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**SYNOPSIS LIST OF DATES AND EVENTS**

23.03.1974 The Parliament enacted The Water (Prevention and Control of Pollution) Act, 1974 (The Water Act) which provides for prevention and control of water pollution and maintaining and restoring of wholesomeness of water. It also provides for establishment of Board for prevention and control of water pollution, for conferring and assigning to such Board Powers and functions relating thereto and for matters connected therewith. It came into force at once in States of Assam, Bihar, Gujarat, Haryana, Himachal Pradesh, Jammu and Kashmir, Karnataka, Kerala, Madhya Pradesh, Rajasthan, Tripura and West Bengal. The Central Government has constituted Central Pollution Control Board (CPCB) to exercise powers conferred on and perform functions assigned to Board under it. The State Governments have established State Pollution Control Boards

C

(SPCB) every state for that purpose. The CPCB and SPCBs have been empowered to take steps to protect water from pollution.

29.03.1981

The Parliament enacted The (Air Prevention and Control of Pollution) Act, 1981 (The Air Act), which provides for prevention, control and abatement of air pollution, for the establishment with a view to carrying out aforesaid purposes, of Boards for conferring on and assigning to such Boards powers and functions relating there to and for matters connected there with. The CPCB constituted under the Water Act has been authorized to exercise powers and perform function of CPCB for prevention and control of air pollution under the Air Act. Similarly SPCB constituted under the Water Act has been authorized to exercise powers and perform function of SPCB for prevention and control of Air pollution under the Air Act. The main

D

functions of CPCB are to improve quality of air and to prevent, control and abate air pollution in country. The SPCB has also been assigned functions to prevent and central of air pollution.

23.5.1986 The Parliament enacted The Environment (Protection) Act, 1986 (The Environment Act) to provide for protection and improvement of environment and matters connected therewith. It empowers Central Government to take all such measures as it deems necessary or expedient for purpose of protecting and improving quality of environment and preventing, controlling and abating environment pollution.

22.1.1991 The Parliament enacted the Public Liability Insurance Act, 1991 (PLI Act) to provide for public liability insurance for purpose of providing immediate relief to persons affected by accident occurring while handling any hazardous substance

E

and for matters connected therewith or incidental thereto.

5.6.1993

The Parliament enacted the Employment of Manual Scavengers and Construction of Dry Latrines (Prohibition) Act, 1993 to provide for prohibition for employment of manual scavengers as well as construction on continuance of dry latrines and for regulation of construction and maintenance of water seal latrines.

18.9.2013

The Parliament enacted The Prohibition of Employment as Manual scavengers and Their Rehabilitation Act, 2013.

The respondents have not implemented essential provisions of aforesaid statues. The manual scavenging still continues and persons who enters into sewers to clean them dies because of asphyxia caused because of toxic gases.

29.01.2020

Hence this Public Interest Litigation is being filed before this Hon'ble Court.

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**IN THE SUPREME COURT OF INDIA**

ORIGINAL CIVIL JURISDICTION

PUBLIC INTEREST LITIGATION

**CIVIL WRIT PETITION (PIL) NO. \_\_\_\_\_ OF 2020**  
UNDER ARTICLE 32 OF CONSTITUTION OF INDIA

WITH PRAYER FOR INTERIM RELIEF

**IN THE MATTER OF:**

Dr. Balram Singh,  
Son of Late Shri Ganga Datt,

[REDACTED]

FILED ON  
11/01/2020  
SUPREME COURT OF INDIA

... Petitioner

Versus

1. Union of India  
Through Secretary, Ministry of Environment  
New Delhi
2. State of Andhra Pradesh  
through Chief Secretary,  
Government of Andhra Pradesh  
Amaravati, Andhra Pradesh
3. State of Arunachal Pradesh  
through Chief Secretary,  
Government of Arunachal Pradesh,  
Itanagar, Arunachal Pradesh
4. The State of Assam,  
Through Chief Secretary  
Government of Assam,  
Dispur, Assam.
5. State of Bihar  
through Chief Secretary,  
Government of Bihar,  
Patna, Bihar.

6. State of Chhattisgarh  
through Chief Secretary,  
Government of Chhattisgarh,  
Chhattisgarh.
7. State of Goa  
through Chief Secretary,  
Government of Goa,  
Panji, Goa.
8. State of Gujarat  
through Chief Secretary,  
Government of Gujarat ,  
Gandhinagar, Gujarat.
9. State of Haryana  
through Chief Secretary,  
Government of Haryana,  
Chandigarh.
10. State of Himachal Pradesh  
through Chief Secretary,  
Government of Himachal Pradesh,  
Shimla, H.P.
11. State of Jharkhand  
through Chief Secretary,  
Government of Jharkhand ,  
Rachi, Jharkhand.
12. State of Karnataka  
through Chief Secretary,  
Government of Karnataka,  
Bengaluru, Karnataka.
13. State of Kerala  
through Chief Secretary,  
Government of Kerala,  
Thiruvananthapuram  
Kerala.
14. State of Madhya Pradesh  
through Chief Secretary,  
Government of Madhya Pradesh ,  
Bhopal, M.P.

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15. State of Maharashtra  
through Chief Secretary,  
Government of Maharashtra,  
Mumbai, Maharashtra.
16. State of Meghalaya  
through Chief Secretary,  
Government of Meghalaya,  
Shilong, Meghalaya.
17. State of Mizoram  
through Chief Secretary,  
Government of Mizoram,  
Aizmal, Mizoram.
18. State of Nagaland  
through Chief Secretary,  
Government of Nagaland,  
Kohima, Nagaland.
19. State of Odisha  
through Chief Secretary,  
Government of Odisha,  
Bhubneshwar, Odisha.
20. State of Punjab  
through Chief Secretary,  
Government of Punjab,  
Chandigarh.
21. State of Rajasthan  
through Chief Secretary,  
Government of Rajasthan,  
Jaipur, Rajasthan.
22. State of Sikkim  
through Chief Secretary,  
Government of Sikkim,  
Gangtok, Sikkim.
23. State of Tamilnadu  
through Chief Secretary,  
Government of Tamilnadu,  
Chennai, Tamil Nadu.

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24. State of Telangana  
through Chief Secretary,  
Government of Telangana,  
Hyderabad, Telangana.
  25. State of Tripura  
through Chief Secretary,  
Government of Tripura,  
Agartala, Tripura.
  26. State of Uttrakhand  
through Chief Secretary,  
Government of Uttrakhand,  
Dehradun, Uttrakhand.
  27. State of Uttar Pradesh  
through Chief Secretary,  
Government of Uttar Pradesh,  
Lucknow, U.P.
  28. State of West Bengal  
through Chief Secretary,  
Government of West Bengal,  
Kolkata, West Bengal.
  29. Union Territory of Andaman and Nicobar  
through Administrator,  
Administration Andaman and Nicobar,  
Island.
  30. Union Territory of Port Blair ,  
Through Administrator  
Administration Government of Port Blair,  
Pin 744101, Po7
  31. Union Territory of Chandigarh  
through Administrator  
Administration Chandigarh-100017.
  32. Union Territory of Dadra and Nagan Haveli  
through Administrator  
Administration of Dadra & Nagan Haveli ,  
Silvasa.
  33. Union Territory of Daman and Diu  
through Administrator

Administration of Daman and Diu,  
Daman

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34. State of Delhi  
through Chief Secretary,  
Government of Delhi  
Delhi
35. Union Territory of Lakshdeep  
through Administrator  
Administration Lakshdeep.
36. Union Territory of Puducherry  
through Administrator  
Administration of Puducherry Silvasa  
Puducherry.
37. Union Territory of Jammu & Kashmir  
through Administrator  
Jammu.
38. Union Territory of Ladakh  
through Administrator  
Leh. ... Respondents

PUBLIC INTEREST PETITION UNDER ARTICLE 32 OF  
CONSTITUTION OF INDIA FOR ISSUANCE OF WRIT,  
ORDER (S), DIRECTION (S) DIRECTING THE  
RESPONDENTS TO IMPLEMENT PROVISIONS OF THE  
WATER (PREVENTION AND CONTROL OF POLLUTION)  
ACT, 1974, THE ENVIRONMENT PROTECTION ACT, 1986,  
AIR (PREVENTION AND CONTROL OF POLLUTION ACT  
1981, THE PUBLIC LIABILITY INSURANCE ACT, 1991, THE  
EMPLOYMENT OF MANUAL SCAVANGERS AND  
CONSTRUCTION OF DRY LATRINES (PROHIBITION) ACT,  
1993, THE PROHIBITION OF EMPLOYMENT AS MANUAL

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SCAVANGERS AND THEIR REHABILITATION ACT, 2013  
AND OTHER STATUTES AND RULES PERTAINING TO  
PROTECTION OF ENVIRONMENT AND HUMAN HEALTH. AS  
FUNDAMENTAL RIGHT GUARANTEED UNDER ARTICLE  
E21 OF CONSTITUTION OF INDIA IS BEING VIOLATED.

TO,

THE HON'BLE CHIEF JUSTICE OF INDIA  
AND HIS COMPANION JUSTICES OF THE  
SUPREME COURT OF INDIA

THE HUMBLE PETITION OF THE  
PETITIONER ABOVE NAMED,

**MOST RESPECTFULLY SHOWETH**

1. That the petitioner is a citizen of India. He is filing present petition under Article 32 of Constitution of India by way of public interest litigation without having any personal or vested interest therein. The petition raises a vital and significant issue of public importance as fundamental right guaranteed under Article 21 of constitution of India is being violated.

2. That the petitioner is a practicing advocate and social worker having annual income of Rs.5,00,000/-. He provides free legal aid to needy persons who comes to him A lot of persons have been benefited by his services.

3. That it has been said that village is cell of national body and cell life must be healthy and developed for national body to be healthy and developed. This statements stands true for the reason that 66.46% of India's population reside in its villages and constitute

76.60 of total workforce. Despite this, rural development has not received its due share of attention vis-à-vis urban lands cape, it is also important to note that rural land scape has underwent several changes since independence leaving its in inprints on entire nation. Amongst these changes, several are of grave concern, environmental humanitarian, developmental as well as constitutional. It is submitted that it is high time that issues hampering rural development are taken sincerely and effective measures and implements are taken.

The areas which call for immediate and direct attention are issue concerning water and sanitation because both of these two sectors have over whelming bearing on human health and survival. The charasteristicis of water has changed considerably in India because of rise in demand and development pressure. The ground water is more depleted and less available. Surface water is getting more polluted and unsustainable for human use. Water of good quality and potential is essential for human health as well as ecosystem. The rural India is particularly lacking basic infrastructure for continuous supply of good, clean and safe water for both purposes drinking and other daily chores. According to a report

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over 5 lacs villages lack Government prescribe provision of 40 liter per capita per day of potable drinking water with assured reality. It is harsh reality that citizen, especially women and young children have to walk miles to fetch drinking water instead of contributing to their full potential to development process and economic growth.

It is submitted that in almost all of the villages there is no provision for drainage of used water. The used water bearing all garbage including cowdung and latrines flows from open street and collects in ponds. It deserves to be mentioned that the cows and buffallos go to these ponds and drink that contaminated water and people drink their milk. It leads to health hazard. It is main reason of epidemics throughout the country. There is no provisions for cleaning dirty streets and to curb flowing of contaminated water in open drains in villages, towns and cities in the country. The latrines which have been constructed providing ditches have proved fatal for human health because the water contaminated with human excreta flows into these ditches which goes into earth and then mixed up in ground water which has polluted both water as well as soil and which in turn has produced contaminated food grains.

It is submitted that arsenic and fluoride contamination in ground water is a challenge that the country has to combat. Some of states are suffering from contamination of arsenic in ground water above permissible limits while others are known to have fluoride contamination. Both these contamination are highly toxic and known to cause neuro muscular disorders, skeletal fluorosis, lung cancer, diarrhoe balck foot disease and skin cancer amongst other diseases

The clamour and problem of supply of pure drinking water is increasing day by day in all of the villages, small and big cities of the nation. It becomes more grave and sensitive in summer season. It is submitted that supply of water purified by RO+ SCMT system is the essential requirement of present day. The government should install big water treatment plants to supply purified water in all cities town and villages. The pollution and depletion of water table due to agricultural purpose is another major area of concern 'According to projections by National Commission on Integrated Water Resources development irrigation sector will require additional 71 billion cubic meter of Water by 2025 and another 250 billion cubic meter of water by 2050 compared to 2010

demands further depleting of ground water which in turn will add to cost of agricultural production as more energy will be utilized to draw water. This will also lead to addition of salts as arsenic and fluoride impact of which have already been discussed and crop yeild per hectare will reduce drastically. This demand, however may be brought down to about 68% by the year 20 50 if water is used judiciously. The Government should provide drip irrigation facilities at subsidized rates and rain water harvesting should be made compulsory for residential commercial and industrial buildings.

4. That sewerage system through out the contrary is at a stage that during rainy season roads are seen flodded with sewerage water. There is no provision to make free flow of this water into the ponds or drains. The sewars are blocked in every seasons. Once it is blocked it is opened by seavangers manually. They enter into the wholes and dies because of effect toxic gases. There is no one to take care for these persons. The parliament has enacted two Acts namely The Employment of Manual scavangers and Constructions of Dry Latrines (Prohibition) Act, 1993 and The Prohibition of Employment as Manual Scanangers and their

Rehabilitation Act, 2013. But unfortunately the provisions of these statute are not being implemented. It is submitted that it is high time to implement provisions of these two statues to stop manual scavanging which can be done by machiners at present day. It is further submitted that manual scavenging is a stigma on modern society of 21<sup>st</sup> century. The persons indulged in this work have also fundamental right to live with human dignity and in a humanly situation and environment. It is very heart breaking when we see the persons standing in sewers whole in dirty water upto neck. This is a situation of greater concern and manual scavenaging should be stooped immediately.

5. That sanitation system in rural India is either non existent or in record. Swach Sarvekshan data reveals that about 6,03,089 villages are open defecation free. National sample survey report points out that only 71% villages have access to sanitation thereby swach Sarvekshan data is doubtntful. A true picture of sanitation has to be pointed to accomplish the left over field work. A true picture of sanitation has to be pointed to accomplish the left over field work. It may be noted that Swach Bharat mission has only managed to bring about a

physical structural change and toilets built under the programme are under utilized. There is need to bring about behavioural change in people and to spread awareness about benefits of hygienic sanitation. It is submitted that most of constructed toilets are not connected to sewerage system. This is a serious lacuna as sewage waste management and disposal is already a menace. There is an estimated potential of 225 MW of energy from all sewage. In order to utilize this capability it is necessary to built toilets on modern scientific lines and sewage treatment plants, wasted energy plants are developed in all villages, towns and cities. This will ensure that contaminated water will not directly flow into water bodies and reusable water will be directed for industrial use and other purposes such as cleaning washing etc. The open drains should be converted into close ones as these are breeding grounds for mosquitoes bacteria's, and other diseases causing pathogens. This will reduce burden on health care infrastructure as number of water born disease will drop down substantially. The provisioning should be done for regular cleaning of drain and sewage lines. Mechanical measure for cleaning should be devised. Fellow human entering

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lathered in muck is a deplorable sight and disgrace on human kind. Moreover, manual cleaning of sewage also has several health hazards such as analmic, jaundice, trackoma, carbon monoxide poisoning, lung loss of lip due to asphyxiation. Manual scavenging is both gender as well as caste based occupation with 90% being women.

The employment of manual scavengers to empty certain type of dry toilet that requires manual daily emptying was prohibited in India in the year 1993. The law was extended and clarified in 2013 to include insanitary latrines, ditches and pits. It has been observed that despite this more than one lakh scavengers still continue the practice. It is submitted that 1993 Act and 2013 Acts should be implemented in letter and spirit. It is necessary to impose a blanket ban on manual scavenging and people engaged in these profession must be adequately rehabilitated and provided jobs. These persons have fundamental right under Article 21 of Constitution of India. Every year hundred of people dies because of toxic gases while doing manual scavenging of sewer.

6. That another reason for water pollution and its contamination is excessive use of fertilizers and

pesticides in agriculture which is a known fact. These products reach ground water by leaching or may be mixed with surface water by run off and drainage. Many of the pesticides are non degradable and their residues have long life, presence of organic and inorganic wastes in water decreases dissolved oxygen content of water which is a pre requisite for survival of aquatic organisms. Advantage of advancement in science and more sustainable method of cultivation should be made available for agriculture sector. The use of fertilizers and pesticides made of chemicals should be minimized and organic manure should be used instead, this however, should not have any negative bearings on food security. Use of organic manure serves twin purposes one reduce environmental pollution, particularly water and soil to some extent second excreta of cattle and livestock other organic degradable waste are brought use in efficient manner. It is submitted that for this purpose biodegradable waste treatment plants and Biogas plants should be set up and brought to use in each village. It is responsibility of government under Article 48 of our constitution to initiate and develop animal husbandry on scientific lines – No steps has been taken in this regard.

Animal husbandary is largely primitive except for some scientific and co-operative establishment.

It is submitted that cattle, poultry and other livestock are ill managed and scientific rearing and breeding seems to be a distante sight. A change can be brought about in this direction by adopting a very small yet effective control measure of preventing cattel livestock and other story animals from entering water biodies means for human use as this will prevent facial contamination which is a major casual factor of diarrhea and also leads to reduction in dissolved dixygen in water, thereby reducing water unfit for human use. Animals too are aversive towards facecal contaminated water and reduce their intake of water continuously fed polluted water, which in turn reduce their productivity. It is submitted that for purpose of animal husbandary separate provisions should be made. Reusable Treated sewage water and /or separate ponds can be used solely for cattel and livestock. Cattle sheds should be constructed in village for upkeep of cattles and their excreta should be collected scientifically and used and

turned to manure, a common biogas plant could be set for entire village for this purpose.

7. That maintenance of roads and traffic management is yet another reason for environmental pollution. There are ditches and pits on roads which slow down speed of running vehicles which cause traffic jams for hours which in turn pollutes air. It is submitted if the roads are repaired timely when required then air pollution may be reduced.

8. That petitioner is taking recourse to enter ordinary jurisdiction of this Hon'ble Court with a hope and belief that the averments would be appreciated. The petitioner does not have any other alternative efficacious remedy but to approach this Hon'ble Court under Article 32 of Constitution of India for reliefs prayed therein.

9. That no other petition has been filed by petitioner or is pending in this Hon'ble or in any High Court or any other court in respect of subject matter of this petition

10. That the petitioner craves leave to alter amend or add to this petition.

11. That the petition is filed bonafide and in interest of justice. The fundamental right of petitioner guaranteed under Article 21 of the Constitution of India is violated.

12. That there is no civil, criminal or revenue litigation between petitioner and respondents pending or ever arises.

**PRAYER**

In view of above submissions it is most respectfully prayed that this Hon'ble Court may graciously be pleased to:

a) issue appropriate writ /order(s) /direction(s) in nature of mandamus directing the respondents to implement provisions of The Water Prevention and Control of Pollution Act, 1974; The Air (Prevention and Control of Pollution) Act, 1981; The Environment Protection Act, 1986, The Public Liability Insurance Act, 1991; The Employment of Manual Scavengers and Construction of Dry Latrines (Prohibition) Act, 1993 The Prohibition of Employment as Manual Scavengers and their Rehabilitation Act, 2013 and other statutes rules and regulation pertaining to protection of environment and human health and direct respondent to:

- b) make provisions for underground sewer / drainage system for disposal of used water and for treatment of used water in all villages towns and cities including slum areas;
- c) make used water reusable after treatment for use of cattels, agricultural and other purposes except for human drinking and separate ponds should be made for collecting water for human use and animals use;
- d) make provisions for supply of goods, clean and un contaminated water in all villages towns and cities and for this purpose to install big water purifier plans so that every citizen of the country can have good and purified drinking water of high quality;
- e) provide for rain water harvesting system throughout the country. It must be made a pre-requisite for raising any type of construction;
- f) connect all toilets with sewage system;
- g) insall sewage treatment plants waste plants in all villages towns and cities of the country
- h) convert all open drains into close one and construct all drains under ground in further.

- i) provide for meachincial scavenging measures for cleaning draings and sewages lines and to stop manual immediately;
- j) repair roads within a prescribed period
- k) fix liabilities of government officer who do not follow and implement provisions for environmental protection. They should be punished for every negligence act of non compliance of provisions
- l) issue any other appropriate writ/order /direction which this Hon'ble Court may deem fit and proper in facts and circumstances of the case and
- m) pay compensation of rupees fifty 50,00,000/- (Rupees fifty lacs) in case any person dies while entering or after entering into sewage for cleaning it manually during pendency of this petition,
- n) provide for good drinking water on demand of public in areas where there is no provision for water supply and water available is contaminated and not fit for human use

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- o) repair all roads on demand of public within a period of three months;

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

DRAWN & FILED BY

*Balram Singh*  
[DR. BALRAM SINGH]  
Petitioner -in-person

Drawn on 27.01.2020  
Filed on: 28.01.2020

IN THE SUPREME COURT OF INDIA  
ORIGINAL CIVIL JURISDICTION  
PUBLIC INTEREST LITIGATION

FILED 21

31 JAN 2020

SUPREME COURT OF INDIA

**CIVIL WRIT PETITION (PIL) NO. \_\_\_\_\_ OF 2020**  
**IN THE MATTER OF:**

Dr. Balram Singh, ... Petitioner

Versus

Union of India and Others ... Respondents

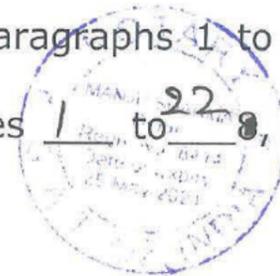
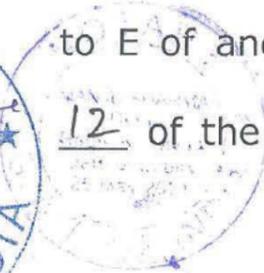
**AFFIDAVIT**

I, Dr. Balram Singh, Son of Late Shri Ganga Datt, R/o.

\_\_\_\_\_ do

hereby solemnly affirm and state as follows:

1. That I am petitioner in the above mentioned matter and am fully acquainted with the facts of the case. I am therefore competent to swear this affidavit. *and I have no personal interest in the matter. There is no personal gain, private motive or oblique reason.*
2. That I have read and understood of the contents of the accompanying writ petition and List of Dates and state that the facts stated in pages B to E of and List of Dates and Paragraphs 1 to 12 of the Writ Petition at pages 1 to 8,



FILED ON  
22  
SUPREME COURT OF INDIA

and same are true and correct to the best of my knowledge and belief.

3. That petitioner is required to file an affidavit stating that there is no personal gain, private motive or oblique reason in filing the Public Interest Litigation

*Babram Singh*  
DEPONENT

**VERIFICATION:**

I verify that the facts stated in paragraphs 1 to 3 hereinabove are true to my knowledge and belief, No part of it is false and nothing material has been concealed therefrom.

Verified at New Delhi on this the 29<sup>th</sup> day of January 2020.

*Babram Singh*  
DEPONENT



CERTIFIED THAT THE CONTENTS EXPLAINED TO THE DEPONENT EXECUTANT WHO APPEARS PERFECT TO UNDERSTAND & AFFIRM / DEPOSE BEFORE ME AT DELHI ON 29/1/20 IDENTIFIED BY

IDENTIFIED THE EXECUTANT/DEPONENT WHO HAS SIGNED IN MY PRESENCE

*Dr. Babram Singh*

ATTESTED  
NOTARY, DELHI-R-8414  
GOVERNMENT OF INDIA  
SUPREME COURT OF INDIA  
COMPOUND, NEW DELHI  
Register No: 8414

IN THE SUPREME COURT OF INDIA  
ORIGINAL CIVIL JURISDICTION  
PUBLIC INTEREST LITIGATION

(23-24)

I.A. NO \_\_\_\_\_ of 2020

In

**CIVIL WRIT PETITION (PIL) NO. \_\_\_\_\_ OF 2020**  
UNDER ARTICLE 32 OF CONSTITUTION OF INDIA

**IN THE MATTER OF:**

Dr. Balram Singh

...Petitioner

Versus

Union of India & Ors.

...Respondents

**APPLICATION FOR PERMISSION TO APPEAR AND**

**ARGUE IN-PERSON**

TO

THE HON'BLE CHIEF JUSTICE OF  
INDIA AND HIS HON'BLE  
COMPANION JUSTICE OF THE  
SUPREME COURT OF INDIA.

THE HUMBLE PETITION OF THE  
PETITIONER ABOVENAMED

**MOST RESPECTFULLY SHOWETH:**

1. That the petitioner has filed above mentioned petition under article 32 of the Constitution of India in public interest. He is not reiterating facts and

circumstances of case in present application for sake of brevity. The petitioner may kindly be permitted to refer and rely upon the same during hearing of this petition/application.

2. That the petitioner is a member of Supreme Court Bar Association. He wants to appear and argue the matter himself in public interest because petitioner him self is an advocate and there is no need for an advocate or advocate on record to be appointed by this Hon'ble Court.

**PRAYER**

In facts and circumstances of the case Petition may kindly be permitted to appear and argue the above mentioned petition in person.

Drawn and filed by

Dt. 01.02.2020

*Balram Singh*  
**DR. BALRAM SINGH**  
Advocate  
Petitioner- in-person