

SYNOPSIS

“This pandemic is not a sprint, it’s like a marathon”

The Petitioner United Nurses Association (UNA) is one of the largest nurses associations with 3.8 lakhs Nurses as its members representing the interest of the registered nurses through its constituents and its organizational affiliates. The United Nurses Association (UNA) was most noted for bringing up the issue of exploitation of nurses as underpaid labourers in the thriving private hospital industry in all over the country. Since 2012 the Petitioner Association has been working as a Trade Union with the help of no political party and not receiving any benefits from them.

Health care workers are at the front line of the COVID-19 outbreak response and as such are exposed to hazards that put them at risk of infection. Hazards include pathogen exposure, long working hours, psychological distress, fatigue, occupational burnout, stigma, and physical and psychological violence etc.

India reported its 1st case of COVID-19 on 30th January, 2020. It was a travel related case from Wuhan, China. Since then (as on 04 April, 2020), 2650confirmed cases and 68 deaths have been reported from 27 States/UTs. Although there is no evidence to widespread community transmission, 20 existing and 22 potential hotspots have been identified by the Ministry of Health, Govt. of India.

In China, where the virus was first discovered, protecting health care workers was a serious challenge. More than 3,300 nurses, doctors and other hospital staff members across the country were infected, many because of insufficient personal protective equipment (PPE).

COVID-19 was declared a pandemic by WHO on 11th March, 2020. WHO has advised countries to take a whole-of-government, whole-of-society approach, built around a comprehensive strategy to prevent infections, save lives and minimize impact. In India also, clusters have appeared in multiple States, particularly Kerala, Maharashtra, Rajasthan, Uttar Pradesh, Delhi, Punjab, Karnataka, Telangana and UT of Ladakh. 211 districts are now reporting COVID-19 cases and the risk of further spread remains very high.

It is pertinent to mention that till filing of the present petition more than 50 health care workers including doctors, nurses from different states are tested positive for Covid-19. So far as Delhi is concerned nine doctors working in different hospitals and clinics have tested positive for Covid-19. A large number of health care workers including nurses, doctors, and other staffers are infected in various states like Maharashtra, Kerala, Delhi, Karnataka etc. Lack of preparedness to tackle the pandemic has led to 10 nurses at Wockhardt Hospital in Mumbai Central contracting the infection and almost all 265 nurses in the said hospital are under observation to contain further spread. The administrators of Hindu Rao Hospital, Delhi received 10-12 resignation over the last few days from the health care workers citing lack of PPEs as a reason. Many Govt. as well as private hospitals are shut down after health care workers tested positive for Covid-19.

World Health Organization (WHO) has issued an interim guidance on 19.03.2020, titled as "***Coronavirus disease (COVID-19) outbreak: rights, roles and responsibilities of health workers, including key considerations for occupational safety and health***" for standardizing

the rights, roles and responsibilities of health care workers internationally. Unfortunately the Respondents herein have not formulated a National Management Protocol for COVID19 for addressing the serious concerns relating to imminent and extreme risks posed to the health and safety of medical personnel throughout the territory of India, amidst the currently persisting and ever escalating spread of the COVID-19 pandemic.

The health and safety (physical / mental) of health care workers are of utmost importance because further shortage of health care workers would result in thousands of unattended COVID-19 patients, which will have serious repercussions including escalation of the present situation and resultant impact on the economy, medical facilities, potential deaths and loss of human resource. During this trying and difficult times the most pressing issues faced by the health care workers including the nurses and para-medical staffs in the country are the following:

- (i) Non-availability of sufficient personal protective equipment(PPE) in numerous hospitals throughout India;
- (ii) Non-availability of sufficient number of COVID-19 testing kits;
- (iii) Sub-standard Personal Protection Equipment's (PPE);
- (iv) Lack of training on infection prevention and control (IPC)
- (v) Lack of basic facilities in isolation wards; Isolation precautions are not being followed by WHO norms;
- (vi) Hourly disinfection is not being done in the wards;
- (vii) Mental harassment in the nature of forced over-time followed by negligible transport facilities and deduction of salary on account of leaves;

- (viii) Health care workers who are pregnant, lactating or immune compromised are being forced to work;
- (ix) Recent trend of eviction of health care workers from rented/leased property.
- (x) Lack of accommodation, food, transportation etc.
- (xi) Lack of free medical support for the health care workers and their families.
- (xii) Continuous breach of Government guidelines by private hospitals;

Current evidence suggests that the virus that causes COVID-19 is transmitted between people through close contact and droplets. People most at risk of acquiring the disease are those who are in contact with or care for patients with COVID-19. This inevitably places health care workers at high risk of infection. Protecting health care workers should be paramount importance to the Respondents herein. It is therefore, the Petitioner herein humbly praying for the following reliefs:

- (a) To formulate a National COVID19 Management Protocol for addressing the serious concerns relating to imminent and extreme risks posed to the health and safety of health care workers throughout the territory of India;
- (b) To ensure that Covid-19 protection kits are made available to every single health care professional working in the corona isolation wards, or who work in close proximity of patients suspected to be infected with the virus;
- (c) To ensure that adequate and standard nutritious meals are provided to the healthcare workers;

- (d) To ensure that all nurses and other health care staff in Corona wards are provided with proper accommodation in close proximity to the hospitals / health care centres where they are discharging medical duties and functions;
- (e) To ensure that adequate and prompt transport provided to all health care workers deputed in Corona wards;
- (f) To ensure proper screening of suspected patients before entering the hospitals and other medical facilities and also to ensure speedy testing of suspected cases.
- (xiii) To ensure that all health care workers are trained on infection prevention and control (IPC), proper use and disposal of Personal Protection Equipment (PPE) etc;
- (g) To ensure that the infrastructure of hospitals and health care centres are temporarily expanded so as to provide separate and hygienic washrooms for staff;
- (h) To expand the scope of personal accident cover provided under the ‘PradhanMantriGaribKalyan Package Health Workers Fighting COVID-19’ to include all health care workers across sectors, including those recruited on ad-hoc basis.
- (i) To ensure that Landlords / Owners throughout the country be prohibited from adhering to the recent trend of evicting the health workers owing to their concern that their health will be in jeopardy.
- (j) To provide free testing facility and treatment for the health care workers in case of infection of Covid-19 while they are

on duty. Families of the health care workers should be taken proper care while they are in quarantine or isolation.

(k) To ensure that Private Hospitals are not charging or deducting salaries from the healthcare workers if they get infected Covid-19 while they are on duty.

LIST OF DATES

30.01.2020 India reported its 1st case of COVID-19 on 30th January, 2020.

11.03.2020 COVID-19 was declared as a pandemic by WHO on 11th March, 2020.

19.03.2020 World Health Organization (WHO) has issued an interim guidance on 19.03.2020, titled as "***Coronavirus disease (COVID-19) outbreak: rights, roles and responsibilities of health workers, including key considerations for occupational safety and health***" for standardizing the rights, roles and responsibilities of health care workers globally.

29.03.2020 GNCTD Health & Family Welfare Department issued Order No. 52/DGHS/PH-IV/COVID-19/2020/prsecyfw/3603-09 whereby the Doctors working in LokNayak Hospital & GB Pant Hospital on Corona -19 duty were provided accommodation by Govt. of Delhi.

03.04.2020 A news article published in Business Today shows that nearly 50 healthcare personnel have been tested positive for novel coronavirus across India, according to Health Ministry officials. They include doctors, nurses and other paramedical staff.

04.04.2020 Hence this Writ Petition.

IN THE SUPREME COURT OF INDIA
CIVIL ORIGINAL JURISDICTION
WRIT PETITION (CIVIL) NO. OF 2020
(UNDER ARTICLE 32 OF THE CONSTITUTION OF INDIA)

IN THE MATTER OF:

UNITED NURSES ASSOCIATION
THROUGH ITS PRESIDENT
MR. JASMINSHA M.
R/O. DOOR NO. 26/548/9, 2ND FLOOR,
CAPITAL CITY, KORAPPATH LINE,
ROUND NORTH, THRISSUR-680020,
KERALA.

PETITIONER

VERSUS

1. UNION OF INDIA,
MINISTRY OF HEALTH & FAMILY WELFARE
THROUGH ITS SECRETARY
DEPT. OF HEALTH & FAMILY WELFARE
NEW DELHI-110001.
2. MINISTRY OF HOME AFFAIRS
THROUGH SECRETARY
SOUTH BLOCK,
NEW DELHI-110001.
3. MINISTRY OF LABOUR AND EMPLOYMENT
THROUGH SECRETARY
SHRAM SHAKTI BHAWAN
RAFI MARG, NEW DELHI-110001. RESPONDENTS

**PETITION UNDER ARTICLE 32 OF THE CONSTITUTION OF
INDIA**

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. The present writ petition under Article 32 is preferred by the Petitioner herein to direct the Respondents to formulate a National

Management Protocol for COVID19 for addressing the serious concerns relating to imminent and extreme risks posed to the health and safety of health care workers throughout the territory of India.

1A. The details of the Petitioner filing present Public Interested Litigation are as follows:

(a) The Petitioner submits that this Petition is maintainable under Article 32 of the Constitution of India. The petitioner is a trade union of registered nurses and its office at Door No. 26/548/9, 2nd Floor, Capital City, Korappath Line, Round North, Thrissur-680020, Kerala. The e-mail id of the Petitioner is unadelhincr@gmail.com and Mobile phone number is +91 9718056373. The annual income of the Petitioner is Rs. 5,00,000. PAN Card and Aadhar Card numbers of Petitioner are ANLPJ6754C and 627973644268 respectively. A true copy of the identity proof of the Petitioner is annexed herewith and marked as **ANNEXURE P-1 (PAGE)**.

(b) The present public interest writ petition is preferred by the Petitioner herein as a *pro bono publico* in the interest of its members as well as other fellow nurses, paramedical and support staffs who are engaged 24 x 7 in fighting this pandemic, to direct the Respondents to formulate a National COVID19 Management Protocol for addressing the serious concerns relating to imminent and extreme risks posed to the health and safety of health care workers throughout the territory of India.

- (c) The Petitioner has no personal or political interest of any kind except the prosperity of the nation and the integrity of the nation's administrative and legal processes aspiring for the welfare of the humanity as a whole. There is no civil, criminal, revenue or any litigation involving against the petitioner, which has or could have a legal nexus with the issues involved in this application.
- (d) That the petitioner is filing this Writ Petition on his own volition and he shall be liable to pay costs as ordered by this Hon'ble Court in the event it is found out that this petition is filed for any personal gain or oblique motive.
- (e) That the Petitioner has not filed any other petition seeking similar reliefs in this Hon'ble Court or any other courts in India.
- (f) That the instant Writ Petition is filed without any delay or laches and there is no legal bar in entertaining the same. The petitioner has no other alternative or efficacious remedy except to file the present Writ Petition under Order XXXVIII Rule 12 of 'The Supreme Court Rules, 2013, before this Hon'ble Court, by invoking Article 32 of the Constitution of India.
- (g) That the petitioner seeks exemption from filing duly affirmed affidavit in the prevailing circumstances with an undertaking that deficit court fees will be paid subsequently. The petitioner further undertakes that the matter may be taken up through the Video Conferencing mode.

(h) That the Annexures are true and correct copies of the respective originals.

BRIEF FACTS:

2. That present public interest litigation is being preferred by petitioner out of growing concern of the unprecedented pandemic covid-19 which is posing a grave threat of deadly infection among the population of the country. It is admitted fact that our health infrastructure is dangerously outstretched understaffed and under resourced. This pandemic is dangerously devouring the life of the citizen of the country at the extraordinary rapidity with extraordinary fatalities.
3. That India reported its 1st case of COVID-19 on 30th January, 2020. It was a travel related case from Wuhan, China. Since then (as on 04 April, 2020), 2322 confirmed cases and 62 deaths have been reported from 27 States/UTs. Although there is no evidence to widespread community transmission, 20 existing and 22 potential hotspots have been identified by the Ministry of Health, Govt. of India.
4. That health care workers are at the front line of the COVID-19 outbreak response and as such are exposed to hazards that put them at risk of infection. Hazards include pathogen exposure, long working hours, psychological distress, fatigue, occupational burnout, stigma, and physical and psychological violence etc.
5. That current evidence suggests that the virus that causes COVID-19 is transmitted between people through close contact and droplets. People most at risk of acquiring the disease are those who are in

contact with or care for patients with COVID-19. This inevitably places health care workers at high risk of infection. Protecting health care workers should be paramount importance to the Respondents herein.

6. That World Health Organization (WHO) issued an interim guidance on 19.03.2020, titled as "***Coronavirus disease (COVID-19) outbreak: rights, roles and responsibilities of health workers, including key considerations for occupational safety and health***" for standardizing the rights, roles and responsibilities of health care workers globally. Unfortunately the Respondents herein did not formulate a National Management Protocol for COVID19 for addressing the serious concerns relating to imminent and extreme risks posed to the health and safety of medical personnel throughout the territory of India, amidst the currently persisting and ever escalating spread of the COVID-19 pandemic.
7. That the interim guidance issued by World Health Organization (WHO) for the rights and responsibilities of health workers, including the specific measures needed to protect occupational safety and health are reproduced hereunder:

Health work rights, roles and responsibilities

Health worker rights include the expectation that employers and managers in health facilities:

- (a) *Assume overall responsibility to ensure that all necessary preventive and protective measures are taken to minimize occupational safety and health risks;*

- (b) *Provide information, instruction, and training on occupational safety and health, including;*
- (c) *Refresher training on infection prevention and control (IPC);*
- (d) *Use, putting on, taking off and disposal of personal protective equipment (PPE);*
- (e) *Provide adequate IPC and PPE supplies (masks, gloves, goggles, gowns, hand sanitizer, soap and water, cleaning supplies) in sufficient quantity to those caring for suspected or confirmed COVID-19 patients, such that workers do not incur expenses for occupational safety and health requirements;*
- (f) *Familiarize personnel with technical updates on COVID-19 and provide appropriate tools to assess, triage, test, and treat patients, and to share IPC information with patients and the public;*
- (g) *Provide appropriate security measures as needed for personal safety;*
- (h) *Provide a blame-free environment in which health workers can report on incidents, such as exposures to blood or bodily fluids from the respiratory system, or cases of violence, and adopt measures for immediate follow up, including support to victims;*
- (i) *Advise health workers on self-assessment, symptom reporting, and staying home when ill;*
- (j) *Maintain appropriate working hours with breaks;*

- (k) *Consult with health workers on occupational safety and health aspects of their work, and notify the labour inspectorate of cases of occupational diseases;*
- (l) *Allow health workers to exercise the right to remove themselves from a work situation that they have reasonable justification to believe presents an imminent and serious danger to their life or health, and protect health workers exercising this right from any undue consequences;*
- (m) *Not require health workers to return to a work situation where there has been a serious danger to life or health until any necessary remedial action has been taken;*
- (n) *Honour the right to compensation, rehabilitation, and curative services for health workers infected with COVID-19 following exposure in the workplace – considered as an occupational disease arising from occupational exposure;*
- (o) *Provide access to mental health and counseling resources; and*
- (p) *Enable cooperation between management and health workers and their representatives.*

Health workers should:

- (1) *Follow established occupational safety and health procedures, avoid exposing others to health and safety risks, and participate in employer-provided occupational safety and health training;*
- (2) *Use provided protocols to assess, triage, and treat patients;*

- (3) *Treat patients with respect, compassion, and dignity; maintain patient confidentiality;*
- (4) *Swiftly follow established public health reporting procedures of suspected and confirmed cases;*
- (5) *Provide or reinforce accurate IPC and public health information, including to concerned people who have neither symptoms nor risk;*
- (6) *Put on, use, take off, and dispose of PPE properly;*
- (7) *Self-monitor for signs of illness and self-isolate and report illness to managers, if it occurs;*
- (8) *Advise management if they are experiencing signs of undue stress or mental health challenges that require supportive interventions; and*
- (9) *Report to their immediate supervisor any situation which they have reasonable justification to believe presents an imminent and serious danger to life or health.*

8. It is pertinent to mention that till filing of the present petition nine doctors working in different hospitals and clinics in the National Capital have tested positive for Covid-19. A large number of health care workers including nurses, doctors, and other staffers are infected in various states like Maharashtra, Kerala, Delhi etc. At least 50 nurses are under quarantine / isolation throughout the country and many of them are tested positive for Covid-19. In Hindu Rao Hospital, Delhi itself the administration received 10-12 resignation over the last few days from the healthcare workers

citing lack of PPEs as a reason. Many Govt. as well as private hospitals are shut down after healthcare workers tested positive for Covid-19.

9. That Govt of NCT of Delhi Health & Family Welfare Department issued Order No. 52/DGHS/PH-IV/COVID-19/2020/prsecyfw/3603-09 whereby the Doctors working in Lok Nayak Hospital & GB Pant Hospital on Corona -19 duty are provided accommodation by Govt. of Delhi. At the same time other front-line warriors like nurses etc are ignored even by Govt of NCT of Delhi. A true copy of Order No. 52/DGHS/PH-IV/COVID 19/2020/prsecyfw/3603-09 issued by GNCTD Health & Family Welfare Department is annexed herewith and marked as **ANNEXURE P-2 (PAGE)**.
10. That a news article published in Business Today daily shows that nearly 50 healthcare personnel have been tested positive for novel Coronavirus across India, according to Health Ministry officials. They include doctors, nurses and other paramedical staff. A true typed copy of News article published in Business Today on 03.04.2020 titled as “Over 50 doctors, medical staff tested positive for coronavirus” is annexed herewith and marked as **ANNEXURE P-3 (PAGES TO)**.

GROUNDS

- A. BECAUSE the health and safety of health care workers are of utmost importance because further shortage of health care workers would result in thousands of unattended COVID-19 patients, which would have serious repercussions with respect to economy, medical facilities, potential deaths and loss of human resource.

B. BECAUSE in this particular circumstance, a unanimously accepted belief is that the service of the health care workers are indispensable. It is the duty of the Governments to give them every possible help and assistance they direly need at this moment. Unfortunately, amid Covid-19 the following most common hardships being regularly faced by the health care workers throughout India.

- (1) Non-availability of sufficient personal protective equipment(PPE) in numerous hospitals throughout India;
- (2) Non-availability of sufficient number of COVID-19 testing kits;
- (3) Sub-standard Personal Protection Equipments (PPE);
- (4) Lack of training on infection prevention and control (IPC)
- (5) Lack of basic facilities in isolation wards; Isolation precautions are not being followed by WHO norms;
- (6) Hourly disinfection is not being done in the wards;
- (7) Mental harassment in the nature of forced over-time followed by negligible transport facilities and deduction of salary on account of leaves;
- (8) Health care workers who are pregnant, lactating or immune compromised are being forced to work;
- (9) Recent trend of eviction of health care workers from rented/leased property.
- (10) Lack of accommodation, food, transportation etc.
- (11) Lack of free medical support for the health care workers and their families.

(12) Continuous breach of Government guidelines by private hospitals;

C. BECAUSE so far as seven doctors working in different hospitals and clinics in the National Capital have tested positive for Covid-19. A large number of health care workers including nurses, doctors, and other staffers are infected in various states like Maharashtra, Kerala, Delhi etc. At least 50 nurses are under quarantine / isolation throughout the country and many of them are tested positive for Covid-19. The administrators of Hindu Rao Hospital, Delhi received 10-12 resignation over the last few days from the health care workers citing lack of PPEs as a reason. Many Govt. as well as private hospitals are shut down after health care workers tested positive for Covid-19.

D. BECAUSE current evidence suggests that the virus that causes COVID-19 is transmitted between people through close contact and droplets. People most at risk of acquiring the disease are those who are in contact with or care for patients with COVID-19. This inevitably places health care workers at high risk of infection. Protecting health care workers should be paramount importance to the Respondents herein.

PRAYER

Under the circumstances, it is most respectfully prayed that this Hon'ble Court may be pleased to issue a writ of Mandamus or any other appropriate writ, order or direction in nature thereof as follows:-

(a) Direct Respondent No.1 to formulate a National COVID19 Management Protocol for addressing the serious concerns

relating to imminent and extreme risks posed to the health and safety of health care workers throughout the territory of India; and

- (b) Direct Respondent No.1 to ensure that Covid-19 protection kits are made available to every single health care professional working in the corona isolation wards, or who work in close proximity of patients suspected to be infected with the virus; and
- (c) Direct Respondent No.1 to ensure that all health care workers are trained on infection prevention and control (IPC), proper use and disposal of Personal Protection Equipment (PPE) etc;
- (d) Direct Respondent No.1-3 to ensure that adequate and standard nutritious meals are provided to the health care workers; and
- (e) Direct Respondent No.1-3 to ensure that all nurses and other health care staff in Corona wards are provided with proper accommodation in close proximity to the hospitals / health care centres where they are discharging medical duties and functions; and
- (f) Direct Respondent No.1-3 to ensure that adequate and prompt transport provided to all health care workers deputed in Corona wards; and
- (g) Direct Respondent No.1 to ensure proper screening of suspected patients before entering the hospitals and other medical facilities and also to ensure speedy testing of suspected cases; and

- (h) Direct Respondent No.1 to ensure that the infrastructure of hospitals and health care centres are temporarily expanded so as to provide separate and hygienic washrooms for staff; and
- (i) Direct Respondent No.1-3 to expand the scope of personal accident cover provided under the 'Pradhan Mantri Garib Kalyan Package Health Workers Fighting COVID-19' to include all health care workers across sectors, including those recruited on ad-hoc basis; and
- (j) Direct Respondent No.2 ensure that Landlords / Owners throughout the country be prohibited from adhering to the recent trend of evicting the health workers owing to their concern that their health will be in jeopardy; and
- (k) Direct Respondent No.1&3 to provide free testing facility and treatment for the healthcare workers in case of infection of Covid-19 while they are on duty. Families of the healthcare workers should be taken proper care while they are in quarantine or isolation; and
- (l) Direct Respondent No.1&3 to ensure that Private Hospitals are not charging or deducting salaries from the health care workers if they get infected Covid-19 while they are on duty; and
- (m) Pass any other or further orders as may be deemed fit and proper in the circumstances of the case.

**AND FOR THIS ACT OF KINIDNESS THE PETITIONER SHALL
AS IN DUTY BOUND EVER PRAY.**

DRAWN BY:

SUBHASH CHANDRAN K.R. &
BIJU P. RAMAN
ADVOCATES

Filed by:

**(BIJU P. RAMAN)
ADVOCATE FOR THE PETITIONER**

Drawn on: 03.04.2020

Place: New Delhi

Dated: 04.04.2020

IN THE SUPREME COURT OF INDIA
CIVIL ORIGINAL JURISDICTION
I.A. NO. OF 2020
WRIT PETITION (CIVIL) NO. OF 2020
(UNDER ARTICLE 32 OF THE CONSTITUTION OF INDIA)

IN THE MATTER OF:

UNITED NURSES ASSOCIATION
THROUGH ITS PRESIDENT PETITIONER
VERSUS
UNION OF INDIA & ORS. RESPONDENTS

APPLICATION FOR EXEMPTION FROM FILING

ATTESTED/NOTARIZED AFFIDAVIT

TO,
THE HON'BLE CHIEF JUSTICE OF INDIA
AND HIS COMPANION JUDGES OF
SUPREME COURT OF INDIA
THE HUMBLE PETITION OF THE
APPLICANT PETITIONER ABOVE-NAMED

MOST RESPECTFULLY SHOWETH:

1. The present writ petition under Article 32 is preferred by the Petitioner herein to direct the Respondents to formulate a National Management Protocol for COVID19 for addressing the serious concerns relating to imminent and extreme risks posed to the health and safety of health care workers throughout the territory of India.
2. That in view of the Nationwide Lockdown, due to which various technical/clerical work could not have been completed at present, the Petitioner is compelled to approach this Hon'ble Court by way of the present application, seeking exemption from filing attested copy of his Affidavit.

3. That for the sake of brevity, the facts and contents of the above titled Petition are not reproduced herein, and the Petitioner thus craves the leave of this Hon'ble Court to consider the same as a part of the present application.
4. That Pertinently, owing to the "Nation Lockdown", none of the notarizing officials are available in Thrissur, Kerala, due to which the Petitioner was rendered unable to attest/verify the accompanying Affidavit. Moreover, the Petitioner is well versed with the contents of the Petition and had duly verified the same, but solely due to non-availability of any notarizing agent in Thrissur, Kerala because of the stringent lockdown, he could not attest the same.
5. That as soon as the lockdown expires, it is hereby undertaken that the Petitioner will expeditiously send the duly verified and attested copy of the Affidavit to Delhi and accordingly, the same will be placed on record as and when received.
6. That the balance of convenience lies in favor of the Applicant.
7. That the instant application is made in bona fide and in the interest of justice.

PRAYER

It is therefore, most respectfully prayed that this Hon'ble Court may be pleased to:

- a) Allow the present application and kindly grant exemption to the Petitioner from filing Attested/Notarized Affidavit on record at present, and/or;

b) Pass any other or further orders as this Hon'ble Court may deem fit and proper in the circumstances of the case.

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

Filed by:

**(BIJU P. RAMAN)
ADVOCATE FOR THE PETITIONER**

Place: New Delhi
Dated: 04.04.2020