

IN THE COURT OF LEARNED PRINCIPAL DISTRICT & SESSIONS JUDGE,

JAMMU

Deepika Singh Rajawat

Versus

UT of J&K

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Presented by:

Alok Bambroo


Jananzaib.A.Hanjal

Advocates

IN THE COURT OF LEARNED PRINCIPAL DISTRICT & SESSIONS JUDGE,
JAMMU

Deepika Singh Rajawat, Age 40 years,

(.....APPLICANT)

VERSUS

Union Territory of Jammu and Kashmir
Through Station House Officer,
Police Station, Gandhi Nagar, Jammu.

(.....NON-APPLICANT)

IN THE MATTER OF: -

Application for seeking grant of anticipatory
bail under section 438 CrPC in favour of the
applicant.

MAY IT PLEASE YOUR HONOUR;

The applicant most respectfully submits as under:-

1. That the applicant is a citizen of India. She is an advocate having been practicing law at Jammu and Kashmir High Court at Jammu since 2009. Copy of her Aadhar Card is enclosed herewith and marked as **Annexure "A"** for the kind perusal of this Hon'ble Court.
2. That the applicant is also a Human Rights activist (women and child rights activist). She is running a registered NGO i.e.

Voice for Rights for the protection of Human Rights in the UT of Jammu and Kashmir since 2013. It is relevant to submit herein that the applicant is an internationally acclaimed person having received number of awards both at national and international level. Copy of her detailed CV is enclosed herewith and marked **Annexure "B"** for the kind perusal of this Hon'ble Court.

3. That with an objective to raise voice against increasing rape cases in India and condemn people who bring atrocities on women, on 19th October, 2020 she tweeted a picture on her verified twitter handle terming raping women 'irony'. Screenshot of her twitter handle and the picture that she has tweeted are collectively enclosed herewith and marked as **Annexure "C"** for the kind perusal of this Hon'ble Court.
4. That giving her said tweet communal colour, ruling BJP IT Cell started an online campaign against her on social media demanding her arrest **#ArrestDeepikaSinghRajawat**. They accused her of hurting religious sentiments and started filing frivolous complaints against her at different places.
5. That at 11-45PM on 19th itself, Bajrang Dal led by Rakesh Bajrangi, State President held protest outside her residence and extended death threats to her ("Deepika Teri Kabar Khudegi Jammu Kashmir Ki Darti Pe, Deepika your grave will be dug in the land of Jammu and Kashmir). The said protest continued till 1:00AM and to protect herself from the aggressive mob that assembled outside her residence, she had

to call police which disbursed the mob. Copies of the newspaper cuttings, screenshot of her tweets seeking help and photographs of slogan-raising men are collectively enclosed herewith and marked as Annexure "D" for the kind perusal of this Hon'ble Court.


6. That the picture posted by the applicant, with a caption irony juxtaposed scenes: in one scene, a man touching feet of a female Hindu deity during the nine-day Hindu festival of Navratri; in the other scene, with the header other days, a man is aggressively holding both the legs of a woman. It is relevant to submit herein that the said picture which highlights the hypocrisy of society towards women was not about religion. It neither abuse Hindu religion nor religious faith of Hindus.
7. That on the basis of a false and frivolous complaint filed by the above named Rakesh Bajrangi who extended death threats to the applicant, an FIR No. 174 under sections 294, 295-A and 505-B (2) has been registered against the applicant in Police Station, Gandhi Nagar, Jammu.
8. That the registration of FIR under the above mentioned sections against the applicant who has been vocal against polices of the central government is an attempt to malign her image, silence voice and threaten her extensively.

An affidavit in support of application is enclosed herewith.

IN THE PREMISES: -

It is, therefore, prayed that keeping in view the submissions made hereinabove and those to be urged at the time of hearing, the Hon'ble Court may very kindly be pleased to allow the instant application by admitting the applicant to anticipatory bail in the interest of justice.



Hon'ble Court may further direct, that, till the application is considered, Police shall not arrest the Petitioner.


Deepika Singh Rajawat

Through counsel

Date: 27/10/20

Place: Jammu


 Alok Bambroo