

CODE NO. ....  
P. I. L. BENCH 2020  
DISTRICT-LUCKNOW

**IN THE HON'BLE HIGH COURT OF JUDICATURE AT  
ALLAHABAD, LUCKNOW BENCH, LUCKNOW**

Writ Petition No. (M/B) of 2020 (P.I.L.)

Krishan Kanhaya Pal

-----Petitioner  
(In Person)

Versus

Union of India & others

-----Opposite Parties

**I N D E X**

<u>Sl. No.</u>	<u>PARTICULARS</u>	<u>PAGES NO.</u>
1.	List of Dates and Events	2-4
2.	Application for interim relief	5
3.	Memo of Writ Petition	6-16
4.	<b><u>ANNEXURE NO. 1</u></b> , the copy of the scene of the web series (Virgin Bhaskar Season-2).	17
5.	<b><u>ANNEXURE NO. 2</u></b> , the copy of literature with regard to work and achievement of the great Devi Ahilyabai Holkar.	18-29
6.	Affidavit	30-31
7.	I.D. Proof	32

LUCKNOW

DATED: 08/09/2020

**(KRISHAN KANHAYA PAL)**  
Advocate  
Petitioner In Person

**IN THE HON'BLE HIGH COURT OF JUDICATURE AT  
ALLAHABAD, LUCKNOW BENCH, LUCKNOW**

*Writ Petition No. (M/B) of 2020 (P.L.L.)*

Krishan Kanhaya Pal

-----Petitioner  
(In Person)

Versus

Union of India & others

-----Opposite Parties

**LIST OF DATES AND EVENTS**

<b>Sl. No.</b>	<b>Dates</b>	<b>Events</b>
1.	---	That Virgin Bhaskar an Indian Web Series the second season, in which, the name of the girls hostel has been named/mentioned i.e. Ahilyabai Girls Hostel.
2.	---	That the Virgin Bhaskar is a Indian Hindi Language Web Series, Virgin Bhaskar Season-2 was released on 29.08.2020 on ALT Balaji and Zee-5, Anant Joshi and Rut Panna Aishwarya are main cost of Virgin Bhaskar Web Series. Virgin Bhaskar Season-2 is directed by Sakshat dalvi and Sangeeta Rao, ALT Balaji is a Indian Subscription based video on demand platform which is wholly owned Subsidiary of Balaji telefilms Ltd., Launched on 16.04.2017, ALT Balaji is the group's foray into the digital entertainment sphere to create Original OTT Content, Owner Balaji

W/W

		<p>telefilms, CEO- Nachiket Pant vaidya (November 2017), Founder -F.K.T.A. Kapoor, Founded 2000, Headquarters location : Mumbai, ZEE-5 is an Indian video on demand service run by Essel group via its subsidiary Zee entertainment enterprises. It was launched in India on 14.02.2018 with content in 12 language, the zee mobile app is available on web androvid, smart TVS, among other devices, Owner zee entertainment enterprises (Essel group) headquarters-Mumbai India, Area served 1904 countries. Users : 150 millien + worldwide (total), it is relevant to mention here that in the above mentioned web series the name of the Girls Hostel has been mentioned i.e. Ahilyabai Girls Hostel, which is highly objectionable and defamatory because the name Ahilyabai is the same name, and similar name to Devi/Maharani Ahilyabai Holkar, Devi/Maharani Ahilyabai holkar was the hereditary noble Sardar of the Maratha Empire, Devi/Maharani Ahilyabai holkar was born in the village of chandi in Jakhed Ahmed Nagar Maharashtra, she moved the seat of her fiefdom to Mahashwar sauth of Indore on the Narmada rivers, Religion- Hindusim, Ahilyabai holkar (31.05.1725 - 13.08.1795).</p>
--	--	--

3.	---	That the petitioner is practicing advocate at Allahabad High Court Sitting at Lucknow and he is also member of Awadh Bar Association of Allahabad High Court sitting at Lucknow and the petitioner's religion is "Hindu" and he belong to shepherd caste and have great respect for Devi Ahilyabai Holkar.
4.	---	That it is relevant to mention here that, after release of the above mentioned web series the people namely belongs to Hindu Religion and shepherd community, are agitating and organizing protest all over the country.
5.	---	That by mentioning the name of girls hostel i.e. Ahilyabai Girls hostel, in the web series (Virgin Bhaskar Season-2), heart the sentiments of the public at large, across the India as well as other countries of the world.
		Hence the present Writ Petition (PIL).

LUCKNOW

DATED: 08/09/2020

**(KRISHAN KANHAYA PAL)**

Advocate

Petitioner In Person



**IN THE HON'BLE HIGH COURT OF JUDICATURE AT  
ALLAHABAD, LUCKNOW BENCH, LUCKNOW**

*C.M. Application No. (M/B)/2020*

*In re:*

*Writ Petition No. (M/B) of 2020 (P.I.L.)*

**Krishan Kanhaya Pal Advocate**

..... Petitioner  
(In Person)

Versus

1. **Union of India** Through its Secretary Ministry of Home affairs North Block New Delhi-110001.
2. **Secretary, Ministry of information and broadcasting** Government of India Room No. 665, A Wing Shastri Bhawan New Delhi-110001.
3. **Censor Board of film certification** through its chief Executive officer, Fims Division Complex, Phase-1 building 9<sup>th</sup> floor, Dr. G. Deshmukh Marg Mumbai-400026.
4. **Balaji Telefilms Limited**, though its founder/C.E.O., C-13 Balaji House Dalia Industrial Estate opp, Laxmi Industrial Estate New link Road, Andhere (w), Mumbai 400053, Maharashtra.
5. **Zee -5** through its C.E.O., corporate and registered office 18<sup>th</sup> floor, A-wing, Marathon futerex Lower Parel Mumbai, Maharashtra, India.

..... Opposite parties


**APPLICATION FOR INTERIM RELIEF**

The applicant/petitioner, named above most respectfully begs to submit as under:-

For the facts, reasons and circumstances revealed in the memo of writ petition, it is most respectfully prayed that this Hon'ble Court may graciously be pleased direct to opposite party No. 2 & 3 to stay the broadcasting of the web series i.e. Virgin Bhaskar Season-2, immediately in the interest of justice.

Any other order or direction which this Hon'ble Court may deem, fit and proper under the circumstances of the case may also be passed in favour of the petitioner.

LUCKNOW  
DATED: 08/09/2020

  
**(KRISHAN KANHAYA PAL)**  
Advocate  
Petitioner In Person

**IN THE HON'BLE HIGH COURT OF JUDICATURE AT  
ALLAHABAD, LUCKNOW BENCH, LUCKNOW**

Writ Petition No.

(M/B) of 2020 (P.I.L.)

**Krishan Kanhaya Pal Advocate**

..... Petitioner  
(In Person)

Versus

1. **Union of India** Through its Secretary Ministry of Home affairs North Block New Delhi-110001.
2. Secretary, Ministry of information and broadcasting Government of India Room No. 665, A Wing Shastri Bhawan New Delhi-110001.
3. Censor Board of film certification through its chief Executive officer, Fims Division Complex, Phase-1 building 9<sup>th</sup> floor, Dr. G. Deshmukh Marg Mumbai-400026.
4. Balaji Telefilms Limited, though its founder/C.E.O., C-13 Balaji House Dalia Industrial Estate opp, Laxmi Industrial Estate New link Road, Andhere (w), Mumbai 400053, Maharashtra.
5. Zee -5 through its C.E.O., corporate and registered office 18<sup>th</sup> floor, A-wing, Marathon futerex Lower Parel Mumbai, Maharashtra, India.

.....Opposite parties

**WRIT PETITION UNDER ARTICLE 226 OF THE  
CONSTITUTION OF INDIA**

To,  
The Hon'ble Chief Justice and his companion  
Judges of this Hon'ble Court.

The petitioner named above most respectfully begs  
to submit as under: -

1. That no notice, information or copy of caveat petition has been received to the petitioner from any one either by registered post or by any other means till today.
2. That legislature made a balance between public interest and private interest, and whenever private interest proceeds to supersede public interest then chaotic situation erupts out, that in compliance of the provisions of chapter XXII R.1 sub rule 3-A of the Allahbad High Court rules it submitted that the petitioner has no personal interest in the present matter, that the result of the litigation will not lead to any undue gain to the petitioner nor to anyone associated with him or undue loss to any person or body persons or state in the present writ petition, that there is no authoritative pronouncement in the present matter by Hon'ble Apex Court & High Court.



3. That the petitioner makes very clear that petitioner is filing the present writ petition for the welfare of public at large.
4. That by means of present writ petition in the nature of PIL filed by the petitioner against the arbitrariness of the opposite parties concerned whereby the opposite party no. 2, 3, 4 & 5 released the Web Series i.e. "Virgin Bhaskar Season-2" was released on 29.08.2020 on ALT Balaji and Zee-5, Anant Joshi and Rut Panna Aishwarya are main cost of Virgin Bhaskar Web Series. Virgin Bhaskar Season-2 is directed by Sakshat dalvi and Sangeeta Rao, ALT Balaji is a Indian Subscription based video on demand platform which is wholly owned Subsidiary of Balaji telefilms Ltd., Launched on 16.04.2017, ALT Balaji is the group's foray into the digital entertainment sphere to create Original OTT Content, Owner Balaji telefilms, CEO- Nachiket Pant vaidya (November 2017), Founder -F.K.T.A. Kapoor, Founded 2000, Headquarters location : Mumbai, ZEE-5 is an Indian video on demand service run by Essel group via its subsidiary Zee entertainment enterprises. It was launched in India on 14.02.2018 with content in 12 language, the zee mobile app is available on web androvid, smart TVS,

among other devices, Owner zee entertainment enterprises (Essel group) headquarters-Mumbai India, Area served 1904 countries. Users : 150 millien + worldwide (total), it is relevant to mention here that in the above mentioned web series the name of the Girls Hostel has been mentioned i.e. Ahilyabai Girls Hostel, which is highly objectionable and defamatory because the name Ahilyabai is the same name, and similar name to Devi/Maharani Ahilyabai Holkar, Devi/Maharani Ahilyabai holkar was the hereditary noble Sardar of the Maratha Empire, Devi/Maharani Ahilyabai holkar was born in the village of chandi in Jakhed Ahmed Nagar Maharashtra, she moved the seat of her fiefdom to Mahashwar sauth of Indore on the Narmada rivers, Religion- Hindusim, Ahilyabai holkar (31.05.1725 - 13.08.1795).

5. That the brief facts of the Petition are that Virgin Bhaskar an Indian Web Series the second season, in which, the name of the girls hostel has been named/mentioned i.e. Ahilyabai Girls Hostel, the copy of the scene of the web series (Virgin Bhaskar Season-2) is being annexed herewith as **ANNEXURE NO. 1** with this writ petition.

6. That the Virgin Bhaskar is a Indian Hindi Language Web Series, Virgin Bhaskar Season-2 was released on 29.08.2020 on ALT Balaji and Zee-5, Anant Joshi and Rut Panna Aishwarya are main cost of Virgin Bhaskar Web Series. Virgin Bhaskar Season-2 is directed by Sakshat dalvi and Sangeeta Rao, ALT Balaji is a Indian Subscription based video on demand platform which is wholly owned Subsidiary of Balaji telefilms Ltd., Launched on 16.04.2017, ALT Balaji is the group's foray into the digital entertainment sphere to create Original OTT Content, Owner Balaji telefilms, CEO- Nachiket Pant vaidya (November 2017), Founder -F.K.T.A. Kapoor, Founded 2000, Headquarters location : Mumbai, ZEE-5 is an Indian video on demand service run by Essel group via its subsidiary Zee entertainment enterprises. It was launched in India on 14.02.2018 with content in 12 language, the zee mobile app is available on web android, smart TVS, among other devices, Owner zee entertainment enterprises (Essel group) headquarters-Mumbai India, Area served 1904 countries. Users : 150 millien + worldwide (total), it is relevant to mention here that in the above mentioned web series the name of the Girls Hostel has been mentioned i.e.

Ahilyabai Girls Hostel, which is highly objectionable and defamatory because the name Ahilyabai is the same name, and similar name to Devi/Maharani Ahilyabai Holkar, Devi/Maharani Ahilyabai holkar was the hereditary noble Sardar of the Maratha Empire, Devi/Maharani Ahilyabai holkar was born in the village of chandi in Jakhed Ahmed Nagar Maharashtra, she moved the seat of her fiefdom to Mahashwar south of Indore on the Narmada rivers, Religion- Hindusim, Ahilyabai holkar (31.05.1725 - 13.08.1795), the copy of literature with regard to work and achievement of the great Devi Ahilyabai Holkar is being annexed herewith as **ANNEXURE NO. 2** with this writ petition.

7. That the petitioner is practicing advocate at Allahabad High Court Sitting at Lucknow and he is also member of Awadh Bar Association of Allahabad High Court sitting at Lucknow and the petitioner's religion is "Hindu" and he belong to shepherd caste and have great respect for Devi Ahilyabai Holkar.
8. That it is relevant to mention here that, after release of the above mentioned web series the people namely belongs to Hindu Religion and shepherd community, are agitating and organizing protest all over the country.

9. That by mentioning the name of girls hostel i.e. Ahilyabai Girls hostel, in the web series (Virgin Bhaskar Season-2), hurt the sentiments of the public at large, across the India as well as other countries of the world.
10. That proper exercise of power conferred by legislature is also the main limb of democracy and it is being done then in differentness may hurt the inevitable interest of public at large and it is clear violation of Article 14 of the Constitution of India.
11. That petitioner has no any efficacious, speedy and adequate remedy so that petitioner is filing this writ petition on the following grounds amongst other:-

**G R O U N D S**

- A. That the brief facts of the Petition is that Virgin Bhaskar an Indian Web Series the second season, in which, the name of the girls hostel has been named/mentioned i.e. Ahilyabai Girls Hostel.
- B. That the Virgin Bhaskar is a Indian Hindi Language Web Series, Virgin Bhaskar Season-2 was released on 29.08.2020 on ALT Balaji and Zee-5, Anant Joshi and Rut Panna Aishwarya are main cost of Virgin Bhaskar Web Series. Virgin Bhaskar Season-2 is directed by Sakshat dalvi and Sangeeta Rao, ALT Balaji is a Indian Subscription based video on

KR/1

demand platform which is wholly owned Subsidiary of Balaji telefilms Ltd., Launched on 16.04.2017, ALT Balaji is the group's foray into the digital entertainment sphere to create Original OTT Content, Owner Balaji telefilms, CEO- Nachiket Pant vaidya (November 2017), Founder -F.K.T.A. Kapoor, Founded 2000, Headquarters location : Mumbai, ZEE-5 is an Indian video on demand service run by Essel group via its subsidiary Zee entertainment enterprises. It was launched in India on 14.02.2018 with content in 12 language, the zee mobile app is available on web androvid, smart TVS, among other devices, Owner zee entertainment enterprises (Essel group) headquarters-Mumbai India, Area served 1904 countries. Users : 150 millien + worldwide (total), it is relevant to mention here that in the above mentioned web series the name of the Girls Hostel has been mentioned i.e. Ahilyabai Girls Hostel, which is highly objectionable and defamatory because the name Ahilyabai is the same name, and similar name to Devi/Maharani Ahilyabai Holkar, Devi/Maharani Ahilyabai holkar was the hereditary noble Sardar of the Maratha Empire, Devi/Maharani Ahilyabai holkar was born in the village of chandi in Jakhed Ahmed Nagar

KAG

Maharashtra, she moved the seat of her fiefdom to Mahashwar south of Indore on the Narmada rivers, Religion- Hindusim, Ahilyabai holkar (31.05.1725 - 13.08.1795).

- C. That the petitioner is practicing advocate at Allahabad High Court Sitting at Lucknow and he is also member of Awadh Bar Association of Allahabad High Court sitting at Lucknow and the petitioner's religion is "Hindu" and he belong to shepherd caste and have great respect for Devi Ahilyabai Holkar.
- D. That it is relevant to mention here that, after release of the above mentioned web series the people namely belongs to Hindu Religion and shepherd community, are agitating and organizing protest all over the country.
- E. That by mentioning the name of girls hostel i.e. Ahilyabai Girls hostel, in the web series (Virgin Bhaskar Season-2), heart the sentiments of the public at large, across the India as well as other countries of the world.

**PRAYER**

Wherefore, it is most respectfully prayed that this Hon'ble Court may graciously be pleased to: -

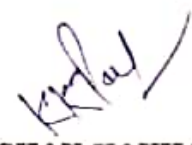
- i) to issue a writ, order or direction in the nature of Mandamus thereby Commanding/directing the

opposite party no. 2 & 3 to stay the broadcasting of the web series i.e. Virgin Bhaskar Season-2 immediately.

- ii) to issue a writ, order or direction in the nature of Mandamus thereby Commanding/directing the opposite party no. 2 & 3 to delete/change the name i.e. Ahilyabai Girls Hostel from the scene of web series Virgin Bhaskar season-2 .
- iii) to issue any other writ, order or direction which this Hon'ble Court may deem fit and proper in the circumstances of the case.
- iv) to allow the writ petition with costs.

LUCKNOW  
DATED: 08/09/2020

KK Pal /



**(KRISHAN KANHAYA PAL)**  
Advocate  
Petitioner In Person