

**IN THE HON'BLE HIGH COURT OF CHHATTISGARH**  
**AT BILASPUR**

**WRIT PETITION (PIL) No. OF 2020**

**PETITIONERS:** : Right to Food Campaign Chhattisgarh  
& others

**VERSUS**

**RESPONDENTS:** : State of Chhattisgarh & others

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**Date – 23.03.2020**

**Place- Bilaspur**

Rajni Soren

(Counsel for the Petitioners)

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**SYNOPSIS AND LIST OF DATES**

The petitioner has filed the instant petition praying for appropriate direction to the respondents to exercise their powers under various legal provisions and take immediate measures especially social security, welfare measures in the interest of the various vulnerable sections of society that are being affected by the COVID 19 shutdown. That, the petitioners have prayed that the following reliefs :-

**Social Security**

- (i) Issue a writ of mandamus directing that Rs. 3000 to be paid per month till the crisis continues, to all but not limited to unorganized sector workers registered with labour department including construction workers, daily wage workers, street vendors, loaders, the first month's allowance to be paid by 1st April, 2020.

- (ii) Increase existing social security pensions (old persons, disabled, widows) amount by 50% (from Rs.300 to Rs.450) for 2 months and pay it in advance by 1st April, 2020.
- (iii) Each Gram Panchayat to have atleast two functional worksites, offering atleast 50 days of work per registered family from 1st April to 15th June 2020.

### **Food Security/Public Distribution System**

- (iv) Issue a writ of mandamus directing 50% increase in quantity over earlier entitlement, given free of cost for the poor (Priority Ration Cards and Antyodaya Ration Cards) and three months quantity given in advance.
- (v) Issue a writ of mandamus directing the arrange for free lunch and dinner for Urban poor and destitutes in government run community kitchens near bus stands, railway stations, hospitals, religious places etc. (to be organized by district collectors)
- (vi) Issue a issue a Writ of Mandamus or any other appropriate writ, order or direction in the nature of Mandamus directing the State Government to ensure that the PDS shops are well stocked with grains, vegetables and other essentials to enable beneficiaries

under the National Food Security Act to purchase the same from the PDS Shops.

- (vii) Issue a writ of mandamus directing the respondents to deliver ration, masks, hand wash, sanitizers, gloves, and make them available to the public at the PDS shops.

### **Health**

- (viii) Issue a writ of mandamus directing the respondents to ensure that all Front line Workers in the essential services not restricted to but particularly in the Health , Law and Order, Sanitation services and Utilities are provided with Protective Gear and Medical Facilities;
- (ix) Issue a writ of mandamus directing the respondents decentralise the testing and treatment for COVID – 19;
- (x) Issue a writ of mandamus directing the respondents to take steps for the local production of testing kits for the novel coronavirus, medicines and protective gear by engaging local self help groups, support groups, voluntary organisations, and others.

### **Housing**

- (xi) Issue a writ of mandamus direct the Respondent Authorities to utilise government buildings, schools or colleges, public halls, hostels, stadiums to temporarily

house homeless persons, stranded daily wage workers and other slum dwellers.

### **Transportation**

- (xii) Issue a Writ of Mandamus directing the respondents to restore Public transport in terms of bus for routine patients to reach hospitals and healthcare and for ANMs, nurses, other healthcare workers and support staff to reach their duties.

### **Education and Communication**

- (xiii) Issue a writ of Respondent Authorities to conduct drives to educate the slum dwellers, daily wage labourers, sex workers, manual scavenger workers, construction workers, street vendors as well as homeless population about the Epidemic and further distribute quality masks, gloves and hand wash, hand sanitizers, sanitary napkins as sanitation material to slum dwellers, daily wage labourers, sex workers, sanitation workers, construction workers, street vendors as well as homeless persons free of cost through PDS Ration Shops

### **List of Dates and Events**

<b>Dates</b>	<b>Events</b>
30.01.2020	The WHO declares COVID 19 as a Public Health Emergency of International Concern

11.3.2020	The WHO in its media briefing characterizes COVID 19 as a pandemic
19.3.2020	WHO issues interim guidance for 'Considerations for quarantine of individuals in the context of containment for coronavirus disease (COVID 19)'
21.3.2020	Mass quarantine lockdown measures implemented in most states including Chhattisgarh till 31.3.2020. Government of Chhattisgarh passed a series of orders closing all government office barring certain specific services like water, electricity,

**Date – 23.03.2020**

**Place- Bilaspur**

Rajni Soren

(Counsel for the Petitioners)

**IN THE HON'BLE HIGH COURT OF CHHATTISGARH**  
**AT BILASPUR**

**WRIT PETITION (PIL) No. OF 2020**

**PETITIONERS:**

- :1. Right to Food Campaign Chhattisgarh through its member Sangeeta Sahu D/o Mayadhar Sahu, aged about 30 years, office address – H. No. 29, New Panchsheel Nagar, Katora Talab, Raipur, Distt. Raipur (C.G.).
2. Chhattisgarh Hawkers Federation through its member Vishvakarma Sharma, aged about 40 years, R/o Adarsh Nagar, Camp – 1, Bhilai, Police Station Chavani, Distt. Durg (C.G.).
3. Jayendra Jha
4. Amarnath Pandey

**VERSUS**

**RESPONDENTS:**

- :1. State of Chhattisgarh  
Through : Chief Secretary,  
Government of Chhattisgarh  
Mantralaya, Raipur (C.G.).
2. Secretary, Department of Health & Family Welfare, Mantralaya, Raipur, Distt. Raipur (C.G.).
3. Secretary, Department of Women & Child Welfare, Mantralaya, Raipur (C.G.)

4. Secretary, Department of Urban Administration & Development, Mantralaya, Raipur (C.G.).
5. Secretary, Department of Revenue & Disaster Management, Mantralaya, Raipur (C.G.).
6. Secretary, Food Civil Supplies & Consumer Protection Department, Mantalaya, Raipur (C.G.).
7. Secretary, Department Social Welfare, Mantalaya, Raipur (C.G.).
8. Secretary, Government of India, Through Secretary Department of Health & Family Welfare,
9. Directorate of Health Services, Govt. of India, Raipur (C.G.).
10. Director, AIIMS Raipur, Distt. Raipur (C.G.).
11. Indian Council of Medical Research, Through : Its Senior Deputy Director, V. Ramlingan Swami Bhawan, P.O. Box No. 4911, Ansari Nagar, New Delhi. - 110021

**WRIT PETITION (PUBLIC INTEREST LITIGATION) UNDER  
ARTICLE 226 OF THE CONSTITUTION OF INDIA**

**1. PARTICULARS OF THE PETITIONERS:**

As stated in the cause title above.



2. **PARTICULARS OF THE RESPONDENTS:**

As stated in the cause title above.

3. **(A) PARTICULARS OF THE ORDER AGAINST WHICH THE PETITION IS BEING PRFERRED:**

Not Applicable

**(B) SUBJECT MATTER IN BRIEF:**

The petitioner has filed the instant petition praying for appropriate direction to the respondents to exercise their powers under various legal provisions and take immediate measures especially social security, welfare measures in the interest of the various vulnerable sections of society that are being affected by the COVID 19 shutdown.

**(C)** (II) The present petition under Article 226 of the Constitution of India is being filed by way of public interest litigation and the petitioners have no personal interest.

(II) The petitioner no. 1 the Right to Food Campaign Chhattisgarh, is the Chhattisgarh Chapter of the National Right to Food Campaign. The right to food campaign has been the major force behind the famous right to food case *PUCL v. Union of India* .....which was heard by the Hon'ble Supreme Court over a period of ten years and a number of orders were passed with

regard to the Integrated Child Development Scheme, Mid Day Meal Scheme, maternity entitlement, rural employment. Petitioner No. 1 also campaigned for the National Food Security Act. Petitioner No. 2 is an organization of street vendors. Petitioner No. 3 is a street vendor carrying on business at Raipur. Petitioner no. 4 is an advocate registered with the Bar Council of Chhattisgarh, he is former member of the Communist party of India, he is presently a member of the Indian National Congress.

- (III) That the petitioners have filed the present petition on their own and not at the instance of someone else. The litigation expense is being borne by the petitioners and the Advocates are doing the case pro bono.
- (IV) That the source of information of facts pleaded in this petition is based on information known to the petitioners, information available in the public domain, information available on the websites of the World Health Organization, Ministry of Health & Family Welfare Government of India, Indian Council of Medical Research, Government of Chhattisgarh.
- (V) That the instant petition prays for directions to the respondents to immediately implement the existing

welfare measures and take additional welfare measures in the light of the shutdown due COVID 19.

(VI) That to the knowledge of the petitioners, the Hon'ble High Court has registered a suo moto petition W.P. (PIL) No. 27/2020 regarding the COVID 19 pandemic.

**4. WHETHER CAVEAT FILED IN THIS PETITION, IF YES, WHETHER COPY OF THE PETITION IS SUPPLIED TO THE PETITIONERS :**

The petitioners submit that no caveat has been filed in this matter to the best of their knowledge and no notice of caveat filed has been served on them.

**5. DETAILS OF REMEDIES EXHAUSTED**

Petitioner No. 1 has submitted a memorandum to the Government of India. The petitioners have no alternative remedy but to approach this Hon'ble Court.

**6. MATTER NOT PREVIOUSLY FILED OR PENDING WITH ANY OTHER COURT ETC.**

The petitioner respectfully submits that they have not filed any application or petition in any other Court of law.

**7. DELAY IN FILING THE PETITION**

There is no delay in filing the present petition.

**8. FACTS OF THE CASE:**

- 8.1 That according to the World Health Organization (hereinafter WHO) "Coronavirus disease (COVID-19) is an infectious disease caused by a newly discovered coronavirus. Most people infected with the COVID-19 virus will experience mild to moderate respiratory illness and recover without requiring special treatment. Older people, and those with underlying medical problems like cardiovascular disease, diabetes, chronic respiratory disease, and cancer are more likely to develop serious illness." The WHO has declared COVID 19 as a Public Health Emergency of International Concern and has declared it a pandemic.
- 8.2 That the Government of Chhattisgarh has passed a number of orders in the wake of the pandemic mainly in the form of advisories for testing, functioning of the health department, travel, appointment of nodal officers in each department and administrative issues. The petitioners appreciate the efforts being made by the respondents, however no real welfare measures have been announced by the state or the central government to counter the socio economic effects of imposition of S. 144 in several parts of the state, closure of non-essential services, self – curfew, suspension of all public transport, closure of all workplaces. All of these lockdown measures are essentially imposition of mass quarantine of the healthy population. According to the WHO quarantine

*"Involves the restriction of movement, or separation from the rest of the population, of healthy persons who may have been exposed to the virus, with the objective of monitoring their symptoms and ensuring early detection of cases."*

The WHO interim guidelines on Quarantine dated 19.3.2020 state the following:

- “- Authorities must provide people with clear, up-to-date, transparent and consistent guidelines, and with reliable information about quarantine measures.
- Constructive engagement with communities is essential if quarantine measures are to be accepted.
- Persons who are quarantined need to be provided with health care; financial, social and psychosocial support; and basic needs, including food, water, and other essentials. The needs of vulnerable populations should be prioritized.
- Cultural, geographic and economic factors affect the effectiveness of quarantine. Rapid assessment of the local context should evaluate both the drivers of success and the

potential barriers to quarantine, and they should be used to inform plans for the most appropriate and culturally accepted measures.”

True copy of the WHO Interim Guidance dated 19.3.2020 is filed herewith as **Annexure P-1**.

- 8.4 That WHO has been repeatedly saying that a complete lockdown has huge socio-economic consequences, and the same has to be combined with scaling up of testing and improving the healthcare infrastructure.
- 8.5 That the respondents have passed a number of orders applicable in the state of Chhattisgarh restricting regular human activity which has affected the livelihood of several persons in the state. The Chhattisgarh Government has passed only one order that provides some redressal for those affected by the lockdown - take home ration in place of midday meals at schools and Anganwadis.
- 8.6 That, it is submitted that the number of affected persons in the state of Chhattisgarh is low when compared to other states. However mass quarantine measures have been imposed in Chhattisgarh just like in other states. However while most other states have taken several social security measures to ameliorate the socio economic impact of the lockdown. Below is a state wise comparison of the social security measures undertaken:

State	Unemployment Allowance for Unorganised Sector Labourers	Social Security Pensions	Public Distribution System	Community Kitchens for subsidized meals	Employment Guarantee Programmes
Delhi	Rs. 4000 to be paid to 8.5 lakh beneficiaries by 7 <sup>th</sup> April, 2020		50% increase in quantity over earlier entitlement, also free of cost for 72 lakh beneficiaries	Free Lunch and Dinner for anybody approaching government run night shelters	
Kerala		Rs. 1000 per family pension for families not covered under earlier schemes (budget allocation Rs.1320 Crore) and Two months welfare Pensions in advance	Free foodgrain (Rs.100 Crore budget allocation)	Subsidised Meals (at Rs.20) – Rs.50 Crore budget allocated	Rs. 2000 Crore budget allocated for employment guarantee in April-May
Punjab	Rs.3000 allowance				
Rajasthan		Two months welfare Pensions in advance	Foodgrain free of cost for existing beneficiaries till May 2020.	Urban labourers/vendors not covered under PDS, to be provided free food packets	
Uttar Pradesh	Rs. 1000 allowance for 15 Lakh daily wage workers and Rs.20 Lakh construction workers		One month free ration under PDS		
Odisha		Four month pensions to	Three months of		

		be paid in advance for 45 lakh beneficiaries by 2 <sup>nd</sup> April 2020	PDS ration in advance		
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True copy of media & social media reports are filed herewith as **Annexure P-2 (Colly)**.

- 8.7 That the lockdown has most adversely affected the workers of the unorganized private sector, private contractual workers, street vendors, MNREGA workers. Petitioner no. 2 and 3 street vendors themselves and sell fruits in Raipur. On a day of good business, they earn about Rs. 400 per day. The administration asked them to close their shops and refrain from selling. Workers are forced to remain unemployed without any wages or job security for unanticipated days of outbreak of the Covid-19.
- 8.8 That the key vulnerable sections are (a) Urban Unorganised sector workers – loaders, construction workers (b) Urban Self employed food vendors, rickshaw pullers, rag-pickers (c) Old persons in poverty urban and rural areas (d) Urban destitute and homeless (e) Poor families in urban and rural areas.
- 8.9 Frontline Workers in the Health, Civic services like law and order, sanitation, transport workers and their families are not being provided with adequate education, aids and facilities to combat the high probability of infection. Neither is there any clarity of the second / alternate line of this workforce to ensure that an undue



strain on them is mitigated from the outset. The toiling class in formal and informal and agricultural sectors lack awareness on Covid-19. They are uneducated, poor, vulnerable, most susceptible to the threat of disease transmission. Therefore, it is all the more essential for the state to provide them with gloves, sanitizers, hand wash, masks at the earliest.

**9. GROUND S URGED:**

The petitioner herein respectfully presents the present writ petition under Article 226 of the Constitution of India inter alia, on the following grounds:

- 9.1 That the Right to Food is inherent to life with dignity under Article 21 of the Constitution of India.
- 9.2 That Article 47 of the Constitution of India spells out the duty of the State to make the following its primary duty:
  1. Raise the level of nutrition and standard of living of its people
  2. Improvement of public health
- 9.3 For the reason that That while it is the time when the primary duty of the State is towards the containment and eradication of the Coronavirus, the State must not turn away its obligation towards marginalised communities and will be the worst affected as a result of a continuous lockdown.

- 9.4 For the reason that in absence of daily wages and no other means of livelihood, persons living in poverty and surviving on bare minimum nutrition will find themselves in extreme poverty and hunger and will suffer from prolonged malnutrition, and even more susceptible to common diseases, let alone a disease as fatal as coronavirus.
- 9.5 That the right to healthcare is a right guaranteed under the right to life and personal liberty under Article 21 of the Indian constitution. That the Apex Court has previously held that the non-availability of medical facilities is a violation of Article 21, in the case of Pashchim Banga Khet Mazdoor Samiti.
- 9.6 That the right to equality, guaranteed under Article 14, mandates that the economically vulnerable communities are not denied access to medical care by virtue of their economic status , especially in light of deadly pandemic.
- 9.7 That the unavailability of prompt testing, identification and isolation, to prevent further outbreak in vulnerable societies, is a grave violation of the right to life.
- 9.8 That the failure to increase testing capacity and testing numbers puts the larger public in danger of facing an outbreak of the deadly coronavirus. That economically vulnerable societies, like slum dwellers, simply cannot practice social distancing and thus the failure of the state in taking prompt preventive action impacts their right to health.

- 9.9 That increasing local production of testing kits, medicines and protective gear ensures that prices stay low and affordable for the majority of the population.
- 9.10 That the existing PDS mechanism and ration shops although having spread across the state, and largely accessible, yet the State government has failed to recognise them as a tool to deliver ration, masks, hand wash, sanitizers, gloves, keep them open compulsorily to combat the rapid spread of Covid-19.
- 9.11 The National Food Security Act, 2013, Epidemic Diseases Act, 1897, Essential Commodities Act, 1957, Disaster Management Act, 2005, Chhattisgarh Food Security Act, Unorganized Worker Social Security Act, 2008, Street Vendors (Protection of Livelihood and Regulation of Street Vending) Act 2014, Mahatma Gandhi National Rural Employment Guarantee Act 2005, require the government to take necessary steps to implement the reliefs prayed for.

**10. RELIEF SOUGHT**

In the light of facts and circumstances of the case, it is respectfully prayed that the Hon'ble Court may be pleased to:

**Social Security**

- (i) Issue a writ of mandamus directing that Rs. 3000 to be paid per month till the crisis continues, to all but not limited to unorganized sector workers registered with

labour department including construction workers, daily wage workers, street vendors, loaders, the first month's allowance to be paid by 1st April, 2020.

- (ii) Increase existing social security pensions (old persons, disabled, widows) amount by 50% (from Rs.300 to Rs.450) for 2 months and pay it in advance by 1st April, 2020.
- (iii) Each Gram Panchayat to have atleast two functional worksites, offering atleast 50 days of work per registered family from 1st April to 15th June 2020.

### **Food Security/Public Distribution System**

- (iv) Issue a writ of mandamus directing 50% increase in quantity over earlier entitlement, given free of cost for the poor (Priority Ration Cards and Antyodaya Ration Cards) and three months quantity given in advance.
- (v) Issue a writ of mandamus directing the arrange for free lunch and dinner for Urban poor and destitutes in government run community kitchens near bus stands, railway stations, hospitals, religious places etc. (to be organized by district collectors)
- (vi) Issue a issue a Writ of Mandamus or any other appropriate writ, order or direction in the nature of Mandamus directing the State Government to ensure

that the PDS shops are well stocked with grains, vegetables and other essentials to enable beneficiaries under the National Food Security Act to purchase the same from the PDS Shops.

- (vii) Issue a writ of mandamus directing the respondents to deliver ration, masks, hand wash, sanitizers, gloves, and make them available to the public at the PDS shops.

### **Health**

- (viii) Issue a writ of mandamus directing the respondents to ensure that all Front line Workers in the essential services not restricted to but particularly in the Health , Law and Order, Sanitation services and Utilities are provided with Protective Gear and Medical Facilities;
- (ix) Issue a writ of mandamus directing the respondents decentralise the testing and treatment for COVID – 19;
- (x) Issue a writ of mandamus directing the respondents to take steps for the local production of testing kits for the novel coronavirus, medicines and protective gear by engaging local self help groups, support groups, voluntary organisations, and others.

### **Housing**

- (xi) Issue a writ of mandamus direct the Respondent Authorities to utilise government buildings, schools or

colleges, public halls, hostels, stadiums to temporarily house homeless persons, stranded daily wage workers and other slum dwellers.

### **Transportation**

- (xii) Issue a Writ of Mandamus directing the respondents to restore Public transport in terms of bus for routine patients to reach hospitals and healthcare and for ANMs, nurses, other healthcare workers and support staff to reach their duties.

### **Education and Communication**

- (xiii) Issue a writ of Respondent Authorities to conduct drives to educate the slum dwellers, daily wage labourers, sex workers, manual scavenger workers, construction workers, street vendors as well as homeless population about the Epidemic and further distribute quality masks, gloves and hand wash, hand sanitizers, sanitary napkins as sanitation material to slum dwellers, daily wage labourers, sex workers, sanitation workers, construction workers, street vendors as well as homeless persons free of cost through PDS Ration Shops
- (xiv) Pass any other order the Hon'ble Court may deem fit in the interest of justice.

For the kindness of the Hon'ble Court petitioner shall ever as  
in duty bound, be grateful.

Bilaspur

(Rajni Soren)

Dated: 23.03.2020

(Counsel for the Petitioners)

**CERTIFICATE**

It is hereby certified that due care has been taken in the case to  
comply with the provisions of Chhattisgarh High Court Rules.

Bilaspur

(Rajni Soren)

Dated: 23.03.2020

(Counsel for the Petitioners)

**IN THE HON'BLE HIGH COURT OF CHHATTISGARH**  
**AT BILASPUR**

**I.A. No. \_\_\_\_\_ /2020**

**IN**

**WRIT PETITION (PIL) No. \_\_\_\_\_ OF 2020**

**PETITIONERS:** : Right to Food Campaign Chhattisgarh  
& others

**VERSUS**

**RESPONDENTS:** : State of Chhattisgarh & others

**APPLICATION FOR WAIVER OF LOCUS STANDI RULES**

The petitioner most respectfully submits as under:

1. That the petitioner has filed the instant Writ Petition (PIL), before this Hon'ble Court.
2. That the contents of the petition may be read as part of the present application.
3. That Writ Petition (PIL) is not filed out of any personal grudge or personal interest. The petition is being filed in public interest, therefore the provisions of locus standi rules may kindly be waived.

**PRAYER**

It is therefore prayed that this Hon'ble Court may be pleased to allow this application and the provisions of locus standi rules may kindly be waived, in the interest of justice.

Bilaspur

Dated: 23.03.2020

(Rajni Soren)

(Counsel for the Petitioners)



**IN THE HON'BLE HIGH COURT OF CHHATTISGARH**  
**AT BILASPUR**

**I.A. No. \_\_\_\_\_ /2020**

**IN**

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& others

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**RESPONDENTS:** : State of Chhattisgarh & others

**APPLICATION FOR EXEMPTION FROM PAYING SECURITY**

**DEPOSIT**

1. That the abovementioned petitioners have filed the accompanying writ petition.
2. That the petitioners by way of this Writ Petition (PIL) has prayed for directions in the light of the Covid -19 pandemic.

**PRAYER**

In the light of the facts and circumstances stated above the Hon'ble Court may be pleased to exempt the petitioners from paying the security deposit prescribed under the Chhattisgarh High Court Rules.

Bilaspur

Dated: 23.03.2020

(Rajni Soren)

(Counsel for the Petitioners)

**IN THE HON'BLE HIGH COURT OF CHHATTISGARH**  
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**PETITIONERS:** : Right to Food Campaign Chhattisgarh  
& others

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**RESPONDENTS:** : State of Chhattisgarh & others

**AFFIDAVIT**

I, Amarnath Pandey, S/o Late Brajraj Pandey, Aged 51, R/o D 9, Babjee Residency, Shubham Vihar, Bilaspur, Chhattisgarh do hereby solemnly affirm and state on oath and declare as under:-

1. That I am the petitioner no. 4 in the instant W.P. (PIL) and am competent to swear this affidavit being fully aware of the facts and circumstances of the case and I have also been authorized by the other petitioners to swear this affidavit on their behalf.
2. That the accompanying W.P (PIL), application for waiver of locus standi rules, application for exemption from payment of security deposit, application for interim relief have been drafted on my instructions and the contents thereof are true to the best of my knowledge.
3. That the documents annexed to the petition are true copies of their respective originals.

Deponent

**VERIFICATION**

I, Amarnath Pandey , the above named deponent solemnly affirm that the contents of the paras 1 to 2 of the above affidavit are true and correct to my personal knowledge, hence verified this 23<sup>rd</sup> day of March, in the year 2020 at Bilaspur.

Deponent

**IN THE HON'BLE HIGH COURT OF CHHATTISGARH**  
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**RESPONDENTS:** : State of Chhattisgarh & others

**ADDITIONAL AFFIDAVIT**

I, Amarnath Pandey, S/o Late Brajraj Pandey, Aged 51, R/o D 9, Babjee Residency, Shubham Vihar, Bilaspur, Chhattisgarh do hereby solemnly affirm and state on oath and declare as under:-

1. That I am the petitioner no. 4 in the instant W.P. (PIL) and am competent to swear this affidavit being fully aware of the facts and circumstances of the case and I have also been authorized by the other petitioners to swear this affidavit on their behalf.
2. That I am hereby declaring that we have not filed the instant Writ Petition (PIL) for any personal gain or raising any personal grievance, or for a private, ulterior motive, or for extraneous considerations.

DEPONENT

**VERIFICATION**

I, Amarnath Pandey , the above named deponent solemnly affirm that the contents of the paras 1 to 2 of the above affidavit are true and correct to my personal knowledge, hence verified this 23<sup>rd</sup> day of March, in the year 2020 at Bilaspur.

DEPONENT