

IN THE SUPREME COURT OF INDIA  
CRIMINAL ORIGINAL JURISDICTION  
**TRANSFER PETITION (CRIMINAL) NO. 225 OF 2020**

**IN THE MATTER OF:**

RHEA CHAKRABORTY

...PETITIONERS

VS.

STATE OF BIHAR & ORS.

...RESPONDENTS

**AFFIDAVIT ON BEHALF OF THE RESPONDENT NO. 3  
(STATE OF MAHARASHTRA)**

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I, Bhushan Mhadev Belnekar, presently working as Police Inspector at Bandra Police Station, Mumbai, having my office at Bandra Police Station, Mumbai, do hereby solemnly affirm and state as under:

1. I am duly authorized to file this Affidavit on behalf of State of Maharashtra. I have gone through the copy of the Transfer Petition filed by the Petitioner and in reply there to I state as follows.
2. I am the investigating officer of the ADR registered at Mumbai. I am filing this affidavit as per the records available in my office and this Affidavit is filed for the limited purpose of pointing out certain relevant facts in the matter. I crave leave of this Hon'ble Court to file a detailed Counter Affidavit at a later date, if required.
3. I do not admit the genuineness or correctness of any statements, allegations, as made in the Transfer Petition and unless any statement, allegation or contention made in the

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Transfer Petition is specifically admitted by me, the same shall be deemed to be denied.

4. I say that the Mumbai Police is the police department of the city of Mumbai, Maharashtra. It is a part of Maharashtra Police and has the primary responsibilities of law enforcement and investigation within the limits of Mumbai. It is headed by the Commissioner of the Mumbai Police who is an IPS officer of the rank of Director General of Police, and each zone in Mumbai is headed by a Deputy Commissioner of Police in the rank of Superintendent of Police. Each police station is headed by a Senior Inspector.

5. I say that the present Transfer Petition seeks transfer of the case of Respondent No. 1 against the Petitioner in FIR No. 241 of 2020 dated 25<sup>th</sup> July 2020 under Sections 341, 342, 380, 406, 420, 306, 506 & 120(B) of the Indian Penal Code registered at Rajeev Nagar Police Station, Patna ('the FIR'), and all consequent proceedings, from the jurisdiction of the Additional Chief Judicial Magistrate 3, Patna Sadar, at Patna, being State of Bihar Vs. Rhea Chakraborty (Case No. G. R. 4046 of 2020).

6. However, pending the present proceedings the CBI has registered the case with it. I am therefore filing this affidavit, keeping in view the situation that prevails on the date of filing of this affidavit and not as on the date the present proceedings were filed by the present petitioner in this Hon'ble Court.

7. At the outset, I say that pending the present proceedings the CBI ought not have gone ahead and registered the case with it

as also constituted a team for conducting the investigation therein. It ought to have awaited the final decision of the present proceedings at the hands of this Hon'ble Court, especially in view this Hon'ble Court's order passed at the last hearing of the present matter, 5<sup>th</sup> August 2020, despite being informed that the CBI agreed in principle to take over the investigation of the FIR in issue. Suffice it to say that, the indecent haste with which the CBI has proceeded in this regard speaks for itself, regarding the bonafides of all involved in this exercise.

8. I say that the true and correct facts in the matter are as follows:

a. An actor, Shri. Sushant Singh Rajput ('the deceased') passed away on 14<sup>th</sup> June 2020, at his residence in Bandra (West), Mumbai.

b. On a telephone call having been received at about 1400 Hrs, I, being the Police Inspector from Bandra Police Station ('the Mumbai Police') visited the residence of the deceased and saw the body of the deceased lying on the bed. Ms. Mithu Singh, the sister of the deceased and 4 others, were present at the said residence.

c. The Mumbai Police registered an Accidental Death Report ('ADR'), which is similar to an Unnatural Death Report in some of the States, and commenced enquiry about the unnatural death of the deceased under Section 174 of the CrPC. After the inquest was completed, the Mumbai Police commenced the investigation under Section 175 of the CrPC to ascertain the cause of death of the deceased.

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d. During the course of investigation, the Mumbai Police have till date, recorded statements of 56 persons and are investigating into the facts and circumstances leading to the death of the deceased from each and every angle. The Mumbai Police are investigating the incident fairly, properly, professionally and impartially.

e. This Hon'ble Court vide its order dated 5<sup>th</sup> August 2020, was pleased to direct Respondent No. 3 to submit a report regarding the status of the investigation of the said ADR. In compliance of the order dated 5<sup>th</sup> August 2020, a report regarding the status of investigation into the said ADR has been filed in a sealed cover in this Hon'ble Court, which is self-explanatory. The investigation into the said ADR is still continuing and hence it is in the interests of justice that the details of the investigation are not shared with the Petitioner and/or any other persons, except this Hon'ble Court. Thus, the Report has been filed in a sealed cover in this Hon'ble Court so that this Hon'ble Court is able to satisfy itself about the fairness, impartiality as also the professionalism with which the said investigation is being conducted by the Mumbai Police into the said ADR.

f. After about 38 days of the death of the deceased, Respondent No. 2, the father of the deceased filed a complaint before Respondent No. 1 alleging offences Sections 341, 342, 380, 406, 420, 306, 506 & 120(B) of the Indian Penal Code and the Bihar Police has registered at Rajeev Nagar Police Station, Patna, as FIR No. 241 of 2020 at Rajeev Nagar Police Station, Patna ('the FIR'),

against the Petitioner and her family members, though not only the death of the deceased but also each and every part of the cause and consequence relating to said death has taken place at Mumbai, in any case in the State of Maharashtra.

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g. The Respondent No. 2 despite being aware of the fact that the Mumbai Police have been investigating the said ADR, did not make any request to the Mumbai Police regarding registering a First Information Report against the Petitioner and her family members on any ground or for any reason whatsoever.

h. It is not the case of the Respondent No. 2, that prior to the registration of the FIR, at any point of time he had requested the Mumbai Police for registering a First Information Report against the Petitioner and her family members and that the Mumbai Police refused to register the First Information Report against the Petitioner and her family members.

i. On the contrary the statements recorded of all the close relatives of the deceased, including the Respondent No. 2 as soon as possible after the said death, demonstrate that none of them had any suspicion about the suicide committed by the deceased or against anybody whosoever in that regard. It is most important to note that these are the statements recorded FIRST in point of time, unlike the subsequent statements with numerous improvements that are apparently tainted with after-thoughts, to say the least.

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9. At the further outset, neither the Judicial jurisdiction lay in the State of Bihar nor the investigative jurisdiction lay with the Bihar Police, in so far as the unfortunate death in issue is concerned. I say that a perusal of the FIR that is now registered by the Bihar Police shows that none of the alleged offences have been committed within the local limits of Rajeev Nagar Police Station, Patna either by the petitioner or for that matter anybody else. In these circumstances, the objection to the territorial jurisdiction can be raised at the pre cognizance stage also. Even the affidavit filed on behalf of the Bihar police in this regard makes a very interesting reading and unmistakably, by itself, demonstrates that neither any cause nor any consequence, relating to the said unfortunate death, as spelt out by law, has even remotely occurred in the state of Bihar, muchless at the place where the said FIR is registered.

10. The Respondent No. 2 alleges in the FIR that the deceased was not permitted to visit Patna and to meet Respondent No. 2 and his other family members. Thus, even the alleged offence of wrongful restraint and confinement, if any, occurred in Mumbai. The Respondent No. 2 alleges that the Petitioner stole or siphoned of money and valuables from the deceased. Thus, the alleged offence of theft, if any, occurred in Mumbai. The Respondent No. 2 further alleges that Petitioner cheated the deceased and committed criminal breach of trust. Even the alleged offences of cheating and criminal breach of trust also occurred at Mumbai. The Respondent No. 2 further alleges that the Petitioner has abetted the suicide of the deceased. Thus, the

alleged offence of abetment of suicide, if any, is also committed at Mumbai.

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11. Hence, I say that the Respondent No. 2 was not within his rights in registering the FIR at Rajceev Nagar Police Station, Patna, and ought to have registered a First Information Report at Bandra Police Station, Mumbai, either by addressing a letter and/or email to the Bandra Police Station, Mumbai, if not by personally remaining present there, as the alleged offences, even according to his case were committed within the local limits of the Bandra Police Station, Mumbai.

12. The Respondent No. 2 despite being aware of the fact that the Mumbai Police were investigating the ADR did not ever make any request to the Mumbai Police to register First Information Report against the Petitioner, her family members and/or for that matter against anybody whosoever, either under Section 154(1) of the CrPC or under Section 154(3) of the CrPC., prior to the registration of the FIR with the Bihar Police. It is not even the case of the Respondent no. 2 that, at any point of time he had requested the Mumbai Police to register First Information Report against the Petitioner and her family members and that the Mumbai Police refused to register the First Information Report against the Petitioner and her family members.

13. Also, the Respondent No. 2 was entitled to approach the Chief Judicial Magistrate, Bandra, Mumbai, under Section 156(3) of the CrPC for an order directing investigation into the death of the deceased. Admittedly, the Respondent No. 2 has not approached the Magistrate under Section 156(3) of the CrPC.



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death of the deceased. Admittedly, the Respondent No. 2 has not approached the Magistrate under Section 156(3) of the CrPC.

14. I say that the Respondent No 2 cannot and ought not to have approached the Bihar Police for registration of the FIR for an entire incident that occurred in Mumbai. Such a practice ought to be deprecated as anybody will approach the State Police of his choice and register First Information Report at the Police Station of his choice and this will lead to disastrous consequences.

15. I say that soalso, any accused will be able to have an offence investigated by the investigating authority of his choice, by getting First Information Report registered at any particular Police Station and/or by getting it transferred thereto. I say that even the Complainant and the accused cannot jointly and with mutual consent, decide as to which police ought to investigate the Crime in issue.

16. I say that had the Respondent No. 2 expressed an intention of registering a First Information Report at Bandra Police Station, Mumbai, the police officers would have gone and recorded the statement of Respondent No. 2 even at Patna and thereafter registered aFirst Information Report at Bandra Police Station, Mumbai.

17. Even assuming without admitting and for the sake of arguments that the FIR in issue is maintainable, it was mandatory for the Rajeev Nagar Police Station, Patna, Bihar, to follow the procedure prescribed under the Advisory issued by Ministry of Home Affairs, Government of India, dated 10<sup>th</sup> May 2013 etc.,

and to register a Zero FIR and thereafter transfer the Zero FIR to the Bandra Police Station, Mumbai, because it is apparent that all the offences alleged in the FIR are committed within the local limits of the Bandra Police Station, Mumbai.

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18. The Advisory issued by the Ministry of Home Affairs, Government of India, dated 10<sup>th</sup> May 2013 states as follows:

3. *The legal position stated above expects that the police shall register an FIR upon receipt of information of the commission of a cognizable offence. Further, it after registration of FIR, upon investigation, it is found that the subject matter relates to the jurisdiction of some other police station, the FIR may be appropriately transferred to the police station in which the case falls. Moreover, if at the time of registration of FIR, it becomes apparent that the crime was committed outside the jurisdiction of the police station, the police should be appropriately instructed to register a 'Zero' FIR, ensure that the FIR is transferred to the concerned police station w/s 170 of the Cr.P.C. It should be clearly stated that the delay over the determination of the jurisdiction leads to avoidable wastage of time which impacts on the victim and also leads to offenders getting an opportunity to slip from the clutches of the law. It should be clearly instructed that failure to comply with the instruction of registering and FIR on receipt of information about the cognizable offence will invite*

*prosecution of the police officer u/s 166A of the IPC for an offence specified u/s 166 A or departmental action or both.*

A true copy of the Advisory issued by the Ministry of Home Affairs, Government of India, dated 10<sup>th</sup> May 2013 is hereto annexed and marked Annexure '1' (Pages 16 to 17).

19. In fact, it was not necessary for the Petitioner to file the present Petition seeking transfer of the FIR and the Bihar Police ought to have transferred the FIR to Bandra Police Station, Mumbai, of their own volition because the Bihar Police had no jurisdiction to investigate the FIR as the offences were committed in Mumbai.

20. On or about 27th July 2020, four police officers from the Bihar Police landed in Mumbai and commenced their own simultaneous inquiry into the allegations levelled in the FIR in issue. Further, the information collected by the Bihar Police was revealed to the media, despite the fact that such revelations would jeopardize the investigation being conducted by the Mumbai Police into the said ADR. Thus, at that time there were two different agencies, namely the Bihar Police and the Mumbai Police who were apparently simultaneously inquiring/investigating into the same incident. There cannot be two simultaneous inquiries, much less investigations, by two different agencies in respect of the same incident and if such simultaneous inquiry were to continue, it may result in conflicting results, apart from its other adverse effects viz. it will ultimately end up in helping the suspect or accused, if any and if at all. Comity

between the Mumbai Police and the Bihar Police also was then required that the Mumbai Police alone continues with the investigation into the incident at hand, as also the Bihar Police forthwith ought to have stopped their legally unsustainable inquiry.

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21. I say that as the Bihar Police did not have jurisdiction to investigate into the FIR or examine witnesses, the question of co-operation by the Mumbai Police into the simultaneous inquiry by the Bihar Police, did not arise. I deny the suggestion that the quarantine of the IPS officer Mr. Vinay Tiwary was aimed at obstructing the investigation by the Bihar Police. In fact, such step was taken by the Municipal Corporation for Greater Mumbai and not by the police authorities. The protocols for passengers arriving at Mumbai airport issued by the Government of Maharashtra, require that domestic passengers who arrive at Mumbai airport, are required to undergo 14 days home quarantine, the only exception being that domestic passengers who intend to exit Mumbai within 7 days of arrival, provided they are able to produce confirmed ticket for onward/return journey. In fact, it is obligatory for the domestic passengers to undergo quarantine, and the four members of the SIT who arrived at Mumbai Airport ought to have also quarantined themselves. In any case now that Mr. Vinay Tiwary has been now left our State and has returned to his home State, nothing more needs to be elaborated in that regard herein.

22. Thus, the action of Bihar Police in not transferring the FIR and continuing with the simultaneous inquiry into the offences alleged in the FIR, was totally malafide and violated the

principles of federalism enshrined in the Constitution. An investigation by two different State Police into the same incident, which has occurred within one State, will lead to a chaotic situation as the investigation of one State Police may interfere with the investigation of another State Police.

23. Further, the newspaper reports produced on record by the Petitioner in IA No. 71571 of 2020 state that the Bihar Police were hesitating for registration of the FIR but the Hon'ble Chief Minister of Bihar and another minister, had persuaded them to register it. Thus, it is submitted that the registration of the FIR at Rajeev Nagar Police Station, Patna, Bihar, was politically motivated and due to extraneous reasons.

24. I say that Section 177 of the CrPC provides that every offence shall ordinarily be inquired into and tried by a court within whose local jurisdiction it was committed. It is settled position of law that the word 'ordinarily' occurring in Section 177 of the CrPC must be given its natural meaning. The provisions contained in Section 178 to Section 183 are exceptions to the general rule for inquiry and trial as provided in Section 177 of the CrPC. The provisions in the Code governing the field emanates from the doctrine that all crimes are local. Investigation into a crime, the witnesses who are to be examined for the purposes of proving the commission thereof and other relevant factors, which are required to be taken for consideration thereof lead to the aforementioned inference. Thus, the territorial jurisdiction of a court with regard to criminal offence would be decided principally on the basis of place of occurrence of the incident and not on the basis where the FIR is registered. None of

the ingredients constituting the offence can be said to have been taken place or committed, nor its consequences, as contemplated by law, can be said to have occurred, within the local jurisdiction of the Magistrate Court at Patna. The incident is already under investigation by the exclusive jurisdictional police station in Mumbai, namely the Bandra Police Station.

25. I say that not a single legally permissible and sustainable ground existed, nor does it exist, either for the registration of the FIR at Patna Bihar or for the transfer of such non-maintainable FIR to the CBI. The alleged sensitivity of the matter cannot be a ground for either registration of the FIR or investigation into the matter by the Bihar Police or for that matter its transfer to the CBI. It is most pertinent to note that no ground existed nor any sustainable ground or reason is placed on record for the transfer of the FIR in issue to the CBI. Such transfer cannot in law be effected at the whims and fancies of all concerned, in absence of ground/reason which is well-settled by various judicial pronouncements or even otherwise legally sustainable.

26. I say that the recommendation by Respondent No. 1 to transfer the investigation into the FIR by the CBI bristles with malafides and the same is void ab-initio. The Respondent No. 1 had only the authority to register a 'Zero' FIR, and thereafter to transfer the 'Zero' FIR to the Bandra Police Station, Mumbai. The Respondent No. 1 did not have any legal sanctity to recommend transfer of the investigation into the said FIR to the CBI.

27. The jurisdiction of CBI is confined only to Union Territories for investigation of offences notified under Section 3

of Delhi Special Police Establishment Act, 1946 ('DSPE Act'). It requires consent of the concerned State Government under Section 6 of the DSPE Act. Further, the CBI requires a corresponding notification from the Central Government under Section 5 of the DSPE Act, before taking up the investigation of a case outside the Union Territories. Thus, the CBI cannot move without consent of the State Government. In other words, Law and Order being a State Subject, CBI derives jurisdiction only when valid consent therefor is given. As Respondent No. 3 – State of Maharashtra, has not given any consent, as provided under Section 6 of the DSPE Act for transferring the investigation into the FIR to the CBI, the investigation into the FIR cannot be transferred to the CBI. In the facts and circumstances of the present case, it is only the State of Maharashtra which is competent to give consent under Section 6 of DSPE Act, for transferring investigation to the CBI because the cause of action has arisen solely and completely within the State of Maharashtra alone.

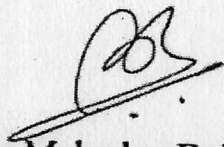
28. Even assuming without admitting and for the sake of arguments that the CBI is entitled to register a FIR, then also it is mandatory for the CBI to follow the procedure prescribed under the Advisory issued by Ministry of Home Affairs, Government of India, dated 10<sup>th</sup> May 2013 and to register a Zero FIR and thereafter transfer the Zero FIR to the Bandra Police Station, Mumbai, because it is apparent that all the offences alleged to have been committed in the FIR in issue, even according to the case of the Respondent No. 2 were committed within the local limits of the Bandra Police Station, Mumbai.

29. In the facts and circumstances of the present case, the FIR ought to be transferred as a Zero FIR to the Bandra Police Station, Mumbai. Further, it is submitted that a fair, proper, professional and impartial investigation has been and also will be conducted by the Mumbai Police in the aforesaid case.

30. That no new facts and grounds have been pleaded in this Affidavit.

Hence the Affidavit.

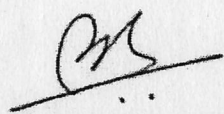
Place: Mumbai  
Date: 08.08.2020

  
(Bhushan Mahadev Belnekar)  
Police Inspector at Bandra Police Station,  
Mumbai

#### VERIFICATION

I, Bhushan Mahadeo Belnekar, having my office at Bandra Police Station Mumbai do hereby state on solemn affirmation, that whatever stated herein above is true to the best of my knowledge and information derived from the records and files maintained in the office and I believe the same to be true.

Solemnly affirmed at Mumbai this 08<sup>th</sup> day of August, 2020.

  
(Bhushan Mahadev Belnekar)  
Police Inspector at Bandra Police Station,  
Mumbai



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Annexure-1

No. 15011/35/2013 - SC/ST-W  
Government of India  
Ministry of Home Affairs  
Centre State Division  
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5<sup>th</sup> Floor, NDCC-II Building  
Jai Singh road, New Delhi  
the 10<sup>th</sup> May, 2013

To

The Additional Chief Secretary/ Principal Secretary (Home)

Sub: Registration of FIR irrespective of territorial jurisdiction and Zero FIR

Sir/Ma'am,

This relates to the registration of FIR by the police when they receive a call/complaint related to a crime committed and suspected to be outside the jurisdiction of the police station concerned.

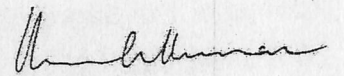
2. Instructions are envisaged on account of the delays occurring when there are issues relating to the area jurisdiction regarding the investigation of the case. The hesitation to take up investigation of cases falling in uncertain territorial areas needs to be dispelled to allay the fears that it may be liable to be quashed u/s 482 of the Cr.P.C. There are two rulings of the Supreme Court in Satvinder Kaur vs Govt. of NCT of Delhi on 5/10/1999 (AIR 1999, Delhi 1031) and in Ramesh Kumari vs Govt. of NCT Delhi on 21/2/2006. In the former case, the Court held that at the stage of investigation, the material collected by an investigating officer cannot be judicially scrutinized for arriving at a conclusion that the police station officer of particular police station would not have territorial jurisdiction. That apart, section 156(2) of the Cr.P.C contains an embargo that no proceeding of a police officer shall be challenged on the ground that he has no territorial power to investigate the case. In the latter case, the Court held that a police officer is duty bound to register the case on the basis of such information disclosing a cognizable offence u/s 154(1) of the Cr.P.C.

3. The legal position stated above expects that the police shall register an FIR upon receipt of information of the commission of a cognizable offence. Further, if after registration of FIR, upon investigation, it is found that the subject matter relates to the jurisdiction of some other police station, the FIR may be appropriately transferred to the police station in which the case falls. Moreover, if at the time of registration of FIR, it becomes apparent that the crime was committed outside the jurisdiction of the police station, the police should be appropriately instructed to register a 'Zero' FIR, ensure that the FIR is transferred to the concerned police station u/s 170 of the Cr.P.C. It should be clearly stated that the delay over the determination of the jurisdiction leads to avoidable wastage of time which impacts on the victim and also leads to offenders getting an opportunity to slip from the clutches of the law. It should be clearly instructed that failure to comply with the instruction of registering an FIR on receipt of information about the cognizable offence will invite prosecution of the police officer u/s166A of the IPC for an offence specified u/s166A or departmental action or both.

4. It may also be emphasized that police services should be sensitized to respond to complaints with alacrity whether is from a man or a woman. Apprehending the accused must take place immediately after the complaint as there is a tendency of the person committing the crime slipping away should there be a delay on extraneous grounds like jurisdiction. The police may also put in place a system of rewarding the personnel for timely response and punishment for wanton lethargy.

5. Home Departments of the States/UTs may direct the DGPs/IGPs to issue above instruction so as to reach all police stations at the shortest possible time.

The receipt of the same may kindly be acknowledged.



(S Suresh KUMAR)

JS (CS)

3/2/21  
True Copy

IN THE SUPREME COURT OF INDIA  
CRIMINAL ORIGINAL JURISDICTION  
CRL M.P. No. OF 2020

IN

**TRANSFER PETITION (CRIMINAL) NO. 225 OF 2020**

**IN THE MATTER OF:**

RHEA CHAKRABORTY ...PETITIONERS

VS.

STATE OF BIHAR & ORS. ...RESPONDENTS

**APPLICATION SEEKING EXEMPTION FROM FILING  
THE AFFIDAVIT WITHOUT AFFIDAVIT  
ATTESTATION**

TO,

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

THE HUMBLE APPLICATION  
OF THE RESPONDENT  
ABOVE NAMED:

**MOST RESPECTFULLY SHOWETH:**

1. That the Applicant is authorized officer of the Respondent in the present Transfer Petition (Criminal) No.225 of 2020 and is filing this Affidavit in his official capacity on behalf of the Respondent.
2. It is submitted that due to the current lockdown scenario caused by the Corona Virus pandemic situation, a Notary/ Oath Commissioner was not available and hence the Respondent is unable to get the adjoining

Affidavit Notarized. Therefore, in the light of above stated facts, the Respondent seeks exemption from filing Notarized Affidavit.

**PRAYER**

The Respondent, therefore, prays that:-

- A) Exempt Respondent from filing Affidavit;
- B) Pass any other order or directions as this Hon'ble Court deems fit and proper.

AND FOR THIS ACT OF KINDNESS THE RESPONDENT SHALL AS IN DUTY BOUNDS EVER PRAY.

FILED BY:-



(SACHIN PATIL)  
Advocate for the Respondent

Place : New Delhi  
Filed on : 08.08.2020