

**IN THE HON'BLE HIGH COURT OF DELHI AT NEW DELHI  
EXTRAORDINARY CIVIL JURISDICTION**

**W.P. (C) No. \_\_\_\_\_ of 2020\_**

**IN THE MATTER OF :**

**ULRICH WILHELM MUELLER ...PETITIONER**

**VERSUS**

**UNIION OF INDIA & ORS ...RESPONDENTS**

**WRIT PETITION UNDER ARTICLE 226 OF THE  
CONSTITUTION OF INDIA SEEKING ISSUANCE OF A WRIT  
OF CERTIORARI FOR GRANTING STAY AND/OR SETTING  
ASIDE THE EXIT PERMIT DATED 07.12.2020 ALOONG WITH  
WRIT OF MANDAMUS OR ANY OTHER APPROPRIATE  
WRIT, ORDER OR DIRECTION THEREBY PRAYING  
BEFORE THIS HON'BLE COURT TO ISSUE DIRECTIONS TO  
THE RESPONDENTS TO EXTEND THE VISA OF THE  
PLAINTIFF ON EXCEPTIONAL MEDICAL AND  
HUMANITARIAN GROUNDS ALLOWING HIM TO STAY IN  
INDIA FOR RECEIVING MEDICAL TREATMENT.**

**To,**

**THE HON'BLE CHIEF JUSTICE OF HIGH COURT OF  
DELHI AND HIS COMPANION JUSTICES OF THE  
HON'BLE HIGH COURT OF DELHI**

**THE HUMBLE PETITION OF THE  
ABOVENAMED PETITIONER**

**MOST RESPECTFULLY SHOWETH:**

1. That the abovenamed Petitioner is a German National, aged
  
2. That the Petitioner is severely ill and has been has been diagnosed with multiple health issues such as Infantile Cerebral Palsy (ICP) since birth, Chronic Anxiety and Depression, Post-Traumatic Stress Disorder (PTSD), severely compromised motor skills, and a suppressed immune system along with 70% physical and mental disability.

4. That on 05.04.2011 a medical investigation report by Dr. Michael Griesmer (Frankfurt) reported that the Petitioner was under investigation since 14.01.2011, wherein it was observed that in the BDI (Beck's Depression Inventory, the Petitioner exceeded the cut-off of 18 and 21 points by getting 24 points and the relevant symptoms of depression could be traced back to the year 2005/2006. Furthermore, it observed that the Petitioner has social anxiety disorder with 71 points (cut-off is 41 points for healthy people). The Petitioner also showed extreme manifestations in the following individual fears: "To speak in public"; "Before exam situations"; "Entering a room where others are already sitting"; "Authority figures" (Warning: paranoid fear reactions); "The feeling of being rejected by others"; "The feeling of not being recognized by others"; "Not to be noticed by others". In addition to the abovementioned fears the report also states that according to the STAI (State Trait Fear Inventory) anxiety was shown in the extreme range. For kind perusal of this Hon'ble court the medical investigation report dated 05.04.2011 by Dr. Michael Griesmer (Frankfurt) along with its English translation is being marked and annexed herewith as **Annexure P – 2 Colly**.
5. That on 25.06.2012, a document from Rheinland Pfalz, Office of Social Affairs reported the new disability level as 70, along with Mental illness, central tone and coordination disorder at level 60; Spine problems, incorrect statics at level 30 and Foot deformity at level 20. For kind perusal of this Hon'ble court document dated

25.06.2012, from Rheinland Pfalz, Office of Social Affairs) along with its English translation is being marked and annexed herewith as **Annexure P – 3 Colly**.

6. That the medical prescription dated 16.06.2016 by Dr. Liane SAXER-NOVOTONY, a Psychiatrist and Neurologist in Vienna reported that the Petitioner is suffering from Chronic Depression, Social Phobia, chronic Williams syndrome (It is a rare genetic disorder characterized by growth delays before and after birth, short stature and a varying degree of mental deficiency. People with this condition require ongoing care) along with Vegetative Dystonia (a condition that is characterised by the malfunction of the autonomic nervous system which results in a drop in supply of oxygen to tissue and organs) and therefore suggested 'PAROXETIN "GENERICON" 20 MG' tablets as permanent medication. For kind perusal of this Hon'ble Court copy of the medical prescription dated 16.06.2016 along with its English translation is being marked and annexed herewith as **Annexure P – 4 Colly**

7. That owing to his severe medical condition and allied disorders the Petitioner has been recurrently visiting India for receiving treatments based on Ayurveda and Yoga Therapies. He visited India for the first time on 10.01.2015 on a single-entry tourist visa and departed on 15.06.2015. He further came to India on an X-Entry Visa on 02.09.2015 and got himself duly registered with

FRRO Pondicherry and thereafter departed on 01.12.2015. For kind perusal of this Hon'ble court the arrival and departure details of the Petitioner are mentioned below in the form of a table and the visa details are being marked and annexed herewith as **Annexure P – 5 Colly.**

<b>S.No.</b>	<b>Arrival Date</b>	<b>Arrival Airport</b>	<b>Departure Date</b>	<b>Departure Airport</b>	<b>Visa Type</b>	<b>Duration of Stay</b>
<b>1</b>	10.01.2015	CSI Airport, Mumbai	15.06.2015	CSI Airport, Mumbai	Tourist Visa - Single Entry	156 days
<b>2</b>	02.09.2015	CSI Airport, Mumbai	01.12.2015	CSI Airport, Mumbai	X-Entry Visa – Multiple Entry	92 days
<b>3</b>	05.10.2016	IGI Airport, New Delhi	11.01.2017	Anna Int'l Airport, Chennai	Tourist Visa – Double Entry	87 days
<b>4</b>	16.09.2017	Anna Int'l Airport, Chennai	16.12.2017	Anna Int'l Airport, Chennai	T-1 Visa – Multiple Entry	91 days
<b>5</b>	21.04.2018	Anna Int'l Airport, Chennai	15.10.2018	Anna Int'l Airport, Chennai	T-1 Visa – Multiple Entry	175 days
<b>6</b>	14.01.2019	-	03.07.2019	-	Medical Visa – Multiple Entry	170 days

7	01.11.2019	Anna Int'l Airport, Chennai	15.12.2019	IGI Airport, New Delhi	T-1 Visa – Multiple Entry	45 days
8	18.01.2020	Anna Int'l Airport, Chennai	-	-	X-Misc. Visa – Multiple Entry	-

8. That on 04.08.2016 while the Petitioner was in Vienna, he was admitted into State Hospital, Hollabrunn in the Department of Social Psychiatry, due to his recurring seizures. Thereafter, he was diagnosed with seizures, depression, social phobia and chronic Williams Syndrome (It is a rare genetic disorder characterized by growth delays before and after birth, short stature and a varying degree of mental deficiency. People with this condition require ongoing care). Despite being under allopathic care for years, the Petitioner's condition progressively worsened, so he again visited India for undergoing alternate medical treatment. For kind perusal of this Hon'ble court, State Hospital, Hollabrunn, Department of Social Psychiatry's report dated 04.08.2016 along with its English translation is being marked and annexed herewith as **Annexure P – 6 Colly**.
9. That on 08.08.2016, Department of Social Welfare, Vienna City MA40 Social submitted a report on determination of the ability of the Petitioner to work and diagnosed the following: Degree of

disability – 50% along with an unspecified organic personality and behavioral disorder due to a disease, damage or dysfunction of the brain (especially psychomotor seizures); Anxiety and depressive disorder; mixed social phobias; Chronic spine syndrome in kyphoscoliosis and perinatal hypoxia (lack of oxygen during childbirth) with tetra spasticity [ It is a subset of spastic cerebral palsy that affects all four limbs (both arms and legs)]. For kind perusal of this Hon'ble Court a copy of the MA40 Social's report dated 08.08.2016 along with its English translation is being marked and annexed herewith as **Annexure P – 7 Colly.**

10. That the Petitioner made several more visits to India searching for alternate medical treatment and was therefore diagnosed by Dr. Soumitra Basu on 25.08.2018. The findings of the report were that the Petitioner is suffering from 50% reduction of working capacity along with depression and alienation resulting in severe stress. The Petitioner further consulted the doctors from Mahatma Gandhi Medical College and Research Institute, Pondicherry, wherein he was diagnosed to be suffering from stress and anxiety along with Cerebral and Cerebellar atrophy (it is the loss of brain cells called neurons, resulting into brain damage, stroke, Alzheimer etc.). The report had also referred the Petitioner to psychiatric assessment and management. Thereafter the Petitioner left for his home country on 15.10.2018. For kind perusal of this Hon'ble court the medical certificate dated

25.08.2018 issued by Dr. Soumitra Basu and Mahatma Gandhi Medical College & Research Institute Hospital's report dated 06.10.2018 are being marked and annexed herewith as **Annexure P – 8 Colly**.

11. That the Petitioner was regularly communicating with his doctors and therefore came to India again on 14.01.2019 for his routine medical check-ups, where he was diagnosed by Dr. Soumitra Basu, on 30.04.2019 and it was found that his disability had increased to 70%, which is a clear indication of his deteriorating health condition and continuous brain damage. Therefore, the doctor advised the Petitioner to make arrangements for longer stay in India as he would be requiring lifelong treatment and supervision. For kind perusal of this Hon'ble Court the medical certificate dated 30.04.2019, issued by Dr. Soumitra Basu is being marked and annexed herewith as **Annexure P – 9**.
  
12. That on 18.12.2019 the Petitioner was examined by Dr. Michael Stingl, Specialist in Neurology, Vienna and was found to be suffering from Chronic Fatigue syndrome as a result of his Infantile Cerebral Palsy (ICP) along with exhaustion, Spasticity, Depression, Seizures and Recurrent colds, especially in winter, occasional sore throat, increased sweating and occasional hot flashes. Furthermore, the Petitioner was also reported to be having a high susceptibility to infections. For kind perusal of this Hon'ble court the medical examination report dated 18.12.2019



by Dr. Michael Stingl, Specialist in Neurology, Vienna along with its English translation is being marked and annexed herewith as **Annexure P – 10 Colly**.

13. That it is evident from the abovementioned table that the Petitioner has been regularly visiting India since 2015 in search for a suitable medical treatment and a peaceful, stress free environment for his mental and physical condition. It is pertinent to note that the Petitioner is a bonafide law-abiding citizen, who has always, dutifully followed the directions and adhered to the all visa conditions and regulations regarding the stay of foreigners in India and has never overstayed in India.
14. That whenever the Petitioner visited India, he stayed at Discovery Fraternity, Auroville, Villupuram, Tamil Nadu and therefore when the Petitioner again arrived in India on 18.01.2020 in order to receive an ayurvedic Hemp oil treatment along with Hatha Yoga and Kundalini Yoga under the guidance of Dr. Ananda Balayogi, he made arrangements for staying at the abovementioned address and has been staying there since his arrival.
15. The above-mentioned therapies and treatments take time and need to be continued for a longer period of time to show benefits. Furthermore, the Petitioner also states that he finds it psychologically comfortable to stay in India. Moreover, he has also been advised to make arrangements of staying in India for a

longer period of time requiring life-long treatment and supervision.

16. That shortly after the Petitioner's arrival in India, a nationwide lockdown was imposed on 22.03.2020 due to the Covid-19 pandemic and the international travel of passengers was banned by the government.
17. That the visa granted to the Petitioner has expired on 08.07.2020 and therefore complying with all visa related regulations, the Petitioner duly submitted applications submitted by the Petitioner through online mode for registration of foreigner on 29.06.2020 and visa extension on 02.07.2020. For kind perusal of this Hon'ble court copy of the foreigner's registration application dated 29.06.2020 and visa extension applications dated 02.07.2020 submitted by the Petitioner are being marked and annexed herewith as **Annexure P – 11 Colly.**
18. That on 03.07.2020 the Directorate General of Civil Aviation (DGCA) extended the ban on International Travel of Passengers till 31.07.2020 which was further extended to 30.11.2020 by circular dated 27.10.2020 and thereafter till 31.12.2020 by circular dated 26.11.2020. For kind perusal of this Hon'ble court a copy of the circulars dated 03.07.2020, 27.10.2020 and 26.11.2020 issued by the Directorate General of Civil Aviation are being marked and annexed herewith as **Annexure P – 12 Colly.**

19. That on 17.11.2020 a personal meeting was requested by FRRO, Puducherry at 11:00 AM. Thereafter the Visa Extension and Registration Applications were summarily rejected by the FRRO, Puducherry, without proper perusal of the medical records of the Petitioner or giving due weightage to his critical medical condition and the Petitioner was asked to leave India at the earliest. Furthermore, on 07.12.2020, an exit permit was served to the Petitioner and he was once again asked to leave India on or before 22.12.2020 by the next available flight. For kind perusal of this Hon'ble court a copy of the exit permit is being marked and annexed herewith as **Annexure P – 13**.
  
20. That an article published on BBC.com dated 13.12.2020 reported Germany has announced regarding imposing a hard lockdown in the country from 16.12.2020 to 10.01.2021. Furthermore, another article published on DW.com dated 20.12.2020 reported that Germany has announced ban on flights from UK. For kind perusal of this Hon'ble Court copy of the article dated 13.12.2020 published in BBC.com and article dated 20.12.2020 published in DW.com are being marked and annexed herewith as **Annexure P – 14 Colly**.
  
21. That according to the latest data available on the website worldometer.info, currently India has 2<sup>nd</sup> highest no. Covid-19 cases in the world and therefore European countries will not be in favour of allowing any person travelling from India to enter

their boundaries, in order to effectively reduce and control the rising no. of cases in their respective territory. For kind perusal of this Hon'ble court a copy of the data downloaded from worldometer.info is being marked and annexed herewith as **Annexure P – 15.**

22. That according to the information available on the official travel portal of Austria – Austria.info the country has imposed lockdown till December 6. Thereafter, according to the update of 08.12.2020 any person travelling from a high-risk area will have to undergo a compulsory 10 days quarantine. Furthermore, according to the latest update on the website the Austria will be going into hard lockdown from 26.12.2020 and it has also banned flights from UK. For kind perusal of this hon'ble court copy of the information available on the website is being marked and annexed herewith as **Annexure P – 16.**

23. That till now we are quite aware of the fact that the Covid-19 virus is proving to be fatal, especially to the elderly people or people with already existing diseases. Since the virus can be easily spread through air, being in close proximity with an infected person and further could be transmitted through liquids/water, and passed on by coming in contact with surfaces infected with the same. Hence, the Petitioner, due to his weak immune system has a high susceptibility to infections and therefore, any travel during the Covid-19 pandemic, puts him at

a higher risk of being infected by the Coronavirus and a far greater risk of mortality.

24. That Article 21 of the Constitution guarantees Right to life and personal Liberty. In the case of **Mohammad Sediq vs. Union of India & Ors, 1998 (47) DRJ 74**, the Hon'ble Delhi High Court ruled that, *“Our constitution confers certain rights on every human being and certain other rights on the citizens alone. Every person, whether he is a citizen or not, is entitled to equality before the law and equal protection of the laws. As such, no person can be deprived of his life or personal liberty except according to the procedure established by law.”*
25. That the Hon'ble Supreme Court in **Hans Muller of Nurenberg v. Superintendent, Presidency Jail, Calcutta and Ors. AIR 1955 SC 367** held that Article 21 guarantees Protection of Right to Life and Liberty to citizens and foreigners alike, and that no person can be deprived of his personal liberty except according to the procedure established by law.
26. That the Hon'ble Apex court has held in case of **Mr. Louis De Raedt & Ors vs Union Of India And Ors 1991 AIR 1886** that the fundamental right of the foreigner is confined to Article 21 for life and liberty. Furthermore, in case of **People's Union for Civil Liberties v. Union of India (1997) 1 SCC 301** the Supreme Court has held that Article 21 of the Constitution of India in relation to human rights has to be interpreted in

conformity with international law. it has also been held in case of **State of Punjab v. Mohinder Singh Chawla (1997) 2 SCC 83** that the right to health is integral to the right to life and the government has a constitutional obligation to provide health facilities.

27. That in case of **C.E.S.C. Limited and Ors. vs. Subhash Chandra Bose and Ors (AIR 1992 SC 573)** the Hon'ble Apex Court had made a reference to Article 22 to 25 of UDHR and concluded that right to health is a fundamental right. It went further and observed that health is not merely absence of sickness: *“The term health implies more than an absence of sickness. Health is thus a state of complete physical, mental and social well being and not merely the absence of disease or infirmity...*

*In the light of Articles. 22 to 25 of the Universal Declaration of Human Rights, International Convention on Economic, Social and Cultural Rights, and in the light of socio-economic justice assured in our constitution, right to health is a fundamental human right to workmen. The maintenance of health is a most imperative constitutional goal whose realisation requires interaction by many social and economic factors....”.*

28. That in case of **Sarbananda Sonowal v. Union of India AIR 2005 SC 2920** reference has been made by the Apex court to Article 13 of the International Covenant of 1966 on Civil and

Political Rights and it was held that this Article provides that an alien lawfully in the territory of a State party to the Covenant may be expelled only pursuant to a decision reached by law, and except where compelling reasons of national security otherwise require, is to be allowed to submit the reasons against his expulsion and to have his case reviewed by and to be represented for the purpose before the competent authority.

29. That the Hon'ble Supreme Court in **Paramanda Katara v. Union of India AIR 1989 SC 2039** held that "*preservation of life is of utmost importance, because if one's life is lost, the status quo ante cannot be restored as resurrection is beyond the capacity of man*". Therefore, 'Right to life' is a basic and inalienable right of man which shall not be subjected to unwarranted hazards."
30. That the Petitioner has preferred the present writ petition on the following amongst other grounds

## **GROUND**

- A. Because the Petitioner is a 44 year old German national, who is severely, mentally and physically ill and is suffering from multiple health issues such as Infantile Cerebral Palsy (ICP) since birth; Chronic Anxiety and Depression; Post-Traumatic Stress Disorder (PTSD); severely compromised motor skills, and a

suppressed immune system along with 70% physical and mental disability; Seizures; Social phobia; Chronic Williams Syndrome (It is a rare genetic disorder characterized by growth delays before and after birth, short stature and a varying degree of mental deficiency); Cerebral and Cerebellar atrophy (it is the loss of brain cells called neurons, resulting into brain damage, stroke, Alzheimer etc.); Chronic Fatigue syndrome as a result of his Infantile Cerebral Palsy (ICP) along with exhaustion; Spasticity; Recurrent colds, especially in winter; Occasional sore throat; Increased sweating and occasional hot flashes.

- B.** Because the Petitioner has been undergoing regular treatment and examinations with doctors and AYUSH practitioners, both in India as well as in his home country and he finds it psychologically comfortable and peaceful to stay in India. Moreover, he has been suggested to make arrangements for a longer stay in India, as he requires life-long treatment and supervision in order to gain any benefit from the undermentioned treatments and therapies.
  
- C.** Because the Petitioner is undergoing Hemp oil treatment along with Hatha Yoga and Kundalini Yoga under the guidance of Dr. Ananda Balayogi. The above-mentioned therapies and treatments take time and need to be continued for a longer period of time under regular supervision to show benefits.



- D.** Because the Petitioner is a bonafide law abiding citizen of Germany and has regularly visited India, a total of 8 times, since January 2015, on various types of valid entry visa wherein he has duly complied with all the visa regulations, adhered to the laws of our country and has never overstayed the duration granted by visa even by a single minute.
- E.** Because the Petitioner duly submitted his application for registration of foreigners in India and visa extension on 29.06.2020 and 02.07.2020 respectively, before the expiry of his visa i.e., 08.07.2020, which remained pending for more than 3.5 months. Furthermore, the Petitioner was requested a personal meeting on 17.11.2020, wherein both the applications of the Petitioner were summarily rejected by the FRRO Puducherry, without proper perusal of the medical records of the Petitioner or giving due weightage to his critical medical condition and thereafter he was served with an exit permit dated 07.12.2020 and asked to leave India on or before 22.12.2020.
- F.** Because on 08.12.2020 Austrian Government announced/extended the ongoing lockdown in their country till 10.01.2021. Additionally, Germany also announced on 14.12.2020 regarding imposing lockdown in the country from 16.12.2020 to 10.01.2021. Furthermore, since India has 2<sup>nd</sup> highest no. of Covid-19 cases reaching till 10,056,248, therefore the European nations will not be in favour of allowing any person

travelling from India to enter their boundaries, in order to effectively reduce and control the rising no. of cases in their respective territory.

- G.** Because due to the increasing number of Covid-19 cases, Germany has announced a ban on flights from UK and looking at the current situation of India, any travelers from India would have to undergo a mandatory quarantine which would be extremely risky and hazardous for the Petitioner's mental and physical health.
- H.** Because Covid-19 virus is proving to be fatal, especially to the elderly people or people with already existing diseases. Since the virus can be easily spread through air, being in close proximity with an infected person and further could be transmitted through liquids/water, and passed on by coming in contact with surfaces infected with the same. Hence, the Petitioner, due to his suppressed and weak immune system has a high susceptibility to infections and therefore, any travel during the Covid-19 pandemic, puts him at a higher risk of being infected by the Coronavirus and a far greater risk of mortality.
- I.** That the Respondent No. 3 has not provided any reason or grounds on the basis of which the visa extension and foreigner registration application of the Petitioner were rejected and he was issued an exit permit without any consideration to the physical

and mental ailments being suffered by the Plaintiff, during such a precarious and perilous situation.

- J.** Because this Hon'ble High Court in its judgement in the case of **Mohammad Sediq vs. Union of India & Ors, 1998 (47) DRJ 74**, the Hon'ble Delhi High Court has held that, "*Our constitution confers certain rights on every human being and certain other rights on the citizens alone. Every person, whether he is a citizen or not, is entitled to equality before the law and equal protection of the laws. As such, no person can be deprived of his life or personal liberty except according to the procedure established by law.*"
- K.** Because the Hon'ble Supreme Court in **Hans Muller of Nurenberg v. Superintendent, Presidency Jail, Calcutta and Ors. AIR 1955 SC 367** held that Article 21 guarantees Protection of Right to Life and Liberty to citizens and foreigners alike, and that no person can be deprived of his personal liberty except according to the procedure established by law.
- L.** Because the Hon'ble Apex court has held in case of **Mr. Louis De Raedt & Ors vs Union of India And Ors 1991 AIR 1886** that the fundamental right of the foreigner is confined to Article 21 for life and liberty. Furthermore, in case of **People's Union for Civil Liberties v. Union of India (1997) 1 SCC 301** the Supreme Court has held that Article 21 of the Constitution of India in relation to human rights has to be interpreted in

conformity with international law. It has also been held in case of **State of Punjab v. Mohinder Singh Chawla (1997) 2 SCC 83** that the right to health is integral to the right to life and the government has a constitutional obligation to provide health facilities.

- M. Because in case of **C.E.S.C. Limited and Ors. vs. Subhash Chandra Bose and Ors (AIR 1992 SC 573)** the Hon'ble Apex Court had made a reference to Article 22 to 25 of UDHR and concluded that right to health is a fundamental right.
  
- N. Because the Hon'ble Supreme Court in **Paramanda Katara v. Union of India AIR 1989 SC 2039** held that *“preservation of life is of utmost importance, because if one's life is lost, the status quo ante cannot be restored as resurrection is beyond the capacity of man”. Therefore, ‘Right to life’ is a basic and inalienable right of man which shall not be subjected to unwarranted hazards.”*
  
- O. Because in **Sarbananda Sonowal v. Union of India AIR 2005 SC 2920** reference has been made by the Apex court and to Article 13 of the International Covenant of 1966 on Civil and Political Rights and it was held that this Article provides that an alien lawfully in the territory of a State party to the Covenant may be expelled only pursuant to a decision reached by law, and except where compelling reasons of national security otherwise require, is to be allowed to submit the reasons against his

expulsion and to have his case reviewed by and to be represented for the purpose before the competent authority.

- P.** Because India is a signatory Universal Declaration of Human Rights (UDHR) and is a party the International Covenant on Civil and Political Rights (ICCPR) and the International Covenant on Economic, Social and Cultural Rights (ICESCR). Article 9 – 12 of ICESCR mandates right to health and since India has ratified this Covenant on 10th April 1979, hence it became obligated to take measures to assure health and healthcare (among others) as a right.
- Q.** Because it has been held through various judgements of the Hon'ble Supreme Court of India and judgements of this Hon'ble court that fundamental right of a foreigner in India is confined to Article 21 of the constitution and right to health is an integral part of right to life guaranteed under Article 21.
- R.** Because the intervention of this Hon'ble court is expedient in the interest of justice in order safeguard the life of the Petitioner and prevent him from being exposed to potentially fatal circumstances.

Therefore, it is the humble submission of the Petitioner that if he is forced to leave India on 22.12.2020 or deported, considering his physical and mental situation, it would be extremely dangerous and

would put him at a higher risk of getting infected by the virus thereby endangering his life.

### **PRAYER**

In lights of the facts and circumstances stated hereinabove the Petitioner most respectfully prays that this Hon'ble Court may graciously be pleased to :

- i. Issue a Writ of Certiorari or any other appropriate writ, order or directions, thereby granting stay on the Exit permit dated 07.12.2020 and/or quashing or setting aside the exit permit.
- ii. Issue a Writ of Mandamus or any other appropriate writ, order or directions, thereby directing the Respondent, to extend the visa of the Petitioner, on exceptional medical grounds considering his physical and mental condition, in the interest of justice.
- iii. Issue any other writ, order or direction as this Hon'ble Court may deem fit and proper under the facts and circumstances of this case, in the interest of justice.

AND FOR THIS ACT OF KINDNESS PETITIONER IS IN DUTY BOUND SHALL EVER PRAY.

**PETITIONER**

THROUGH

**COUNSELS FOR THE PETITIONER**

**PRAKHAR DIXIT & SIDDHARTH KUMAR SINGH**

PLACE: NEW DELHI

DATE: 23.12.2020