

**IN THE HIGH COURT OF DELHI AT NEW DELHI
(EXTRAORDINARY WRIT JURISDICTION)**

Writ Petition (Civil) No. _____ of 2020

(IN THE MATTER OF PUBLIC INTEREST LITIGATION)

IN THE MATTER OF:

Shobha Gupta & Ors.

...PETITIONERS

VERSUS

Union of India & Ors.

...RESPONDENTS

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New Delhi

PETITIONERS IN PERSON

Shobha Gupta, Rajesh
Sachdeva

Dated

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NOTICE OF MOTION

Please take note that the above noted matter will be listed on ___/___/2020 before the Hon'ble Court. It is, therefore, requested to you to please enter your appearance on the said date.

New Delhi

PETITIONERS

Shobha Gupta, Rajesh
Sachdeva

Dated

**IN THE HIGH COURT OF DELHI AT NEW DELHI
(EXTRAORDINARY WRIT JURISDICTION)**

Writ Petition (Civil) No. 2945 of 2020

CM Petition No. _____ of 2020

(IN THE MATTER OF PUBLIC INTEREST LITIGATION)

IN THE MATTER OF:

Shobha Gupta & Ors.

...PETITIONERS

VERSUS

Union of India & Ors.

...RESPONDENTS

MEMO OF PARTIES

1. Ms. Shobha Gupta

Advocate

C-35, LGF, South Ex. – II

New Delhi

...Petitioner No. 1

2. Mr. Rajesh Sachdeva

Advocate

35, Lawyers Chambers

Supreme Court of India
New Delhi ...Petitioner No. 2

3. Mr. Anubhav Singh
Advocate
C-35, LGF, South Ex – II
New Delhi ...Petitioner No. 3

VERSUS

1. Union of India
Through Ministry of Law and Justice
4th Floor, A-Wing, Shastri Bhawan
New Delhi – 11000 ...Respondent No. 1
2. Ministry of Health and Family Welfare
Nirman Bhavan
Near Udyog Bhavan Metro Station
Maulana Azad Road,
New Delhi – 110011 ...Respondent No. 2
3. Government of NCT of Delhi
Through Chief Secretary
A-Wing, 5th Floor, Delhi Secretariat
New Delhi-110113 ...Respondent No. 3

4. Lt. Governor of Delhi
Raj Nivas Marg,
Ludlow Castle
Civil Lines, New Delhi – 110054 ...Respondent No. 4

5. Delhi Development Authority
4, Mahatama Gandhi Road,
IP Estate, New Delhi – 110002 ...Respondent No. 5

6. Max Super Speciality Hospital
1, 2, Press Enclave Marg,
Saket Institutional Area,
Saket, New Delhi – 110017 ...Respondent No. 6

7. Maxx Super Speciality Hospital
108A, IP Extension, Patparganj
Delhi – 110092 ...Respondent No. 7

8. Max Super Speciality Hospital
FC 50, C and D Block, Shalimar Place Site,
Shalimar Bagh, New Delhi – 110088 ...Respondent No. 8

9. Fortis Hospital
AA-299, Shaheed Udham Singh Marg,
AA Block, Poorbi Shalimar Bagh,
Shalimar Bagh, New Delhi – 110088 ...Respondent No. 9

10. BLK Hospital,
Pusa Road, Radha Soami Satsang,
Rajendra Place, New Delhi – 110005 ...Respondent No. 10

11. Manipal Hospital,
Sector 6, Main Road Dwarka,
New Delhi – 110075 ...Respondent No. 11

12. Indraprastha Apollo Hospital,
Metro Station, Mathura Road,
Sarita Vihar, New Delhi – 110076 ...Respondent No. 12

13. Apollo Hospital,
33, Rohtak Road,
Anand Parbat, New Delhi – 110052 ...Respondent No. 13

14. Apollo Hospital
North Block, Central Secretariat,
New Delhi – 110004 ...Respondent No. 14

15. Holy Angels Hospital,
Community Center B,
Basant Lok, Vasant Vihar,
New Delhi – 110057 ...Respondent No. 15

16. Primus Hospital,
2, Chandragupta Marg,
Chanakyapuri, New Delhi – 110021 ...Respondent No. 16

New Delhi

PETITIONERS

Shobha Gupta, Rajesh
Sachdeva

Dated

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LIST OF DATES AND SYNOPSIS

Medical profession is regarded as a moral profession and in such critical times of Spread of COVID-19, it is of utmost importance that there shall be a lot of charity be done for poor and needy people. However, the private hospitals conjointly with the charitable trusts have been misusing funds and moulding the law to their own whims and fancies.

There is huge amount of money being transmitted from hospitals to charitable trusts. This money should be used for the treatment of poor and needy for free or a minimum cost.

Sl.no	Date	Particulars
1.		The world has witnessed the spread of a communicable respiratory disease called the Novel Corona Virus (COVID-19).
2.	December 2019	The outbreak was first identified in Wuhan, Hubei, China.
3.	March 2020	The world health organisation declared COVID-19 as a controllable pandemic after noting that COVID-19 has increased 13-fold in countries other than China. Some State governments have also

		declared COVID-19 an epidemic.
4.	April	The private hospitals have been charging a very heavy amount to provide for treatment of COVID-19.

New Delhi

PETITIONERS

Shobha Gupta, Rajesh
Sachdeva

Dated

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(IN THE MATTER OF PUBLIC INTEREST LITIGATION)

IN THE MATTER OF:

Shobha Gupta & Ors.

.....Petitioners

VERSUS

Union of India & Ors.

.....Respondents

**WRIT PETITION (PIL) UNDER ARTICLE 226 OF
CONSTITUTION OF INDIA SEEKING WRIT OF MANDAMUS
OR ANY OTHER APPROPRIATE WRIT SEEKING
DIRECTIONS TO RESPONDENTS TO PERFORM AUDITING
OF MAXX HOSPITAL, FORTIS HOSPITAL, MANIPAL
HOSPITAL, APOLLO HOSPITAL AND BLK HOSPITAL,
HOLY ANGELS HOSPITAL, PRIMUS HOSPITAL AND
OTHER PRIVATE HOSPITALS RUN WITH AND BY/FOR
ALONG SIDE CHARITABLE TRUST ON FREE/
CONFESSIONAL GOVERNMENT INSTITUTIONAL LAND IN
DELHI/ NEW DELHI.**

To,

The Hon'ble Chief Justice and His
Companion Judges of Delhi High Court At
New Delhi

The Humble Petition of the petitioners above
named

MOST RESPECTFULLY SHOWETH:-

1. That the present petition is filed under Article 226 of the Constitution of India seeking writ of mandamus and/or other appropriate writ, order and directions as detailed in the prayer clause.
2. That the petitioners are law abiding citizen of India and has no personal interest attached to the present writ petition.
3. That the private hospitals are partnered with trust(s) registered under the Societies Registration Act, 1860 and have associated with them for the functioning. It is pertinent to note that land is given by DDA solely to the hospitals, however, the hospitals are being run by the so called trusts. It has been specifically mentioned in the object of trusts that they would provide free medical aid to the poor and needy out of the funds of the trust and such earning by the trust would be applied to fulfill the objects of

trust. A copy of object of Human Care Medical Charitable Trust is Annexure-A/1. Copy of the Lease deed is Annexed A/2. Copy of the allotment letter is Annexure A/3 Copy of agreements are Annexure A/4. As case example above such Human Care Medical Charitable has Camouflage agreement with a private hospitals (Manipal hospital) which amounts to simple rental arrangement and there is no charitable activity to utilized the large sums of money given to the trust .

4. That the Section 5 of the Societies Registration Act, 1860 provides:-

“The property, movable and immovable belonging to a society registered under this Act, if not vested in trustees, shall be deemed to be vested, for the time being, in the governing body of such society, and in all proceedings civil and criminal, may be described as the property of the governing body of such society for their proper title.”

That as per the above section the trustees of the trust have a vested interest in the property given by DDA to the hospitals. That one such trust named as *Human Care Medical Charitable Trust* has private arrangements with Manipal Hospital whereby it has specifically stated the revenue map of the partnered agreement.

5. That the memorandum of the charitable trusts ensures that there should also be free of cost treatment of patients who are poor and needy. Such memorandum(s) is/are being violated by the hospitals as there is extremely high fees being billed to the patients in such critical times. That a huge amount of money is generated by these so called charitable trusts. That since such amount is non-taxable, there is no whereabouts of such amount. That just not the property but even the movable property is vested in the trustees. That such hospitals have huge amount of revenue generation each year and such revenue should be utilized in the treatment of COVID-19 patients for free or minimum cost for the poor and needy persons.

6. That it is the duty of State to keep a constant check on wrong doings upon and related to its land. State has given the land for free or minimal charges to private hospitals, which obligates the State to keep regular surveillance upon the management of such hospitals and its funds. In the case of *Moolchand Khairati Ram Trust vs. Union of India* (2018) 8 SCC 321 the Hon'ble Supreme Court held:

“It is unfortunate that most of the hospitals are being run on a commercial basis and various ills have sunk in the noble medical profession. Right from wrong reporting, uncalled for investigation inclusive of invasive one, even as to heart and other parts of the body, which are wholly

unnecessary, are performed, it is time for soul searching for such big hospitals in and around Delhi, Gurgaon etc. and other places. They must ponder what they are doing. Is it not a criminal act? Simply by the fact that action is not taken does not absolve the responsibility. Time has come to fix accountability and to set right the evils which have rotten the system. The medical profession had never been intended to be an exploitative device to earn money at the cost of patients who require godly approach and helping hand of doctors. Every prescription starts from Rx, not from the amount of bill. Being big commercial international hospitals in and around Delhi, they are not above the ethical standards which they have to maintain at all costs even by extending financial help to the have-nots.”

7. That due to such arbitrariness it is the poor and needy people who are suffering out of the ill wills of the illicit money makers. It has been held in *Parmanand Katara vs. Union of India*, reported in (1989) 4 SCC 286:

“ There can be no second opinion that preservation of human life is of paramount importance. That is so on account of the fact that once life is lost, the status quo ante cannot be restored as resurrection is beyond the capacity of man...”

8. That as per the Guidelines circulated by the Ministry of Health the cost of COVID-19 tests is capped at Rs.4,500/-. However, to the dismay of the petitioner several private institutions have been charging exorbitant fees far more than Rs.4,500/-. Recently, the Government is removed this cap allowing the private hospitals and Labs to run amuck charging whopping amounts as COVID-19 testing fees adding miseries to the already suffering population in these testing times.
9. That the charitable trusts partnered with hospitals on lease land at a very concessional rates from the government. That while taking such land they undertake to abide by the object and Article of the trust, which is of providing free medical treatment for the poor and needy. That despite minting a huge sum of money touching some 100 crores, these charitable trusts do not abide by their Article and memorandum.
10. That these charitable trusts have a private collaboration agreement with the private hospitals, which acts as a camouflage of transmission of huge amount of money for personal purpose. That such private arrangements between these trusts and private institutions completely breach the public morality and public interest. That such arrangements breach the government's condition of resell and sub leasing, and illegally moulds the law to their own personal benefit.

11. That as per Section 5 of Societies Registration Act, 1860 all the sums of money belonging to the trusts is impliedly the money of trustees. That such charitable trusts are not using this money for free treatment/ concessional charges of patients and instead transmitting it for their own illegal personal gains. That such money falls under the tax exemption and hence these trustees manage to eliminate themselves from any kind of liability.
12. That it is a dire need to have a forensic auditing of such charitable trusts and private institution who are commercializing such a noble profession. That no poor person can be deprived of medical treatment in such tough times. That it is a duty cast upon the state to give equality to each individual and not discriminate on the basis of one's financial condition.
13. That the present outbreak of COVID-19 has severally affected the entire nation. That in the wake of such a critical situation it is extremely inhumane to see that the Private Hospitals in Delhi are charging an unreasonable amount from the poor and needy. A PIL bearing number IA 49119/2020 has been filed before the Hon'ble Supreme Court, Notice has been issued by the Apex court.

14. That the petitioner(s) in the above said writ petition have prayed for the following reliefs:
- i. direction to regulate the cost of treatment of COVID-19 at private/ corporate hospitals across the country.
 - ii. To direct hospitals running on charitable trust to treat COVID-19 patients either pro bono public or on no profit basis.
 - iii. Direction to respondent to bear cost of COVID-19 at private hospitals for poor persons
 - iv. direction to combating commercialization and black marketing of essential health services.
15. That the private hospitals have unreasonably increased the per bed prices, room rent, PPF Kit, Gloves, sanitizers and have also charging higher amount than the MRP for basic medicines and needs. It is pertinent to note that as per the Order No. F. No. Z.28015/23/2020-EMR dated 21.03.2020 issued by the Ministry of Health and Family Welfare the guidelines for the maximum cost that can be charged by the private health care institutions for treatment of COVID-19 patients. True copy of Order No. F. No. Z.28015/23/2020-EMR dated 21.03.2020, issued by the Ministry of Health and Family Welfare is **Annexure-A/5**.
16. That the COVID-19 patients can be categorized into three categories i.e. mild, moderate and severe. That the mild ones only

require a quarantine facility to prevent the transmission of disease. However, the private hospitals are charging exorbitant amount of RS. 25, 000 /- (Rupees Twenty sFive Thousand) and above per day (24 hours) from patients for providing quarantine facility. That during the need of the hour even the five star hotels are charging about Rs. 4000/- (Rupees Four Thousand – 24 hours), it is surprising that these hospitals are charging such huge amounts, clearly to exploit and fleece the hapless patients to unjustly enrich themselves.

17. That the invariably, the private hospitals have been given land almost free of cost (paltry lease amount) by the Delhi Development Authority (DDA) for a lease period of 99 years during which the land cannot be sold or sub leased, or used for personal gains of the allottee. The said regulation is being brazenly violated by the private hospitals to obtain undue advantage. Private hospitals have made their own private arrangements with charitable trusts to commercialize and run their hospitals.

18. That it is submitted such private hospitals have while taking lands dirt cheap from the government affirmed that they would provide free medical facilities to the needy and poor. That to the dismay of the petitioner such affirmations remain on paper and the

assured medical facilities never reached out to the poor and needy.

19. That India has reached 7th spot on the list of most affected countries of COVID-19. As of today 1.9 lakhs are reported COVID-19 patients in the country, a merrier situation for private medical institutions to make illicit profit out of human agonies and sufferings. Medical hospitals, irrespective of being private or public, are moral agents consisting of moral responsibility to treat the poor and needy for free or at the most at some reasonable cost, de hors of profit factor.

20. That it is a huge amount of money being circulated from the private institutions to the charitable trusts and then to their respective trustees. Such private institutions smell of scams which may involve criminal offences of cheating and fraud upon patients visiting the hospitals. That there have been many instances wherein hospitals charging exorbitant fees have come to light. In of *Ratanbhai Sayeed v. Shirdi Nagar Panchayat*, reported in **(2016) 4 SCC 631** by the Hon'ble Supreme Court that private interest should take a back seat when pitted against public interest.

21. That despite such a huge amount of money being generated by the private hospitals, yet they trying to illegally attain profit smacks of illegal mounting business going on under the table. There is dire need to have forensic auditing of private hospitals including Fortis Group, Apollo Group, Maxx Hospital, BLK Hospital and Manipal Hospital besides others. Hon'ble Supreme Court of India on an earlier occasion ordered for forensic audit of large groups such as Amrapali, Unitech, etc. who indulged in defrauding and fleecing the public. It is upon the forensic audit of these developers that the general public could get relief. Now the turn has taken by these private hospital who are fleecing the patients in these trying and testing time of pandemic.

22. That medicine is a humanitarian profession and in times as tough like these it is important to have a full constraint over any illegal activity by persons in medicine.

GROUND:-

- A. That the private hospitals are charging exorbitant fees above the normal rates in such critical time. That such private hospitals have increased the rates of each bed and other necessities within the premises inclusive of the medicine and medical instruments.
- B. That such private hospitals are run by various charitable trusts. That such trusts have a memorandum of association whereby

they are obliged to adhere to the object of the trust, which is free treatment of poor and needy persons.

- C. That there is no free treatment being done such private institutions and instead there is a higher rate being charged by such institutions. That such arbitrariness imposed by these institutions amounts to violation of Article 14 of the Indian Constitution as state by the Hon'ble Supreme Court in the case of **EP Royappa. (supra)**.
- D. That such private hospitals have received land from the government for free/by paying minimal charges. That as per the rules such land is devoid of being sub let, sell, etc. That any such sale, sub let, etc would only be concluded after due permission from the DDA. It is pertinent to note that this rule is being trampled by the private hospitals by partnering with the various charitable trusts.
- E. That Section 5 of the Societies Registration Act, 1860 provides that all moveable and immoveable property of the trust would be deemed to be of the trustees. That a large amount of money generated by the hospitals is being diverted to the trustees. As per the object of the trust, the revenue generated should be utilized for the medical treatment of poor and needy people, yet there is no such charity being doled out by such charitable institutions.
- F. That the money being diverted to the trustees is outside the ambit of being taxed and thereby there is a huge amount without any whereabouts which is being used illegally. That it is the duty of

the state to keep and control and surveillance over such private institutions when it has given its land for humanitarian ground.

- G. That medical profession is an epitome of moral conscience and failing to treat any patient due to financial constraint is violative of Right to life and liberty enshrined by the Indian Constitution.
- H. That Right to life enshrined under Article 21 of the Constitution of India includes the protection of health and access to basic health care which cannot be denied to the public on financial grounds.
- I. That it is the need of the hour that such private institutions shall be subject to scrutiny by way of conducting auditing. That the Hon'ble Supreme Court has on earlier occasions ordered forensic auditing of large groups such as Amrapali, Unitech, etc. to deliver justice to the public at large.
- J. That no patient suffering from COVID-19 shall be denied the necessary medical aid on account of financial restraint. That it is a time to come together and considering the humanitarian ground solve the problem. That denial of such patients would result into a severe situation as all other persons in contact will also be contaminated with the same.
- K. That no private hospital shall accord to illicit ways of mounting money. That it is not a time to commercialize the medical profession.

- L. That the petitioner craves leave of this Hon'ble Court to raise such other and further grounds as may be available at the time of hearing.
23. That no other similar petition has been filed by the petitioners before any other judicial authority. That the petitioners would bear any and all cost arising out this petition

PRAYER

In the above premises the petitioner seeks issuance of writ of *mandamus* or any other appropriate writ, order or directions and thereby:-

- (A) direct the official respondents to formulate and constitute committee(s) to inspect and audit the account and management of Apollo Group, Maxx Hospital, Fortis Group, BLK Hospital, Manipal Hospital, Holy Angels Hospital and Primus Hospital and other leading private hospitals in Delhi/New Delhi;
- (B) direct the private hospitals, respondents herein and others, to render truthful accounts of all the monies received and disbursed at least during the period pandemic; and may also.
- (C) pass any other order(s) as this Hon'ble Court deems fit and proper in the interest of justice, equity and good conscience.

PETITIONER

DATE

PLACE

**IN THE HIGH COURT OF DELHI AT NEW DELHI
(EXTRAORDINARY WRIT JURISDICTION)**

Writ Petition (Civil) No. _____ of 2020

(IN THE MATTER OF PUBLIC INTEREST LITIGATION)

IN THE MATTER OF:

Shobha Gupta & Ors.

...PETITIONERS

VERSUS

Union of India & Ors.

...RESPONDENTS

AFFIDAVIT IN SUPPORT OF THE PETITION

I SHOBHA GUPTA

do hereby solemnly affirm and declare as under:

1. That I am the Petitioner No. 1 in above named Petition.
2. I have filed the present Petition accompanying 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 the Petitioner 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.
6. 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 New Delhi, on this the ___ day of ___ 2020 that the contents of this affidavit are true and correct to the best of my knowledge and belief and nothing material has been concealed there from.

D E P O N E N T
IN THE HIGH COURT OF DELHI AT NEW DELHI
(EXTRAORDINARY WRIT JURISDICTION)
Writ Petition (Civil) No. _____ of 2020

(IN THE MATTER OF PUBLIC INTEREST LITIGATION)

IN THE MATTER OF:

Shobha Gupta & Ors.

...PETITIONERS

VERSUS

Union of India & Ors.

...RESPONDENTS

AFFIDAVIT IN SUPPORT OF THE PETITION

I RAJESH SACHDEVA

do hereby solemnly affirm and declare as under:

1. That I am the Petitioner No. 2 in above named Petition.
2. I have filed the present Petition accompanying 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 the Petitioner 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.
6. 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 New Delhi, on this the ___ day of ___ 2020 that the contents of this affidavit are true and correct to the best of my knowledge and belief and nothing material has been concealed there from.

D E P O N E N T

**IN THE HIGH COURT OF DELHI AT NEW DELHI
(EXTRAORDINARY WRIT JURISDICTION)**

Writ Petition (Civil) No. _____ of 2020

(IN THE MATTER OF PUBLIC INTEREST LITIGATION)

IN THE MATTER OF:

Shobha Gupta & Ors.

...PETITIONERS

VERSUS

Union of India & Ors.

...RESPONDENTS

AFFIDAVIT IN SUPPORT OF THE PETITION

I Anubhav Singh

do hereby solemnly affirm

and declare as under:

1. That I am the Petitioner No. 3 in above named Petition.
2. I have filed the present Petition accompanying 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 the Petition 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.
6. 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 New Delhi, on this the ___ day of ____ 2020 that the contents of this affidavit are true and correct to the best of my

knowledge and belief and nothing material has been concealed there from.

DEPONENT