

SYNOPSIS

That the Petitioner filed this Public Interest Litigation for directing the respondents 1 to 4 to file the case of 600 billion U.S. dollars compensation in international court of Justice against People Republic of China on Covid 19.

That the International Court of Justice has constituted for hearing the disputes between the States. Common citizen could not file the Petition. So the Petitioner filed this Writ Petition as Public interest litigation.

That the International Court of Justice has no Jurisdiction to deal with Petition from individuals, only states can file the Petition. Article 93 (1) of the United Nations charter says all members of the United Nations are ipso facto parties to the statute of International Court of Justice but the same does not apply for a common citizen.

That COVID19 pandemic deliberately created by China as biological weapon against India. That so many

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People killed and economy destroyed by COVID19 pandemic crisis

LIST OF DATE AND EVENT

- 8.12.2019** The Corona virus had started in China, China announced the virus found in a market at Wuhan city.
- 21.12.2019** The China announced officially corona virus pandemic and said people are died it may originated from bats.
- 18.1.2020** The World Health Organization warn all countries about COVID19.

11.3.2020 The World Health Organization declared COVID19 is pandemic

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20.3.2020 The corona virus found everywhere in India. People are admitted hospitals and some of them died.

3.5.2020 In India over all confirmed cases 40,263 including 10,886 patients discharged after recovery and 1323 people died.

4.5..2020 Hence this Writ Petition

IN THE SUPREME COURT OF INDIA
CIVIL ORIGINAL JURISIDICITION
UNDER ARTICLE 32 OF THE CONSTITUTION OF
INDIA 1950
PUBLIC INTEREST LITIGATION
WRIT PETITION (CIVIL) No..... of 2020

IN THE MATTER OF:

K.K.Ramesh,

..... Petitioner

VERSUS

1. Union of India ,
Office of the Prime Minister
Through its Principal Secretary
South Block,
New Delhi – 01.

2. Union of India

Rep. by its Secretary,
Ministry of Law and Justice,
South Block,

New Delhi _ 01.

3. Union of India

Rep. by its Secretary,

Ministry of Health and Family Welfare,

North Block,

New Delhi _01.

4. Union of India

Rep. by its Secretary,

Ministry of social justice and empowerment,

Room no. 202, 2nd floor

C-wing, ShastriBhawan,

New Delhi 110001

..... Respondents

**WRIT PETITION UNDER ARTICLE 32 OF THE
CONSTITUTION OF INDIA IN THE NATURE OF A
PUBLIC INTEREST LITIGATION SEEKING AN
APPROPRIATE WRIT IN THE NATURE OF
MANDAMUS.**

TO,

THE HON'BLE CHIEF JUSTICE AND
THE OTHER COMPANION JUDGES OF
THE HON'BLE SUPREME COURT OF INDIA

HUMBLE PETITION OF THE
PETITIONER ABOVE NAMED

MOST RESPECTFULLY SHOWETH:-

1. That the present Writ Petition is being filed as Public Interest Litigation, under Article 32 of the Constitution of India by the petitioner seeking Issue a writ of mandamus or any other appropriate Writ or Order or Direction or any suggestion or observation or particularly in the nature of Writ, directing the respondents 1 to 4 to file the case of 600 billion U.S. dollars Compensation in International Court of Justice against People's Republic of China on covid 19.
2. That the Petitioner states the People's Republic of China had deliberately created biological weapon COVID19 against India and leaked every public places and killed Indian People, destroyed India economy.

3. That Petitioner states COVID19 is an extremely dangerous disease, it has an extremely aggressive nature, was designed to mutate from person to person, spreads very quickly and

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early, no vaccine exists yet on account of it being a new disease. Actually the COVID19 is biological weapon, not a disease and it had created by China against India.

4. That Petitioner states China biological weapon COVID19 making too harm in Indian society so many people killed, lot of people admitted hospital for treatment, crores people lost their jobs and destroyed India economy.
5. That Petitioner states many reputable people scientists and experts have this come to the conclusion that this crisis began when a Chinese biological weapon facility released the COVID19 virus into the India.
6. That Petitioner states on the COVID19 crisis around 7 crores migrates are stranded across India. Most of the migrates are daily labours

and poor backgrounds. All states, entire nation migrate workers have not provided food, shelter, medicines and financial supporting during the lockdown due to COVID19 pandemic. Either Union of India or States Governments not offered reimbursement of

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funds being spend on the standard migrate workers.

7. That Petitioner states Union of India or States had not effectively develop mechanisms for the safe movement of stranded migrates back to their village, most of the migrates workers are breadwinner of entire family has abounded.
8. That Petitioner states People have moved long distances for job in which they have neither security of empowerments not proper housing. Losing a job, even temporarily, means starvation. In the present COVID19 situation, the loss is temporary or permanent but there is no knowing how soon the pandemic would

end and the old job or a new one become available.

9. That Petitioner states there are large number of People is this COVID19 pandemic situation trapped in Delhi, Mumbai, Bangalore and all other major cities.
10. That Petitioner states United Nation's LabourBody has warned about 400 million Indian People working in the informal economy are at

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risk of falling deeper into poverty due to the COVID19 crisis.

11. That Petitioner states Lakhs to People forced to walk miles to reach home due to the lockdown. That 4 million plus homeless people in India have had no way of making a living due to COVID19 pandemic crisis, with streets deserted, they now even have no place for begging.
12. That Petitioner states COVID19 pandemic effect the economic consequences of an

extended business shutdown could swell the rank of India poorest to 915 million from 60 %, the proportion of people below the poverty line could increase to 68 per cent, a situation seen in the country more than a decade ago much of the Indian government effects to mitigate poverty over the years could be negated in a matter of just a few months.

13. That Petitioner states imposing lockdown due to COVID19 on 1.3 billion people was always going to be challenging. The movement of

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restriction will prove economically devastating for India's poor, who live in its vast rural areas.

14. That Petitioner states more People will die of hunger than the pandemic, unless the Government wakes up to the situation and addresses the issue on a war footing.
15. That Petitioner states the United Nations 2019 multidimensional poverty index (MPI) about India, a more holistic measure of poverty that

look at deprivation through the lens of nutrition, health indicators, schooling, sanitation and access to essential amenities puts the number of poor in India at 369 million. That this numbers would sharp increase on COVID19.

16. That Petitioner states the World Bank warned, COVID19 pandemic will hit India very hard and the significant gains mace in poverty alleviation are likely to be wiped out. The World Bank estimating that growth will fall to a range between 1.8 per cent in 2020. The report warned of a worst case scenario in which the

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country would experience a negative growth rate this year.

17. That Petitioner states MOODY has projected India's economic growth at 0.2 per cent in 2020, marking a sharp downward revision compared to its projection of 2.5 per cent in march this year. That MOODY said economic

costs of COVID19 crisis amid the near shutdown of the Indian economy are accumulating rapidly.

18. That Petitioner states the FITCH rating said India's sovereign rating of BBB could come under pressure with a deteriorating fiscal outlook arising from weaker growth due to the COVID19 outbreak, further deterioration in the fiscal outlook as a result of lower growth or fiscal easing could pressure the sovereign rating in light of the limited fiscal headroom India had when it entered this COVID19 pandemic crisis.

19. That Petitioner states COVID19 originated Wuhan, China, the epicentre of the outbreak but the COVID19 has not spreads the China cities like Beijing, Shanghai, Shenzhen,

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Wenzhon and other parts of China. That COVID19 travelled to some thousands K.M to India and other continentals.

20. That Petitioner states the first case of COVID19 had identified in Wuhan city, China

in December 2019 and over all confirmed cases on the China 82.708 including 77.713 patients discharged after recovery and 4.633 people died of the disease COVID19 is not true. That none of the China people died due to COVID19 pandemic and any people had not treated for COVID19 pandemic in China. That China made long lockdown in only Wuhan city for misleading India and whole world.

21. That Petitioner states China claim COVID19 originated in bats passed into pangolin is not believable. That the COVID19 found in the marketWuhan, China , whenever bats had not sold in the market and according scientists, the characteristic of the virus that evolved to enable it to latch on to human cells. That pangolin not able to develop this characteristic. That pangolin as an intermediary altogether,

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because samples of similar virus taken from pangolin lacked a chain of amino acids seen in the virus now circulating in humans.

22. That Petitioner states China claim the “” virus cannot be manmade and never believed that human have the capability at this time to create such virus “” is big lie and misleading India and whole world.
23. That Petitioner states China deliberately trying to misled India and whole world without having any evidence or knowledge about the virus that originated from animals.
24. That Petitioner states so many countries and its leaders openly expressed China created biological weapon of COVID19 and not originated from animals. That American president said that he have evidence COVID19 pandemic created biological lab in China.
25. That Petitioner states COVID19 pandemic was designed by China to be a very effective and catastrophic biological warfare weapon to kill mass population in India. That the Wuhan

26. That the petitioner stated that petitioner not sent any representation to respondents, remedy rely up on only this Hon'ble court. That the petitioner state that the petitioner address is K.K.Ramesh,

27. That the petitioner occupation states that is own business as ink sell and the most time service to people and

29. **Cause of action** that cause of action is rest of the country people living with stress after 8.12.2019. if it is

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continue the entire country will suffer, people will die.

30. That the petitioner have not any personal interest or personal motive on file this Public Interest Litigation.

31. That the petitioner have not any civil and criminal and Revenue litigation, involving the petitioner or any of the petitioner which has or could have a legal nexus with the issue involved in the public interest litigation.

32. That the petitioner not filed similar petition before any court or Hon'ble High Court and the Hon'ble Supreme Court.

33. That the petitioner stated that nature of injury is for all states people those are suffering with stress due to corona virus crisis and economy destroyed people have not money for food.

A. Because the Respondents is an arbitrary manner without proper perusal of the records and without proper application of mind about people grievances and made discrimination by the way of creating starvation, poverty .

B. Because the Respondents are without following the basic principles of Natural justice and violate of Article 21 of the Indian Constitution.

C. Because one citizen could not file the case in International Court of Justice. That only states can file the Petition. The Court has no Jurisdiction to deal with Petition from individuals. Article 93(1) of the United Nation charter says “” all members of the united nations are ipso facto parties to the statute of

International Court of Justice but the same does not apply for a common citizen “” .

D. Because 1984 the Biological Weapon Convention ,
China also agreed the prohibition of the development,
production and stockpiling of Biological and Toxin
Weapons.

E. Because the COVID19 created by China laboratory.
There strongly evidence that COVID19 originated
Wuhan Institute of Virology.

F. Because Union of India failed to test and quarantined
the People coming from aboard and now trying to
blame citizen and making unbearable difficult to
people

G. Because COVID19 killed so many Indian people and
destroy economy. Indian People are facing very
difficult to food and other conveniences .

PRAYER

In the facts and circumstances of the case, as mentioned above, it is, therefore, most humbly prayed that this Hon'ble Court may graciously be pleased to ;-

- (A)** Issue a writ of mandamus or any other appropriate Writ or Order or Direction or any suggestion or observation or particularly in the nature of Writ, directing the respondents 1 to 4 to file the case of 600 billion U.S.dollars Compensation in International Court of Justice against People's Republic of China on COVID19.

(B).Pass any other appropriate reliefs, orders, or directions which may deem fit and just in the nature and circumstances of this case.

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

Drawn by.C.R.JayaSukin

FILED BY :

Advocate for the petitioner

Narenderkumarverma

Filed on:4.5.2020

IN THE SUPREME COURT OF INDIA
CIVIL ORIGINAL JURISDICTION
CIVIL WRIT PETITION (PIL) NO. _____ OF 2019

IN THE MATTER OF:

K.K.Ramesh Petitioner

Versus

Union of India&Ors Respondents

AFFIDAVIT

I, K.K.Ramesh,

i do hereby solemnly affirm and sincerely affirm
and state on oath as follows :

1. I am the petitioner in the above mentioned Writ petition and I am well acquainted with the facts of the case, as such I am competent to swear this affidavit.

2. That I have read the averments in paras to of the petition for writ petition pages 1 to 15 and the facts stated in pages (B to D) the list of dates and IA's and state that they are true to the best of my knowledge and belief.

- 3.I say that the Annexures filed with the writ petition are truecopies of their respective originals.

4. I have not any personal interest and any motive file this Civil Writ Petition (PIL).

DEPONENT

VERIFICATION

Verified at New Delhi on this the 5 day of may2020. I the above named deponent to hereby verify that the contents of the above affidavit are true and correct to the best of my knowledge and belief. No part of it is false and nothing material has been concealed there from.

ATTESTED

DEPONENT

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To.

The Registrar,
Supreme Court.

The Matter Of

K.K.RAMESH Vs UNION OF INDIA

Sir,

We filed the Writ Petition (PIL). I am the Advocate for above matter. I could not able to pay the Court fee, notary in affidavit, welfare stamp in Vakalatunamadue to lockdown. I undertaking that I would pay the Court fee and welfare stamp in Vakalatunamaafter the lockdown left. Kindly accept it.

The above matter is Public interest litigation regarding COVID19. People are die and so many people are suffering. The matter is extreme urgency. I request you kindly list the matter as urgency.

Thank you.

5.5.2020. Narender Kumar Verma

