

IN THE HON'BLE SUPREME COURT OF INDIA

[CIVIL ORIGINAL JURISDICTION]

WRIT PETITION(CIVIL)NO._____ OF 2020

[UNDER ARTICLE 32 OF THE CONSTITUTION OF INDIA]

PUBLIC INTEREST LITIGATION

IN THE MATTER OF:

Chinmay Mishra
S/o Late Shri M.P. Mishra
Age- 62 year approx.
Occupation- writer and researcher
Address- 6, Bijasan Road,
Opposite Mahavir Bag,
Indore (M.P.)

....PETITIONER

Versus

1. Union of India
Represented by Secretary
Ministry of Health & Family Welfare
Nirman Bhawan, New Delhi – 110 011.

2. State of Madhya Pradesh
Represented by Chief Secretary
Government of Madhya Pradesh
Satpuda Bhawan - 462004
Bhopal (MP)

....RESPONDENTS

PETITION UNDER ARTICLE 32 OF THE CONSTITUTION
OF INDIA FOR ISSUANCE OF A WRIT IN THE NATURE
OF MANDAMUS DIRECTING THE RESPONDENTS TO
CONSTITUTE HIGH LEVEL EXPERT MONITORING
COMMITTEE, PROVIDE PPE KITS, MORE TESTING LABS
ETC AMONG OTHER DIRECTIONS.

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

THE HUMBLE PETITION OF
THE PETITIONER ABOVENAMED

MOST RESPECTFULLY SHOWETH THAT:

1. That following are the details which Petitioner is required to disclose in the Writ Petition as per Order XXXVII Rule 12(2) of Supreme Court Rules, 2013:-
 - a) The Petitioner is citizen of India and writer and researcher by profession and was also the member of steering committee of planning commission of India and at present Applicant is the president of Madhya Pradesh Sarvoday Mandal. The Driving Licence No of Petitioner is MP09R-2019-0332452.
 - b) That cause of action for filing present Writ Petition under Article 32 of Constitution of India is that in the wake of the widespread of COVID-19, the Madhya Pradesh is one of the most affected state from the Corona virus. The Capital Bhopal and Financial Capital Indore are most affected cities in Madhya Pradesh. Till 15.04.2020 there are 1053 positive cases of Corona Virus in Madhya Pradesh out of which in Indore 646 cases and in Bhopal 170. So, both the cities are worst affected by the infection. It is pertinent to note that Indore is having the worst mortality rate in entire country due to Covid 19. The situation is reaching the stage of beyond redemption in the State of Madhya Pradesh.
 - c) The Petitioner herein has no vested interest or ulterior motive in filing the present Petition, and the same has only been filed to secure larger public interest. The Petitioner is not guided by self-gain or for gain of any other

person/institution/body. Further, the Petitioner is approaching this Hon'ble Court with clean hands and sole intention of addressing the larger public concern to secure the fundamental rights of the citizens of India.

- d) That the Petitioner is not involved in any criminal, civil, revenue, or any other litigation that has any legal nexus with the issues involved in the present public interest litigation.

2. The instant Petition has been filed under Article 32 of the Constitution of India to enforce fundamental rights secured to the citizens of India, particularly those enshrined under Article 21 of the Constitution of India.
3. The instant Petition in the nature of Public Interest Litigation is filed under Article 32 of the Constitution of India by the Petitioner seeking, *inter alia*, a writ of mandamus directing the Respondents herein to constitute High Level Expert Monitoring Committee, secure medical assistance to every sick person, provide adequate amount of PPE Kits to Health workers, Setup testing labs in remote parts of State of Madhya Pradesh. Increase the testing among many others.
4. That the Petitioner herein has the requisite *locus standi* to file the present public interest litigation. The state machinery has utterly failed to handle the situation and there is total lack of information and transparency in State of Madhya Pradesh therefore the Petitioner is preferring Writ Petition Before this Hon'ble court.

ARRAY OF PARTIES

- (I) The Petitioner is citizen of India and writer and researcher by profession and was also the member of steering committee of planning commission of India and at present Applicant is the president of Madhya Pradesh Sarvoday Mandal. He is the resident of Indore, Madhya Pradesh, which is worst hit with highest mortality rate in India. He himself as well his family is also at high risk due to the failure of the state machinery.
- (II) The Respondent No. 1 is the Union of India, through the Ministry of Health and Family Welfare, represented by its Secretary, which is the appropriate ministry responsible for the Health and welfare of citizens of this country.
- (III) The Respondent No.2 herein is State of Madhya Pradesh, through directorate of Health, represented by its Chief Secretary, which is the appropriate authority in State of Madhya Pradesh for Health and Welfare.

All the Respondents referred to hereinabove are "State" within the meaning of Article 12 of the Constitution of India and hence amenable to writ jurisdiction of this Hon'ble Court under Article 32 of the Constitution of India.

5. BRIEF FACTS OF THE CASE

The facts and circumstances leading to the filing of this Writ Petition is as under:

- 5.1 On 31.12.2019, Chinese Health officials informed the World Health Organization (shortly WHO) about a cluster of 41 patients with a mysterious pneumonia.

Shortly after, Chinese authorities identified the virus that caused the pneumonia-like illness as a new type of coronavirus. And in about 2 months, the death caused by novel corona virus in China surpassed 774.

- 5.2 Subsequently, global outbreak of COVID-19 began and cases appeared in Europe, Iran, South Korea and other regions of the around the world. On 11.03.2020, WHO declared COVID-19 outbreak a pandemic.
- 5.3 That, the entire world is facing the problem of Novel Coronavirus (COVID-19), and as many as 196 countries, about 20,83,607 people affected and 1,34,632 deaths took place till 16.04.2020 (04:51 GMT) as per the information available on the official website of World Health Organization (WHO). In India also the situation of Novel Coronavirus (COVID-19) is alarming and till 16.04.2020 there are 12,456 confirmed case in India.
- 5.4 Madhya Pradesh is one of the most affected state from the Corona virus. The Capital Bhopal and Financial Capital Indore are most affected cities in Madhya Pradesh. Till 17.04.2020 there are more than 1300 positive cases of Corona Virus in Madhya Pradesh out of which in Indore 842 cases and in Bhopal 196. So, both the cities are worst affected by the infection. It is pertinent to note that Indore is having the worst mortality rate in entire country due to Covid 19. The situation is reaching the stage of beyond redemption in the State of Madhya Pradesh.
- 5.5 That, the issues involved in this application is with respect to the failure of the State Administration dealing with the Corona virus problem, this failure

ultimately leading to cost life of the people. The various news reports and ground level reporting of news-papers clearly demonstrate the same. The issues on which the State Government failed to take steps are as follows:

- a)** The State Government, in this time of unprecedeted global health emergency, does neither have a proper administrative structure nor a concrete plan and system to cope with this pandemic. The State does not have a health Minister and even the officers responsible in the department have been reported unwell. The State Government does not have adequate decision making structure in place to cope with the pandemic.
- b)** That the State of Madhya Pradesh does not have any expert committee in place with medical experts of experience to cope with the pandemic in the State of madhya Pradesh. The state Government is, unfortunately, dependent on the task force formed by the ruling political party with political leaders along with the Chief Minister in the said task force. There is no expert member even in that task force.
- c)** The State Administration neither have the adequate laboratories to test the Corona Virus nor have the adequate number of testing kits, which finally resulted into the less number of test and higher risk of spread of virus.
- d)** It has been noted that the samples from Indore are still being sent to other place for testing, which is taking 4-5 days leading to deterioration in the condition of patient of this fatal disease.

- e) The State Administration after completion of the 22 days of lockdown still demanding for the Rapid Antibody testing kit for Corona virus test, which shows nothing but the clear failure of State Administration in dealing with the issue.
- f) That it has been reported that the still the state government does not adequate testing infrastructure in Madhya Pradesh and more particularly in Indore, Bhopal and Ujjain, which are marked as Red zones. Still the samples are being sent to other states, where the testing is taking four to five days and even the samples are failing tests. Ujjain, despite being under red zone, does not have a single lab.
- g) The various news reports published in different news-papers show that during this extreme situation the State Administration failed to provide the basic health care services to the people and number of individual unfortunately died because of non-availability of health care facility in public as well as private hospital, even after the enforcement of ESMA act by the State Government.
- h) That, the central government as well as the Hon'ble Supreme Court emphasized on the special care for nutrition of Children and Pregnant women, unfortunately state also failed to do so.
- i) That, there is no data/press release/status report released by the State Administration which shows that the special arrangements have

been made for the labour from unorganized sector, homeless persons and destitute.

- j) That, non-availability of essential facilities food, water and proper sanitation in the hospitals and quarantine centers is reason why patients run away.
- k) That, the State Administration is bound to provide the ration and food to the needy people but unfortunately failed on this aspect also, which leads to increase the problem of hunger and people use to violate the curfew to arrange the food for their family.

5.7 That, problem mentioned in para 9.5(a), (c) and (d), related to the inadequate testing laboratories and the testing kits, the news reports dated 15.04.2020 shows 1142 samples were sent to the Delhi for the testing. Further news report dated 16.04.2020 which incorporate the statement of Commissioner Indore clearly mentioned that the administration still do not have the Anti-body test kit, which is very much essential for the testing. Further the administration is still depending on the sample testing in the hotspot areas. True Translated copy of News report dated 15.04.2020 annexed here and marked as **Annexure P/1**(Pg. 25)

True Translated copy of News report dated 16.04.2020 annexed here and marked as **Annexure P/2**(Pg. 26)

5.8 That, the issue mentioned in para 9.5(g) is related with the failure of State Administration with respect to ensuring the general health services in the state. It is

also essential to mention here that the Essential Services Management Act, 1968 has already enforced and time and again the administration directed and threaten the private hospitals to continue to provide the health facilities to patients, even after that hospitals are not doing the same which resulted into the unfortunate and untimely death of the people. Few news reports covering these unfortunate incidents are given below. News Report dated 15.04.2020, Patrika Indore edition, cover page reported that senior citizen died because three hospitals refused to treat him and in absence of ambulance service the relatives were forced to bring him on Activa Scooter from one to another hospital and at last he died in absence of treatment. News Report dated 13.04.2020, Patrika Indore edition, Page-3 reported various unfortunate incidents including the refusal to provide the treatment to 80 years old woman suffering from cardiac arrest by two big hospitals, finally resulted into her death. Another incident refusal to give the body of deceased on account of non-payment. Another incident shows that the Medanta Hospital refused to admit the retried government servant and after intervention of collector he was admitted. This news report also shows there are more than 300 hospitals which are divided in the red, yellow and green category and not providing the proper health services. Further the acquisition or marking of Gukuldas and Chohitram Hospital of Indore city leads to problems for dialysis patients. There are various news reports which also shows that the shortage of essential medicines in the Indore City. News Report dated 12.04.2020, Patrika Indore edition, Page-3 reported various unfortunate incidents including the physically

challenged husband could not get her wife admitted in 6 different hospitals, but because of the involvement of officials she was admitted later. Even the pregnant lady also had to suffer the same problem and was not admitted by the various hospitals even after the clear direction of collector, Indore.News Report dated 12.04.2020, Patrika Indore edition, Page-3 reported various unfortunate incidents. The shameful incident was that a pregnant woman and her child died because of non-availability of the treatment. In another case lady gave the birth to the child in parking of M.Y. Hospital because of lack of facilities. In Another case lady was forced to carry the dead child in the womb for four long days and had to go to various hospitals for treatment. The humble submission is that these are just few incidents which are reported there will be certainly various other incidents which even could not be reported. These examples are just to show the actual position of the health services and clear failure of administration to manage the same. True Translated Copy of Newspaper report dated 12.04.2020 is marked as **Annexure-P/3 (Pg. 27 - 31)**.True Translated Copy of Newspaper report dated 13.04.2020 is marked as **Annexure-P/4 (Pg 32 - 33)**.True Translated Copy of Newspaper report dated 13.04.2020 is marked as **Annexure-P/5 (Pg. 34- 37)**.True Translated Copy of Newspaper report dated 15.04.2020 is marked as **Annexure-P/6 (Pg 38-39)**.

5.9 That, with respect to para 9.5(d) it is humbly submitted that the important schemes for ensuring proper nutrition of the children in the State are Mid-Day-Meal scheme and Take-Home-Ration Scheme. The present lockdown is adversely affecting both the

schemes as all the schools as well as Anganwadies are closed which were the places for implementation of schemes throughout the State. The estimated figure is in total around 65 lakhs children were benefited under both the schemes. The non-functioning of the schools and Anganwaris certainly leads to problem of malnourishment in children. The State of Madhya Pradesh issued an order dated 14.03.2020 and directed the concerning authorities to provide the take home ration to the children of age group of 3 to 6 years. But on the other hand, ground reality is that the take home ration is not available for the children of age group of 6 months to 3 years and for pregnant women because all the Anganwari centres are shut down and no proper direction given to the Anganwari workers for supply of ration. Moreover the government order dated 14.03.2020 was issued without any operational guideline, action plan or instructions for its implementation, which certainly lead to problems. That, it is essential to mention here that there are as many as 97,135 Anganwaries and mini-Anaganwaries in the State of Madhya Pradesh and in total there are 89,70,403 beneficiaries under the ICDS, National Food Security Act, 2013. The 42.8% of children are of lesser weight and 42% children are suffering from stunting malnourishment in the State of Madhya Pradesh. That, it is also the known fact that the malnourishment in children in state of Madhya Pradesh is very high and even more as compared to few Sub Saharan countries and that is why the government is bound by a duty to provide the proper food to children. The State of Haryana issued an order and specifically mention that the period between 19.03.2020 to 31.03.2020 cannot be consider as

holidays and supply of mid-day-meal shall not be affected by the same. True Translated copy of government order dated 14.03.2020 annexed here and marked as **Annexure P/7 (Pg. 40).**

5.10 That, not only State of Madhya Pradesh is bound by duty to ensure the availability of adequate ration at each ration shop specifically in the rural and poor urban areas. The non-availability of ration at the public distribution shops of ration might lead to situation of starvation in the state. There is no order/notification/circular issued by the State of Madhya Pradesh to overcome with these difficulties till date. That, humble submissions of the Applicant is that the India is already facing the huge problem of Coronavirus and cannot afford to engage in the problem of scarcity of food and grains for public at large at this stage.

5.11 That, with respect to the issue mentioned in para 9.5 (j) the problem of homeless families and people due to this lockdown. The census data of the year of 2011 which is the latest available data reveals that there are at-least 37,000 homeless families in the State of Madhya Pradesh which includes 1,46,435 persons. There is no announcement for any relief with respect to their safe shelter and food. The state is bound by a duty to provide the same as they are also the citizen of this country. That, there are shelter homes available at the urban area for the poor and homeless persons but certainly these shelter homes are not enough for the 37,000 homeless families. More so the proper standard of hygiene, medical facilities and food is also required to be maintained in these shelter homes. That,

the humble submission of the Applicant is that the available shelter homes are not enough to accommodate all homeless hence it is duty of the State to immediately create more place for the homeless.

5.12 That, the State of Madhya Pradesh on 25.03.2020 uploaded the press note on the official website which contains certain benefits for the vulnerable section of society. Most of them are related to the advance payment of subsidies to the beneficiary. The only new amount promised to pay to the workers of organized sector which is approximately Rs. 275 crores. True Translated Copy of order of chief secretary dated 26.03.2020 is annexed here and marked as **Annexure P/8 (Pg.41-42)**

5.13 That, the issue mentioned in para 9.5 (f) is again related to the protection from corona virus, the Ayush Department also emphasized upon the healthy and nutritious food to fight with the corona virus. So there is no doubt about that the patients suffering from the corona virus requires healthy & nutritious food as well as hygienic environment to heal themselves and to fight with this virus. During the period of lock-down various news reports were published shows that the patients from the hospitals and quarantine centers runaway because of non-availability of food, drinking water and proper sanitation facilities. This is the duty of the administration to provide the same, but the administration failed to do so.

5.14 That, the Indore city is under the total lockdown since 29.03.2020 and till date because of lack of testing and improper implementation of orders the situation of Corona Virus could not be controlled. The total

lockdown of Indore also includes the lockdown of Kirana/Ration shops and other essentials except medicine.

5.15 That, the Times of India report dated 17.04.2017 provided that the State of Madhya Pradesh saw the spike in cases with 361 cases, whereas a study by IIM faculty provided that at this rate will see almost 50,000 cases in Madhya Pradesh by end of month May,2020. True Copy of Times of India Report dated 17.04.2017 is marked as **Annexure-P/9(Pg. 43)**. True copy of Reports Published in Free Press Journal dated 17.04.2020 are marked as **Annexure-P/10 (Pg. 44 - 54)**.

5.15 That, it is also essential to mention here that the State of Madhya Pradesh is also suffering from the political crises, during the beginning of the crises of corona virus in India there is change in the government and new chief Minister sworn oath on 23.03.2020 only. But even till date there is neither any cabinet in existence nor there is any health minister is in State of Madhya Pradesh. Rather only Chief Minister is here and no other minister sworn the oath or holds the office. So, during this critical period there is no political leadership exist to check and guide the work of bureaucracy, and to provide the help to the bureaucratic set up.

6. GROUNDS

The Petitioner herein is approaching this Hon'ble Court under Article 32 of the Constitution of India, on the following grounds inter alia –

- A. FOR THAT, Article 21 of Constitution of India guaranteed the Right to Life to every citizen and it is the duty of the State to ensure the same.
- B. FOR THAT, the number of cases of corona positive are increasing in the State of Madhya Pradesh at rapid speed specially in the Bhopal and Indore, hence both these cities require the more kits for testing, more laboratories and also higher number of Anti-body testing kits to ensure the proper and adequate tests. As lockdown along with the proper testing is tool for fighting this critical situation. The case in Indore has increased to 842 as on 17.4.2020 from 5 cases on 27.3.2020 with more than 50 casualties. The state of Madhya Pradesh, today, stands at 5th highest reported Covid – 19 cases in just 10 days whereas other states have managed to significantly stop the spreading of pandemic.
- C. FOR THAT the State of Madhya Pradesh lacks the proper Administrative set up to cope with this pandemic and a global medical emergency. The state does not have a functioning Health Minister and the senior administrative officers of the Department of health have been reported unwell. The required machinery to take informed decision making is absent in the state, which is jeopardising the putting to risk the lives of the entire state population.
- D. FOR THAT the State Government has failed to constitute an expert committee, who is technically competent to handle the situation, to cope and fight with this pandemic. The results are writ large. The states with Expert committees have been able to

significantly contain the contagion in the State for example Kerala and Rajasthan, which were worst hit have significantly controled the new infections and the spread.

- E. FOR THAT ther are not treatment centres even in the red zone marked areas and even there is no testing center in Ujjain, which is a red marked district. This state of affairs is alarming and deserve the intervention from this Hon'ble Court.
- F. FOR THAT, total lockdown certainly does not mean the health care institutions are not bound to provide the heath care services to the public at large, number of news reports annexed here shows that even after enforcement of ESMA the health services are not proper in the Indore city and people are losing life because of this. There has been denial of medical services to the sick persons from the hospitals, which is aghastening, more so in the present times of medical emergency, The Administration failed to ensure the proper health services to its residents.
- G. FOR THAT the State Government has failed to conduct tests across Madhya pradesh. The districts specified in green zone have hardly conducted tests. Many districts have conducted less than 100 tests so far and on the basis these meagre number of tests, declared the districts as green zone districts.
- H. FOR THAT, now the crises of medicines also arising in the State of Madhya Pradesh and people are also suffering because of non-availability of dialysis centers etc. In most of the districts, there are no ventilators

and if at all there are the number of ventilators is not sufficient for the population.

- I. FOR THAT, the State Administration also failed to provide the ration and food to the needy even during this crucial time of lockdown, the State is bound by a duty to ensure the proper supply of food and grains in the State.
- J. FOR THAT, in the present situation the supply of grains and ration at every village and city is very much essential to decrease the mental trauma and ensure the healthy life of the individual.
- K. FOR THAT, most unfortunate aspect is that the State is even failed to provide the food, water and sanitation facilities to the patients suffering from the Corona Virus in the Hospitals and Quarantine centers, which is not good for the health and wellbeing of the patients as well as public at large.
- L. FOR THAT, the present situation is very serious because of the problem of Corona Virus and possibilities of its spread, but state government is bound by a duty to provide the ration/meal to each and every children of the State of Madhya Pradesh for their proper nutrition and health life, more so also essential this to develop the proper immunity within the children.
- M. FOR THAT, the supply of cooked food for children and destitute are essential as they have no place and resources to cook food, that is why also the establishment of community kitchen are very much essential to ensure the health and wellbeing.

- N. FOR THAT, the available shelter homes are not adequate in number to accommodate all the homeless families, it is duty of the State to create the required number of shelter homes for homeless and to ensure the food, hygiene and medical facilities in the shelter homes for homeless.
- O. FOR THAT, at this stage schemes like mid-day-meal and take-home-ration cannot be compensated through the monetary compensation as at present it is even difficult to get the ration from government shops.
- P. FOR THAT, in absence of any cabinet or ministers which are very much essential for the proper working of the Government and proper check on the activities of bureaucrats and to guide them the state of Madhya Pradesh is facing the hardship and entirely dependent upon the decisions of bureaucratic system, which is certainly not good as one organ of the State is not in function till date.
- Q. FOR THAT, the petitioner may please be permitted to take other grounds to be taken up at the time of the hearing of the writ petition.

7. That this Hon'ble Court has the jurisdiction to entertain and try this Petition.

8. That the Petitioner craves leave to alter, amend or add to this Petition.

9. That the Petitioner seeks leave to rely on documents, a list of which, along with true typed copies has been annexed to this Petition.
10. That this Petition has been made bona fide and in the interest of justice.
11. That the Petitioner has not filed any other Petition before this Hon'ble Court or before any other Court seeking the same relief.
12. The petitioner seeks permission to exempt the attested / affirmed affidavit, hard / photocopies of paper books (3+1) of Writ Petition and deficit court fee (if any) in the prevailing circumstances as the matter is urgent and need urgent hearing. The petitioner is also agree for hearing of the present writ petition through video conferencing.

PRAYER

In the facts and circumstances stated above, it is most humbly prayed that this Hon'ble Court may be pleased to issue appropriate writs, orders and directions as set out below:

- a) Issue a writ of mandamus, or any appropriate writ, order or direction to the Respondents to immediately constitute and appoint a Expert Committee with executive powers, comprising of Doctors and experts

and the members from the Union Government to handle and cope with the pandemic;

- b) Issue a writ of mandamus, or any appropriate writ, order or direction to the Respondents to issue necessary directions to all hospitals and nursing homes injuncting them from refusing or denying proper medical care to any person during this pandemic and to ensure the availability of proper and affordable health care facility in the State and also take appropriate legal actions against the institutions which refuse to provide the health care facility during this critical situation;
- c) Issue a writ of mandamus, or any appropriate writ, order or direction to the Respondents to conduct more Covid tests across the state and even in green marked districts;
- d) Issue a writ of mandamus, or any appropriate writ, order or direction to the Respondents to set up testing centres and laboratories in all red marked districts and all other districts which have reported more than 10 cases;
- e) Issue a writ of mandamus, or any appropriate writ, order or direction to the Respondents to ensure the availability of adequate medicine and dialysis centres to secure the life of the individuals;
- f) Issue a writ of mandamus, or any appropriate writ, order or direction to the Respondents to maintain the proper quantity and quality of grains and ration at every village and city of the State to ensure the health and wellbeing of the residents and keep all information and data in public domain;
- g) Issue a writ of mandamus, or any appropriate writ, order or direction to the Respondents to spread the

proper awareness with respect to the supply and availability of free and subsidized food at every level to ensure the health and wellbeing of the public at large;

- h) Issue a writ of mandamus, or any appropriate writ, order or direction to the Respondents to continue with the beneficial scheme i.e. Mid-Day-Meal and community kitchens and continue to provide the packaged food in the situation of present crises to all beneficiaries and release the data with respect to the same;
- i) Issue a writ of mandamus, or any appropriate writ, order or direction to the Respondents to regularize and systematize the Take-Home-Ration scheme for the proper and healthy diet of children under the present Coronavirus Crises and make a implementation-monitoring framework to ensure all women and children receive Take Home Ration regularly and also ensure the involvement of local bodies and women self- help ground for preparing take home ration;
- j) Issue a writ of mandamus, or any appropriate writ, order or direction to the Respondents to ensure the establishment of community kitchen to ensure the availability of cooked food for children, pregnant women, poor and destitute in the State of Madhya Pradesh because it is difficult for many families to even arrange for the facilities to cook food at this stage;
- k) Issue a writ of mandamus, or any appropriate writ, order or direction to the Respondents to ensure the proper functioning of shelter homes for homeless people and migrated workers and also to ensure the adequate food, medicine and hygiene at shelter homes;

I) Pass any other order or relief as this Hon'ble Court may deem fit and proper under the circumstances of the present case in the interest of justice, equity, and good conscience.

DRAWN BY:

[MANISH TIWARI]
ADVOCATE

FILED BY:


(SARVAM RITAM KHARE)
ADVOCATE FOR THE PETITIONER

DRAWN ON: 17.04.2020
FILED ON: 18.04.2020

IN THE HON'BLE SUPREME COURT OF INDIA

[CIVIL ORIGINAL JURISDICTION]

WRIT PETITION(CIVIL)NO._____ OF 2020

IN THE MATTER OF:

CHINMAY MISHRA ...PETITIONER

VERSUS

UNION OF INDIA AND ANOTHER ...RESPONDENTS

AFFIDAVIT

I, Chinmay Mishra S/o Late Shri M. P. Mishra aged 62 years approx. R/o 6, Bijasan Road, Opposite Mahavir Bag, Indore (M.P.) do hereby solemnly affirm and declare as under:

1. That I am the Petitioner in the present matter and well conversant with the facts and circumstances of the present matter. I am competent to swear this affidavit.
2. That the contents of the accompanying Writ Petition (PIL) have been drafted on my instructions and I have gone through the same, I say that the contents of the WP(PIL) are true and correct and nothing material is concealed therefrom.
3. That the annexures filed alongwith the writ petition are correct copies from their originals.

DEPONANT

VERIFICATION:

Verified at Indore on this 18th day of April 2020 that the contents of this affidavit are true and correct and nothing material is concealed therefrom.

DEPONANT