

IN THE HON'BLE HIGH COURT OF DELHI AT NEW DELHI
CRIMINAL ORIGINAL JURISDICTION

WRIT PETITION (Cri.) NO. _____ OF 2020

Under Article 226 of the Constitution of India

IN THE MATTER OF:

Mohammed Zubair ... Petitioner

VERSUS

State of GNCT & Ors. ... Respondents

Writ Petition under Article 226 of the Constition of India directing the respondents to supply the copy of the FIR to the Petitioner and immediately quash it and further direct criminal action against the Respondents

To

The Lord Chief Justice of Delhi, and

His Lordship's Companion Justices of the Hon High Court of Delhi

Humble petition of the
Petitioner herein

Most respectfully showeth:

1. The present Writ petition is being filed under Article 226 of the Constitution of India for directing the respondents to supply the copy of the FIR registered against the Petitioner and immediately quash it and further direct criminal action against the Respondents.

2. The Petitioner herein is a journalist and co-founder of India's most read fact-checking website news outlet Alt News. The Petitioner is a dedicated citizen who through his news outlet debunks misinformation put out by individuals and by political parties without any bias. Due to the nature of his work the Petitioner is often abused, threatened and demeaned by people the website debunk and expose or their blind supporters.
3. Two separate FIRs have been registered against the Petitioner, one by Delhi Police Cyber Cell and other in Chhattisgarh. Petitioner is filing the present petition in respect of FIR in Delhi. He is in the process of challenging FIR registered in Chhattisgarh separately. The petitioner fears that he may be arrested by Delhi Police immediately, hence the present petition.

BRIEF FACTS

4. On 18.04.20, the Petitioner herein shared an old image of his wearing traditional Indian attire. One Jagdish Singh (complainant herein) from his twitter handle replied to this image with the following tweet "***once a jihadi is always a jihadi***". The Petitioner though, shocked and agonised did not respond. The copy of the screen shot of the tweet dated 18.04.20 made by the complainant is annexed herewith as **Annexure A-1 at page 36.**

The link of the tweet can be found at:

[https://twitter.com/JSINGH2252/status/1251219650538467328#sent/ blank](https://twitter.com/JSINGH2252/status/1251219650538467328#sent/blank)

5. Thereafter again on 07.07.2020, after the Petitioner tweeted a simple tweet this twitter troll named Jagdish Singh from his twitter handle replied to the Petitioner with a vulgarly worded image. It must be noted that the Petitioner again chose not to respond and simply tried to ignore this habitual troll. The relevant part of the abusive tweet is as under:

“Tu toh bada madharchod nikla re”

The copy of the tweet dated 07.07.2020 made by the complainant herein annexed herewith as **Annexure A-2 at page 37**. The link of the tweet can be found at:

<https://twitter.com/JSINGH2252/status/1280559570784378881#sent/blank>

6. Thereafter on 06.08.2020, the Petitioner retweeted an Alt News fact check report debunking an old video spreading misinformation on the internet. That the habitual troll, complainant Jagdish Singh from his twitter handle again replied to this tweet with abuses. The relevant part of the abusive tweet is as under:

“लवडे का फैक्ट चेकर”

The copy of the tweet dated 06.08.2020 made by the complainant herein annexed herewith as **Annexure A-3 at page 38**. The link of the tweet can be found at:

<https://twitter.com/JSINGH2252/status/1291427657641422848>

7. On the same day, the petitioner then retweeted Jagdish Singh's twitter display picture which was visible to the public. He was standing with his daughter whose face was pixelated/blurred by the Petitioner. The tweet's caption called Jagdish Singh out for being a twitter troll who repeatedly hurled derogatory, lewd and often communally charged abuses at the Petitioner on twitter. The relevant part of the tweet made by the petitioner herein is asunder:

"Hello Jagdish Singh, Does your cute grand daughter know about your part time job of abusing people on social media?

I suggest you to change your profile pic."

The copy of the tweet dated 06.08.2020 made by the petitioner herein is annexed herewith as **Annexure A-4 at page 39**. The link to the above mentioned tweet is asunder:

https://twitter.com/zoo_bear/status/1291436221915213825

8. Thereafter, the complainant herein Jagdish Singh makes a frivolous complaint to the Ld. National Commission for Protection of Child Rights ("NCPCR") against the Petitioner for the tweet dated 6.8.20 where Jagdish Singh was called out for being abusive on social media.

9. On 08.08.2020, petitioner through tweets got to know that the Chairman of the NCPCR- Priyank Kanoongo has taken cognisance of the complaint made by the complainant and recommended legal

action against the petitioner. NCPCR also summoned the Twitter India and sought action against the petitioner. The relevant part of the tweet of the Chairperson is asunder:

The Commission has taken cognizance of the case of threatening and torturing a girl child through Twitter. Necessary communication have been issued to @TwitterIndia and concerned law enforcement authorities for appropriate action.

The copy of the tweet made by Chairman of the NCPCR is annexed herewith as **Annexure A-5 at page 40.**

<https://twitter.com/KanoongoPriyank/status/1292076822683779072>

10. Aggrieved by the one sided and biased approach of the Chairperson of the NCPCR, petitioner herein wrote to the Chairperson of the Ld. National Commission for Protection of Child Rights inquiring about such an ex parte direction issued by them without even sending a notice intimating about the complaint or the subsequent direction the Commission had passed. The Petitioner submitted all the abusive tweets sent out by the habitual troll, that even the tweet against which objection was being raised did not show the face of the minor girl and had no derogatory substance against the child or even Jagdish Singh the habitual troll himself. That it was in fact Jagdish Singh against whom proceedings should be initiated for all his bullying, harassment and abuses. The petitioner also enquired whether the communication

made by Jagdish Singh to the Commission was indeed authentic and how did the commission's decision get published in public domain and further requested to retract NCPCR communication dated 8.8.2020.

True copy of the representation dated 09.08.2020, sent by the petitioner to the NCPCR is annexed herewith as **Annexure A-6 at page 40 to 44.**

11. That on 04.09.2020, based upon the frivolous complaint of the complainant and biased and prejudiced directions of the NCPCR, an FIR No. 131/2020 dated 04.09.2020, was registered against the petitioner at P.S-Pandri, District- Raipur, Chhattisgarh, under section 509 Indian Penal Code, 1860; 67 Information and Technology Act, 2000 and section 12 of the Protection of Child from Sexual Offences Act, 2012.

True copy of the FIR No. 131/2020 dated 04.09.2020, registered at P.S-Pandri, District- Raipur, Chhattisgarh is annexed herewith as **Annexure A-7 at page 45 to 49.**

12. It is also brought to the Notice of the Petitioner that a separate FIR has also been registered against the petitioner in Delhi based upon the biased recommendation of the NCPCR. However, copy of the FIR registered in Delhi is not supplied to the petitioner.

True copy of news report reporting registration of FIR in both Delhi and Chhattisgarh is annexed herewith as **Annexure A-8 at page 50 to 51.**

<https://indianexpress.com/article/india/firs-against-co-founder-of-fact-checking-website-in-delhi-raipur-after-ncpcr-complaint-6584868/>

GROUND

13. The Petitioners submits that being aggrieved with the frivolous FIR Petitioner has preferred the present Petition for quashing of the FIR on the following grounds:

Multiple FIRs for the same incident liable to be quashed

- A. That multiple FIR's cannot be lodged for the same facts and incident, more so at different places. In the present case, two separate FIRs are registered in Chhattisgarh and Delhi. Recently, Hon'ble Supreme Court in W.P (Crl.) No. 130 of 2020 titled Arnab Ranjan Goswami v Union of India & Ors. vide judgment dated 19.05.2020, quashed the multiple FIRs registered in different States against the petitioner journalist. Hon'ble Supreme Court held as under:

"28... The law concerning multiple criminal proceedings on the same cause of action has been analyzed in a judgment of this Court in TT Antony v State of Kerala ("TT Antony"). Speaking for a two judge Bench, Justice Syed Shah Mohammed Quadri interpreted the provisions of Section 154 and cognate provisions of the CrPC including Section 173 and observed:

"20...under the scheme of the provisions of Sections 154, 155, 156, 157, 162, 169, 170 and 173 CrPC, only the earliest or the first information in regard to the commission

of a cognizable offence satisfies the requirements of Section 154 CrPC. Thus, there can be no second FIR and consequently there can be no fresh investigation on receipt of every subsequent information in respect of the same cognizable offence or the same occurrence or incident giving rise to one or more cognizable offences. On receipt of information about a cognizable offence or an incident giving rise to a cognizable offence or offences and on entering the FIR in the station house diary, the officer in charge of a police station has to investigate not merely the cognizable offence reported in the FIR but also other connected offences found to have been committed in the course of the same transaction or the same occurrence and file one or more reports as provided in Section 173 CrPC."

The Court held that "there can be no second FIR" where the information concerns the same cognisable offence alleged in the first FIR or the same occurrence or incident which gives rise to one or more cognisable offences. This is due to the fact that the investigation covers within its ambit not just the alleged cognisable offence, but also any other connected offences that may be found to have been committed. This Court held that once an FIR postulated by the provisions of Section 154 has been recorded, any information received after

the commencement of investigation cannot form the basis of a second FIR as doing so would fail to comport with the scheme of the CrPC.

...

33.... The manner in which the petitioner has been subjected to numerous FIRs in several States, besides the Union Territories of Jammu and Kashmir on the basis of identical allegations arising out of the same television show would leave no manner of doubt that the intervention of this Court is necessary to protect the rights of the petitioner as a citizen and as a journalist to fair treatment (guaranteed by Article 14) and the liberty to conduct an independent portrayal of views. In such a situation to require the petitioner to approach the respective High Courts having jurisdiction for quashing would result into a multiplicity of proceedings and unnecessary harassment to the petitioner, who is a journalist....”

Abuse of process of Court

- B. That the allegations levelled against the petitioner are false, frivolous & concocted by the Complainant/Respondent with an ulterior motive. That the offences alleged mentioned in the FIR does not hold true to the events that transpired. A bare perusal of the tweets made by the petitioner would show that no offence is made out against the petitioner, in fact an FIR should be registered against the complainant for using abusive and threatening language against the petitioner.

- C. That the Hon'ble Supreme Court in the landmark judgement **State of Haryana v. Bhajan Lal**, 1992 Supp (1) SCC 335 in paragraph 102 clearly states to prevent abuse of the process of any court or otherwise to secure the ends of justice are the guiding principles to be followed by Courts while quashing an FIR. The bench further adds that **where the allegations made in the first information report or the complaint, even if they are taken at their face value and accepted in their entirety do not prima facie constitute any offence or make out a case against the accused or where a criminal proceeding is manifestly attended with mala fide and/or where the proceeding is maliciously instituted with an ulterior motive for wreaking vengeance on the accused and with a view to spite him due to private and personal grudge are situations that qualify to quash the FIR in question.**
- D. In case of **Rupan Deol Bajaj v. K.P.S. Gill**, (1995) SCC (Cri) 1059, **Rajesh Bajaj v. State of NCT of Delhi** (1999) 3 SCC 259 and **Medical Chemicals & Pharma (P) Ltd. v. Biological E Ltd. & Ors**; 2000 SCC (Cri) 615, the Apex Court clearly held that if the allegations do not constitute any offence as alleged and appear to be patently absurd and improbable, Court should not hesitate to quash the complaint.

Offence not made out: Section 12, POSCO

- E. It is submitted that charges alleged under section 12, POSCO is prima facie not made out in the present case. That section 12 of the POCSO

Act provides for the punishment for sexual harassment when offence under Section 11, POSCO is committed. Relevant portion of section 11 is extracted below:

“A person is said to commit sexual harassment upon a child when such person with sexual intent,-

i. utters any word or makes any sound, or makes any gesture or exhibits any object or part of body with the intention that such word or sound shall be heard, or such gesture or object or part of body shall be seen by the child; or

ii. makes a child exhibit his body or any part of his body so as it is seen by such person or any other person; or

iii. shows any object to a child in any form or media for pornographic purposes; or

iv. repeatedly or constantly follows or watches or contacts a child either directly or through electronic, digital or any other means; or

v. threatens to use, in any form of media, a real or fabricated depiction through electronic, film or digital or any other mode, of any part of the body of the child or the involvement of the child in a sexual act; or

vi. entices a child for pornographic purposes or gives gratification therefore.

Explanation.- Any question which involves "sexual intent" shall be a question of fact."

F. The substantive offence (Section 11) for which punishment is prescribed under Section 12 POCSO, clearly indicates that the precondition for the section to be attracted is that an act, as enumerated therein, is done with sexual intent as held in **State GNCT of Delhi v. Baljeet Singh (2019) 261 DLT (CN 23B) 23**. In the present case, from the allegations against the Petitioner, no such intention even prima facie is coming forward. On the contrary, the Petitioner acting with caution and care made sure to blur/ pixelate face of the minor child of the Habitual Twitter troll who would abuse the Petitioner regularly.

G. Similarly, Hon'ble Delhi High Court in **State v Anil 2019 SCC OnLine Del 10995** reiterated that the **main ingredients of Section 12 of the POCSO Act, is sexual intent and upheld trial courts observation *"that the main ingredients of Section 12 of the POCSO Act, i.e., sexual intent is missing in the entire act of the respondent and therefore the prima facie offence of sexual harassment was not made out against him and he was accordingly discharged."***

Offence not made out: Section 509 B, IPC

H. That a bare reading of section 509B of the Indian Penal Code, 1860 would reveal that prima facie that there was no comment, request,

suggestion, proposal, image or other communication, which is obscene, lewd, lascivious, filthy or indecent with the intent to harass anyone made by the Petitioner in the 6.8.20 Tweet. Relevant portion section 509(B) IPC 1860 extracted below:

“509B. Sexual harassment by electronic modes. - Whoever, by means of telecommunication device or by any other electronic mode including internet, makes, creates, solicits or initiates the transmission of any comment, request, suggestion, proposal, image or other communication, which is obscene, lewd, lascivious, filthy or indecent with intent to harass or cause or having knowledge that it would harass or cause annoyance or mental agony to a woman shall be punished with rigorous imprisonment for a term which shall not be less than six months but may extend to two years and shall also be liable to fine.”

I. In **S. Khushboo v. Kanniammal**, (2010) 5 SCC 600, 3 judge bench of the Hon’ble Supreme Court held that it is important to show that modesty a *particular woman* is outraged to attract section 509 of IPC. It also states such an offence cannot be made out if allegations against action are in written form. Relevant portion of the judgment is extracted below:

“23. Similarly, Section 509 IPC criminalises a “word, gesture or act intended to insult the modesty of a woman”

and in order to establish this offence it is necessary to show that the modesty of a particular woman or a readily identifiable group of women has been insulted by a spoken word, gesture or physical act. Clearly this offence cannot be made out when the complainants' grievance is with the publication of what the appellant had stated in a written form...."

- J. That likewise in the present case at hand, the Petitioner merely shared an image of Jagdish Singh standing with a minor girl whose face was pixelated and calling Jagdish Singh out on his foul, shameful and abusive behaviour on social media. The entire complaint circles around a tweet which is in the written format simply holding the habitual troll, Jagdish Singh accountable of his derogatory conduct. Not demeaning any women or even Jagdish Singh himself. That any words or gestures in question must have a direct bearing or nexus with the modesty of woman rather than the woman herself and therefore mere use of words which are otherwise not going to have any bearing on the modesty, the provisions of section 509 IPC shall not get attracted. That any image in question must have a direct bearing or nexus with the material that can be termed "*obscene, lewd, lascivious, filthy or indecent*" to any person. Merely trying to hold a habitual troll accountable for their constantly abusive behaviour and if in that there is a passing reference to someone else does not constitute offence under 509B IPC when no ingredient is prima facie made out.

K. Hon'ble Kerala High Court in **Basheer & Anr. v. State of Kerala**, (2014) 4 KLT (SN 81) 65 the Court held as under:

“3. ...Mere insult will not attract Section 509 IPC. For a prosecution under Section 509 IPC there must be a definite allegation of insult to the modesty of woman or intrusion into the privacy of woman. Thus the allegation must involve modesty of woman or privacy of woman. Mere insult or false allegation will not attract a prosecution under Section 509 IPC. In Annexure A2 complaint the 2nd respondent does not have a case that the petitioners herein had insulted her modesty as a woman, or that they had intruded into her privacy in any manner. If at all the petitioners had spread or published any insulting and defamatory matters, she can initiate prosecution for defamation under Section 500 IPC, provided, the allegations would come under the definition of defamation under Section 499 IPC. Any way mere insult or insulting words, or abuse will not attract a prosecution under Section 509 IPC. In this case there is absolutely nothing in the complaint preferred by the 2nd respondent, or in the final report submitted by the police to indicate that the petitioners had in any manner insulted her modesty or intruded into her privacy. Merely insulting a woman is different from insulting the modesty of woman. The

subject of insult for a prosecution under Section 509 IPC must be the modesty of woman and not the woman as such. When there is nothing to make out the essential elements of the offence under Section 509 IPC, the prosecution against the petitioners cannot proceed under the law. I find that the present prosecution is an abuse of legal and judicial process. If at all the 2nd respondent has a grievance or complaint that the petitioners herein had made or published any defamatory material against her alleging misappropriation of amount, she will have to pursue appropriate remedy, if at all such allegations would constitute the offence of defamation. The present prosecution cannot proceed because the complaint does not contain the essential elements or ingredients of the offence under Section 509 IPC.

Offence not made out: Section 67, IT ACT

- L. Section 67 governs punishment for publishing or transmitting obscene material in electronic form. Relevant portion is extracted below:

“Punishment for publishing or transmitting obscene material in electronic form. -Whoever publishes or transmits or causes to be published or transmitted in the electronic form, any material which is lascivious or appeals to the prurient interest or if its effect is such as to tend to deprave and corrupt persons who are likely, having regard to all relevant circumstances, to read, see or hear the

matter contained or embodied in it, shall be punished on first conviction with imprisonment of either description for a term which may extend to three years and with fine which may extend to five lakh rupees and in the event of second or subsequent conviction with imprisonment of either description for a term which may extend to five years and also with fine which may extend to ten lakh rupees.]”

M. A plain reading of the section indicates that basic ingredient to extract would be transmission of *obscene material* in the tweet in question which reads “ *Hello Jagdish Singh , does you cute granddaughter know about your part time job of abusing people on social media ? I suggest you change your profile pic.*” It is submitted that not once in this tweet was any obscene word or even insinuation made by the Petitioner. Infact, the Petitioner was calling this habitual troll out for his derogatory behaviour against the Petitioner.

Quashing of FIR

N. That it is amply clear that the FIR was lodged to harass the Petitioner and not a single offence is made out against him. This practice is nothing more than abuse of process of the court, a malicious prosecution with hidden personal agenda of the habitual troll Jagdish Singh who clearly was embarrassed by the 6.8.20 that mirrored him of his indecent and abusive actions.

- O. That such malicious prosecution has been clearly barred and condemned by the Hon'ble Supreme Court in *Bhajan Lal* case (supra) and held ground for quashing of such frivolous FIR.
- P. That 3-judge bench of the Hon'ble Supreme Court led by Justice D.Y Chandrachud, the then Chief justice of India Deepak Misra and AM Khanwilkar crystallised 10 principle for Quashing of FIR in **Parbatbhai Aahir v. State of Gujarat**, (2017) 9 SCC 641. Relevant portion extracted below:

“16. The broad principles which emerge from the precedents on the subject, may be summarised in the following propositions:

16.1. Section 482 preserves the inherent powers of the High Court to prevent an abuse of the process of any court or to secure the ends of justice. The provision does not confer new powers. It only recognises and preserves powers which inhere in the High Court.

16.2. The invocation of the jurisdiction of the High Court to quash a first information report or a criminal proceeding on the ground that a settlement has been arrived at between the offender and the victim is not the same as the invocation of jurisdiction for the purpose of compounding an offence. While compounding an offence, the power of the court is governed by the provisions of Section 320 of the Code of Criminal Procedure, 1973. The

power to quash under Section 482 is attracted even if the offence is non-compoundable.

16.3. In forming an opinion whether a criminal proceeding or complaint should be quashed in exercise of its jurisdiction under Section 482, the High Court must evaluate whether the ends of justice would justify the exercise of the inherent power.

16.4. While the inherent power of the High Court has a wide ambit and plenitude it has to be exercised (i) to secure the ends of justice, or (ii) to prevent an abuse of the process of any court.

16.5. The decision as to whether a complaint or first information report should be quashed on the ground that the offender and victim have settled the dispute, revolves ultimately on the facts and circumstances of each case and no exhaustive elaboration of principles can be formulated.

16.6. In the exercise of the power under Section 482 and while dealing with a plea that the dispute has been settled, the High Court must have due regard to the nature and gravity of the offence. Heinous and serious offences involving mental depravity or offences such as murder, rape and dacoity cannot appropriately be quashed though the victim or the family of the victim have settled the dispute. Such offences are, truly speaking, not private in nature but have a serious impact upon society. The

decision to continue with the trial in such cases is founded on the overriding element of public interest in punishing persons for serious offences.

16.7. As distinguished from serious offences, there may be criminal cases which have an overwhelming or predominant element of a civil dispute. They stand on a distinct footing insofar as the exercise of the inherent power to quash is concerned.

16.8. Criminal cases involving offences which arise from commercial, financial, mercantile, partnership or similar transactions with an essentially civil flavour may in appropriate situations fall for quashing where parties have settled the dispute.

16.9. In such a case, the High Court may quash the criminal proceeding if in view of the compromise between the disputants, the possibility of a conviction is remote and the continuation of a criminal proceeding would cause oppression and prejudice; and

16.10. There is yet an exception to the principle set out in propositions 16.8. and 16.9. above. Economic offences involving the financial and economic well-being of the State have implications which lie beyond the domain of a mere dispute between private disputants. The High Court would be justified in declining to quash where the offender is involved in an activity akin to a financial or economic

fraud or misdemeanour. The consequences of the act complained of upon the financial or economic system will weigh in the balance.”

Collusion between Respondent No. 2 & 3

14. Because the direction given by Priyank Kanoongo- Chairperson, NCPCR, intentionally forwarding a patently frivolous and malafide complaint to the Delhi Police and the actions of the respondent R-3 (Jagdish Singh) in making malafide complaint are illegal and punishable. Respondent No. 2 misused his official position by forwarding and directing the police to register false case against the petitioner with the sole intention to harass and defame the petitioner. Both R-2 and R-3 knew right from the beginning that no offence in law is made out, yet both acting in collusion decided willfully to prosecute the petitioner. Both have close links with the party in power at the Centre and share the same ideology. Most important, both share animus against the petitioner for repeatedly exposing the fake news and communal propaganda emanating from the party in power and its affiliates. The petitioner has over the years exposed the fake news relentlessly. There are many more exposes done by the petitioner.

15. The present frivolous case is instituted at the behest of the powerful people of the ruling party with a view to give vent to their anger against the petitioner, for exposing fake news and communal propaganda. Petitioner has been targeted for being a Muslim. Both

the respondents R-2 and R-3 appear to have deep anti-minority vile and prejudicial view of the minority community. This is obvious from the fact that though no crime has been committed, yet FIR was registered after many right wing portals on the internet demanded action against the petitioner. The registration of FIR was also celebrated by these extremist right wing online portals.

Biased and Prejudicial Delhi Police

16. The role of the Delhi Police in the present case also indicate malafide and bias. The copy of the FIR was never supplied to the petitioner even after repeated calls were made to DCP Anyesh Roy, Special Cyber Cell, Delhi (Respondent No. 4) requesting for the same. Counsel for the petitioner also made several calls to R-4 seeking copy of the FIR but the calls were never answered. Thereafter, counsel for the petitioner also sent a text message requesting for the copy of the FIR, this too was not responded. While police refused to share the copy of the FIR with the petitioner and his counsel, the information relating to registration of FIR was leaked to the press and widely circulated. This was done to defame and harass the petitioner.
17. Because there is no other similar Petition filed before this Hon'ble Court or before any other Court for similar reliefs prayed by the Petitioner herein. Insofar as FIR in Chhattisgarh is concerned, petitioner shall take separate appropriate remedy in accordance with law.

18. That the FIR has been lodged within the territorial jurisdiction of this Hon'ble Court, therefore this Hon'ble Court has jurisdiction to hear the matter and pass necessary orders in the interest of justice.

PRAYERS

In the facts and circumstances stated herein above, it is most respectfully prayed that this Hon'ble Court graciously be pleased to:

- a. Pass an order directing the respondent No. 1 to supply the copy of the FIR to the petitioner immediately.
- b. Pass an order quashing the FIR registered against the petitioner by Delhi Police Cyber Cell.
- c. Pass an order directing the respondent to not take any coercive action against the petitioner pursuant to FIR registered against the petitioner by Delhi Police Cyber Cell.
- d. Pass an order directing initiation of criminal proceedings against Respondent No. 2 and 3.
- e. Pass an order directing respondents to pay cost to the tune of Rs. 50 lakhs for harassing and defaming the petitioner.
- f. Pass any other order in the interest of justice.

Filed by:

Date: 7.9.2020
Place:

Gunjan Singh & Pragya Ganjoo
Advocate for the Petitioner