

**IN THE HIGH COURT OF ANDHRA PRADESH
AT AMARAVATHI**

(Rule-4(e) the High Court of Andhra Pradesh at Amaravati Public Interest Litigation
Rules, 2015)

WP(PIL).No.

OF 2020

Between:

Chintha Venkateswarlu, Aged 58 years, Retired Railway Employee, Caste-Schedule Caste Mala, S/o Krishna Murthy, D-No-69-2-28/A, Ambedkar Nagar, NSM Public School Back Side, Patamata, Vijayawada Urban, Krishna Dist, Andhra Pradesh, Pin-520010, State Bank of India, Bank Account Number:11349322396, Railway Colony Branch, Guntupalli, Krishna Dist, PAN.No.ADLPC7460J-Mailid-chinthavenkateswarlu@gmail.com, Mobile: 9441 251800.

.....Petitioner

AND

1. The State of Andhra Pradesh, Rep by it's Principal Secretary (Home Dept) Secretariat Buildings, At Amaravathi, Guntur dist, Andhra Pradesh.
2. The Director General of Police, Mangalagiri, Andhra Pradesh 522502.
3. The Commissioner of Police, Visakhapatnam, Andhra Pradesh.

....Respondents

AFFIDAVIT

I Chintha Venkateswarlu, Aged 58 years, Retired Railway Employee, Caste-Schedule Caste Mala, S/o Krishna Murthy, D-No-69-2-28/A, Ambedkar Nagar, NSM Public School Back Side, Patamata, Vijayawada Urban, Krishna Dist, Andhra Pradesh, Pin-520010, State Bank of India, Bank Account Number : 11349322396, Railway Colony Branch, Guntupalli, Krishna Dist, PAN.No.ADLPC7460J- Mailid-chinthavenkateswarlu@gmail.com, Mobile: 9441251800, do hereby solemnly and sincerely affirm and state as follows:

1. Particulars of the Cause/Order against which the petition is made:

Subject Matter in Brief:

1. The petitioner respectfully submits that, the present Writ Petition is filed as Public Interest Litigation, challenging the brutal action of the respondent no 3 in dealing with the doctor who is in noble profession as he was being dragged towards the roads and tie his hands with ropes in a most brutal manner and taken him to the police station. The action of the respondents in dealing with a person who is a doctor is highly condemn and violations of human rights. It is further submitted that the action of the respondent police in taking him to police station in most uncivilized manner and roaming him over roads when thousands of peoples are witnessing. It is

respectfully submit that the incident was occurred on 16.05.2020 at Visakhapatnam and telecasted in all Television Channels as well in National Media too.

2. It is respectfully submits that the government with a pre motive of harassing the doctor behaved in most un-democratically and degrades the professional dignity of the doctors. It is respectfully submits that the respondent authorities have ulterior motive of taking away the dignity of the doctor violated the fundamental right of dignity and dragged him like an animal in roads which the civilized society feels ashamed. The background of the issue is for your honours kind knowledge, when the masks and other fighting equipments are scared in Narsipatnam (PMC) Primary Health Center) the duty doctor who was in-charge raised his voice against the government and spoken in such a manner and made constructive suggestions. The doctor made certain remarks that due to scarcity of masks even to the doctors treating the COVID-19 patients are unable to perform their duties effectively and make specific remark that every Minister and MLA are using N95 Mask. He further asserted that the government is not even thinking of providing of N95 Masks to the Doctors who direly required in treating CORANA patients. The statements made by him are neither questioning the government functioning nor made any specific remark over his higher official.

3. It is respectfully submit that the person who is duty doctor is responsible in looking after the patient's welfare and he is having every authority in making certain recommendations for providing better treatment to the patients. The person who used to provide his services as Anaesthesia in the particular hospital and N95 masks are very much essential to the Anaesthesian doctors. The doctor who is humiliated in the subject matter is a person who is responsible for his personal life as well to the patients who came for treatment. It is further submitted that when the doctor made certain assertions, the government took the issue very seriously and without issuing any show cause notice suspending him unilaterally. Immediately after suspension the doctor tendered his apology and requested the authorities to take back him into service and reiterated that he never intended to make any criticism against the government and in order to bring the requirements of the Hospital me made constructive suggestions which the government and authorities took in to different way. It is further submitted that the doctor made his open statement and tendered his apology but of no use.

4. The petitioner respectfully submit that taking advantage of the situation the police authorities crated a story when the doctor was faced in Visakhaptanam make him to semi naked duly tide his hands with ropes taken him over streets. The action of the respondent is highly condemnable and brutal one. The respondent police action is nothing but violation of Art 21 and 19 of the Constitution of India. The Constitution has provided certain rights even to the accused and even he is an

accused his dignity shall not be violated. In the case of D K Basu Vs State of West Bengal reported in 1997 (1) SCC 416 Hon'ble Apex Court issued certain directions to the police to follow even in the case of arrest of a person.

[36] We, therefore, consider it appropriate to issue the following requirements to be followed in all cases of arrest or detention till legal provisions are made in that behalf as preventive measures :

(1) The police personnel carrying out the arrest and handling the interrogation of the arrestee should bear accurate, visible and clear identification and name-tags with their designations. The particulars of all such police personnel who handle interrogation of the arrestee must be recorded in a register.

(2) That the police officer carrying out the arrest of the arrestee shall prepare a memo of arrest at the time of arrest and such memo shall be attested by at least one witness, who may be either a member of the family of the arrestee or a respectable person of the locality from where the arrest is made. It shall also be countersigned by the arrestee and shall contain the time and date of arrest.

(3) A person who has been arrested or detained and is being held in custody in a police station or interrogation centre or other lock-up, shall be entitled to have one friend or relative or other person known to him or having interest in his welfare being informed, as soon as practicable, that he has been arrested and is being detained at the particular place, unless the attesting witness of the memo of arrest is himself such a friend or a relative of the arrestee.

(4) The time, place of arrest and venue of custody of an arrestee must be notified by the police where the next friend or relative of the arrestee lives outside the district or town through the Legal Aid Organisation in the District and the police station of the area concerned telegraphically within a period of 8 to 12 hours after the arrest.

(5) The person arrested must be made aware of this right to have someone informed of his arrest or detention as soon as he is put under arrest or is detained.

(6) An entry must be made in the diary at the place of detention regarding the arrest of the person which shall also disclose the name of the next friend of the person who has been informed of the arrest and the names and particulars of the police officials in whose custody the arrestee is.

(7) The arrestee should, where he so requests, be also examined at the time of his arrest and major and minor injuries, if any, present on his/her body, must be recorded at that time. The "Inspection Memo" must be signed both by the arrestee and the police officer effecting the arrest and its copy provided to the arrestee.

(8) The arrestee should be subjected to medical examination by a trained doctor every 48 hours during his detention in custody by a doctor on the panel of approved doctors appointed by Director, Health Services of the concerned State or Union Territory. Director, Health Services should prepare such a panel for all Tehsils and Districts as well.

(9) Copies of all the documents including the memo of arrest, referred to above, should be sent to the illaqa Magistrate for his record.

(10) The arrestee may be permitted to meet his lawyer during interrogation, though not throughout the interrogation.

(11) A police control room should be provided at all district and State headquarters, where information regarding the arrest and the place of custody of the arrestee shall be communicated by the officer causing the arrest, within 12 hours of effecting the arrest and at the police control room it should be displayed on a conspicuous police board.

5. It is respectfully submit that even the arrested person's rights have been protected in Criminal Procedure Code and under the Constitution. As per the directions of the Hon'ble Supreme Court the accused person shall be treated with dignity and his right to life shall not be violated. In the present case in hand the doctor who raised irregularities for better society not for insulting either the government or the authorities. He utilized his freedom of speech being a doctor who extending his services over the hospital. Instead of taking it constructive suggestions the authorities with a mala fide intention put personal grudge over him and hatched a plan to take away his life. It is further submitted that the respondent authorities further cooked up story that the doctor is mentally disturbed and druggist and lost his mental balance. It is further submitted that till March-end the doctor had been continued in the duties and he was allowed to treat patients. The plea of the respondent authorities is nothing but culpable story and no truth. In order to degrade his image the respondent authorities created a story and dragged him in most inhumanly even respecting the person who in their hands is doctor. It is respectfully submit that the doctor is having good track records as petitioner's knowledge and he belong to Schedule Caste.

6. Therefore, taking the serious of the issue the petitioner respectfully submit that the respondent police violated the directions of Hon'ble Apex Court issued in the above case and the action of the police is nothing but attacking on the human rights and an high level judicial enquiry may be order to take action against the erring police officer who committed the crime.

II. Particulars of the Petitioner:

I, Chintha Venkateswarlu, Aged 58 years, Retired Railway Employee, Caste-Schedule Caste Mala, S/o Krishna Murthy, D-No-69-2-28/A, Ambedkar Nagar, NSM Public School Back Side, Patamata, Vijayawada Urban, Krishna Dist, Andhra Pradesh, Pin-520010, State Bank of India, Bank Account Number:11349322396, Railway Colony Branch, Guntupalli, KrishnaDist,PAN.No.ADLPC7460J-Mailid chinthavenkateswarlu@gmail.com, Mobile: 94412 51800.

The petitioner humbly submits to the Hon'ble Court that, I am the petitioner in in the present case and retired Railway Employee. The petitioner filed the present petition in the interest of public at large as the respodnent police violated the directions of the **Hon'ble Apex Court in the case of D K Basu Vs State of West Bengal reported in 1997 (1) SCC 416** and violated the human rights of doctor who belong most respectable profession. The doctor who was humiliated in the hands of the police is belongs to Schedule Caste and having good track record in his professional life. Therefore, the petitioner being a dalit leader having public spiritual person filed the present public interest litigation challenging the action of the

respondent.

2. LOCUS STANDI OF THE PETITIONER :

The petitioner humbly submit to the Hon'ble Court that, the PIL is filed purely on Public Interst Litigation and no other oblique motive. The petitioner is a registred electrol voter of Andhra Pradesh, and retired railway ememployee having tremundress thrust in addressing irregularties in the society excepiacelly in the down trodeen community. It is further submitted that the petitioner is running NGO in the name and style if Samatha Seva Samithi which is cultural as well social organization aimed to uplift the lives of SC's as well ST's people who are living in pathatic conditions in the society. Hence, in the interest of public at large, the present public interest litigation is filed.

3. Declaration and understanding of the Petitioner:

I, Chintha Venkateswarlu, Aged 58 years, Retired Railway Employee, Caste-Schedule Caste Mala, S/o Krishna Murthy, D-No-69-2-28/A, Ambedkar Nagar, NSM Public School Back Side, Patamata, Vijayawada Urban, Krishna Dist, Andhra Pradesh, Pin-520010, State Bank of India, Bank Account Number:11349322396, Railway Colony Branch, Guntupalli, Krishna Dist, PAN.No.ADLPC7460J- Mailid-chinthavenkateswarlu@gmail.com, Mobile: 94412 51800.

The petitioner respectfully submits that, the present Writ Petition is filed as Public Interest Litigation, challenging the brutal action of the respondent no 3 in dealing with the doctor who is in noble profession as he was being dragged towards the roads and tide his hands with ropes in a most brutal manner and taken him to the police station. The action of the respondents in dealing with a person who is a doctor is highly condemn and violations of human rights. It is further submitted that the action of the respondent police in taking him to police station in most uncivilized manner and roaming him over roads when thousands of peoples are witnessing. It is respectfully submit that the incident was occurred on 16.05.2020 at Visakhapatnam and telecasted in all Television Channels as well in National Media too.

- b. I respectfully state that I have never faced contempt of court proceedings.
- c. I respectfully state that I have never ordered by any court not to file any further WP(PIL) case.
- d. I respectfully submit that the petitioner has not been involved in any other civil, revenue, criminal litigation before any court or tribunal.
- e. I respectfully submit that the present petition is being filed by way of Public Interest Litigation and the petitioner does not have any personal interest in the

matter. The petition is being filed in the interest of public at large as the respondents are taking advantage of their unquestionable power direly ignoring the rules framed under Fisheries.

- f. I respectfully submit that the petitioner is an advocate and filed the present Public Interest Litigation. I borne the entire litigation cost. My PAN Card Number: ADLPC7460J.
- g. I respectfully declare that the petition is filed purely in public interest and not at the instance of any person other than the petitioner herein.
- h. I respectfully submit that a thorough research has been conducted in the matter raised through this petition and all the material in respect of such research shall be annexed with the petition.
- i. I respectfully submit that to the best of my knowledge and research, the issue raised was not dealt with or decided and that a similar or identical petition is not filed earlier by me.
- j. I respectfully declare that I have taken all reasonable care to gather information before making such a statement.
- k. I respectfully submit that the petitioner herein has understood that in the course of hearing of this petition the court may require any security to be furnished towards costs or any other charges and I shall comply with such requirements.

4. FACTS IN BRIEF, CONSISTING THE CAUSE

1. The petitioner respectfully submits that, the present Writ Petition is filed as Public Interest Litigation, challenging the brutal action of the respondent no 3 in dealing with the doctor who is in noble profession as he was being dragged towards the roads and tide his hands with ropes in a most brutal manner and taken him to the police station. The action of the respondents in dealing with a person who is a doctor is highly condemn and violations of human rights. It is further submitted that the action of the respondent police in taking him to police station in most uncivilized manner and roaming him over roads when thousands of peoples are witnessing. It is respectfully submit that the incident was occurred on 16.05.2020 at Visakhapatnam and telecasted in all Television Channels as well in National Media too.

2. It is respectfully submits that the government with a pre motive of harassing the doctor behaved in most un-democratically and degrades the professional dignity of the doctors. It is respectfully submits that the respondent authorities have ulterior motive of taking away the dignity of the doctor violated the fundamental right of

dignity and dragged him like an animal in roads which the civilized society feels ashamed. The background of the issue is for your honours kind knowledge, when the masks and other fighting equipments are scarce in Narsipatnam PMC) Primary Health Center) the duty doctor who was in-charge raised his voice against the government and spoken in such a manner and made constructive suggestions. The doctor made certain remarks that due to scarcity of masks even to the doctors treating the COVID-19 patients are unable to perform their duties effectively and make specific remark that every Minister and MLA are using N95 Mask. He further asserted that the government is not even thinking of providing of N95 Masks to the Doctors who direly required in treating CORONA patients. The statements made by him are neither questioning the government functioning nor made any specific remark over his higher official.

3. It is respectfully submit that the person who is duty doctor is responsible in looking after the patient's welfare and he is having every authority in making certain recommendations for providing better treatment to the patients. The person who used to provide his services as anaesthesia in the particular hospital and N95 masks are very much essential to the anaesthesian doctors. The doctor who is humiliated in the subject matter is a person who is responsible for his personal life as well to the patients who came for treatment. It is further submitted that when the doctor made certain assertions, the government took the issue very seriously and without issuing any show cause notice suspending him unilaterally. Immediately after suspension the doctor tendered his apology and requested the authorities to take back him into service and reiterated that he never intended to make any criticism against the government and in order to bring the requirements of the Hospital he made constructive suggestions which the government and authorities took in to different way. It is further submitted that the doctor made his open statement and tendered his apology but of no use.

4. The petitioner respectfully submit that taking advantage of the situation the police authorities created a story when the doctor was faced in Visakhapatnam make him to semi naked duly tie his hands with ropes taken him over streets. The action of the respondent is highly condemnable and brutal one. The respondent police action is nothing but violation of Art 21 and 19 of the Constitution of India. The Constitution has provided certain rights even to the accused and even he is an accused his dignity shall not be violated. In the case of **D K Basu Vs State of West Bengal** reported in 1997 (1) SCC 416 Hon'ble Apex Court issued certain directions to the police to follow even in the case of arrest of a person.

5. It is respectfully submit that even the arrested person's rights have been protected in Criminal Procedure Code and under the Constitution. As per the directions of the Hon'ble Supreme Court the accused person shall be treated with

dignity and his right to life shall not be violated. In the present case in hand the doctor who raised irregularities for better society not for insulting either the government or the authorities. He utilized his freedom of speech being a doctor who extending his services over the hospital. Instead of taking it constructive suggestions the authorities with a mala fide intention put personal grudge over him and hatched a plan to take away his life. It is further submitted that the respondent authorities further cooked up story that the doctor is mentally disturbed and druggist and lost his mental balance. It is further submitted that till March-end the doctor had been continued in the duties and he was allowed to treat patients. The plea of the respondent authorities is nothing but culpable story and no truth. In order to degrade his image the respondent authorities created a story and dragged him in most inhumanly even respecting the person who in their hands is doctor. It is respectfully submit that the doctor is having good track records as petitioner's knowledge and he belong to Schedule Caste.

6. Therefore, taking the serious of the issue the petitioner respectfully submit that the respondent police violated the directions of Hon'ble Apex Court issued in the above case and the action of the police is nothing but attacking on the human rights and an high level judicial enquiry may be order to take action against the erring police officer who committed the crime.

5. SOURCE OF INFORMATION

I respectfully submit that the source of information of the facts pleaded in the petition is gathered through information from various News Channel and Newspaper Articles. I have verified the facts personally by perusing the financial entries obtained through children.

6. NATURE AND INJURY CAUSED/ APREHENDED

The petitioner respectfully submits that the Act of respondents in treating the doctor who belong to schedule community is nothing but insult to the entire people who belong to modern society people. The Doctor profession must be respected with dignity and at this juncture no one else are saving our lives except the doctors. At this PANDAMIC- 19 situation the doctor who made constructive suggestions to overcome the situation have been taken drawn adverse inference and suspended him without having any justification. The act of respondent police in behaving with the person who belong to Nobel profession would certainly weaken the confidence of the doctor's community and it would create panic situation over them. Now the world is facing ever witnesses PANDAMIC-2019 due to CORONA and the doctors are real Gods to save this world at this extremious situation. The act of police would certainly degrade the doctor's confidence and morality towards the society if such thing is

happen, lakhs of people would be put under threat of life. These kinds of inhuman acts of the police would diminish the morality of doctors and caused severe mental agony. The respondent police without following the Hon'ble Apex court guidelines behaved most inhumanly and the act is nothing but gross violation of human rights.

7. Any representation Made

I respectfully submit that the petitioner did not made any representation since he questioned the mere action of the police.

8. Delay if any

It is respectfully submits that, the petitioner did not made any delay in filing the present petition.

9. Documents Relied Upon

The petitioner relied on the Videos and Photographs.

10. I respectfully submit that the petitioner did not have alternative remedy except to approach this Hon'ble Court for relief under Article 226 of the Constitution of India.

11. I hereby affirm and state on oath the following:

That the petitioner have no personal interest in the subject matter of the writ petition (P.I.L.).

That I declare that the petition is filed purely in Public interest and not at the instance of any person or organization other the petitioner herein.

That I have conducted thorough research in the matter raised through the petition. (All the relevant material in respect of my research is annexed with the petition)

That I hereby undertake to pay exemplary costs or compensatory damages as directed by this Hon'ble Court in the event of contrary findings upon the adjudication by this Hon'ble Court that the writ petition is filed for extraneous/ personal consideration or with an oblique motive.

12. Relief(s) prayed for

The Hon'ble court may be pleased to issue an appropriate Writ, order, or direction more particularly one in the nature of Mandamus, declaring the brutal action of the respondent No 3 in dealing with the doctor who is in noble profession as he was being dragged towards the roads and tide his hands with ropes in a most brutal

manner and taken him to the police station, duly violating his personal rights as well human rights in most uncivilized manner when thousands of peoples are witnessing on 16.05.2020 and the act of respondents as illegal, arbitrary and violation of principles of natural justice and also Article 14, 19 and 300-A of the Constitution of India and consequently to constitute a high level Judicial committee in enquiring about the issue and pass such other order or orders as the Hon'ble Court may deemed fit and proper in the circumstances of the case.

13. Interim prayer :-

The Hon'ble Court may be pleased to issue an appropriate interim directions to the Respondent No. 1 and 2 to take immediate disciplinary action against the erring police officers who are responsible for the brutal act occurred on 16.05.2020 as the action of the respondent no 3 and his sub-ordinates are nothing but violation of the directions of Hon'ble Apex court issued in the case of **K Basu Vs State of West Bengal reported in 1997 (1) SCC 416** in time bound manner pending disposal of the above writ petition pass such other order or orders may deemed fit and proper in the circumstances of the case.

14. Caveat

I submit that I have not received any notice lodging a caveat by the opposite party.

Solemnly and sincerely affirm this
the day of 16/05/2020
and signed his name in my presence.

Deponent

BEFORE ME

ADVOCATE//AMARAVATI

VERIFICATION

I, Chintha Venkateswarlu, Aged 58 years, Retired Railway Employee, Caste-Schedule Caste Mala, S/o Krishna Murthy, D-No-69-2-28/A, Ambedkar Nagar, NSM Public School Back Side, Patamata, Vijayawada Urban, Krishna Dist, Andhra Pradesh, Pin-520010, State Bank of India, Bank Account Number:11349322396, Railway Colony Branch, Guntupalli, Krishna Dist, PAN.No.ADLPC7460J- Mailid-chinthavenkateswarlu@gmail.com, Mobile: 944 1251800., do hereby on solemnly affirmation state and declare that what is stated in the paragraph 1 to 7 are true to the best of my knowledge, belief and information, and other paras and the prayers sought are as per legal parameters which I believe to be true and correct and I have not suppressed any material facts. Hence, verified on this the 16.05.2020.

Verified in my presence at vijayawada on 16.05.2020.

Advocate

Deponent

Annexure-5

IN THE HIGH COURT OF ANDHRA PRADESH AT AMARAVATHI

(Rule-4(e) the High Court of Andhra Pradesh at Amaravati Public Interest Litigation Rules, 2015)

WP(PIL).NO.

OF 2020

Between:

Chintha Venkateswarlu, Aged 58 years, Retired Railway Employee, Caste-Schedule Caste Mala, S/o Krishna Murthy, D-No-69-2-28/A, Ambedkar Nagar, NSM Public School Back Side, Patamata, Vijayawada Urban, Krishna Dist, Andhra Pradesh, Pin-520010, State Bank of India, Bank Account Number:11349322396, Railway Colony Branch, Guntupalli, Krishna Dist, PAN.No.ADLPC7460J-Mailid-chinthavenkateswarlu@gmail.com, Mobile: 9441 251800.

.....Petitioner

AND

1. The State of Andhra Pradesh, Rep by it's Principal Secretary (Home Dept) Secretariat Buildings, At Amaravathi, Guntur dist, Andhra Pradesh.
2. The Director General of Police, Mangalagiri, Andhra Pradesh 522502.
3. The Commissioner of Police, Visakhapatnam, Andhra Pradesh.

....Respondents

AFFIDAVIT FILED UNDER RULE 5 OF PIL RULES-2015

I, Chintha Venkateswarlu, Aged 58 years, Retired Railway Employee, Caste-Schedule Caste Mala, S/o Krishna Murthy, D-No-69-2-28/A, Ambedkar Nagar, NSM Public School Back Side, Patamata, Vijayawada Urban, Krishna Dist, Andhra Pradesh, Pin-520010, State Bank of India, Bank Account Number:11349322396, Railway Colony Branch, Guntupalli, Krishna Dist, PAN.No.ADLPC7460J- Mailid-chinthavenkateswarlu@gmail.com, Mobile: 94412 51800.

1. I am the Petitioner herein and as such I am well acquainted with the facts of the case.
2. I state that my mail ID, mobile number, Aadhar number, Bank Account, PAN number and my address and all particulars furnished in the above cause title is true and correct.
3. I am herewith annexing copies of Aadhar Card, Bank Account, PAN Card towards my identity and address proof as required under Rule-5(b) of the PIL Rules, 2105.
4. I submit that I did not face contempt of court proceedings under the Contempt of Courts Act, 1971.
5. I have not been ordered by this Hon'ble Court or any other court not to file Public Interest Litigation Cases.
6. I submit that I have not involved in a civil, criminal and revenue cases.
7. I am not a party in pending civil or criminal cases that has a nexus with the subject matter of the above public interest litigation case.

Solemnly and sincerely affirm this
the day of 16/05/2020
and signed his name in my presence.

Deponent

BEFORE ME

ADVOCATE :: Vijayawada

VERIFICATION

I, Chintha Venkateswarlu, Aged 58 years, Retired Railway Employee, Caste-Schedule Caste Mala, S/o Krishna Murthy, D-No-69-2-28/A, Ambedkar Nagar, NSM Public School Back Side, Patamata, Vijayawada Urban, Krishna Dist, Andhra Pradesh, Pin-520010, State Bank of India, Bank Account Number:11349322396, Railway Colony Branch, Guntupalli, Krishna Dist, PAN.No.ADLPC7460J-Mailid-chinthavenkateswarlu@gmail.com, Mobile: 94412 5180, I, being do hereby solemnly affirm and sincerely state that what are stated in the paragraphs are true to my own knowlwdge and belief and what is stated in the paragraphs are based on the information available in official website of GoAP and paper clippings which I believe to be true and correct.

Advocate

Deponent

IN THE HIGH COURT OF ANDHRA PRADESH ATY AMARAVTHI

(Rule-4(e) the High Court of Andhra Pradesh at Amaravati Public Interest Litigation Rules, 2015)

WP(PIL).NO.

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1. The State of Andhra Pradesh, Rep by it's Principal Secretary (Home Dept) Secretariat Buildings, At Amaravathi, Guntur dist, Andhra Pradesh.
2. The Director General of Police, Mangalagiri, Andhra Pradesh 522502.
3. The Commissioner of Police, Visakhapatnam, Andhra Pradesh.

....Respondents

DECLARATION UNDER RULE 6 OF PIL RULES-2015

I, Chintha Venkateswarlu, Aged 58 years, Retired Railway Employee, Caste-Schedule Caste Mala, S/o Krishna Murthy, D-No-69-2-28/A, Ambedkar Nagar, NSM Public School Back Side, Patamata, Vijayawada Urban, Krishna Dist, Andhra Pradesh, Pin-520010, State Bank of India, Bank Account Number:11349322396, Railway Colony Branch, Guntupalli, Krishna Dist, PAN.No.ADLPC7460J-Mailid-chinthavenkateswarlu@gmail.com, Mobile: 94412 51800 do hereby solemnly affirm and state on oath and declare that the Writ Petition is being insituted purely in public Interest and not at the instance of any other person or organization other than the Petitioner.

Solemnly and sincerely affirm this
the day of 16/05/2020

and signed his name in my presence.

Deponent

BEFORE ME

ADVOCATE :: Vijayawada

VERIFICATION

I, Chintha Venkateswarlu, Aged 58 years, Retired Railway Employee, Caste-Schedule Caste Mala, S/o Krishna Murthy, D-No-69-2-28/A, Ambedkar Nagar, NSM Public School Back Side, Patamata, Vijayawada Urban, Krishna Dist, Andhra Pradesh, Pin-520010, State Bank of India, Bank Account Number:11349322396, Railway Colony Branch, Guntupalli, Krishna Dist, PAN.No.ADLPC7460J-Mailid-chinthavenkateswarlu@gmail.com, Mobile: 94412 51800, I, being do hereby solemnly affirm and state on oath that the Petitioner herein have no personal interest in the above subject matter of his petition. The petitioner hereby undertakes to pay exemplary costs and or compensatory damages as directed by the Court that the Writ Petition is filed for extraneous/personal considerations or with an oblique motive.

Solemnly and sincerely affirm this
the day of 16/05/2020

Petitioner

and signed his name in my presence.

Annesure-7A

IN THE HIGH COURT OF ANDHRA PRADESH AT AMARAVATHI
(Rule-4(e) the High Court of Andhra Pradesh at Amaravati Public Interest Litigation
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AND

1. The State of Andhra Pradesh, Rep by it's Principal Secretary (Home Dept)
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2. The Director General of Police, Mangalagiri, Andhra Pradesh 522502.
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....Respondents

AFFIDAVIT FILED UNDER RULE 7A OF WRIT PROCEEDINGS RULES-2015

I Chinth Venkateswarlu, Aged 58 years, Retired Railway Employee, Caste-Schedule Caste Mala, S/o Krishna Murthy, D-No-69-2-28/A, Ambedkar Nagar, NSM Public School Back Side, Patamata, Vijayawada Urban, Krishna Dist, Andhra Pradesh, Pin-520010, State Bank of India, Bank Account Number:11349322396, Railway Colony Branch, Guntupalli, Krishna Dist, PAN.No.ADLPC7460J-Mailid-chinthavenkateswarlu@gmail.com, Mobile: 94412 51800, I hereby affirm and state on oath that the Petitioner herein have no personal interest in the above subject matter of his petition. The petitioner hereby undertakes to pay exemplary costs and or compensatory damages as directed by the Court that the Writ Petition is filed for extraneous/personal considerations or with an oblique motive.

Solemnly and sincerely affirm this
the day of 16/05/2020
and signed his name in my presence.

Deponent

BEFORE ME

ADVOCATE :: vijayawada

VERIFICATION

I, Chinth Venkateswarlu, Aged 58 years, Retired Railway Employee, Caste-Schedule Caste Mala, S/o Krishna Murthy, D-No-69-2-28/A, Ambedkar Nagar, NSM Public School Back Side, Patamata, Vijayawada Urban, Krishna Dist, Andhra Pradesh, Pin-520010, State Bank of India, Bank Account Number:11349322396, Railway Colony Branch, Guntupalli, Krishna Dist, PAN.No.ADLPC7460J-Mailid-chinthavenkateswarlu@gmail.com, Mobile: 94412 51800, I, being do hereby solemnly affirm and state on oath that the Petitioner herein have no personal interest in the above subject matter of his petition. The petitioner hereby undertakes to pay exemplary costs and or compensatory damages as directed by the Court that the Writ Petition is filed for extraneous/personal considerations or with an oblique motive.

Verified at Vijayawada on this day 16/05/2020

Advocate

Deponent

Annexure-8

IN THE HIGH COURT OF ANDHRA PRADESH AT AMARAVATHI
(Rule-4(e) the High Court of Andhra Pradesh at Amaravati Public Interest Litigation
Rules, 2015)

WP(PIL).NO. OF 2020

Between:

Chintha Venkateswarlu, Aged 58 years, Retired Railway Employee, Caste-Schedule
Caste Mala, S/o Krishna Murthy, D-No-69-2-28/A, Ambedkar Nagar, NSM Public
School Back Side, Patamata, Vijayawada Urban, Krishna Dist, Andhra Pradesh, Pin-
520010, State Bank of India, Bank Account Number:11349322396, Railway Colony
Branch, Guntupalli, Krishna Dist, PAN.No.ADLPC7460J-Mailid-
chinthavenkateswarlu@gmail.com, Mobile: 9441 251800.

.....Petitioner

AND

1. The State of Andhra Pradesh, Rep by it's Principal Secretary (Home Dept)
Secretariat Buildings, At Amaravathi, Guntur dist, Andhra Pradesh.
2. The Director General of Police, Mangalagiri, Andhra Pradesh 522502.
3. The Commissioner of Police, Visakhapatnam, Andhra Pradesh.

....Respondents

**DECLARATION FILED UNDER RULE 8
OF THE PUBLIC INTEREST LITIGATION RULES, 2015**

I, Chintha Venkateswarlu, Aged 58 years, Retired Railway Employee, Caste-Schedule Caste Mala, S/o Krishna Murthy, D-No-69-2-28/A, Ambedkar Nagar, NSM Public School Back Side, Patamata, Vijayawada Urban, Krishna Dist, Andhra Pradesh, Pin-520010, State Bank of India, Bank Account Number:11349322396, Railway Colony Branch, Guntupalli, Krishna Dist, PAN.No.ADLPC7460J-Mailid-chinthavenkateswarlu@gmail.com, Mobile: 94412 51800., do hereby solemnly and sincerely affirm and declare that the questions made in the writ petition (PIL) has not been raised are agitated earlier and there are no other case/s or petition/s filed or that are pending before this Hon'ble Court or any other forum or court to the best of my knowledge, and belief.

Verified at Vijayawada on this day 16/05/2020

Advocate

Deponent

Annexure-10

IN THE HIGH COURT OF ANDHRA PRADESH AT AMARAVATHI
(Rule-4(e) the High Court of Andhra Pradesh at Amaravati Public Interest Litigation Rules, 2015)

WP(PIL).NO.

OF 2020

Between:

Chintha Venkateswarlu, Aged 58 years, Retired Railway Employee, Caste-Schedule Caste Mala, S/o Krishna Murthy, D-No-69-2-28/A, Ambedkar Nagar, NSM Public School Back Side, Patamata, Vijayawada Urban, Krishna Dist, Andhra Pradesh, Pin-520010, State Bank of India, Bank Account Number:11349322396, Railway Colony Branch, Guntupalli, Krishna Dist, PAN.No.ADLPC7460J-Mailid-chinthavenkateswarlu@gmail.com, Mobile: 9441 251800.

.....Petitioner

AND

1. The State of Andhra Pradesh, Rep by it's Principal Secretary (Home Dept) Secretariat Buildings, At Amaravathi, Guntur dist, Andhra Pradesh.
2. The Director General of Police, Mangalagiri, Andhra Pradesh 522502.
3. The Commissioner of Police, Visakhapatnam, Andhra Pradesh.

....Respondents

AFFIDAVIT FILED UNDER RULE 10 OF PIL RULES-2015

I, Chintha Venkateswarlu, Aged 58 years, Retired Railway Employee, Caste-Schedule Caste Mala, S/o Krishna Murthy, D-No-69-2-28/A, Ambedkar Nagar, NSM Public School Back Side, Patamata, Vijayawada Urban, Krishna Dist, Andhra Pradesh, Pin-520010, State Bank of India, Bank Account Number:11349322396, Railway Colony Branch, Guntupalli,Krishna Dist, PAN.No.ADLPC7460J-Mailid-chinthavenkateswarlu@gmail.com, Mobile: 94412 51800.

I hereby affirm and state on oath sincerely as follows:

1. I state that I do not have any personal gain or private motive or oblique reason in filing the above Wit Petition/PIL.
2. I hereby undertakes that I shall pay costs as may be ordered by this Hon'ble Court, in the event that this has been filed for extraneous reasons or that it lacks bonafides.
3. I state that all the information based on documents and Go's available on official website of GoAP and other source of information the petition is prepared. I undertakes to furnish any additional information as may be directed by this Hon'ble Court.
4. I undertakes that if I seek permission to withdraw the above Writ Petition or if I do not attend the hearing of the case. I shall bear the costs incurred by the respondent and any such additional costs imposed in the discretion of this Hon'ble Court.
5. I indertakes that in the event to withdraw the above Writ Petition, after the same is admitted, I shall do so only filing an appropriate petition and not by any other nethode except with the leave of this Hon'ble Court.

Solemnly and sincerely affirm this
the day of 16/05/2020
and signed his name in my presence.

Deponent

BEFORE ME

ADVOCATE :: Vijayawada

VERIFICATION STATEMENT

I, Chintha Venkateswarlu, Aged 58 years, Retired Railway Employee, Caste-Schedule Caste Mala, S/o Krishna Murthy, D-No-69-2-28/A, Ambedkar Nagar, NSM Public School Back Side, Patamata, Vijayawada Urban, Krishna Dist, Andhra Pradesh, Pin-520010, State Bank of India, Bank Account Number:11349322396, Railway Colony Branch, Guntupalli,Krishna Dist, PAN.No.ADLPC7460J-Mailid-chinthavenkateswarlu@gmail.com, Mobile: 94412 51800.

Vijayawada
Date-16-05-2020

Deponent

PERSONAL DETAILS

1. Mobile No. : 94412 51800
2. Proof regarding personal identification : AAdhar Card, Pan card
3. Postal Address: : S/o Krishna Murthy D-No-69-2-28/A,
Ambedkar Nagar, NSM Public
School Back Side, Patamata,
Vijayawada Urban, Krishna Dist,
Andhra Pradesh, Pin-520010
4. Occupation : Retired Railway Employee
5. Annual Income : 50000/-
- Bank Account Details** :
6. Bank Name : State Bank of India, Bank
7. Account Holder Name : Chintha Venkateswarlu
8. Account Number : 11349322396
9. Branch : Railway Colony Branch
10. PAN Card Number : ADLPC7460J
11. AADHAR Card Number : 709206672765

Signature

Petitioner

MEMORANDUM OF WRIT PETITION
(SPECIAL ORIGINAL JURISDICTION)
(UNDER ART. 226 OF THE CONSTITUTION OF INDIA)

IN THE HIGH COURT OF ANDHRA PRADESH AT AMARAVATHI

WP(PIL).NO.

OF 2020

Between:

Chintha Venkateswarlu, Aged 58 years, Retired Railway Employee, Caste-Schedule Caste Mala, S/o Krishna Murthy, D-No-69-2-28/A, Ambedkar Nagar, NSM Public School Back Side, Patamata, Vijayawada Urban, Krishna Dist, Andhra Pradesh, Pin-520010, State Bank of India, Bank Account Number:11349322396, Railway Colony Branch, Guntupalli, Krishna Dist, PAN.No.ADLPC7460J-Mailid-chinthavenkateswarlu@gmail.com, Mobile: 9441 251800.

.....Petitioner

AND

1. The State of Andhra Pradesh, Rep by it's Principal Secretary (Home Dept) Secretariat Buildings, At Amaravathi, Guntur dist, Andhra Pradesh.
2. The Director General of Police, Mangalagiri, Andhra Pradesh 522502.
3. The Commissioner of Police, Visakhapatnam, Andhra Pradesh.

....Respondents

The address for service on the above named Petitioners is that of their counsel J.Sravan Kumar, Advocate, Moghalrajpuram, Vijayawada. Cell:6301860393.

12. Relief(s) prayed for

The Hon'ble court may be pleased to issue an appropriate Writ, order, or direction more particularly one in the nature of Mandamus, declaring the brutal action of the respondent No 3 in dealing with the doctor who is in noble profession as he was being dragged towards the roads and tie his hands with ropes in a most brutal manner and taken him to the police station, duly violating his personal rights as well human rights in most uncivilized manner when thousands of peoples are witnessing on 16.05.2020 and the act of respondents as illegal, arbitrary and violation of principles of natural justice and also Article 14, 19 and 300-A of the Constitution of India and consequently to constitute a high level Judicial committee in enquiring about the issue and pass such other order or orders as the Hon'ble Court may deemed fit and proper in the circumstances of the case.

Vijayawad
DATE: 16-05-2020

Counsel for the Petitioner

Krishna District

IN THE HIGH COURT OF ANDHRA PRADESH AT
AMARAVATHI

WP(PIL). NO. OF 2020

WRIT PETITION

Filed By:

M/s J.SRAVAN KUMAR (19645)

SYKAM RAJASEKHAR(21929)
Advocates

Counsels for Petitioner

MEMORANDUM OF WRIT PETITION MISC. PETITION
(UNDER SEC. 151 OF THE C.P.C.)

IN THE HIGH COURT OF ANDHRA PRADESH AT AMARAVATHI

I.A. NO. OF 2020

IN

WP(PIL). NO. OF 2020

Between:

Chintha Venkateswarlu, Aged 58 years, Retired Railway Employee, Caste-Schedule Caste Mala, S/o Krishna Murthy, D-No-69-2-28/A, Ambedkar Nagar, NSM Public School Back Side, Patamata, Vijayawada Urban, Krishna Dist, Andhra Pradesh, Pin-520010, State Bank of India, Bank Account Number:11349322396, Railway Colony Branch, Guntupalli, Krishna Dist, PAN.No.ADLPC7460J-Mailid-chinthavenkateswarlu@gmail.com, Mobile: 9441 251800.

.....Petitioner

AND

1. The State of Andhra Pradesh, Rep by it's Principal Secretary (Home Dept) Secretariat Buildings, At Amaravathi, Guntur dist, Andhra Pradesh.
2. The Director General of Police, Mangalagiri, Andhra Pradesh 522502.
3. The Commissioner of Police, Visakhapatnam, Andhra Pradesh.

...Respondents

The Hon'ble court may be pleased to issue an appropriate Writ, order, or direction more particularly one in the nature of Mandamus, declaring the brutal action of the respondent No 3 in dealing with the doctor who is in noble profession as he was being dragged towards the roads and tie his hands with ropes in a most brutal manner and taken him to the police station, duly violating his personal rights as well human rights in most uncivilized manner when thousands of peoples are witnessing on 16.05.2020 and the act of respondents as illegal, arbitrary and violation of principles of natural justice and also Article 14, 19 and 300-A of the Constitution of India and consequently to constitute a high level Judicial committee in enquiring about the issue and pass such other order or orders as the Hon'ble Court may deemed fit and proper in the circumstances of the case.

The Hon'ble Court may be pleased to issue an appropriate interim directions to the Respondent No. 1 and 2 to take immediate disciplinary action against the erring police officers who are responsible for the brutal act occurred on 16.05.2020 as the action of the respondent no 3 and his sub-ordinates are nothing but violation

of the directions of Hon'ble Apex court issued in the case of **K Basu Vs State of West Bengal reported in 1997 (1) SCC 416** in time bound manner pending disposal of the above writ petition pass such other order or orders may deemed fit and proper in the circumstances of the case.

Vijayawada

Counsel for the Petitioner

DATE: 16-05-2020

Krishna District

IN THE HIGH COURT OF ANDHRA PRADESH
AT AMARAVATHI

I.A.NO. OF 2020

IN

WP(PIL). NO. OF 2020

DIRECTION PETITION

Filed by:

M/s J.SRAVAN KUMAR (19645)
SYKAM RAJA SEKHAR
Advocate

Counsel for Petitioner

SINGLE / BENCH
 SERVICE/NON-SERVICE
 DEPT:_____

Category Code and
 Sub Category Code
 Admission Court:

HIGH COURT
 SPECIAL ORIGINAL JURISDICTION

WP(PIL).NO. OF 2020

Krishna District

Chintha Venkateswarlu ...Petitioner/s

By

M/s J.SRAVAN KUMAR (19645)
 COUNSEL FOR PETITIONER

NATURE OF APPLICATION

(Under Art. 226 of Constitution of India)

The Hon'ble court may be pleased to issue an appropriate Writ, order, or direction more particularly one in the nature of Mandamus, declaring the brutal action of the respondent No 3 in dealing with the doctor who is in noble profession as the doctor was being dragged towards the roads and tide his hands with ropes in a most brutal manner and taken him to the police station, duly violating his personal rights as well human rights in most uncivilized manner when thousands of peoples are witnessing on 16.05.2020 and the act of respondents as illegal, arbitrary and violation of principles of natural justice and also Article 14, 19 and 300-A of the Constitution of India and consequently to constitute a high level Judicial committee in enquiring about the issue and pass such other order or orders as the Hon'ble Court may deemed fit and proper in the circumstances of the case.

Permitted on : 16-05-2020
 Presented on : 16-05-2020
 Filed on : 16-05-2020
 I.A.No. OF 2020

HIGH COURT
WRIT PETITION MISC.PETITION

I.A.NO. OF 2020

IN

WP(PIL). NO. OF 2020

Krishna District

Chintha Venkateswarlu

... Petitioner/s

By
M/s J.SRAVAN KUMAR (19645)

NATURE OF APPLICATION
(UNDER SEC. 151 C.P.C.)

The Hon'ble Court may be pleased to issue an appropriate interim directions to the Respondent No. 1 and 2 to take immediate disciplinary action against the erring police officers who are responsible for the brutal act occurred on 16.05.2020 as the action of the respondent no 3 and his sub-ordinates are nothing but violation of the directions of Hon'ble Apex court issued in the case of **K Basu Vs State of West Bengal reported in 1997 (1) SCC 416** in time bound manner pending disposal of the above writ petition pass such other order or orders may deemed fit and proper in the circumstances of the case.

PRESENTED ON: 16-05-2020

REPRESENTED ON:

FILED ON: 16-05-2020

IN THE HIGH COURT OF ANDHRA PRADESH AT AMARAVATHI

WP(PIL). NO.

OF 2020

Between:

Chintha Venkateswarlu

...Petitioner/s

AND

The State of Andhra Pradesh rep.. by its Principal Secretary and others

.Respondent/s

CHECK LIST FOR WRIT PETITION

S.No.	Item No.	Page No.	Checking Officer's Signature	Remarks
1	2	3	4	5

ORIGINAL SET

- 1) Proof of Service 1
- 2) Court Fee Rs. /- 2
- 3) Writ Petition
- 4) Annexures I & II
- 5) Affidavit to
 - a) Averment regarding previous proceedings
(mention Page No. Para No.)
 - b) Averment regarding alternative relief
(mention Page No. Para No.)
- 6) Verification Statement
- 7) Enclosure
- 8) Material Papers
(Duly Indexed P.Series) to
- 9) a) Vakalath Rs. /-
b) Power of Attorney/Resolution Authorising
to sue if petition is filed in rep.capacity
- 10) Sheet containing Respondents' Addresses

DUPLICATE SET

- 11) Writ Petition 3
- 12) Annexures I & II
- 13) Affidavit to
- 14) Material Papers to

MISCELLANEOUS SET

- 15) Batta Rs.
- 16) Rule Nisi Forms
- 17) Covers with Postal Addresses & Ack.Forms
- 18) Copies of Petition and Affidavits
(As many as the No.of the Respondents + 2)

19. WRIT PETITION MISC. PETITION

(Filed for)
Petition
Court Fee Rs.
Batta Rs.
Notice Papers, Covers with Postal Addresses and Ack.Forms
Proforma Draft Interim Order

Signature of the
Scrutiny Officer

Signature of the Advocate
Name: J.SRAVAN KUMAR (19645)

FOR OFFICE USE ONLY

Respondent Vakalat filed by _____ for Respt.No.
Counter Filed for Respt.No.
Other Miscellaneous Petitions filed

BATTA FORM

1. The State of Andhra Pradesh, Rep by it's Principal Secretary (Home Dept) Secretariat Buildings, At Amaravathi, Guntur dist, Andhra Pradesh.
2. The Director General of Police, Mangalagiri, Andhra Pradesh 522502.
3. The Commissioner of Police, Visakhapatnam, Andhra Pradesh.

....Respondents

BATTA FORM

1. The State of Andhra Pradesh, Rep by it's Principal Secretary (Home Dept) Secretariat Buildings, At Amaravathi, Guntur dist, Andhra Pradesh.
2. The Director General of Police, Mangalagiri, Andhra Pradesh 522502.
3. The Commissioner of Police, Visakhapatnam, Andhra Pradesh.

Vijayawada

Counsel for the Petitioner(s).

DATE: 16-05-2020

RESPONDENTS ADDRESSES:

1. The State of Andhra Pradesh, Rep by it's Principal Secretary (Home Dept) Secretariat Buildings, At Amaravathi, Guntur dist, Andhra Pradesh.
2. The Director General of Police, Mangalagiri, Andhra Pradesh 522502.
3. The Commissioner of Police, Visakhapatnam, Andhra Pradesh.

1. The State of Andhra Pradesh, Rep by it's Principal Secretary (Home Dept) Secretariat Buildings, At Amaravathi, Guntur dist, Andhra Pradesh.
2. The Director General of Police, Mangalagiri, Andhra Pradesh 522502.
3. The Commissioner of Police, Visakhapatnam, Andhra Pradesh.

SERVICE CERTIFICATE

(PROOF OF SERVICE)

We have served the copies of Writ Petition, Affidavit, Writ Petition Miscellaneous Petition(s) and Material Papers on the other side Counsel/Government Pleader.

Vijayawada
DATE: 16-05-2020

Counsel for the Petitioner

IN THE HIGH COURT OF ANDHRA PRADESH AT AMARAVATHI

I.A.No. OF 2020 IN WP(PIL). NO. OF 2020

Between:

Chintha Venkateswarlu, Aged 58 years, Retired Railway Employee, Caste-Schedule Caste Mala, S/o Krishna Murthy, D-No-69-2-28/A, Ambedkar Nagar, NSM Public School Back Side, Patamata, Vijayawada Urban, Krishna Dist, Andhra Pradesh, Pin-520010, State Bank of India, Bank Account Number:11349322396, Railway Colony Branch, Guntupalli, Krishna Dist, PAN.No.ADLPC7460J-Mailid-chinthavenkateswarlu@gmail.com, Mobile: 9441 251800.

.....Petitioner

AND

1. The State of Andhra Pradesh, Rep by it's Principal Secretary (Home Dept) Secretariat Buildings, At Amaravathi, Guntur dist, Andhra Pradesh.
2. The Director General of Police, Mangalagiri, Andhra Pradesh 522502.
3. The Commissioner of Police, Visakhapatnam, Andhra Pradesh.

....Respondents

Take Notice that the Appellant /Petitioner (Respondent) has/have presented a petition to the Court Praying that Under Section 151 of C.P.C. (AFFIDAVIT AND PETITION ENCLOSED) and that the same will be heard by the Court on the day 2020.

Notice and Interim Stay has/have been granted by order Court dated the of 2020 the affidavit of has been filed in support thereof Dated at Vijayawada this day 2020

Advocate for Petitioner

(Writ of Court Orders-Order List (To Produce and or to appear)
IN THE HIGH COURT OF ANDHRA PRADESH AT AMARAVATHI
(Special Original Jurisdiction) day the _____ of two thousand Twenty

WP(PIL). No. _____ of 2020

Between:

Chintha Venkateswarlu

.....Petitioner

AND

1. The State of Andhra Pradesh rep. by its Principal Secretary, Genral Administration,4th Block, Ground Floor, Room No:135, A.P Secretariat Office, Velagapudi, Amaravathi, Guntur Dist, Andhra Pradesh.
2. The Principal Secretary to Government of Andhra Pradesh, Department of Social Welfare and Tribal Welfare, 3rd Block, 1st Floor, A.P Secretariat, Velagapudi, Amaravathi, Andhra Pradesh.
3. The Principal Secretary, Panchayat Raj and Rural Development,2nd Block, 1st Floor, AP Secretariat, Velagapudi, Amaravathi, Andhra Pradesh.
4. The Principal Secretary to Government of Andhra Pradesh, Department of Finance, 2nd Block, 1st Floor, A.P Secretariat, Velagapudi, Amaravathi, Andhra Pradesh.
5. The VC and Managing Director, Andhra Pradesh Scheduled Castes Co-operative Finance Corporation, Tadepalli, Amaravathi, Guntur Dist, Andhra Pradesh.
6. The Commissioner and Director of Municipal Administration, Door No. 5-1-1, 1st Lane, Brodipet, Guntur, Andhra Pradesh-522002.
7. The Directorate of Tribal Welfare Department, D.No.40-3/1-46-4A, Ward No.13, Koneru Lakshmaiah Street, Moghalrajpuram, Vijayawada-520 010, Andhra Pradesh.
8. The Dist Collector, East Godavari, Kakinada, Andhra Pradesh.

...Respondents

Mr. J.SRAVAN KUMAR (19645) upon motion this day made in to this Court by bring of opinion that the record to and touching upon all the matter and contentions raised in the memorandum of representation petition, a copy of which is annexed hereto, together with the decision therein should be called for and pursued: IT IS HEREBY COMMANDED.

(1) That you, the aforesaid Respondent No. _____ do sent, of our use in High Court of Judicature Andhra Pradesh all and singular the said record and other with all the things touching the same as fully and perfectly as they have been made by you and now remain in your custody or power together with this, Rule Nisi before the day of _____ 2020 and

That you intend to oppose the petition you the aforesaid Respondent No. _____ do appear personally OR by Advocate on the _____ day of _____ 2020 at 10-30 A.M. before the court show cause why this petition should not be complied with and that we may cause further to be done there on what of right and according to law we shall see fit to be done.

WITNESS the Hon'ble Chief Justice of IN THE HIGH COURT OF ANDHRA PRADESH AT AMARAVATHI at Vijayawada, this the year two thousand

Hearing Date:
registrar

Assistant

RETURN OF THE WRIT OF CERTIORARI ORDER : NISI
(To be endorsed on Writ to appear)

The Process of the Writ of Certiorari where of mention is which made was served on respondent This day of _____ two thousand eleven

This should be served urgently on the Respondent No. _____ and returned to the High Court
(Sd)

writ and rule nise

WP(PIL). No. _____ of 2020

Certified that the required conveyance charges and the process for the service of the Process have been collected it is requested that English Translation of the Process Service, Report, it is in Vernacular, my be sent along with the Rule-Nise returned.

FORM: 8

RETURN OF THE WRIT OF CERTIORARI ORDER NISI
(TO BE ENDORSED ON WRIT TO PRODUCE)

The process of the Writ of certiorari where of mention is within made with all things touching the same in the several papers hereto annexed as within commanded.

The Answer of

The _____ respondent here
Date _____ day of _____ 2020

(Sd)

IN THE HIGH COURT OF ANDHRA PRADESH AT AMARAVATHI

WP(PIL).No.

OF 2020

CHRONOLOGICAL / RUNNING INDEX

Sl. No.	Exhibit	Description of Document	Date of Document	Date of filing of Document	Page No.
1.		Service Certificate	16-05-2020	16-05-2020	1
2.		Court fee	-do-	-do-	2
3.		Writ Petition	-do-	-do-	3
4.		Annexure I, II, III, IV	-do-	-do-	
5.		Affidavit & Verification	-do-	-do-	
		Affidavit & Verification			
		Affidavit & Verification			
		Affidavit & Verification			
<u>MATERIAL PAPERS</u>					
6.	P1	Copy Judgment in DK Basu Vs State of Bengal	18-12-1996	-do-	
8.	P2	Photographs shows the doctor was allowed to display on roads	16.05.2020		
09.		Vakalath	16.05.2020	-do-	
10.		Respondents Addresses	-do-	-do-	

DATE: 16-05-2020

Vijayawada

Counsel for the Petitioner

IN THE HIGH COURT OF ANDHRA PRADESH AT AMARAVATHI

WP(PIL).NO. of 2020

LIST OF EVENTS**ANNEXURE – I**

S.No	Date	Description of the Events	Page Nos in Affidavit	Para No. in Affidavit
1	16.05.2020	The petitioner respectfully submits that, the present Writ Petition is filed as Public Interest Litigation, challenging the brutal action of the respondent no 3 in dealing with the doctor who is in noble profession as he was being dragged towards the roads and tie his hands with ropes in a most brutal manner and taken him to the police station. The action of the respondents in dealing with a person who is a doctor is highly condemn and violations of human rights. It is further submitted that the action of the respondent police in taking him to police station in most uncivilized manner and roaming him over roads when thousands of peoples are witnessing. It is respectfully submit that the incident was occurred on 16.05.2020 at Visakhapatnam and telecasted in all Television Channels as well in National Media too.		
2	04.04.2020	It is respectfully submits that the government with a pre motive of harassing the doctor behaved in most undemocratically and degrades the professional dignity of the doctors. It is respectfully submits that the respondent authorities have ulterior motive of taking away the dignity of the doctor violated the fundamental right of dignity and dragged him like an animal in roads which the civilized society feels ashamed. The background of the issue is for your honours kind knowledge, when the masks and other fighting equipments are scared in Narsipatnam (PMC) Primary Health Center) the duty doctor who was in-charge raised his voice against the government and spoken in such a manner and made constructive suggestions. The doctor made certain remarks that due to scarcity of masks even to the doctors treating the COVID-19 patients are unable to perform their duties effectively and make specific remark that every Minister and MLA are using N95 Mask. He further asserted that the government is not even thinking of providing of N95 Masks to the Doctors who direly required in treating CORANA patients. The statements made by him are neither questioning the government functioning nor made any specific remark over his higher official.		

ANNEXURE-II

Under Article 226 of Constitution of India.

Vijayawada
DATE: 16-05-2020

Counsel for Petitioner/s

IN THE HIGH COURT OF ANDHRA PRADESH AT AMARAVATHI

WP(PIL).NO.

OF 2020

BETWEEN:

Chintha Venkateswarlu
AND

..Petitioner(s)

The State of Andhra Pradesh rep.. by its Principal Secretary and others

..Respondent(s)

COURT FEE

DATE: 16-05-2020
Vijayawada

Counsel for the Petitioner