

**IN THE HIGH COURT OF JUDICATURE AT BOMBAY
IN ITS CRIMINAL APPELLATE JURISDICTION
IN ITS JURISDICTION UNDER ARTICLE 226 OF THE CONSTITUTION
OF INDIA**

WRIT PETITION NO. OF 2020

Suraj Singh Thakur & Anr.

...Petitioners

V/s

Senior Police Inspector Ghatkopar
Police Station & Ors.

...Respondents

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Office Note, Office Memorandum of Coram, Appearances, Court Orders of directions and Prothonotary's Orders.	Court's or Judge's Order
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2.	19.04.2020	Home Minister of Maharashtra tweeted that the members of the mob were of the same religion as those murdered, and that there was no communal angle involved.	C	14
3.	20.04.2020	Several news outlets reveal that the Palghar mob lynching incident has been falsely communalised on social media.	B	7-13
4.	21.04.2020	Respondent No. 3 airs the " <i>Puchta Hai Bharat</i> " segment on his TV network with an evidently communal agenda despite unfolding of findings to the contrary.	E	19
5.	22.04.2020	Home Minister of Maharashtra publicly released a list of names of the members of the mob who were arrested.	D	15-18
6.	22.04.2020	Petitioner seeks to file FIR against Respondent No. 3 with the Sr. Police Inspector at Ghatkopar Police Station.	A	1-3

B. MAIN POINTS TO BE URGED

- a) That the Respondent No.3 in the video repeatedly states that the victims were lynched for being Hindus, leading to conclusions that there was a communal angle to the attack and that the mob was of a different religion than the victims, which clearly was not the case;
- b) That the Respondents Nos. 3 and 4 are twisting the actual facts of the matter and spreading fake news by implying that the perpetrators were of another community than the victims whereas it was already established days in advance that the accused were of the same religion as the victims;
- c) That the Respondents Nos. 3 and 4 defied all clarifications and statements made by the State Government and all other news outlets regarding the nature and religion of the attack and the goons respectively and went ahead regardless to propagate hatred and lies;
- d) That although the integral value of freedom of speech and the press is essential to a democracy like India, such freedom and tenets are blatantly misused and violated by the Respondents Nos. 3 and 4 by presenting distorted and partisan viewpoints.

C. ACTS AND CITATIONS

1. Indian Penal Code, 1860

2. Constitution of India
3. Other Acts and Citations, at the time of arguments.



Advocate for Petitioner

**IN THE HIGH COURT OF JUDICATURE AT BOMBAY
CRIMINAL APPELLATE JURISDICTION
WRIT PETITION NO. _____ OF 2020**

District: Mumbai

In the matter of:

Article 226 & 227 of the
Constitution of India;

AND

In the matter of:

Article 14, 19 and 21 of the
Constitution of India;

AND

In the matter of:

Section 117, 120B, 153,
153A, 295A, 298, 500, **504**,
505 and 506 of the Indian
Penal Code, 1860 r/w the
Information Technology Act,
2000;

1. Suraj Singh Thakur,)
(Original Complainant))
Rajiv Gandhi Bhavan,)
Ensa Hutments,)
opp. Azad Maidan Police Station,)
Mumbai – 400001)

Petitioner No.1

2. Bhai Jagtap,)
01, Munshi Chambers, 3rd Pasta Lane,)
Next to Kailas Parbat Restaurant,)
Opp. Colaba Sweet Mart, Colaba,)
Mumbai – 400005)

Petitioner No. 2

Versus

1. Senior Police Inspector)
Ghatkopar Police Station)
LBS Road, Chirag Nagar,)
Ghatkopar (W), Mumbai)
Maharashtra, 400086)

Respondent No.1

2. State of Maharashtra)
Through Principal Secretary)
Home Department, Govt. of Maharashtra,)
Mantralaya, Madam Cama Road,)
Hutatma Rajguru Chowk, Nariman Point,)
Mumbai, Maharashtra – 400032)

Respondent No.2

3. Mr. Arnab Ranjan Goswami)
Managing Director, Editor-in-Chief,)
Co-Founder Republic TV,)
Bombay Dyeing Compound,)

Worli, Mumbai – 400018)

Respondent No. 3

4. Republic TV)

Bombay Dyeing Compound,)

Worli, Mumbai – 400018)

Respondent No. 4

5. Union of India,)

Through Secretary,)

Ministry of Information & Broadcasting)

Room No. 552, A-wing,)

Shastri Bhawan, New Delhi – 110001)

Respondent No. 5

To,

The Hon'ble Chief Justice &
Puisne Judges of the Hon'ble
High Court of Judicature at Bombay

The Petition of the
Petitioners abovenamed

MOST RESPECTFULLY SHEWETH:

1. The Petitioners are approaching this Hon'ble Court to urge the filing of an FIR against Respondents Nos. 3 and 4 for promoting enmity between different groups on grounds of religion (even though it was well known that the members of the mob that committed the Palghar incident were of the same religion as the victims) and to restrain Respondents Nos. 3 and 4 from airing their programs or speaking on any media platforms until appropriate and thorough investigations are undertaken and concluded in this regard. Annexed hereto and marked as '**Exhibit A**' is a true copy of the Complaint by the Petitioner No. 1. Annexed hereto and marked as '**Exhibit A-1**' is a true typed copy of Exhibit A.

2. The Petitioner No. 1, the original complainant, is the Maharashtra State Vice President of the Indian Youth Congress, the youth wing of the Indian National Congress Party. He is also the Ex-State President of the National Students' Union of India (NSUI).
3. The Petitioner No. 2 is a Member of the Maharashtra Legislative Council and member of the Indian National Congress. He is a social activist, trade unionist and is deeply concerned with and involved in working towards maintaining communal peace and harmony, and working towards national interest.
4. The Respondent No. 1 is the Senior Police Inspector of the Ghatkopar Police Station with whom the complaint was filed by the Petitioner No.1.
5. The Respondent No. 2 is the State of Maharashtra represented through the Principal Secretary of the Home Department.
6. The Respondent No. 3 is Mr. Arnab Goswami, Managing Director, Editor-in-Chief, and Co-Founder of Respondent No. 4 Republic TV.
7. Respondent No.4 is an Indian television news channel co-founded by Respondent. No. 3.
8. The Respondent No. 5 is the Union of India represented through the Secretary of the Ministry of Information & Broadcasting.
9. The Petitioners submit that on 21.04.2020 Respondents Nos. 3 and 4 have aired a segment called "*Puchta Hai Bharat*" on their Republic TV channel in which they unabashedly attempt to paint the recent Palghar mob lynching incident as a political and religiously backed phenomenon. Despite ongoing investigations as well as government statements, and several news reports released days before the program was aired, categorically stating that the mob that lynched the Hindu Monks were also Hindus themselves, that there was no religious angle to the lynchings, and that the mob committed the heinous crimes due to fake news and rumours re. child kidnappers and thieves, the Respondents Nos. 3 and 4 openly conducted a fierce and propaganda-heavy "debate" aiming to falsely communalise the event by making direct and indirect accusations of religious and political motivation behind the Palghar tragedy, clearly leading viewers to draw the conclusion that the mob lynching was committed against Hindu saints by minority

religious groups like Muslims and/or Christians, even though on the 19th of April 2020 itself the Home Minister of Maharashtra had clarified that the mob and victims were both of the same religion, and on the 20th of April 2020, all news anchors and news outlets (except Respondents Nos. 3 & 4) clearly clarifying in unambiguous terms that the mob lynching was committed by members of the same religion as the victims, and there was no religious angle to the same.

10. The brief facts that give rise to this instant petition are as under:

11. A mob lynching took place at Gadchinchale village in Palghar district during the late night and early morning hours of 16.04.2020 and 17.04.2020, where a group of two Hindu monks and their driver were mercilessly beaten to death by an unruly mob of the same religion as the monks, in the presence of helpless police officers.

12. The ensuing days saw a frenzy of social media posts peddling fake news and propaganda attempting to communalise the incident, especially targeting the Muslim and Christian communities of conducting the lynching. However, by 19.04.2020, government officials as well as several news outlets had reported and clarified that there was no communal involvement in the event and that the lynching was a result of mistaken identity of the victims with rumours ranging from the victims being kidnappers to thieves to organ harvesters. Annexed hereto and marked as '**Exhibit B**' is a true copy of one such news article describing the array of false communal twists to the story.

13. On 19.04.2020, the Home Minister of Maharashtra in a Tweet said that the incident had no communal angle and that the victims and the accused were not from different religions. Annexed hereto and marked as '**Exhibit C**' is a true copy of the said Tweet dt. 19.04.2020. This was subsequently affirmed on 22.04.2020 in a follow up Tweet by the Home Minister releasing a list of 100-odd names of the members of the mob who were arrested in connection with the lynching. Annexed hereto and marked as '**Exhibit D**' is a true copy of the said Tweet dt. 22.04.2020.

14. On 21.04.2020, the Respondent No. 3, Mr. Arnab Ranjan Goswami - Managing Director, Editor-in-Chief, Co-Founder of Republic TV, hosted his "Puchta Hai Bharat" segment on his network. Annexed hereto and marked as '**Exhibit E**' is a true copy of the link to the video uploaded by the Republic TV channel on YouTube. This said segment attracts a wide audience both

domestically and globally. In his program on the said date, the Respondent No. 3 conducted a debate wherein he invited guests from different religious and political backgrounds to speak on the Palghar Mob Lynching incident that took place on the night and early hours of 16.04.2020 – 17.04.2020 respectively.

15. The Respondent No. 3 initiated his debate by highlighting the lynching incident as a political and religious ploy. Despite information announced by the State Home Minister at Exhibit B and news articles highlighting the absence of any communal plot in the mob lynching at Exhibit C, the Respondents Nos. 3 and 4 blatantly disregarded such verified information and tried to blame the incident on minority religious groups such as Muslims and Christians. They persistently suggested that the victims of the attack were killed for being Hindus, for wearing saffron, and for being monks, even though by the 19th of April 2020 it was already well known that the mob and the victims were of the same religion, and there was no religious angle to the horrible lynching. The Respondents Nos. 3 and 4 intentionally engaged in outright lies to paint minority religions in a negative light. Repeated claims by the Respondent No. 3 such as “*award wapsi gang-mombatti gang santo ke mob lynching par khamosh hai*” (*the award-returning, candlelight gang is silent on the mob lynching of Hindu saints*), “*mob lynching ko mazhab ke chashme se dekha jaata hai*” (*mob lynching is merely viewed through the lens of religion*), and rhetoric questioning such as “*kya gerua pehenna paap hai?*” (*is wearing saffron a sin?*) openly indicates that Respondents Nos. 3 and 4 portrayed the issue at hand with religious and political overtones which can have disastrous social implications at a time of an unprecedented global pandemic. Such rhetoric is particularly dangerous when there is absolutely no evidence of communal or religious influence in the dreadful mob lynching. The Respondents Nos. 3 and 4 knowingly and purposefully attempted to misleadingly portray that the victims of the mob lynching were targeted due to their Hindu religion, leading viewers to deduce and believe that the mob would have to be of another religion, such as Muslim or Christian.

16. The Respondent No. 3 engaged not only in countless unfounded religious and political insinuations, but also in several personal jabs against some of his own guests and against Mrs. Sonia Gandhi, the Congress Party leader. The statements made by the Respondent No. 3 are nothing short of derogation, instigation, and defamation aimed towards individuals and

communities that do not see eye to eye with him. This is a tactic employed and monopolized by the Respondent No. 3 and is visible in most of his TV debates and segments. By incessantly loud mouthing over his guests and also encouraging them to do the same, the Respondent No. 3 effectively portrays his debates as dramas for TRP by antagonizing, instigating, and intimidating the guests who differ in views with him. The Respondent No. 3 often also denies most of his guests the opportunity to even voice themselves, thereby rendering his invitations as utterly pointless. Even if a chance to speak is given, the moment the Respondent No. 3 feels like what is being said is against his agenda or stands to hurt his viewership, he employs his top-of-the-lungs shouting maneuvers.

17. The Respondent No. 3 did not shy from using utterly bizarre and disgraceful language and attacks in his segment on 21.04.2020. Claims such as *“Italy waali Sonia Gandhi/Antonia Maino...khush hai ki santo ko sadko pe mara gaya”* (Italy’s Sonia Gandhi is happy that Hindu saints were slaughtered on the streets) aimed to cause political uproar and attacks on his guests such as *“aap bik chuke hai”* (You have been sold), *“Aap acharya kehne laayak nahi hai”* (You do not deserve to be called a priest) are grossly inappropriate statements meant plainly and obviously to incite animosity and suspicion in the minds of innocent and gullible audience members. Such use of belligerent and aggressive language is in itself evidence that the intentions of the Respondent Nos. 3 and 4 is to spread communal disharmony with the view of gaining TRP.

18. At a time when not only the nation, but the whole world is tangled in a unified war against an invisible enemy, the Respondent No. 3 deems it necessary and appropriate to engage in cheap politics and tactics to benefit his own TV network and TRP. Also at a time when sentiments around religion and politics are especially sensitive in light of recent social and political events of the past few months, as well as efforts to curb the dissemination of fake news and propaganda, the Respondent No. 3 finds it acceptable to further weaken the links that hold this country together by harping on religious and political conspiracy theories. This is especially worrisome due to the fact that days before the segment aired it was already clear that the mob and victims belonged to the same religion, and there was absolutely no religious angle to the violence.

19. The verbal attacks and declarations of the Respondents Nos. 3 and 4 are prejudicial to the maintenance of order in society that is especially necessary and significant during the COVID-19 lockdown period. Further, such acts are highly likely to disturb the public tranquility by promoting communal insecurity and feelings of unnecessary ill-will, especially with allegations that are downright baseless and unproven. To reiterate, such drama is exceptionally toxic when there is not a single shred of communal, religious or political involvement in the murders, i.e. as stated several times, the mob and victims belonged to the same religion, and there was absolutely no religious angle to the violence.
20. The Petitioners are even more deeply aggrieved by the lynching than the Respondents Nos. 3 & 4, who are attempting to use the incident for personal gain and profit (TRP). And thus have already demanded the strictest action against the members of the mob that committed the heinous Palghar lynching.
21. The Petitioners fully stand by and support the vital tenets of a democracy that include the freedom of speech and the freedom of the press. However, the journalistic and reporting standards and methods adopted by the Respondents Nos. 3 and 4 are contrary to the spirit of such freedom and is not representative of such freedom as is employed responsibly by all other journalists and news agencies. The means utilized by the Respondents Nos. 3 and 4 are downright unethical and abusive of the true notion of freedom of speech and the press.
22. Aggrieved by the actions of the Respondents Nos. 3 and 4, the Petitioners seek relief from this Hon'ble Court on the following grounds which are without prejudice to each other.

GROUND

- A. That that Respondent No. 3 in the video at Exhibit E of this Petition repeatedly states that the victims were lynched for wearing "gerua" (Saffron). Such a statement will lead any logical person to conclude that the lynch mob were of a different religion. Whereas it was already clear days before that the mob was of the same religion as the victims.

- B. That the Respondent No.3 in the video repeatedly states that the victims were lynched for being Hindus. This will lead any logical person to conclude that the mob was of a different religion. Whereas it was already clear days before that the mob was of the same religion as the victims.
- C. That guests on the show repeatedly reaffirm that the victims were killed for being Hindu, wearing Saffron and/or being Hindu religious leaders, implying that the attack was conducted or sanctioned by another religion. Whereas it was already clear days before that the mob was of the same religion as the victims.
- D. That one Guest of the video even goes as far as to suggest that if one listens to the mob lynching recording carefully, one will hear words which indicates the name/religion of the perpetrators of the lynching. This is a clear endorsement of the fake news being peddled that “Shoaib bas!” (“Shoaib stop!”) was said in the recording of the lynching, whereas reports clearly find that “oye bas!” (“hey stop!”) was in fact being uttered.
- E. That the Respondent No. 3 in the video (11:40) states that Mrs. Sonia Gandhi supports the killings, and that she will write a letter to “Italy” stating that she has gotten Hindu priests killed. Statements like these will lead any logical person to conclude that Mrs. Gandhi somehow orchestrated the killings.
- F. That Respondent No.3 in the video states that (22:47) the policemen had received “supari” (contract killing). This will lead any logical person to conclude that the mob lynching was premeditated and state/police sponsored. Whereas it was already clear days before that the mob was acting on false rumours of kidnapping and thievery.
- G. That Respondent No. 3 in the video repeatedly states that if the victims had been either Muslim or Christian religious heads, Mrs. Sonia Gandhi, the Congress Party, and other members of Civil Society and Celebrities would have protested, but since the victims were Hindu priests, there is silence. This completely misses the point that while the lynching was heinous in nature, the victims were not at all murdered for their religion. Whereas in the video - Respondents Nos. 3 & 4 clearly want their

viewers to believe that the victims were murdered for their religion (Hinduism), and that they were murdered by either Muslims or Christians.

- H. That not once in the entire video does any person even remotely suggest that the perpetrators were themselves Hindus too, since that would lead to the viewers concluding that there could not possibly have been a religious angle to the killings.
- I. That on 19.04.2020 (two days before the video was aired), the Home Minister of Maharashtra had tweeted that the members of the mob were of the same religion as those that were murdered.
- J. That on 20.04.2020 (one day before the video was aired), several news outlets had reported that the religion of the mob, and of those murdered was the same.
- K. That days before the video of the Respondents Nos. 3 & 4 aired, it was concluded that the victims had been killed by members of their own religion in a case of mistaken identity, due to false rumours being spread that the victims were child kidnappers and/or thieves and that there was no religious angle to the crime whatsoever.
- L. That on a viewing of the video one will easily come to the conclusion that its only intention was to create the impression that the men were killed by either Muslims or Christians, and additionally that (through some unknown and bizarre logic) for this reason the Congress Party and its leaders are supporting the killing.
- M. That neither the Respondent No. 3, nor any of his guests offer any explanation whatsoever as to why orchestrating the killings of monks of the largest religious denomination, would benefit a political party or its leaders that are dependent on Hindu votes for survival. However there cannot be any logical explanation for the same, which is why none was ever even attempted to be offered.
- N. That the Respondent No. 3 in the video repeatedly affirms through statements and rhetorical questions - that the Congress Party, its leaders,

celebrities, and others would have more strongly opposed the killings if the victim had been a Muslim or Christian religious leader. However the real question should have been “*would the reaction have been the same if Muslim or Christian religious leaders had been lynched by members of their own religion, in a case of mistaken identity?*”. This question was not asked because the reply from the viewers would be “*yes it would*”. Which would clearly go against the agenda of the Respondents Nos. 3 & 4.

- O. That in the video Mr. Navin Kohli even makes vague allegations regarding the grant of visas to foreigners to attend the Tablighi Jamaat. However visas are always issued by the Union Government (controlled by his party/BJP). Additionally, the State of Maharashtra refused permission for the Jamaat to be held in Mumbai, but subsequently the Union Government granted permission for it to be held in Delhi.
- P. That at a time when the country and the whole world is facing an unprecedented situation, where unity, and joint efforts are the need of the hour, the absurd actions of the Respondents Nos. 3 and 4 to create religious disharmony, especially when the incident didn't even contain members of different religions, is dangerous and has severely hurt national interests.
- Q. That creating religious tensions and animosity especially through fake news and falsely labelling the accused as members of religions which they are not, will greatly hurt national interests both in the fight against COVID-19 and even in the overall national interests of the country for decades to come.
- R. That the interests of the Nation should not be allowed to be put behind the private interests (TRP and profits) of the Respondents Nos. 3 & 4. In fact, the hypocrisy of the Respondent No. 3 is amply clear (10:00) when he blurts out how mainstream “media” reporting is largely influenced by political and TRP gains.
- S. That if the Respondent Nos.3 and 4 are allowed to continue airing their programs, there will be a huge loss to National interests, efforts to combat the COVID-19 pandemic, economic growth, and stability.

- T. That if the Respondent Nos.3 and 4 are allowed to continue airing their programs, there will be a huge risk of turning our country into a Hindu version of Pakistan or any other country where religious leaders exert massive control, and minorities are targeted. The whole world is well aware of the economic and social statuses of such countries, and it is imperative that India be protected from turning into the same.
 - U. That the Respondents Nos. 3 and 4 are attempting to misuse the tenets of freedom of speech and freedom of the press in a highly immoral way by employing fear mongering tactics and pandering to its audience.
 - V. That the Petitioners are deeply respectful of the value of factual and investigative journalism and the role that media has played in ensuring that the strands of democracy are kept intact, however the present instance is a clear violation of such values of journalism.
 - W. That the Petitioners believe that now, more than ever, when people are confined to their homes, there is a greater responsibility placed on the media to ensure that they inform the public on the basis of verified facts and not inflame public sentiment by misrepresenting evidence or unfairly manipulating evidence to stir communal hatred and skepticism.
 - X. That the actions and statements of the Respondents Nos. 3 and 4 are grossly violative of sections 117, 120B, 153, 153A, 295A, 298, 500, 504, 505 and 506 of the Indian Penal Code, 1860.
 - Y. That for these reasons it is absolutely necessary that an FIR be registered against the Respondent No. 3 and the managers of Respondent No. 4.
 - Z. That despite a Complaint being filed with the Respondent No. 1, no FIR has yet been registered against the Respondent No. 3 and Respondent No. 4 managers.
23. The Petitioners crave leave to produce other relevant documents, statements, letters, and/or papers, to support their case, as and when required, and with the prior permission of this Court.

24. There is no delay or laches in filing this Petition. The present petition is not barred by limitation.
25. No other Petition has been filed by the Petitioners in respect of the subject matter of this Petition either before this Court or in the Supreme Court of India.
26. The cause of action has arisen in Mumbai. The Petitioners are aware that the studio of the Respondents Nos. 3 and 4 is in Mumbai from where their program has been aired, the Petitioners are domiciled in Mumbai and watched the video/program in Mumbai, and that therefore this Hon'ble Court has jurisdiction to consider this Petition and decide the same.
27. The Petitioners also crave leave to add, alter, amend, delete and modify the contents of this Petition, if so be needed, with the prior permission of this Court.
28. The Petitioners have annexed necessary Court fees of Rs. 500 as is prescribed / applicable for filing this Petition.
29. This petition is being verified by the Petitioner No. 1 Mr. Suraj Singh Thakur.

Prayers

In light of the above the Petitioners hereby pray that this Hon'ble Court be pleased to:

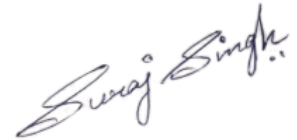
- a) Grant/direct a Writ of Mandamus or any other appropriate writ/order to the Respondents Nos. 1 & 2 to register an FIR against the Respondent No. 3 and the managers of Respondent No. 4, and to begin investigations immediately;
- b) In the interim and pending the hearing and final disposal of the present petition, the Respondent No. 3 be banned from speaking on any television channel or online platform until the investigation against him is concluded;

- c) In the interim and pending the hearing and final disposal of the present petition, the Respondent No. 4 be banned from airing any program and/or be taken off the air, until the investigations against its managers are concluded;
- d) for costs of this petition;
- e) for such other and further reliefs in favour of the Petitioners and which may also meet the ends of justice.

For this act of kindness, the Petitioners are forever duty bound to pray.



Mr. Rahul Kamerkar,
Adv. For the Petitioners



Petitioner No. 1
Suraj Singh Thakur



Petitioner No. 2
Bhai Jagtap

VERIFICATION

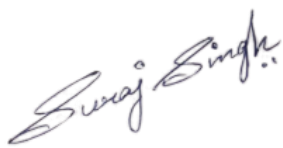
I, Suraj Singh Thakur, the Petitioner No.1 abovenamed, do hereby state on solemn affirmation that whatever has been stated by me in the above mentioned paras is true and correct, is stated on information, and I believe the same to be true.

Solemnly affirmed at Mumbai)

Dated this 23rd day of)

April, 2020)

Identified and explained by me;)



(Petitioner No. 1)

Suraj Singh Thakur



(Petitioner No. 2)

Bhai Jagtap

Identified by me:



Advocate for Petitioner

5. Union of India,)
Through Secretary,)
Ministry of Information & Broadcasting)
Room No. 552, A-wing,)
Shastri Bhawan, New Delhi – 110001)

Respondent No.5

To,
The Registrar,
High Court (A.S), Criminal Side

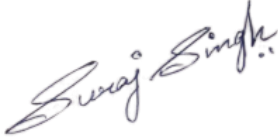
Respected Sir,

VAKALATNAMA

We, the Petitioners above- named, do hereby appoint Mr. Rahul Kamerkar, Advocate, to act, appear and plead on our behalf in the above-mentioned matter.

In witness whereof we have set and subscribed our hands to this writing at Mumbai.

Dated this 23rd day of April 2020



Petitioner No. 1
(Suraj Singh Thakur)



Petitioner No. 2
(Bhai Jagtap)

Accepted by Me:



For Petitioner
Mr. Rahul Kamerkar
402, Yusuf Building,
Flora Fountain,
Mumbai 400 001.
Advocate Code: I15455
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