

SYNOPSIS

The Petitioners are filing the present Writ Petition under Article 32 of the Constitution pursuant to newspaper reports that have highlighted the decision of the Government of India to deport approximately 40,000 Rohingya estimated to be living across India, back to Myanmar. The Rohingya are a majority Muslim ethnic group, described as the world's most persecuted minority who have lived in Myanmar for centuries but have faced growing violence and persecution forcing thousands to flee to neighboring countries including India. The petition seeks to invoke the extraordinary jurisdiction of this Hon'ble Court to secure and protect the fundamental human rights of these refugees against deportation in view of the Constitutional guarantees provided under Article 14 and Article 21, read with Article 51(c) of the Constitution of India and in terms of India's obligations under humanitarian law and has also been mentioned in various international covenants signed, ratified and accepted by India.

It is reported widely in newspapers that the Union Minister of State for Home Affairs, has stated that the Indian Government had directed State authorities to identify and deport illegal immigrants including Rohingya. He has further stated that since India is not a signatory to the Refugee Convention, India is not bound to offer refuge to the Rohingya Muslims. This is contrary to international customary law. India's ratification of the Universal Declaration of Human Rights (1948), International Covenant on Civil and Political Rights, the obligations of due process and the universal principle of 'non-refoulement'.

In complete violation of the international customary law and the law of the land, the respondent issued directions on 08.08.2017 granting powers to the State Governments/Union Territories to identify and deport foreign nationals staying illegally in the country. The order/direction issued by the Union of India dated 08.08.2017, pursuant to the government's statement of not accepting the Rohingya refugees, is violative of Articles 14 and 21 of the Constitution.

The UN High Commissioner for human rights has described the situation of Myanmar's Rohingya minority as a "textbook example of ethnic cleansing" and criticized both Yangon and New Delhi, the latter

for seeking to deport Rohingyas who fled to India. He has further deplored New Delhi's measures to deport them, noting that 40,000 had settled in India and 16000 of them had received refugee documentation.

The petitioners submit that the proposed deportation by the Government of India of the Rohingya refugees is contrary to the Constitutional guarantees provided inter alia under Articles 14, Article 21 and Article 51(c) of the Constitution of India. If the Rohingya refugees are deported back to Myanmar there is an immediate threat of them being persecuted and robbed of their dignity by the incumbent government. Such an act of the government is contrary to the spirit of the Indian Constitution reflected in its Preamble, Directive Principles laid down in Part III.

In the above premise, the Petitioner is approaching this Hon'ble Court seeking appropriate directions to the Respondents to protect and safeguard the rights of refugees in India under Article 14 and Article 21, along with Article 51(c) of the Constitution of India. The petitioner prays for appropriate directions to the respondent Government not to deport Rohingya refugees back to Myanmar.

LIST OF DATES

Dates	Events
1948	India ratified the Universal Declaration of Human Rights
1951	International Convention on Status of Refugees adopted by the United Nations
1968	India ratified the International Convention on the Elimination of all Forms of Racial Discrimination
1979	India ratified the International covenant on Civil and Political Rights

1997	India became signatory to the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment
2007	India became signatory to the International Convention on Protection of all Persons Against Enforced Disappearances
11.08.2017	Reuters publishes report stating the Union Minister of State for Home Affairs, Kiren Rijuju, told the Parliament that the Central Government had directed the State Governments to “constitute task forces at district levels to identify and deport the illegally staying foreign nationals.”
08.08.2017	Government issued directions to the authorities to deport Rohingya refugees.
14.08.2017	NHRC press release regarding the notice to the Union Home Ministry, regarding the media reports about the government’s decision to deport Rohingya refugees.
11.09.2017	United Nations Human Rights Chief flayed attempts to deport Rohingya refugees from India by the Indian government.
12.09.2017	In a news item published in the Economic Times the Minister is stated to have said “nobody should preach New Delhi on the matter as India absorbed the maximum refugees in the world”.

IN THE SUPREME COURT OF INDIA
(CIVIL ORIGINAL JURISDICTION)

WRIT PETITION (CIVIL) NO. _____ OF 2017

IN THE MATTER OF:

1. RAUSHAN TARA JASWAL
D/o Dr. ROHIT JASWAL
A-2/95 FIRST FLOOR
JANAKPURI, NEW DELHI - 110058
ENROLLMENT NUMBER: D/3653/2017
PAN NUMBER: AUQPJ1392L
ANNUAL INCOME: 4 LAKHS P.A
..... PETITIONER NO. 1
2. ZEBA KHAIR
D/o LATE ABDUL KHAIR
HOUSE NO. 27 POCKET 1
JASOLA VIHAR, NEW DELHI - 110025
ENROLLMENT NUMBER: D 677/1999
PAN NUMBER: AORPK0302C
ANNUAL INCOME: 10 LAKHS P.A
..... PETITIONER NO. 2
3. K.G. GOPALKRISHNAN
S/o K.G. GOPALKRISHNAN
C - 8/ 8483
VASANT KUNJ
NEW DELHI - 110070
ENROLLMENT NUMBER: D/629/1998R
Pan NUMBER: AESPG4415P
ANNUAL INCOME: 10 LAKHS P.A
..... PETITIONER NO. 3

VERSUS

1. UNION OF INDIA,
THROUGH ITS SECRETARY
MINISTRY OF HOME AFFAIRS
NORTH BLOCK, CENTRAL SECRETARIAT
NEW DELHI-110001
....RESPONDENT NO.1
2. NATIONAL HUMAN RIGHTS COMMISSION
THROUGH ITS CHAIRMAN
MANAV ADHIKAR BHAWAN
BLOCK C, GPO COMPLEX
INA, NEW DELHI – 110023
.....RESPONDENT NO.2

**WRIT PETITION UNDER ARTICLE 32 OF THE
CONSTITUTION OF INDIA FOR ISSUING DIRECTIONS
TO RESPONDENT NO. 1 TO PREVENT THE
DEPORTATION OF ROHINGYA REFUGEES IN INDIA**

**IN LIGHT OF THE CONSTITUTIONAL GUARANTEES
UNDER ARTICLES 14 AND ARTICLE 21, READ WITH
ARTICLE 51(C) OF THE CONSTITUTION OF INDIA.**

To

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

THE HUMBLE PETITION OF THE
PETITIONERS ABOVE NAMED

MOST RESPECTFULLY SHOWETH:

1. That the Petitioners are practicing advocates and public spirited citizens committed to the enforcement and protection of fundamental human rights. They are deeply disturbed and saddened by the recent decision of the Government more specifically the Order issued by the Joint Secretary Ministry of Home/Government of India dated 08.08.2017 regarding identification of illegal migrants and monitoring thereof with a view to deporting them. The Petitioners have no personal interest in the matter and are only espousing the cause of "Rohingya refugees" in public interest, against their arbitrary deportation to their home country.
2. That the Petitioners are filing the present Writ Petition under Article 32 of the Constitution of India for the enforcement of human rights of the Rohingyas refugees pursuant to certain newspaper reports which have highlighted the decision of the Government of India to deport approximately 40,000 Rohingya estimated to be living across India back to Myanmar. The Rohingyas are a Muslim ethnic group, described as the world's most persecuted minority who have lived in Myanmar for centuries but have faced growing violence and persecution that has forced thousands to flee to neighboring countries including India. The petition seeks to invoke the extraordinary jurisdiction of this Hon'ble Court to

secure and protect the rights of these refugees against deportation in view inter alia of the Constitutional guarantees provided under Articles 14 and Article 21, read with Article 51(c) and 253 of the Constitution of India and also in furtherance of international humanitarian law enshrined in various covenants signed, ratified, and accepted by India.

3. It was reported widely in newspapers and by news agencies including Thomson Reuters Foundation, that the Union Minister of State for Home Affairs, has stated that the Indian Government had directed State authorities to identify and deport illegal immigrants including Rohingya refugees. A typed true copy of the said Reuters Report by Rina Chandran dated 11.08.2017 is annexed herewith and marked as **ANNEXURE – P/1 (Pg. No. _____ to _____)** . The Minister further stated that since India is not a signatory to the Refugee Convention, India is not bound by law to allow Rohingya refugees to enter India.
4. Pursuant to the said statement, an order dated 08.08.2017 was passed by the Central Government where by powers have been given to the State Governments/Union Territories to identify and deport foreign nationals staying illegally in the country. A typed true copy of the said Government Order dated 08.08.2017 is annexed herewith and marked as **ANNEXURE – P/2 (Pg. No. _____ to _____)**.
5. By virtue of customary international law, its ratification by both of the International Covenant on Civil and Political Rights, and the Universal Declaration of Human Rights, the obligations of due process and the universal principle of non refoulement, India cannot carry out collective expulsions, or return people to a place where they risk torture or other serious infractions of human dignity.
6. It is understood that the National Human Rights Commission (NHRC) has issued notice to the Ministry of Home Affairs,

taking suo motu cognizance of media reports regarding deportation of about 40,000 illegal Rohingya immigrants from Myanmar, who are residing in various part of India. The NHRC press release dated 18th August, 2017, states:

“The Commission has observed that refugees are no doubt foreign nationals but they are human beings and before taking a big step the Government of India has to look into every aspect of the situation, keeping the fact into focus that the members of the Rohingya community have crossed into India borders are residing here for long, have a fear of persecution once they are pushed back to their native country...The Commission has also observed that the Supreme Court of India has consistently held that the Fundamental Right enshrined under Article 21 of the Constitution regarding Right to Life and Personal Liberty, applies to all, irrespective of the fact whether they are citizens of India or not”.

7. That an Annual Report “Situation of Human Rights of Rohingya Muslims and other Minorities in Myanmar” was submitted to the Human Rights Council by the United Nations High Commissioner for Human Rights dated, 28th June 2016, pursuant to its resolution 29/21 on human rights violations and abuses against the Rohingyas and other communities in Myanmar particularly the recent incidents of trafficking and forced displacement of Rohingyas.
8. Raghu Menon, Advocacy Manager, Amnesty International India has issued a statement stating “Indian authorities are well aware of the human rights violations, Rohingya community have had to face in Myanmar and it would be outrageous to abandon them to their fates. It shows blatant disregard for India’s obligations under international law”. Meenakshi Ganguly, South Asia Director at Human Rights Watch stated “the government should put an end to any plans

to deport the Rohingya, and instead register them so that they can get education and health care and find work". A similar statement was issued by UN Human Rights Chief, "I deplore current measures in India to deport Rohingyas at a time of such violence against them in their country".

FACTUAL MATRIX

9. Myanmar is one of the most ethnically diverse countries in Asia. The Citizenship Law of 1982 recognizes eight major national ethnic groups. However the Rohingyas representing the largest percentage of Muslims in Myanmar with majority living in Rakhine State have not been included in the list of recognized ethnic groups. Most of them are therefore stateless.
10. Rakhine is one of the poorest states in Myanmar with limited access to basic services and livelihood opportunities for the entire population. Many Rakhine contest the claims of the Rohingyas to a distinct ethnic heritage and historic links to Rakhine state, viewing Rohingyas as illegal immigrants with no cultural, religious or social ties to Myanmar.
11. Against this background, tensions have erupted into violence, the most recent one June and October 2012, which led to hundreds of cases of injury, death, destruction of property and displacement of 1,40,000 people and around 1,20,000 individuals remain in internally displaced camps in central

Rakhine State with ongoing segregation between Rakhine and Rohingya communities.

12. As Rohingyas speak Bengali they headed in large numbers towards Bangladesh. The Rohingya Refugees are seeking a place to lead a life of dignity and are thus turning to India for compassion and justice.
13. Rohingyas entered into North-East India through various routes and presently spread over large areas across various States including Assam, West Bengal, Uttar Pradesh, Delhi, Jammu & Kashmir, Andhra Pradesh and Kerala. According to the estimates in 2015 their population was estimated to have been 10,500 which has now increased to 40,000.
14. That as per a report dated 22nd April, 2013, by Human Rights Watch, titled '*All You Can Do is Pray: Crimes Against Humanity and Ethnic Cleansing of Rohingya Muslims in Burma's Arakan State*' there has been continuous violence between Arakanese and Rohingya since 2012, and also claims that the government authorities destroyed mosques, conducted violent mass arrests, and blocked air to displaced Muslims. The Arakanese mobs have also attacked Muslim communities in townships, razing villages, and killing residents while security forces stood aside or assisted the assailants. Some of the dead were buried in mass graves, further impeding accountability. These findings have been dealt with in an article dated 22.04.2013, titled as "*Burma: End 'Ethnic Cleansing' of Rohingya Muslims*". A typed true copy of the Article dated 22.04.2013 which has been published on the website of Human Rights Watch (<https://www.hrw.org/>) is annexed as **ANNEXURE P/3 (Page ___ to ___)**
15. Most of the Rohingya refugees are registered with the office of the United Nations High Commissioner for Refugees. Although all international organizations have appealed to India not to deport the Rohingyas, but the Government is taking a stand that since it is not a signatory to the 1951 Refugee Convention of the United Nations or the 1967

Protocol relating to the status of refugees, it would be deporting the Rohingyas back to Myanmar as it concerns the state of security of the Nation.

16. That the Indian Constitution accords protection of human rights of refugees under Articles 14 and 21.
17. That Article 51 (c) of the Indian Constitution, a Directive Principle of State Policy, requires fostering of respect for international law and treaty obligations in the dealings of organised people with one another. This Hon'ble Court has consequently held that India's domestic laws must be construed in relation with International Laws. [Case laws referred: 2014 (5) SCC 182, 2009 (5) SCC 212, 1997 (6) SCC 241.]
18. International Law Obligations of India
 - A. India ratified the **Universal Declaration of Human Rights on 10th December 1948**. UDHR, while laying down the basic foundation for Human Rights, protects the Refugees by explicitly recognising the Principle of Non-Refoulement. Article 14 states the following:

(1) Everyone has the right to seek and to enjoy in other countries asylum from persecution.
 - B. **International Covenant on Civil and Political Rights**

The United Nations High Commission on Refugees in their Advisory Opinion on Non- Refoulement stated that the ICCPR also "encompass the obligation not to extradite, deport, expel or otherwise remove a person from their territory, where there are substantial grounds for believing that there is a real risk of irreparable harm, such as that contemplated by Articles 6 [Right to life] and 7 [Right to be free from torture or other cruel, inhuman or degrading treatment or punishment] of the

Covenant, either in the country to which removal is to be effected or in any country to which the person may subsequently be removed.” India ratified the ICCPR in 1979.

C. Article 3 of the Convention Against Torture And Other Cruel, Inhuman or Degrading Treatment or Punishment 1984 to which India is a signatory as far back as 1997, states that;

“1. No State Party shall expel, return (refouler) or extradite a person to another State where there are substantial ground for believing that he would be in danger of being subjected to torture;

2. For the purposes of determining whether there are such grounds, the competent authorities shall take into account all relevant considerations including, where applicable, the existence in the State concerned of a consistent pattern of gross, flagrant or mass violations of human rights.”

D. THAT, India became a signatory to the Convention of the rights of Child in 1992 and accepted the most of the provisions except that of child labour. Article 22 of the Convention explicitly provides for non-refoulement of children and states:

i. “States Parties shall take appropriate measures to ensure that a child who is seeking refugee status or who is considered a refugee in accordance with applicable international or domestic law and procedures shall, whether unaccompanied or accompanied by his or her parents or by any other person, receive appropriate protection and humanitarian assistance in the enjoyment of applicable rights set forth in the present Convention

and in other international human rights or humanitarian instruments to which the said States are Parties.

ii.

iii. For this purpose, States Parties shall provide, as they consider appropriate, co-operation in any efforts by the United Nations and other competent intergovernmental organizations or non-governmental organizations co-operating with the United Nations to protect and assist such a child and to trace the parents or other members of the family of any refugee child in order to obtain information necessary for reunification with his or her family. In cases where no parents or other members of the family can be found, the child shall be accorded the same protection as any other child permanently or temporarily deprived of his or her family environment for any reason , as set forth in the present Convention.”

E. In the past India has, as part of State practice and customary international humanitarian law given refuge to immigrants having had to flee their country on account of persecution, violence, torture and infraction of human dignity. India has given refuge to Syrian Christians, Malabar Jews, Tibetans, Afghanis etc. It is therefore, reasonable to expect that the Respondent No.1 shall accord similar treatment to Rohingya refugees and not act upon its decision to deport them back to Myanmar as part of its obligations to protect human rights.

19. Considering that global migration primarily for reasons of persecution, violence, exploitation and denial of human dignity are on the rise, there is an urgent need for global governance on the subject based on customary and international humanitarian law. Further, in relation to nations, the progress of civilization has

been from force to law. India has a track record of consistently honoring international humanitarian obligations and has remained steadfast in its commitment to the promotion of human dignity. This commitment is entrenched in Part III of the Indian Constitution and has been reinforced through a series of decisions of this Hon'ble Court. The evolving constitution and human rights jurisprudence impels an urgent intervention by this Hon'ble Court to protect, preserve and uphold the basic human rights of the Rohingya Muslims by ensuring that they are not deported back to their country of origin to face persecution." Extracts from some of the relevant judgments are;

(i) In *Dongh Lian Kham v. Union of India*, 226(2016) DLT 208, the Hon'ble Delhi High Court observed as under,

"30. The principle of "non-refoulement", which prohibits expulsion of a refugee, who apprehends threat in his native country on account of his race, religion and political opinion, is required to be taken as part of the guarantee under Article 21 of the Constitution of India, as "non-refoulement" affects/protects the life and liberty of a human being, irrespective of his nationality. This protection is available to a refugee but it must not be at the expense of national security..."

32. Since the petitioners apprehend danger to their lives on return to their country, which fact finds support from the mere grant of refugee status to the petitioners by the UNHCR, it would only be in keeping with the golden traditions of this country in respecting international comity and according good treatment to refugees that the respondent FRRO hears the petitioners and consults UNHCR regarding the option of deportation to a third country, and then decide regarding the deportation of the petitioners and seek approval thereafter, of the MHA (Foreigners Division)."

- (ii) The Gujarat High Court in *Ktaer Abbas Habib Al Qutaifi v. Union Of India*, 1999 CriLJ 919, held as under;

“_. This principle prevents expulsion of a refugee where his life or freedom would be threatened on account of his race, religion, nationality, membership of a particular social group or political opinion. Its application protects life and liberty of a human being irrespective of his nationality. It is encompassed in Article 21 of the Constitution, so long as the presence of refugee is not prejudicial to the law and order and security of India. All member nations of United Nation including our country are expected to respect for international treaties and conventions concerning Humanitarian law. In fact, Article 51(c) of the Constitution also cast a duty on the State to endeavour to "foster respect for international law and treaty obligations in the dealing of organized people with one another".

- (iii) The Supreme Court in its landmark judgement on the right to privacy dated 24th August 2017, in, *Justice K.S. Puttaswamy (Retd) and Anr. v. UOI and Ors* WP (C) No. 494/2012, has categorically stated,

“Constitutional provisions must be read and interpreted in a manner which would enhance their conformity with the global human rights regime. India is a responsible member of the international community and the Court must adopt an interpretation which abides by the international commitments made by the country particularly where its constitutional and statutory mandates indicate no deviation.”

20. This Hon’ble Court as well as a number of High Courts in the country have in similar situations dealt with the laws relating to refugees and have stayed their deportation. It is therefore,

submitted that this Hon'ble Court may direct Respondent No.1 not to deport the Rohingya refugees thereby ensuring that there is no violation of human rights.

21. The petitioners have not filed any other petition, application, suit or case seeking similar relief before this Hon'ble Court or any High Court or any other Court throughout the territory of India. The petitioners have no other remedy available.

GROUNDS:

- A. Because the action of Respondent number 1, in seeking to deport the Rohingya refugees is in violation of their rights guaranteed under the Articles 14 and 21 of the Constitution of India and also international treaty obligations.
- B. Because by virtue of customary international law, ratification of the Universal Declaration of Human Rights (1948), International Covenant on Civil and Political Rights (1976) by India, the obligations of due process and the universal principle of non refoulement, India is obliged to facilitate the persecuted Rohingya community for preserving their basic human rights, including their right to live with dignity as expressed by this Hon'ble Court and as understood internationally.
- C. Because Article 51 (c), a Directive Principle of State Policy, requires India to foster respect for international law and treaty obligations in the dealings of organised peoples with one another. Thus India needs to secure and protect the interest of refugees and save them from being deported back to Myanmar, and to fulfill its international obligation.
- D. Because the Rohingya refugees cannot be arbitrarily deported to their home country where they face a serious threat of being persecuted.

- E. Because India has in the past as part of State practice and commitment to customary international humanitarian law given refuge to immigrants having had to flee their country on account of persecution, violence, torture and infraction of human dignity. India has given refuge to Syrian Christians, Malabar Jews, Tibetans, Afghanis etc. and refugees from Sri Lanka and Bangladesh. India's universalism is embodied in the ancient Indian world view reflected in the philosophy of "Vasudeva Kutumbakam - *The World is one family*"
- F. Because the evolving constitutional and human rights jurisprudence impels an urgent intervention by this Hon'ble Court to protect, preserve and uphold the basic human rights of the Rohingya refugees by ensuring that they are not deported back to their country of origin to face persecution. This Hon'ble court has in a series of judgments, held that torture or violence offends human dignity which is a core right that inheres in every individual by virtue of his humanity and this right cannot be taken away by the State. [Case Laws Referred: Justice K. Puttaswamy (retd.) & anr. vs Union of India, decided on 24th August 2017; Shabnam vs Union of India, 2015 (6) SCC 702; D.K. Basu, 1997 (1) SCC 416; NHRC vs State, 1996 (1) SCC 742]
- G. Because Article 33(1) of the 1951 United Nations Convention on the Status of Refugees casts an obligation to observe international guidelines—
- "No contracting State shall expel or return ("refouler") a refugee in any manner whatsoever to the frontiers of territories where his life or freedom would be threatened on account of race, religion, nationality, membership of a particular social group or political opinion."
- H. Because Article 3 of the Convention Against Torture And Other Cruel, Inhuman or Degrading Treatment or Punishment 1984 to which India is a signatory states that;

“1. No State Party shall expel, return (refouler) or extradite a person to another State where there are substantial ground for believing that he would be in danger of being subjected to torture;

2. For the purposes of determining whether there are such grounds, the competent authorities shall take into account all relevant considerations including, where applicable, the existence in the State concerned of a consistent pattern of gross, flagrant or mass violations of human rights.”

- I. Because the proposed deportation is contrary to the Constitutional protections of Article 14, Article 21 and Article 51(c) of the Constitution of India, which provides equal rights and liberty along with right to life with dignity to every ‘person’. The act of Respondent No.1 would be contrary to the principles of ‘Non- Refoulement’, which has been widely recognised as a principle of Customary International Law.
- J. Because India has also ratified and is a signatory to various Conventions that recognize the principle and spirit of ‘Non-Refoulement’ which prohibits the deportation of refugees to a country where they face threat to their life. Further, the Constitution of India under Article 51(c), a Directive Principle of State Policy, also requires fostering respect for International Law and Treaty Obligations. Also, that as per Article 253 of the Constitution of India, Respondent No. 1 has the power to make

legislation to give effect to international agreements to implement any treaty, agreement, and convention or any decision made at any international conference, association or body.

- K. Because the petitioners claim that despite these Constitutional and International humanitarian obligations, the Respondent no. 1 has failed to carry out its obligations to ensure that protection to the Rohingya Community by proposing to deport the Community to their home country of Myanmar, where they face serious persecution.
- L. Because even otherwise the directions dated 08.08.2017 issued by the Respondent No.1 are bad in law, contrary to the settled rules of International Customary law, violative of Articles 14, 21 and 51C of the Constitution of India and therefore liable to be set aside.
- M. The petitioners crave leave to produce such other grounds as may be advised and to file other or furnish documents in support of their contentions.

PRAYER

In view of the above facts and circumstances, it is most respectfully prayed that this Hon'ble Court may be pleased:

- a. To issue an appropriate writ of Mandamus or any other writ, order or direction of like nature, directing the Respondents not to deport members of the Rohingya community who are presently in India;
- b. To issue appropriate guidelines future which are consistent with the Constitution of India and India's international obligations, to enable the respondents to deal with the present Rohingya situation as well as similar such situations that may arise in the future; and

c. To pass such other order as this Hon'ble Court may deem fit and proper in the facts and circumstances of the case.

Filed By:

(Sujeeta Srivastava)
Advocate For The Petitioners

Drawn on : 14th September 2017.
Filed on:
Place : New Delhi

INDEX

Sl. No.	Particulars of Document	Page No. of part to which it belongs		Remarks
		Part 1 (Contents of Paper Book)	Part II (Contents of file alone)	
(i)	(ii)	(iii)	(iv)	(v)
1.	Listing Proforma	A1-A2	A1-A2	
2.	Cover Page of Paper Book		A-3	
3.	Index of Record of Proceedings		A-4	
4.	Defect List		A-5	
5.	Note Sheet		NSI to..	
6.	List of Dates			
7.	Writ Petition with affidavit			
8.	<u>ANNEXURE P-1</u> A typed true copy of the Reuters report by Rina Chandran dated 11.08.2017			
9.	<u>ANNEXURE - P-2</u> A typed true copy of the Government Order dated 08.08.2017			
10.	<u>ANNEXURE - P-3</u> A typed true copy of the Article dated 22.04.2013 which has been published on the website of Human Rights Watch (https://www.hrw.org/)			
11.	Filing Memo			
12.	V/A			
13.	Authority Letter			

INDEX

S.NO.	PARTICULARS	PAGES
1.	Office Report on Limitation	
2.	Listing Proforma	
3.	Synopsis and List of Dates	
4.	Writ Petition with affidavit.	
6.	<u>ANNEXURE P-1</u> A copy of the newspaper report dated 11.08.2017	
7.	<u>ANNEXURE – P-2</u> A copy of the Government Order dated 08.08.2017	
8.	<u>ANNEXURE – P-3</u> A copy of the Article dated 22.04.2013 published on the website of Human Rights Watch.	

IN THE SUPREME COURT OF INDIA
(CIVIL ORIGINAL JURISDICTION)

WRIT PETITION (CIVIL) NO. _____ OF 2017
(PUBLIC INTEREST LITIGATION)

IN THE MATTER OF:

RAUSHAN TARA JASWAL & ORS.

PETITIONERS

Versus

UNION OF INDIA & ANR.

RESPONDENTS

CERTIFICATE

Certified that the Writ Petition is confined only to the before the Trial Court and the High Court and other documents relied upon in those proceedings. No additional facts, documents are grounds have been taken therein or relied upon in the SLP. It is further certified that the copies of the document / annexures attached to the SLP are necessary to answer the question of law raised in the petition or to make out grounds urged in the SLP for consideration of this Hon'ble Court. The certificate is given on the basis of the instructions given by the Petitioner whose affidavit is filed in support of the SLP.

FILED BY:

PRERNA MEHTA
ADVOCATE FOR THE PETITIONER

NEW DELHI
DATED: