ENAITH HABIBULLAH,
R/O 529, MOUNT KAILASH,
TOWER NO.3, EAST OF KAILASH,
NEW DELHI-110065.
3. BAHADUR ABBAS NAQVI,
S/O SHRI ZAFAR ABBAS NAQVI,
R/O G-32/1, SHAHEEN BAGH,
ABUL FAZAL ENCLAVE,
OKHLA, NEW DELHI 110025.

...APPLICANTS
(INTERVENORS)

WITH

I.A. NO. _____ OF 2020

Application for intervention under Order XLVIII read with
Order VI Rule 2(3) of Supreme Court Rules, 1966

PAPER BOOK

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ADVOCATE FOR APPLICANTS/INTERVENORS:MANSOOR ALI

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OKHLA, NEW DELHI 110025.

...APPLICANTS
(INTERVENORS)

**APPLICATION FOR INTERVENTION ON
BEHALF OF APPLICANTS UNDER ORDER
XLVIII READ WITH ORDER VI RULE 2(3) OF
SUPREME COURT RULES, 1966**

②

TO,
THE HON'BLE CHIEF JUSTICE OF
INDIA AND HIS COMPANION
JUSTICES OF THE SUPREME
COURT OF INDIA, NEW DELHI;

The humble Application of the
Applicants above-named;

MOST RESPECTFULLY SHOWETH:-

1. The Applicants/Intervenors are citizens of India and are seeking this Hon'ble Court's indulgence to intervene in the present Petition which is collusive and motivated. The Applicants/Intervenors submit that the intention of the Petitioners is to inter-alia enable the administration use the orders of this Hon'ble Court to justify police force and excesses on women who are protesting peacefully in Shaheen Bagh.
2. The Applicants/Intervenors also seek to bring to the notice of this Hon'ble Court, the fact that the allegation of road blockade by the protestors is just an excuse. It is submitted that the Administration has deliberately blocked various other roads connecting Delhi to Noida and Faridabad on the pretext of the Shaheen Bagh demonstrations (which have been completely peaceful), to

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deliberately create a situation where the public is inconvenienced.

3. The Applicants/Intervenors seek kind indulgence of this Hon'ble Court to briefly bring to its notice some of the collusive acts of the Administration, the Home Ministry as well as the State of Uttar Pradesh in blocking alternate roads that are far away from Shaheen Bagh to deliberately cause traffic jams for commuters commuting between Delhi, Noida and Faridabad. Some of the blockages are as under:-

- A. With the G.D. Birla Marg being barricaded, vehicular traffic between Noida and Delhi could have passed through the Kalindi Kunj Mithapur Road that runs parallel to the G.D. Birla Marg. However, the Uttar Pradesh Police have barricaded access to this road by placing barricades around the Kalindi Kunj Bridge that connects Noida to Delhi.
- B. The other route from the Khadar Kalindi Kunj Road has been blocked near the Kalindi Kunj Metro Station by the Delhi Police.
- C. As a result, the commuters are left with no option but to use the Delhi Noida Direct flyover.

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4. The Applicants/Intervenors crave leave to place all the facts in detail before this Hon'ble Court.
5. It is pertinent to mention that the Shaheen Bagh protests are peaceful protests against the Citizenship Amendment Act, as well as discrimination by removing reservation for SC, ST, OBCs etc., and has the support of over 85% of the citizens which comprise of the Muslim Minority, SC, ST, OBC and other citizens who do not subscribe to the 'Manuvadi' ideology. The Shaheen Bagh protest is considered an iconic peaceful protest and has been replicated in most major cities and States of India.
6. The Applicants/Intervenors are responsible citizens of India. They are seeking intervention in the present petition as it is necessary to place all facts before this Hon'ble Court. This Hon'ble Court has been pleased to issue notice to the Central Government. Since the present Petition has been filed in collusion with the Central Government, who controls the police force within the Union territory of Delhi, and since the blocking of alternate routes are also done by forces under the Central Government, the Intervenors apprehend that the real facts will not be placed before this Hon'ble Court and that the Hon'ble Court may be misled into passing orders that will be used by the Central Government as a

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pretext to commit mass genocide of innocent women and citizens of this country. Therefore, in view of the above and in view of the fact that the Petition is collusive and can have a far reaching impact on human rights of the citizens of this Country, it would be in the interests of justice if this Hon'ble Court would be pleased to permit the Applicants/Intervenors to intervene in the present Petition and to place all the relevant material on the record before this Hon'ble Court.

7. In view of the aforesaid, the Applicants/Intervenors humbly seeks to be impleaded as a party-Respondents in the instant proceedings, for the protection of their Rights and in order to place all relevant facts which have a material bearing on the Petition being heard by this Hon'ble Court and will also have a bearing in the effective adjudication of the issues at hand.
8. The Applicants/Intervenors crave leave of this Hon'ble Court to add, alter or amend any of the above averments at a later stage, if so advised.
9. That no harm or prejudice would be caused to any party if the Applicants are permitted to intervene in the present petition and granted an opportunity to address this Hon'ble Court in the present proceeding.

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PRAYER:

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

- a) allow the present application and permit the Applicants to intervene in the present petition and place all the relevant facts and material before this Hon'ble Court; and
- b) permit the Applicants to make oral and written submissions in the instant petition; and
- c) pass such other or further order/s as it may deem fit and proper.

AND FOR THIS ACT OF KINDNESS, THE APPLICANTS/
INTERVENORS SHALL, AS IN DUTY BOUND, EVER
PRAY

FILED BY:

(MANSOOR ALI)

Advocate on Record
for Applicants/Intervenors

DRAWN AND SETTLED BY:

MEHMOOD PRACHA

ADVOCATE

DRAWN ON: 11.02.2020

FILED ON: 12.02.2020

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IN THE SUPREME COURT OF INDIA

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IN THE MATTER OF:

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Commissioner of Police & Ors.

.....Respondents

AND IN THE MATTER OF:

1. CHANDRA SHEKHAR AAZAD,
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R/O HARIJAN COLONY, GALI NO.2,
CHHUTMALPUR, P.S. FATEHPUR,
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S/O SHRI ZAFAR ABBAS NAQVI,
R/O G-32/1, SHAHEEN BAGH,
ABUL FAZAL ENCLAVE,
OKHLA, NEW DELHI 110025.

...APPLICANTS
(INTERVENORS)

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AFFIDAVIT

I, Wajahat Habibullah, S/o Late Enaith Habibullah, aged 74 years, R/o 529, Mount Kailash, Tower No.3, East of Kailash, New Delhi-110065, do hereby solemnly affirm and state as under:-

1. That I am Applicant/Intervenor No.2 in the instant application and being well conversant with the facts and circumstances of the case hence am competent and authorized to swear this affidavit before this Hon'ble Court.
2. The contents of accompanying Application(s) at pages ... to ..., have been drafted by my counsel under my instructions. I say that the contents thereof are true and correct to my knowledge and have been understood by me in vernacular and submissions of law are made therein as per legal advice and believed to be true and correct.
3. The Annexure A-1 to Annexure A-__ annexed along with the application are true and correct copies of their respective originals.

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4. The averments of facts stated hereinabove are true to my knowledge and no part of it is false and nothing material has been concealed thereof.



DEPONENT

VERIFICATION:-

Verified at New Delhi on this ___th day of February, 2020, I have read the above affidavit and having understood the contents thereof in vernacular. I say that the facts stated therein are true to my knowledge and belief and no part of it is false and nothing material has been concealed therefrom.



DEPONENT

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IN THE SUPREME COURT OF INDIA

CIVIL APPELLATE JURISDICTION

I.A. NO. _____ OF 2020

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IN THE MATTER OF:

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1. CHANDRA SHEKHAR AAZAD,
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CHHUTMALPUR, P.S. FATEHPUR,
DISTRICT SAHARANPUR, UTTAR PRADESH
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R/O G-32/1, SHAHEEN BAGH,
ABUL FAZAL ENCLAVE,
OKHLA, NEW DELHI 110025.

...APPLICANTS
(INTERVENORS)

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AFFIDAVIT

I, Bahadur Abbas Naqvi, S/o Shri Zafar Abbas Naqvi, aged 39 years R/o G-32/1, Shaheen Bagh, Abul Fazal Enclave, Okhla, New Delhi-110025, do hereby solemnly affirm and state as under:-

1. That I am Applicant/Intervenor No.3 in the instant application and being well conversant with the facts and circumstances of the case hence am competent and authorized to swear this affidavit before this Hon'ble Court on behalf of Intervenor No.1 as well.
2. The contents of accompanying Application(s) at pages ... to ..., have been drafted by my counsel under my instructions. I say that the contents thereof are true and correct to my knowledge and have been understood by me in vernacular and submissions of law are made therein as per legal advice and believed to be true and correct.
3. The Annexure A-1 to Annexure A-__ annexed along with the application are true and correct copies of their respective originals.

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4. The averments of facts stated hereinabove are true to my knowledge and no part of it is false and nothing material has been concealed thereof.


DEPONENT

VERIFICATION:-

Verified at New Delhi on this ___th day of February, 2020, I have read the above affidavit and having understood the contents thereof in vernacular. I say that the facts stated therein are true to my knowledge and belief and no part of it is false and nothing material has been concealed therefrom.


DEPONENT

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IN THE SUPREME COURT OF INDIA

IA — 2020
in
SLP (C) 2456 OF 2020

Amit Sahni

.... APPELLANT(S)

VERSUS

Commissioner of Police for.

.... RESPONDENT(S)

VAKALATNAMA

I, CHANDRA SHEKHAR AAZAD Applicant/Intervener in the above Appeal do hereby appoint and retain Mr. Mansoor Ali, Advocate, to act and appeal for me in the above Appeal and on my behalf to conduct and prosecute (or defend) the same and all proceedings that may be taken in respect of any application connected with the same of any decree or order passed therein, including proceedings in taxation and application for review, to file and obtain return of documents, and to deposit and receive money on my behalf in the said Appeal and in applications of review, and to represent me and to take all necessary steps on my behalf in the above matter. I agreed to ratify all acts done by the aforesaid Advocate in pursuance of this authority.

Accepted

Advocate Supreme Court

CC No. 2218

Dated


PETITIONER *

MEMO OF APPEARANCE

To,

The Registrar,
Supreme Court of India,
New Delhi.

Sir,

Please enter my appearance on behalf of the Petitioner in the above mentioned matter.

Dated this ___ day of February 2020.

Yours faithfully,

(MANSOOR ALI)

CC No. 2218

Advocate for the Intervener

Office/Chamber: 432, Patiala House,

New Delhi -- 110003

Ph. No. 9891271233

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IN THE SUPREME COURT OF INDIA

CIVIL APPELLATE JURISDICTION

Special Leave Petition (C) No.2456 of 2020

Amit Sahni

Petitioner(s)

VERSUS

Commissioner of Police & Ors.

Respondent(s)

VAKALATNAMA

I, Wajahat Habibullah, S/o Late Enaith Habibullah, Petitioner(s)/Intervenor(s) in the above Petition/Application do hereby appoint and retain **Mr. Mansoor Ali, Advocate on Record** of Supreme Court of India to act and appeal for me in the above Petition/Intervention and on my/our behalf to conduct and prosecute (or defend) the same and all proceedings that may be taken in respect of any application connected with the same of any decree or order passed therein, including proceedings in taxation and application for review, to file and obtain return of documents, and to deposit and receive money on my/our behalf in the said Petition/Intervention and in applications of review, and to represent me and to take all necessary steps on my/our behalf in the above matter. I/We agreed to ratify all acts done by the aforesaid Advocate in pursuance of this authority.

Accepted/Identified & Certified



PETITIONER(s)/

INTERVENOR(s)

Advocate Supreme Court

Memo of Appearance

To
The Registrar,
Supreme Court of India,
New Delhi.

Sir,

Please enter my appearance on behalf of the Petitioner(s)/Intervenors(s) in the above mentioned matter.

Dated this ___ day of February, 2020.

Yours faithfully,

(MANSOOR ALI)

CC No.2218

Advocate for Petitioner(s)/Intervenor(s)

432, Patiala House, New Delhi-110003

Ph.No.9891271233

TH

IN THE SUPREME COURT OF INDIA

CIVIL APPELLATE JURISDICTION

Special Leave Petition (C) No.2456 of 2020

Amit Sahni

Petitioner(s)

V E R S U S

Commissioner of Police & Ors.

Respondent(s)

V A K A L A T N A M A

I, Bahadur Abbas Naqvi, S/o Shri Zafar Abbas Naqvi, Petitioner(s)/Intervenor(s) in the above Petition/Application do hereby appoint and retain **Mr. Mansoor Ali, Advocate on Record** of Supreme Court of India to act and appeal for me in the above Petition/Intervention and on my/our behalf to conduct and prosecute (or defend) the same and all proceedings that may be taken in respect of any application connected with the same of any decree or order passed therein, including proceedings in taxation and application for review, to file and obtain return of documents, and to deposit and receive money on my/our behalf in the said Petition/Intervention and in applications of review, and to represent me and to take all necessary steps on my/our behalf in the above matter. I/We agreed to ratify all acts done by the aforesaid Advocate in pursuance of this authority.

Accepted/Identified & Certified


PETITIONER(s)/
INTERVENOR(s)

Advocate Supreme Court

Memo of Appearance

To
The Registrar,
Supreme Court of India,
New Delhi.

Sir,

Please enter my appearance on behalf of the Petitioner(s)/Intervenors(s) in the above mentioned matter.

Dated this ___ day of February, 2020.

Yours faithfully,

(MANSOOR ALI)
CC No.2218
Advocate for Petitioner(s)/Intervenor(s)
432, Patiala House, New Delhi-110003
Ph.No.9891271233