

IN THE HIGH COURT OF JUDICATURE AT BOMBAY

(CIVIL APPELLATE JURISDICTION)

(Rule 4(e) of the Bombay High Court Public Interest Litigation Rules,
2010)

PUBLIC INTEREST LITIGATION NO. OF 2021

DISTRICT: RAIGAD

Ms. Vaishnavi Gholave & Anr

...Petitioners

VERSUS

The Union of India And others

...Respondents

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Place: MUMBAI

Date: 05/03/2021

(Vinod P. Sangvikar)

Advocate for the Petitioners

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I. SYNOPSIS

A. **Challenge in brief** Petitioners are seeking directions from this Hon'ble Court against the Respondents to declare the members of the legal fraternity as Frontline workers and to provide them vaccine on priority basis.

II. LIST OF DATES

Date	Particular of Events
11.03.2020	Covid-19 was declared as a pandemic by the World Health Organisation.
21.10.2020	Government of India issued “Guidelines For Healthcare Workers Database For COVID - 19 Vaccination”
26.10.2020	The Government granted permission to the to travel by local train, by placing them into the essential service category.
28.12.2020	Respondent No. 1 issued a “Covid 19 Vaccines - Operational Guidelines” which listed the members who are to be treated as Frontline Workers.

	The members of the legal fraternity are not included in the list of Frontline Workers list and have not been provided Vaccine on priority. Hence this Public Interest Litigation
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III. POINTS TO BE URGED:

A. To declare the members of the legal fraternity as Frontline workers and to provide them vaccine on priority basis.

IV. ACTS TO BE REFERRED :-

1. The Constitution of India
2. The Disaster Management Act, 2005
3. The Epidemic Diseases Act, 1897

V. AUTHORITY TO BE CITED

As per the Exhibits

Place: MUMBAI

(Vinod P. Sangvikar)

Date: 05/03/2021

Advocate for the Petitioners.

IN THE HIGH COURT OF JUDICATURE AT BOMBAY
(CIVIL APPELLATE JURISDICTION)

**[RULE 4 (C) OF THE BOMBAY HIGH COURT
PUBLIC INTEREST LITIGATION RULES, 2010]
PUBLIC INTEREST LITIGATION PETITION OF 2021
DISTRICT : RAIGAD**

In the matter of Articles 12, 21 and
226 of the Constitution of India;

AND

In the matter of identifying the
members of the Legal Fraternity as the
frontline workers.

AND

In the matter of providing Vaccination
on priority to the members of the Legal
Fraternity.

AND

In the matter of Right of Life & Health
guaranteed under Article 21 of the
Constitution of India.

...PETITIONERS

-VERSUS-

1. The Union of India

Ministry of Health and Family Welfare

Government of India,

Nirman Bhawan,

New Delhi-110011.

Through its Secretary

ncov2019@gov.in

2. The Union of India

Ministry of Home Affairs

North Block

New Delhi - 110001

Through its Secretary

hshso@nic.in

3. The State of Maharashtra

Through its Chief Secretary,

Mantralaya, Mumbai - 32

cs@maharashtra.gov.in

4. The State of Maharashtra.

Public Health Department,

Mantralaya, Mumbai-32.

Through it's Principal Secretary.

psec.pubhealth@maharashtra.gov.in

...RESPONDENTS

**TO,
THE HON'BLE CHIEF JUSTICE AND
OTHER HON'BLE PUISNE JUDGES OF THE
HON'BLE HIGH COURT OF JUDICATURE OF
BOMBAY.**

**HUMBLE PETITION OF THE
PETITIONERS ABOVE NAMED.**

MOST RESPECTFULLY SHEWETH: -

**A) PARTICULARS OF THE CAUSE/ORDER AGAINST
WHICH THE PETITION IS MADE.**

The Petitioners are filing the present Petition as a Public Interest Litigation for directing the Respondents to declare the members of the Judiciary and its staff,

Advocates and their staff as frontline workers and to provide them vaccination on priority basis.

B) PARTICULARS OF THE PETITIONERS:-

The Petitioners are the citizens of India. The Petitioner No.1 and 2 are practising advocates in the Hon'ble High Court of Bombay. Their Bar Council Registration number is MAH/4990/2020 and MAH/5996/2014 respectively.

C) PARTICULARS OF THE RESPONDENTS:-

Respondent No.1 is the Union of India, Ministry of Health and Family Welfare, Government of India, which is the apex body, which is duty bound and responsible for framing and implementing the health policy throughout India so as to protect and safeguard the health related issues of people including awareness campaigns, immunisation campaigns, preventive medicine and public health. Respondent No.2 is the Ministry of the Home Affairs, who discharges multifarious responsibilities, the important among them being - internal security, border management, Centre-State relations, disaster management, etc. In pursuance of these obligations, the Ministry of Home Affairs continuously monitors the internal security situation, issues appropriate advisories, shares

intelligence inputs, extends manpower and financial support, guidance and expertise to the State Governments for maintenance of security, peace and harmony without encroaching upon the constitutional rights of the States. The Respondent No. 3 is the State of Maharashtra through its Chief Secretary whereas the Respondent No. 4 is the Public Health Department, which has control and is responsible for health related issues of all persons in the State of Maharashtra.

Thus, all the Respondents are the instrumentalities of the State as defined under Article 12 of the Constitution of India and hence, are amenable to writ jurisdiction of this Hon'ble Court. In short, the present Public Interest Litigation/ Petition is maintainable against all the Respondents.

D) DECLARATION AND UNDERTAKING OF THE PETITIONERS:

- I. Present petition is filed by way of public interest litigation (PIL). The petitioners though likely to benefit if the decision in the proceeding is favourable i.e. the all the reliefs sought are allowed however the same would be incidental as the petition is filed in larger interest and not with the motive of personal interest. The petition is filed for declaring the members of the Legal

fraternity as the frontline workers and to provide them the Vaccine, which is ultimately in the public interest as would be evident from narration of the facts in this petition.

- II. The petitioners are filing this petition in the capacity of a responsible citizen as they have concern in relation to the increase in the number of corona patients and deaths day by day and reliable reports of the large number of persons from the legal fraternity getting infected on the gradual opening of Courts across the State of Maharashtra.
- III. The petitioners have obtained several documents including relevant material, through the official website of the various state departments. The petitioner could not seek information under the Right to Information Act, 2005 because on account of COVID-19 pandemic, several offices are not fully functional and paucity of time.
- IV. Since the cause involved in the present Public Interest Litigation is really touching the health of all Hon'ble Judges, Staff, Advocates, etc., who are the citizens of India.
- V. The petitioners have made necessary enquiries and in a way done a thorough research in the matter raised through this PIL. The petitioners have obtained several

documents, including relevant material, the copies of which are annexed to this PIL.

E) FACTS IN BRIEF, CONSTITUTING THE CAUSE, ARE AS FOLLOWS:-

1. The petitioners state that, COVID-19, which is also known as the coronavirus pandemic, is an ongoing pandemic caused by Severe Acute Respiratory Syndrome (SARS) coronavirus. The World Health Organisation (WHO) declared the outbreak of Covid-19 as a Public Health Emergency (PHE) of international concern on 30th January, 2020, and a pandemic on 11th March, 2020. As on 30th June 2020, more than 1,04,96,151 cases of COVID-19 have been reported in more than 188 countries and territories, resulting in more than 157 K deaths and more than 10.8 M people have recovered.
2. As per the W.H.O., the corona virus is primarily spread amongst the people during close contact, most often via small droplets produced by coughing, sneezing and talking. The droplets usually fall to the ground or onto surfaces rather than travelling through air over long distances. Less commonly, people may become infected by touching a contaminated surface and then touching their face. It is most contagious during the first three days after the onset of symptoms, although spread is

possible before symptoms appear, and from people who do not show symptoms known as asymptomatic.

3. The common symptoms include fever, cough, fatigue, shortness of breath, and loss of sense of smell. Complications may include pneumonia and acute respiratory distress syndrome. The time from exposure to onset of symptoms is typically around five days but may range from two to fourteen days. Today there is a vaccine or specific antiviral treatment available which is claimed to be effective against coronavirus. Primary treatment is symptomatic and supportive therapy.
4. The usual incubation period (the time between infection and symptom onset) ranges from one to 14 days, and is most commonly five days. Some infected people, who do not show any symptoms, are known as asymptomatic or presymptomatic carriers as the virus can be transmitted from such infected persons. Initially there were 5% corona patients of asymptomatic nature, but as on 6th April, 2020, the ratio of such asymptomatic increased from 5% to 80%.
5. The Petitioners state that symptoms of COVID-19 can be relatively non-specific; the two most common symptoms are fever (88 percent) and dry cough (68 percent). Less common symptoms include fatigue, respiratory sputum production (phlegm), loss of the

sense of smell, loss of taste, shortness of breath, muscle and joint pain, sore throat, headache, chills, vomiting, coughing out blood, diarrhea, and rash.

6. Among those who develop symptoms, approximately one in five may become more seriously ill and have difficulty in breathing. Emergency symptoms include difficulty in breathing, persistent chest pain or pressure, sudden confusion, difficulty in walking, and bluish face or lips; therefore, immediate medical attention is advised if these symptoms are present. Further development of the disease can lead to complications including pneumonia, acute respiratory distress syndrome, sepsis, septic shock, and kidney failure.
7. Strategies for preventing transmission of the disease include vaccination, maintaining overall good personal hygiene, washing hands, avoiding touching the eyes, nose or mouth with unwashed hands, and coughing or sneezing into a tissue, and putting the tissue directly into a waste container. It has been made mandatory for all the people to wear a face mask in public. Physical distancing measures are also recommended to prevent transmission.
8. Many Governments across the world including Indian Government and State Governments, have restricted travel or advised against all non-essential travels to and

from countries and areas affected by the outbreak. The virus has already spread within communities in a large part of the world, with many not knowing where or how they were infected. Considering the number of corona patients as on 04.03.2021 in India, it seems that the corona virus has started spreading within communities as many patients did not know from where they are infected.

9. That the old aged adults and those with underlying medical conditions (certain specified comorbidities) such as diabetes, heart disease, respiratory disease, hypertension and compromised immune systems, face increased risk of serious illness and complications and have been identified as persons who would receive vaccine on priority.

10. The Petitioners state that according to the information given there are 4 stages of Coronavirus.

They are as follows -

- In the first stage of a pandemic, the disease doesn't spread locally - cases reported are usually people who have had travel history to an already affected country.
- The second stage is of local transmission - when people who have brought the virus into the country transmit it to people they come in contact

with, usually friends and family. At this stage, it is easy to trace spread and quarantine people.

- The third stage is when the source of the infection is untraceable; this stage is identified by people who haven't had travel history getting affected by the virus - once here spread is extremely contagious and difficult to control.
- The fourth stage is where spread is practically uncontrollable and there are many major clusters of infection all over the country.

11. The Petitioners state that it is very essential to stop the spread of coronavirus. And hence it is the responsibility of the state to vaccinate the citizens so as to ensure a healthy living.

12. The Petitioner states that the vaccine will help us achieve two things :-

- I. It will further bring down the mortality, and
- II. It will bring down the number of cases.

48% of COVID deaths occur in people above 50, who develop severe illness because of other comorbidities such as diabetes, kidney disease, chronic respiratory diseases. If we reduce the severity of the disease in this group, we will be able to bring down the mortality rate. Besides, if you are able to vaccinate a significant number of people, this together with people who have

developed immunity naturally because they have had the disease, will help us acquire herd immunity. This will help us to return to a near normal life, at the earliest date.

13. The Vaccination helps in protecting our healthcare workers, other frontline workers, our elderly and other high-risk groups and brings down the severity and mortality of the disease, reducing the impact of the COVID disease and may become a normal cold and cough disease.

14. In order to get rid of this pandemic, socially and economically, vaccines are important. Every aspect of human life : education, jobs, businesses and health services have suffered a lot because of this pandemic. A vaccine is important if we want to get back to normal. Needless to state that, the legal fraternity is one of the most adversely affected sections in the society due to restrictions placed on workings of the Court to prevent spread of disease. This has also been orally observed and commented upon by the Hon'ble Apex Court during hearings.

15. The Government of India issued "Guidelines For Healthcare Workers Database For COVID - 19 Vaccination" in October 2020, stating that the Nodal Officers will be appointed to prepare a database of

Health Care Workers who will be prioritized for receiving Covid Vaccine. These guidelines only spoke about the Health Care Workers and no one else. Hereto annexed and marked **Exhibit “A”** is the copy of the guidelines.

16. The Respondent No. 1 issued a “Covid 19 Vaccines - Operational Guidelines” on 28.12.2020. The guidelines at Point No. 7 describes Prioritization of the covid 19 vaccine which includes Health Care Workers, other Front line Workers like personnel from State and Central Police department, Armed Forces, Home Guard, prison staff, disaster management volunteers and Civil Defense Organization, Municipal Workers and Revenue officials engaged in COVID-19 containment, surveillance and associated activities and Population \geq 50 years of age and $<$ 50 years with co-morbidities like diabetes, hypertension, cancer, lung diseases etc. Hereto annexed and marked **Exhibit “B”** is the copy of the Operational Guidelines.

17. From 1st March, 2021 the Government has initiated the programme to vaccinate people above 60 years of age and those having the specified comorbidities falling in the age group of 45-60 years.

18. The Petitioner states that Judiciary is declared as one of the essential pillars of Democracy. The members who are part of this pillar which includes the Judges, Court

Staff, Advocates and their clerks (legal fraternity). Hence they are equally important along with the other staff.

19. Being the national lockdown in world wide the Judiciary never failed to perform their duty, there was online filing, urgent matters were heard, Judges and officers of the court were always discharging their duties though being the difficult times. The governments should not be tempted to perceive the present crisis as an opportunity to overlook the essential role of Judiciary and their officers, which could not have been fulfilled with active support of the Advocates.

20. Even during the lockdown period the doors of the courts were still open for the common layman. Although at few courts the proceedings were held through an online platform, there were many esp. lower courts which conducted the court proceedings physically. The advocates would travel all way long for their clients and to provide legal aid to the needy.

21. From 26.10.2020 the Advocates were added in the Essential Services list and hence the Western Railway and Central Railway permitted practising advocates and registered clerks of advocates to travel by suburban services in the Mumbai Metropolitan Region, after intervention in a batch of the petitions by this Hon'ble Court in exercise of its extraordinary writ jurisdiction

under Article 226 of the Constitution of India.

22. The Petitioner states that, it is not only logical, appropriate but also necessitated by the circumstances that, when the legal fraternity is added in the list of Essential Services then they should be also added in the Front Line Workers List so as to avail the benefit of vaccination.
23. The Petitioners state that the majority of the Judges of this Hon'ble Court are above the age of 45 years, there is a high risk that they are affected by CoronaVirus, which would affect the work of justice delivery.
24. The state must not be ignorant that access to justice is recognised as a Fundamental Right and Judges, their staff and Advocates who are also referred as the officer of the court constitute the integral part of the access to Justice which is required to deliver justice.
25. The legal profession rightly described as a noble profession is the service to the society, the main aim of it is to protect citizens from injustice in any form. It is meant to protect and uphold the rule of law. The purpose of law is to preserve the moral sanctity that binds the society and lawyers are the social engineer to bring social change and development.
26. In the circumstances, there is a grave injustice done

by the government in not recognizing the members of the legal fraternity as the Front Line Workers even though declared essential.

27. The Brookings Institution website defines frontline workers as “frontline workers as employees within essential industries who must physically show up to their jobs. Rather than capture every worker within essential industries, we propose identifying a subset of workers in specific frontline occupations who face a variety of health risks in their workplaces. These workers may frequently be in close physical proximity to customers and colleagues or may be exposed to germs and other potentially hazardous conditions”.

28. As per the observation of the above referred definition it can be seen that Advocate are now covered under essential service and the concept of Advocate and Judge coming in contact of germs/ virus and being exposed is high as the document received by the client, meeting with clients and the document being tendered to the Court during arguments all can contain germs of the this novel disease, as per the above definition the Judges and Advocate are no less than frontline workers.

29. The petitioners want to draw attention to the commendable role being played by the Legal Services Authority (legal aid) and its empanelled lawyers in

providing free of cost/ reasonable cost legal services to the most poor, destitute, illiterate amongst the citizens who otherwise cannot afford the litigation and are thus likely to be deprived of access to justice, which is fundamental right and essential for realising rule of law sustains in the long run and build confidence in the system of the public. The Advocates had to travel and appear physically for such matters in all types of matters and in particular Bails, Criminal Appeals, etc, being heard physically from a very early period after lockdown was eased. At huge risk to their life and also to their family members the fraternity with the support of staff of legal services authority continued to work to ensure that no one is deprived of access to justice even during the pandemic and restricted functioning of Courts. To deprive such persons who help in realisation of fundamental right (Article 21) to access to justice and speedy justice without much delay, taking personal risk are at par with and no less than other FLWs who were working to ensure right to life of countrymen. Thus, from this angle too, discrimination against the legal fraternity is arbitrary, capricious, unreasonable, baseless and bad in law.

30. By not declaring the members of the Legal fraternity as Front Line Workers and not providing them

Vaccination on priority they are deprived of their right to life and health under Article 21 of the Constitution. By corollary, the judiciary is duty-bound to examine the actions of the State, and hold it up against the constitutional standards.

31. The right to health refers to and means the most attainable levels of health that every human being is entitled to. Health has been much regarded as the basic and fundamental human right by the international community under the International Human Rights Law. In contrast to all the other human rights, the right to health creates an obligation upon the States to ensure that the right to health is respected, protected and fulfilled. So the petitioner prays that the advocates be given vaccination on priority.
32. Being aggrieved by the failure on the part of the Government at State and National level as well as the negligence and ignorance shown by the Respondents towards declaration of the members of the Legal fraternity as the essential workers and not providing them vaccine on priority, the petitioners prefer this Public Interest Petition on the following amongst other grounds which are without prejudice to each other:-

::GROUNDS::

- I. It ought to be held that acts of commission and/or omission on the part of the State as well as the Central Government in depriving the members of the Legal Fraternity from being declared as the Frontline Workers category, is arbitrary, capricious, unreasonable and in violation of Article 14 of the Constitution of India.
- II. It ought to be held that the act of the Respondents at various levels violates the rights of members of the legal fraternity Art. 21 of the Constitution of India.
- III. It ought to be held that if these members are given vaccines on priority then it will be beneficial for the country as a whole since its pillars will be strong and as the access to Justice has to be ensured at all points of time which necessitates services of the fraternity.
- IV. It ought to be held that not declaring the members of the legal fraternity as Front line workers creates inequality amongst the other field workers and the Advocates. As a result the right to equality of the members of the legal fraternity guaranteed under Art.14 of the Constitution Of India is infringed.
- V. The Government has not considered the risk involved properly, while defining FLWs, and thus the decision excluding /omitting the legal community suffers from non-application of mind. It has not given due and

proper consideration to the fact that Courts, by their very nature, are places which have very high density congregations of people on a daily basis. The Courts are expected to conduct the hearings (except for certain specifically excluded categories) in a manner that they are open to access to the public. Hundreds and thousands of cases are listed in any given court complex every day. Apart from judges, the court staff - which is substantial, and Advocates & their staff - who have to attend to their respective cases, and a large number of litigants visit courts in which their cases are listed, on a daily basis.

VI.It ought to be considered that vaccination is the need of the hour to Judges, their staff and Advocates, and also their staff so as to secure their life and health.

VII.This act / omission of the Government is violative of the Directive Principle of State Policy. The object of the Directive Principle is to raise the level of nutrition and the standard of living of its people and the improvement of public health as among its primary duties and, in particular. The petitioner states that nothing better is achieved by this act of the respondents.

VIII. It ought to be held that all this failure on part of the government infringes the rights of the members provided by the Constitution of India.

IX. It ought to be held that the illegality, arbitrariness, inaction, ignorance and negligence on the part of the respondents in not taking the measures for the benefit of members of the legal fraternity and depriving them from getting vaccine on priority is malafide and violative of Articles 21 of the Constitution of India.

38. In the circumstances aforesaid, the Petitioners are approaching this Hon'ble Court invoking its extraordinary jurisdiction under Article 226 of the Constitution of India, as the Petitioner has no other alternative, equally efficacious remedy. Further, the Petitioner states that the balance of convenience is in favour of the Petitioners and no harm or prejudice would be caused to the Respondents if the prayers of this Petition are granted.

39. This petition is being filed as expeditiously as possible and within reasonable time. Thus, there is no delay in filing this petition and if there is any delay, the same may kindly be condoned in the interest of justice. The judgment of the Supreme Court in the matter of Improvement Trust Ludhiana v. Ujagar Singh and Ors. reported in (2010) 6 SCC 786, amongst other judgments of the Supreme Court comes to my aid. The Court had held in that matter that -

“It is pertinent to point out that unless mala fides are writ large on the conduct of the party, generally as a normal rule, delay should be condoned. In the legal arena, an attempt should always be made to allow the matter to be contested on merits rather than to throw it on such technicalities. Justice can be done only when the matter is fought on merits and in accordance with law rather than to dispose of it on such technicalities and that too at the threshold” .

Thus, I request delay if any in approaching this Hon’ble Court may be kindly condoned.

40. The Petitioners have not filed any other Petition or proceedings on the subject matter of this Petition either in this Hon’ble Court or in the Hon’ble Supreme court of India.

41. The Respondents and Petitioners are from Maharashtra. The cause of action arose in Maharashtra and hence, this Hon’ble Court has jurisdiction to entertain, try and dispose of the present petition in exercise of its extraordinary civil Jurisdiction.

42. The Petitioners are paying a fixed court fee of Rs.500/- on this Petition.

43. The Petitioners will rely upon documents a list whereof is annexed hereto.

44. The petitioners have not received a notice of caveat till date from any of the Respondents.

45. The petitioners undertake to supply an English Translation of vernacular documents as and when required.

46. The petitioners crave leave to add, amend, delete and modify any of the grounds/submissions as and when required.

47. The petitioners have a good prima facie case on merits and the petitioners hope to succeed in this petition. The petitioners state that due to the non addition of the members of the legal fraternity in the essential list and depriving them from taking the vaccine on priority their life is at risk. Therefore, during the pendency of this petition, it is necessary to direct the respondents, their officers and subordinates to declare these members as front line workers. If the interim relief is not granted, then, it would cause irreparable loss and hardship to the public at large.

48. **Therefore the Petitioner most respectfully prays that:-**

A. Rule be issued

B. To allow this Public Interest Litigation.

C. By way of a writ of mandamus or any other appropriate writ, order or direction in the like nature, this Hon'ble Court may direct the respondents, their officers and subordinates to declare the members of the Legal Fraternity as the Front Line Workers.

D. By way of a writ of mandamus or any other

appropriate writ, order or direction in the like nature, this Hon'ble Court may direct the respondents, to provide vaccine on priority to the members of the legal fraternity and preferably within stipulated time period.

E. By way of a writ of mandamus or any other appropriate writ, order or direction in the like nature, this Hon'ble Court may direct the authorities to make available necessary infrastructure in court premises for vaccination.

F. Any further relief may be granted in favour of the Petitioner in the interest of justice.

AND FOR THIS ACT OF KINDNESS, PETITIONER AS IN DUTY BOUND SHALL EVER PRAY.

Dated this ____th day of March, 2021.

(Vinod P. Sangvikar)

ADVOCATE FOR PETITIONERS

VERIFICATION

I, Vaishnavi Maruti Gholave, Age: 23, Occ- Advocate, R/o:G-13/2. Surya CHS, Sukapur, New Panvel. Maharashtra, PAN No. BREPG1601D, AADHAR No. 918614360388, Mobile No. 8767948338, the Petitioner No.1 for herself and for Petitioner No.2 herein above state on solemn affirmation, that the contents of the above Public Interest Litigation from Para Nos.1 to 47 are true and correct to the best of my knowledge and belief. and Para no. 48 (A) to (F) are humble prayers to this Hon'ble Court, which are explained to me in vernacular, which are true and correct.

Hence, verified and signed at Mumbai on this ____day of March, 2021.

Identified by,

Deponent

Advocate

(Vaishnavi Maruti Gholave)
Aadhar No. 918614360388