

**IN THE HIGH COURT OF KARNATAKA AT BANGALORE
(ORIGINAL JURISDICTION)
W.P.NO. 20317 /2021(PIL)
In the Matter of a Public Intrest Litigation**

BETWEEN

National Federation of the Blind,
Having its registered office at
Plot P.21, Sector 6,
M.B. Road, Pushpa Vihar, New Delhi-110017
Having its Karnataka Branch Office at:
S-372, Bharat Nagar
2nd Phase Near Karnataka Bank
Magadi Main Road,
Bangalore-560091
Represented by its General Secretary,
Mr. Gautam Prakash Agarwal

....PETITIONER

AND

1. State Government of Karnataka
Department for the Empowerment
Of the Differently Abled and Senior Citizens
Dr. Ambedkar Veedhi
Bangalore- 560001
Represented by its Principal Secretary

2. State Government of Karnataka
Department of Personnel and Administrative Reforms
M.S. Building, Near K.R. Circle
Dr. Ambedkar Veedhi
Bangalore- 560001
Represented by its Principal Secretary

....RESPONDENTS

**MEMORANDUM OF PETITION UNDER ARTICLES 226
AND 227 OF THE CONSTITUTION OF INDIA**

The Petitioner most respectfully submits as follows:

1. This petition is filed as a public interest litigation under Article 226 of the Constitution by the Petitioner Association on behalf of all the disabled government employees in the state of Karnataka to protect their rights under Section 20(5) of the Rights of Persons with Disabilities Act 2016 ("RPwD Act")

and under Article 14 and 21 of the Constitution of India. Section 20(5) states that the appropriate government may frame policies for posting and transferring of employees with disabilities. The Petitioner seeks implementation of Section 20 (5) of the RPwD Act because despite the various notifications and orders passed by the Central Government and government circulars by the State government, there is no comprehensive policy on the transfer of government employees with disabilities in the State. Government employees with disabilities in Karnataka are routinely transferred, which severely impacts them and no reasonable accommodation is provided as a policy measure to either give them relaxation in transfers or to transfer them to a place of their choice. The Karnataka Government must therefore take into consideration the directions issued by the Central Government dated 04.08.2020 and frame a comprehensive transfer policy regulating the transfer of persons with disabilities. Hence this petition. Further, the Petitioner has no personal interest and the present petition is not filed for self gain or for gain of any other person/institution/body and there is no other motive other than that of public interest of persons with disabilities in filing the present writ petition.

2. The Petitioner states that the source of knowledge of facts alleged in the present petition is from Office Memorandums, Government Orders, Circulars and Policies dealing with people with disabilities issued by the Governments, and representations made, which have been added as Annexures herein.

3. The writ petition benefits people with disabilities, and more specifically employees with disabilities in Karnataka. People with disabilities who are employed at different levels, are not only unaware of their statutory rights but also due to their disability are unable to have access and resources to effective legal representation and to get their rights as provided under the Rights of Persons with Disabilities Act 2016. Therefore the Petitioner organization, which strives for the welfare for the community is filing the present PIL on their behalf to ensure enforcement of laws, policies and programs for the benefit of persons with disabilities.
4. It is submitted that the Government authorities whose responsibility to implement the directions issued by the Central Government dated 04.08.2020 and frame a comprehensive transfer policy regulating the transfer of persons with disabilities have been arrayed as Respondents. The Respondent No. 1 is a Department of the State Government of Karnataka, which deals with the welfare of persons with disabilities and has the duty and responsibility to enforce laws, policies and programs for the benefit of the disabled. The Respondent No. 2 is the Department of Personnel and Administrative Reforms whose function is to formulate personnel policies on matters relating to recruitment, promotion and conditions of service, reservation of SC/ST and other backward classes in the civil services and conducting research in personnel administration and cadre management among other functions. As far as the Petitioner is aware, no other personal bodies/institutions are likely to be affected by the orders sought in the present petition.

5. The Petitioner is an apolitical federation of visually impaired low vision people formed in 1970 with the philosophy of "Let the Blind Lead the Blind". The Petitioner Federation has been striving for equality of opportunity for the Blind in the field of Education, Training and Employment etc for over 50 years. The Federation is serving the blind community through its various welfare programmes in the state. The Petitioner Federation presently has around 900 members all over the State. The Petitioner organization has set up residential schools and hostels for the blind, provide scholarships, as well as undertake advocacy initiatives to implement the rights of persons with disabilities. The Petitioner is represented by its General Secretary- Mr. Gautam Prakash Agarwal. The Petitioner has the means to pay the costs, if any, imposed by the Hon'ble Court and provide any undertaking to the Hon'ble Court in that respect. The details of the organization are : National Federation of the Blind, Registered office at : Plot P.21, Sector 6, M.B. Road, Pushpa Vihar, New Delhi-110017 and Karnataka Branch Office at: S-372, Bharat Nagar 2nd Phase Near Karnataka Bank Magadi Main Road, Bangalore-560091. The Office Bearers of the Governing Council for the Petitioner Federation are as follows:

- (i) President- Mr. Nagaraj M Sirsi
- (ii) Vice President- Mr. Balaji Varadarajan
- (iii) General Secretary- Shri. Gautam Prakash Agarwal
- (iv) Secretary- Mr Praeep TS & Smt. Geetharam Mohan
- (v) Treasurer- Mr.Aravind Goel

Further, the Petitioner has filed the following PILs :

S.No	PILs/Letter Petitions	Status of the Petition	Outcome
1.	W.P No. 13075 of 2012 NFB v. Sarva Shiksha Abhiyana & Ors.	Pending	Pending
2.	W.P No. 10875 of 2012- NFB v. KPSC & Ors.	Pending	Pending
3.	W.P No. 51251 of 2019 – NFB v Karnataka Textbook Society	Pending	Pending
4.	W.P No. 8474 of 2021 – NFB v. The Registrar General & Secretary & Ors.	Pending	Pending
5.	W.P No. 8048 of 2021 – NFB v State of Karnataka	Pending	Pending

6. The Petitioner Association sent representations dated 01.06.2020 and 17.08.2020 to the Respondent State Government requesting them to frame a transfer policy for employees with disabilities. There have been no reply to the said representation by the Respondent No.1 till date. The said representation has been annexed as **Annexures E and G** herewith.

BRIEF FACTS

7. There are several barriers and logistical issues facing employees with disabilities at the workplace. Apart from exclusionary policies, and a lack of sensitization to the specific issues faced by persons with disabilities, the work environment does not cater to the particular needs of employees with disabilities. These clear disparities at the workplace make it especially difficult in terms of career progression, job opportunities and accessibility to resources.

8. Transfers in government employment aggravate the persisting issues which are faced by employees with disabilities particularly in terms of access to care. If there are frequent transfers, there are pronounced issues faced by employees with disabilities in terms of access to medical care and family support. It is far more difficult for an employee with a disability to adjust to a new environment after a transfer, especially given the specific issues in terms of access to care.

9. It is submitted that prior to the coming into force of the RPwD Act, there were several Office Memoranda and government orders issued by the Central Government and the Respondent State government to provide some concessions in transfers to government employees with disabilities. However, this was not uniform.

10. The Central Government issued an Office Memorandum dated 10.5.1990 bearing No. A-B 14017/41/90-Estt. (RR) containing a recommendation that persons with disabilities appointed by the Government should preferably be posted in their native places, or at the least, in their native districts. Although the Government held that it may not be possible to implement this recommendation with respect to employees with disabilities belonging to Group-A or Group-B, it held that holders of Group-C or Group-D posts who are disabled and who have been recruited on a regional basis must be posted in their native places within the region, subject to administrative constraints. Additionally, requests from employees regarding transfer to their native

places must also be given preference.

(A copy of the Office Memorandum dated 10.05.1990 is annexed herein and is marked as **ANNEXURE-A**)

11. This was further clarified by Office Memorandum bearing No. A-B 14017/16/2002-Estt.(RR) dated 13.02.2002 which states that requests from employees with disabilities regarding transfer to or near their native places would cover employees with disabilities in Groups A, B, C and D.

(A copy of the Office Memorandum dated 13.02.2002 is annexed herein and is marked as **ANNEXURE-B**)

12. In the meanwhile, it is submitted that the Respondent No. 2 issued a Government Order No. DPAR 18 STR 2013 dated 06.02.2014 amending the existing transfer guidelines by adding that persons with disabilities must be treated with sympathy and a concession must be given to them with respect to the general rules of transfer. They should be allowed to continue in the same place for a longer period than the prescribed period. If it is essential to transfer them, particularly in situations where they have been promoted, they must not be transferred against their will. Additionally, they must be transferred to a place that they prefer. However, this order does not direct government establishments to ensure the posting of blind and other severely disabled employees near their home towns.

(A copy of the Karnataka Government Order dated 06.02.2014 is annexed

herein and is marked as **ANNEXURE-C**)

13. Thereafter the Central Government issued Office Memorandum No. 36035/3/2013-Estt.(Res) dated 31.03.2014 directing that certain facilities must be provided for persons with disabilities who are already employed in the Government in order to ensure efficient performance of their duties. These Guidelines are applicable to all employees working in the Ministries/Departments of the Central Government, their attached and subordinate offices, Central Public Sectors Enterprises, Cantonment Boards and so on. In Paragraph H of the said guidelines, it states that persons with disabilities must be exempted from rotational transfer policy and be allowed to continue in the same job where they would have achieved the desired performance. Further, there must be preference at the time of transfer or promotion subject to administrative constraints. As far as possible, they must be retained in the same place where their services could be optimally utilized.

(A copy of the Office Memorandum dated 31.03.2014 is annexed herein and is marked as **ANNEXURE-D**)

14. It is submitted that the Rights of Persons with Disabilities Act 2016 ("RPwD Act") came into force in 2017. One of the most important chapters in the RPwD Act is Chapter IV which deals with Skill Development and Employment. Section 20 provides for non-discrimination in employment and states as follows:

20. Non-discrimination in employment.—

(1) No Government establishment shall discriminate against any

person with disability in any matter relating to employment: Provided that the appropriate Government may, having regard to the type of work carried on in any establishment, by notification and subject to such conditions, if any, exempt any establishment from the provisions of this section.

(2) Every Government establishment shall provide reasonable accommodation and appropriate barrier free and conducive environment to employees with disability.

(3) No promotion shall be denied to a person merely on the ground of disability.

(4) No Government establishment shall dispense with or reduce in rank, an employee who acquires a disability during his or her service: Provided that, if an employee after acquiring disability is not suitable for the post he was holding, shall be shifted to some other post with the same pay scale and service benefits: Provided further that if it is not possible to adjust the employee against any post, he may be kept on a supernumerary post until a suitable post is available or he attains the age of superannuation, whichever is earlier.

(5) The appropriate Government may frame policies for posting and transfer of employees with disabilities.

15. Hence under Section 20 (5) of the RpWD Act, the Respondent State Government is required to frame policies for the posting and transfer of employees with disabilities so as to enable them to work without discrimination and to provide them reasonable accommodation.

16. It is submitted that the Ministry of Social Justice and Empowerment sent a letter to Principal Secretaries of all States and Union Territories, dated 04.08.2020 bearing No. 38-10/2020-DD-III stating that all states and Union Territories are requested to frame a comprehensive posting and transfer policy for employees with disabilities in respect of their organizations in accordance with Section 20(5) of the RPwD Act. A copy of said policy was supposed be forwarded to the Department of Empowerment of Persons with

Disabilities.

(A copy of the Letter dated 04.08.2020 is annexed herein and is marked as **ANNEXURE-E**)

17. Since the Respondent State Government despite these requests from the Central government did not frame any policy on transfers for persons with disabilities, the Petitioner Association sent a representation dated 17.08.2020 to the Respondent State Government requesting them to frame a transfer policy for employees with disabilities to ensure their posting at the office or branch of the respective establishment which is nearest to the residence of the disabled employees in view of the vulnerability and risk to the disabled employees in the wake of the spread of corona virus.

(A copy of the Representation dated 17.08.2020 is annexed herein and is marked as **ANNEXURE-F**)

18. It is submitted that despite all these requests the Respondent State government has not framed any transfer policy. The Respondent Government has been routinely transferring employees with disabilities away from their hometown and away from their families despite their requests not to transfer them. Even the existing State and Central Government Guidelines are not being adhered to. These actions are contrary to the Rights of Persons with Disabilities Act as well as the provisions of the Constitution, given the negative impact that such transfers would have on the work performance, comfort, stability and

well-being of such employees.

19. Thus, aggrieved by the action of the Respondents in not framing a transfer policy, the Petitioner Association has filed this Petition, having no alternative and equally efficacious remedy. The Petitioner has not filed any other petition before this Hon'ble Court or any other court or forum on a similar cause of action. The Petition has been filed on the following, among other grounds.

GROUND:

20. **THAT** the inaction of the Respondent State Government in drafting a specific transfer policy catering to the needs of government employees with disabilities is contradictory to Section 20(5) of the RPwD Act. Section 20(5) directs the appropriate government to frame a comprehensive posting and transfer policy for employees with disabilities, so that employees with disabilities are not discriminated in their employment. The Respondent State Government is yet to frame such a policy, and such inaction is thus in violation Section 20(5) of the Act. Rule 8 of the Rights of Persons with Disabilities Rules, 2017 states that every establishment must publish an equal opportunity policy for persons with disabilities, and the said policy must contain the manner of selection of persons with disabilities for various posts, post-recruitment and pre-promotion training, ***preference in transfer and posting***, special leave, preference in allotment of residential accommodation if any, and other facilities.

21. **THAT** the Respondents have failed to recognize the aggravated effect of the pandemic on persons with disabilities, specifically the pronounced impact that frequent transfers would have on their daily routine, ability to take care of themselves, comfort, living conditions, and access to family members/care-givers.

22. **THAT** the non-framing of a comprehensive transfer policy has violated Article 14 of the Constitution which provides for the right to equality and a right against discrimination as well as a right to reasonable accommodation. This right to reasonable accommodation has been further provided under Section 3 of the RPwD Act.

"3. Equality and non-discrimination.—

(1) The appropriate Government shall ensure that the persons with disabilities enjoy the right to equality, life with dignity and respect for his or her integrity equally with others.

(2) The appropriate Government shall take steps to utilise the capacity of persons with disabilities by providing appropriate environment.

(3) No person with disability shall be discriminated on the ground of disability, unless it is shown that the impugned act or omission is a proportionate means of achieving a legitimate aim.

(4) No person shall be deprived of his or her personal liberty only on the ground of disability

(5) The appropriate Government shall take necessary steps to ensure reasonable accommodation for persons with disabilities."

23. **THAT** in ***Vikash Kumar v. Union Public Service Commission, AIR 2021 SC 2447*** the Supreme Court acknowledged the principle of reasonable accommodation and held that there must be affirmative action and additional support provided to persons with disabilities to facilitate their full and effective

participation in society.

“35. The principle of reasonable accommodation captures the positive obligation of the State and private parties to provide additional support to persons with disabilities to facilitate their full and effective participation in society.”

The principle of reasonable accommodation must thus be recognized in order to ensure that the right to equality is granted in a complete and meaningful sense. Hence the non-framing of a transfer policy for government employees with disabilities amounts to a violation of the reasonable accommodation obligations under Article 14 of the Constitution.

24. **THAT** the routine and rotational transfers of employees with disabilities violates the principle of equality and non-discrimination as the Respondent State Government is treating employees with disabilities similarly to employees without disabilities, which amounts to treating unequal categories in the same manner. Transferring government employees with disabilities routinely, would put them at a disadvantage thus violating their right to equality and non-discrimination under Article 14. Persons with disabilities need to be given certain concessions and hence special transfer policies need to be framed for them, keeping in mind the needs of substantive equality under Article 14. In ***Vikash Kumar v. Union Public Service Commission, AIR 2021 SC 2447*** the Hon’ble Supreme Court held that Article 14 would apply with full force and vigour to persons with disabilities. The Supreme Court held:

“32. Part III of our Constitution does not explicitly include persons with disabilities within its protective fold. However, much like their able-bodied counterparts, the golden triangle of Articles 14, 19 and 21 applies with full force and vigour to the disabled. The RPwD Act 2016 seeks to operationalize and give concrete shape to the promise of full

and equal citizenship held out by the Constitution to the disabled and to execute its ethos of inclusion and acceptance.

33. The fundamental postulate upon which the RPwD Act 2016 is based is the principle of equality and non-discrimination. Section 3 casts an affirmative obligation on the government to ensure that persons with disabilities enjoy (i) the right to equality; (ii) a life with dignity; and (iii) respect for their integrity equally with others. Section 3 is an affirmative declaration of the intent of the legislature that the fundamental postulate of equality and non-discrimination is made available to persons with disabilities without constraining it with the notion of a benchmark disability. Section 3 is a statutory recognition of the constitutional rights embodied in Articles 14, 19 and 21 among other provisions of Part III of the Constitution. By recognizing a statutory right and entitlement on the part of persons who are disabled, Section 3 seeks to implement and facilitate the fulfilment of the constitutional rights of persons with disabilities."

Hence the respondent state government must ensure that persons with disabilities enjoy the right to equality and the right against discrimination by providing a transfer policy to ensure that persons with disabilities are not discriminated.

25. **THAT** in the case of **Jeeja Ghosh & Anr. v. Union of India & Ors. (2016) 7 SCC 761** it was held that merely granting a right to equality is not enough to safeguard the rights of persons with disabilities. There is also a need to provide certain opportunities and concessions in order to prevent discrimination. It held,:

"In international human rights law, equality is founded upon two complementary principles: non-discrimination and reasonable differentiation. The principle of non-discrimination seeks to ensure that all persons can equally enjoy and exercise all their rights and freedoms. Discrimination occurs due to arbitrary denial of opportunities for equal participation. For example, when public facilities and services are set on standards out of the reach of persons with disabilities, it leads to exclusion and denial of rights. Equality not only implies preventing discrimination (example, the protection of individuals against unfavourable treatment by introducing antidiscrimination laws), but goes beyond in remedying

discrimination against groups suffering systematic discrimination in society. In concrete terms, it means embracing the notion of positive rights, affirmative action and reasonable accommodation. The move from the patronising and paternalistic approach to persons with disabilities represented by the medical model to viewing them as members of the community with equal rights has also been reflected in the evolution of international standards relating specifically to disabilities, as well as in moves to place the rights of persons with disabilities within the category of universal human rights. {See - Report of United Nations Consultative Expert Group Meeting on International Norms and Standards Relating to Disability 10-2-2001}

There must therefore be reasonable differentiation in order to accommodate the needs and interests of persons with disabilities, thus ensuring that they are treated equally. The principle of non-discrimination and reasonable differentiation fall within the overarching framework of Article 14 and has also been recognized by several international conventions and reports such as the Report of United Nations Consultative Expert Group Meeting on International Norms and Standards Relating to Disability dated 10.02.2001 and the Convention on the Rights of Persons with Disabilities dated 13.12.2006. If persons with disabilities are transferred frequently and are not posted in locations of their preference they are negatively impacted in several ways. The performance of employees with disabilities would be contingent on the environment in which they work, which is why there is a need for affirmative action to ensure that they are provided with an appropriate work environment. The actions of the Respondent Government have led to an arbitrary denial of opportunities thus violating the right against discrimination.

26. **THAT** Article 21 of the Constitution guarantees a right to life and personal

liberty which is non-derogable and inalienable, except according to the procedure established by law. In the case of ***Francis Coralie Mullin v. the Administrator, 1981 AIR 746*** the Supreme Court has held that every act which offends human dignity would also constitute as a violation of Article 21.

"Every act which offends against or impairs human dignity would constitute deprivation pro tanto of this right to live and it would have to be in accordance with reasonable, fair and just procedure established by law which stands the test of other fundamental rights"

This expansive interpretation would mean that any act which impairs a right to life with dignity would stand in violation of Article 21. The routine and rotational transfer of persons with disabilities by the Respondent government would thus contravene Article 21 of the Constitution. Persons with disabilities must be guaranteed the right to go about their daily lives without having to suffer additional hardships such as being constantly transferred to an unfamiliar region, which would adversely impact them in several ways. Therefore, the right to life and dignity under Article 21 of the Constitution has also been violated by the Respondents owing to their failure to frame a transfer policy.

27. **THAT** although the Respondent State Government passed an order dated 06.02.2014 providing for an exemption from routine transfers in general, it does not however, provide for the posting of employees with disabilities near their home town and even this Circular is not adhered to as employees with disabilities are routinely transferred and hence there is a need for a

comprehensive transfer and posting policy for government employees with disabilities to ensure that they will not be treated on par with other non-disabled employees and that special provisions will be made for them.

28. **THAT** the Ministry of Social Justice and Empowerment vide its letter to the Principal Secretaries of all the States and Union Territories dated 04.08.2020 requested all the States to formulate a comprehensive posting and transfer policy for employees with disabilities and to forward a copy to the Department. The Respondent State Government is yet to draft such a policy thus violating the directions issued by the Department of Empowerment of Persons with Disabilities.

29. **THAT** in the case of **V.K Bhasin v. State Bank of Patiala, MANU/DE/1013/2005** the Delhi High Court held that a person with a disability is entitled to protection against transfer in concurrence with the Government Orders passed. The transfer was held to be violative of the central government memorandums, orders and policies and therefore it was held to be completely erroneous.

"19. The most important aspect is that the circular dated 15.02.1988 has never been revoked and the same was issued by the Ministry of Finance and to deal with public sector banks like the respondent. The Ministry of Personnel has issued certain circulars for its officers. It is abundantly clear to us that the clear intent is that the bank must give preference in a nearby location to the original native place for posting of such persons with disability.

20. The aforesaid, thus, makes it clear that the very premise of the decision of the respondent Bank is erroneous. The affidavit and the decision show that the circulars are being read as if no

preference is sought to be given to persons in Group A and posts, which is fallacious."

The Respondents in the present matter, have blatantly ignored the Central Government directions, orders and circulars, which leads to a cogent need to frame a transfer policy.

30. **THAT** In the case of ***S. Ramalingam v. State Government, 2017 SCC Mad. 34141*** the Madras High Court held that while dealing with the transfer of certain government employees with disabilities the memorandums and policies of the government must be taken into consideration and held:

"12. Coming to the other contentions raised, we find that even as per the communication sent by the Government of Puducherry, nowhere it is stated that the Government Order passed in G.O.Ms. No. 23, dated 08.4.1997 and the Official Memorandum dated 31.3.2014 would not be given effect to."

Despite the numerous judgments which have held that Central Notifications and Orders must be considered, the Government is yet to frame a transfer policy in implementation of the Central Directions. The Respondent Government must therefore take into consideration the directions issued by the Central Government dated 04.08.2020 and frame a comprehensive transfer policy regulating the transfer of persons with disabilities.

GROUND FOR INTERIM PRAYER

31. **THAT** as per Government Order dated 06.02.2014 bearing No. DPAR 18 STR 2013 employees with disabilities should be allowed to continue in the same place of posting for a longer period than the prescribed period. They must not be transferred against their will. Additionally, they must be transferred to a place that they prefer. Therefore, any transfers of state government

employees with disabilities that is undertaken during the pendency of the writ petition must be in strict compliance with the Government Order dated 06.02.2014. Unless the transfers of state government employees with disabilities is in strict compliance with strictly comply with the Government Order No. DPAR 18 STR 2013 dated 06.02.2014 during the disposal of this writ petition, the Respondent Government will continue to arbitrarily transfer these employees with disabilities, in the absence of a comprehensive policy, thus causing considerable inconvenience and hardship to them. This will lead to a further violation of the Section 20(5) of RPwD Act as well as Article 14 and 21 of the Constitution and the purpose and objective behind the petition would be rendered infructuous and the ill-effects arising from such transfers would be irreversible.

PRAYER

WHEREFORE, in light of the above facts and circumstances, the Petitioner most respectfully prays that this Hon'ble Court be please to:

- A. Issue a Writ of Mandamus directing the Respondents to frame a comprehensive transfer policy for disabled government employees, as required under Section 20 (5) of the RPwD Act 2016, and such transfer policy must include that government employees with disabilities are exempted from routine and rotational transfers, that they are given preference in place of posting at the time of transfer or promotion, that the initial postings of disabled employees are made near their home towns among other concerns, within a specific time period of 3 months;

B. Issue a Writ of Mandamus directing that all transfers made should be strictly in terms of the transfer policy to be framed and the central and state government Office Memoranda and Circulars, including Circular dated 06.02.2014 produced herein as **ANNEXURE- C**;

C. And pass any such further orders as this Hon'ble Court deems fit in the interest of justice and equity.

INTERIM PRAYER

Pending the disposal of this writ, the Petitioners pray that this Hon'ble Court be pleased to direct that the Respondents to strictly comply with the the Government Order No. DPAR 18 STR 2013 dated 06.02.2014, produced herein as **ANNEXURE - C**, and not transfer government employees with disabilities without considering the said Government Order, in the interest of justice and equity.

Place: Bangalore

Counsel for the Petitioner

Date:

Address for Service: -

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