

## **DATES AND EVENTS**

| <b>Dates</b>               | <b>Events</b>  |
|----------------------------|--|
| 28.03.2022                 | As per the news report, a pregnant woman namely Late Smt Asha Bhairwa aged about 22 years W/o of Sh. Laluram Bhairwa was died at Anand Hospital, Lalsot, Dausa, Rajasthan during course of the delivery caused due to Postpartum (Post-delivery) Hemorrhage (PPH) which a medical condition under which severe bleeding happens after childbirth.  |
| 28.03.2022<br>(Evening)    | Sh. Laluram Bairwa (husband of deceased patient) and relatives went back to their village along with the body of deceased patient. The hospital had arranged for the body to be sent back to home in an ambulance and they were preparing for last rites at the village. However, it was informed to the husband of deceased doctor namely Dr Suneet Upadhyay that Mr Shiv Shankar Balya Joshi went to their home and picked them up under assurance of getting good compensation. |
| 28.03.2022<br>(Late Night) | After sometimes local leaders namely Mr Shiv Shankar Balya Joshi had succeeded in  |

|                                 |   |
|---------------------------------|---|
|                                 | <p>instigating the family of deceased patient with assurance of getting handsome compensation and had returned with the family and relatives including other borrowed protesters in number of approximately 200 and had started an intensified protest by keeping body in front of hospital demanding immediate action against the erring doctors, where the local police reached the spot of incident and assured protesters about appropriate action and investigation against the treating doctors. However, the protesters could not agree with the assurance of local police and continued the protest till late night. At around 12 o'clock night former parliamentary secretary Sh. Jitendra Gothwal, sarpanch Sh. Hemraj Meena demanded assistance to the victim's family and at around one o'clock in the night the family deceased agreed for the post-mortem and the matter was settled.</p> |
| <p>29.03.2022<br/>(Morning)</p> | <p>On Tuesday morning, the body of the patient was handed over to the family</p>  |

|            |   |
|------------|---|
|            | <p>members after post-mortem from the medical board. It is pertinent to mention that the police had registered a case against the doctor couple on Monday (28.03.2022) evening itself.</p>  |
| 29.03.2022 | <p>The police personal of Lalsot Police Station Dausa (Rajasthan) had started threatening the doctor couple by citing the serious sections 302 of IPC (murder charges) upon, which the deceased doctor could not bear the torturing pressure from the local police being influence by the politicians and had committed suicide leaving a suicide note under her signature.</p> |
| 30.03.2022 | <p>The husband of deceased doctor has also registered an F.I.R., however, the police has not acted on the FIR of the husband of deceased doctor.</p>  |
| 31.03.2022 | <p>The state government has suspended the superintendent of police as well as SHO only to eyewash the public and doctor's community across the country. However, the family of the deceased doctor yet to see the justice.</p>  |

|            |   |
|------------|---|
| 01.04.2022 | The Indian Academy of pediatrics has represented office of Prime Minister demanding the enactment of deterrent law for protection of the doctor in our country. |
|            | The husband of deceased doctor along with children are running from pillar to post to get the justice in said unfortunate incident but of no avail.             |
|            | Hence the instant Writ Petition in the interest of public at large.   |



4. **Government of State of Rajasthan**  
Through it's Principal Secretary  
Department of Personnel. Main Building,  
Secretariat, Main Building,  
Bhagwan Das Road,  
Jaipur, Rajasthan-302005. ... **Respondent No.4**
5. **Medical Council of India**  
Phase -1, Dada Dev Mandir Rd,  
Block P, Sector 8 Dwarka,  
New Delhi-110077. ... **Respondent No.5**

(ALL RESPONDENTS ARE CONTESTING RESPONDENT)

**PUBLIC INTEREST PETITION UNDER ARTICLE 32 OF  
THE CONSTITUTION OF INDIA FOR THE ISSUANCE OF  
WRIT, ORDER OR DIRECTION IN NATURE OF  
MANDAMUS OR ANY OTHER APPROPRIATE WRIT,  
ORDER OR DIRECTION OR DIRECTIONS FOR A CBI  
ENQUIRY TO THE CIRCUMSTANCES WHICH LED TO  
UNFORTUNATE DEATH OF YOUNG GYNECOLOGIST  
DOCTOR BY COMMITTING SUICIDE UNDER THE  
MYSTERIOUS CIRCUMSTANCES OR/AND ISSUANCE OF  
A COMPREHENSIVE GUIDELINES FOR PROTECTION OF  
DOCTORS WHO ARE REGULARLY FALLING VICTIM OF  
PHYSICAL ASSAULT AT THE SLIGHTEST SUSPICION**

**OVER TREATMENT AND DELAY RECOVERY OF THE PATIENTS AND/OR DIRECT THE RESPONDENTS FOR EVOLVING A MECHANISM TO COMPENSATE THE FAMILY AND DEPENDENTS OF SUCH DECEASED DOCTORS WHO LOST THEIR LIVES TO THE CAUSE OF PUBLIC SERVICE.**

TO,

HON'BLE THE CHIEF JUSTICE AND HIS  
HON'BLE COMPANION JUSTICES OF THE  
HON'BLE SUPREME COURT OF INDIA THE  
HUMBLE PETITION OF THE PETITIONERS  
ABOVE-NAMED

**MOST RESPECTFULLY SHEWETH:**

1. That the instant public interest litigation under section 32 of the constitution of India is necessitated on account of continuous assaults on treating doctors under the cover of medical negligence across the country on a regular basis. The recent incident of death of a practicing gynecologist doctor namely Dr Archana Sharma of Jaipur (Rajasthan) on 29.03.2022 is grim reminder of ugly treatment being meted out to the treating doctors and the doctors now a days under constant fear of being assaulted and harassed at the slightest delay in recovery of the patients and the state police are freely registering an F.I.R. under serious charges including charges under section 302 of IPC 1860. It is further submitted that the gory incident of Jaipur has stirred widespread protest across the country by large number of doctors fearing their lives and asking for

protection from the government, so that the doctors should not be harassed or tortured after the treatment of patients. The deceased doctor namely Dr Archana Sharma has fallen victim of harassment by the local politicians through the relatives of deceased patients as well as the police who had booked both husband wife under section 302 of IPC 1860.

1.A That the Petitioner's association has been continuously requesting from the concerned authorities for protection of treating doctors who sacrifices their family to save the patients but of no avail. In this respect, it is submitted that the Petitioner's association has recently also written to the Hon'ble Prime Minister of India to look into the such matters and bring some guidelines for the foolproof protection of treating doctors but no concrete step on the said issue has been taken as yet. It is further submitted that the doctors had played a pivotal role as corona warriors during widespread of deadly Covid-19 across the country and their humanitarian services has been acknowledged and recognized by all sections of society across the world. However, the incidents of such barbarity action of police as well as local politicians are indicative of the fact that common people as well as the law enforcement authorities including the state police are not alive to the pressing situation under which the treating doctors might have been working day and night towards their humanitarian services. The circumstances under which a young budding professional doctor was forced to prematurely depart from this world, cast a serious stigma on the entire society whose animosity had caused great injustice. It is submitted that the medical profession is considered to be a noble profession as it helps in preserving the lives and the doctor is key to the preservation. A patient generally approaches a

doctor/hospital with hope of treatment and under full faith that the treating doctor will not harm in any manner either because of the negligence, carelessness, recklessness etc. Thought, it is common knowledge a doctor may not be in position to save all patients life at all the time, as the patient may succumb to death due the critical illness. Nevertheless, in such circumstances, the attendant become violent on treating doctors without exercising the gravity of the illness. The copy of the said representation is being annexed here with and marked as **Annexure P-1 [Page .... to Page ....]**.

- 1.B That the instant writ petition is being preferred on behalf the petitioner's association namely "**Indian Medical Association (Dwarka)**" through its duly authorized representatives namely its president (Dr Mukesh Verma) and Hony. Secretary (Dr Pritam Pankaj) are preferring this writ petition in the interest of public at large for issuance of an exhaustive guideline in order to protect the treating doctors from physical assault as well as harassment being caused by attendants of patients in the circumstances of delay in recovery of the patients. The copy of the authorization letter is being annexed herewith and marked as **Annexure P-2 [Page .... to Page ....]**.
- 1.C That the petitioner's association is constrained to approach this Hon'ble Court, highlighting the high handedness, casualness and non-application of mind on the part of state police of Rajasthan state where the state police has registered an F.I.R. under serious section like 302 of IPC against the treating doctor which is widely covered in print media. The downloaded copy of the print media reports along with the suicide note of doctor is

being annexed here with as **Annexure P-3 [Page .... to Page ....]**.

- 1.D That the petitioner's association is a non-profit organization working for the welfare of its members and has unblemished record of relentlessly contributing towards welfare of the society at large. The petitioner's association being a group of the doctors having common mission to protect the interest of the doctors across the country have been professionally and socially engaged with the various societal commitments having an average financial resource to pay the cost in case this Hon'ble Court finds this PIL to be without any cause of action. Further the petitioner's organization undertakes through the authorized representative that in case any cost is imposed by this Hon'ble Court, the Petitioner's organization has the means to pay the same. The email address of the petitioner's association is drppthakur@gyahoo.com and contact details of its chairmen is +91-9810005182. The Permanent account number of the Petitioner's organization is AAEP9551A. The postal address of the Petitioner's association is Flat No. A-1/5A, Near Metro Pillar 756, Mohan Garden, Uttam Nagar, New Delhi-110059.
- 1.E The Petitioner's association have no personal interest, or private/oblique motive in filing the instant writ petition. There is no civil, criminal, revenue or any litigation involving against the Petitioner's organization, which has or could have a legal nexus with the issues involved in this writ petition except to bring such illegality on the part of the police in interest of the doctors across the country.
- 1.F That the Petitioner's association is filing this Writ Petition on their own volition and its shall be liable to pay the

costs as ordered by this Hon'ble Court in the event, if it is found out that this petition is frivolously filed for any personal gain or oblique motives.

- 1.G That this petition is being preferred out of the own findings of the Petitioner's association. This petition is filed on the basis of information that have been verified in capacity of personal knowledge as well as information obtained by the Petitioner from various sources. The incidences of suicide by the practicing doctor in vicinity of Lalsot police station at Dausa, Rajasthan is an illustrative of the reoccurring phenomenon where the qualified doctors are being victimizes by the illegal and arbitrary treatment from the state police under the presumption of medical negligence. In this respect, it is submitted that the state police once gets such complaint of medical negligence, starts ruckus at the premises of the practicing doctors against whom the complaint received from the attendant of the patients so much so, as per the contents of FIR registered by the husband namely Dr Suneet Upadhyay of deceased doctor, it is apparent that one politically influenced local leader namely Mr Shiv Shankar Balya Joshi along with a patrika reporter Mr Mahesh had played a pivotal role in forcing the treating doctor to commit suicide as they had called public move by instigating the family and relatives of deceased patients including the common people with support of local goons under news coverage for the purpose best known to them only .
2. That the Petitioner's association has no political affiliation to or membership of any political party. The Petitioner further submits that they have never held any post of any national or regional political party. The Petitioner never directed their

attention towards evaluation and interfering in the working of any State of Central Government or authorities.

### **QUESTION OF LAW**

3. That it is submitted that in the circumstances mentioned herein above and below, the pertinent question of law emerges for consideration and determination which are set out as under:-
- (a) **Whether**, there is requirement of setting up of CBI enquiry to looking into the causes and lapses on the part of state police which led to unfortunate death to innocent doctor?
  - (b) **Whether**, there is an urgent and strict requirement for implementation of a comprehensive and deterrent guidelines/policies/regulations in order to protect the treating doctors in all state across the country from arbitrarily and illegally being booked by state police in serious criminal charges under the garb of medical negligence?
  - (c) **Whether**, the act of local state police is justified in registering an F.I.R. against deceased doctor under serious charges of murdering a patient who died in course of the treatment?
  - (d) **Whether**, the respondents No.2 (i.e. State of Rajasthan) is not responsible for death of innocent doctors namely Dr Archana Sharma by not taking adequate caution while registering the FIR against the doctor?
  - (e) **Whether**, there is urgent requirement to ensure the protection of all treating doctors by issuance of an immediate direction in order to serve patients fearlessly at hospitals as well as private practice places?

- (f) **Whether**, the qualified doctors of our country have a right to life under the article 21 of the Constitution of India and are entitled to be protected against arbitrary and irresponsible act of the authorities of the state?
- (g) **Whether**, there should be comprehensive guidelines in relation to appropriate compensation to be paid to the next of kin/family members of such doctors, who victimizes and targeted by the local police or politicians or any other citizens under the garb of negligence and lack of accountability towards the exiting health care delivery systems of the states?

## **GROUNDS**

4. That petitioner's association being aggrieved by the mysterious death of Dr Archana Sharma of Jaipur (Rajasthan) who has been forced to commit suicide on 29.03.2022 leaving a suicide note under her signature. The allegations leveled by the local state police under the serious charges of murder of a patient is completely arbitrary to the provision of law and same needs to being investigated that under what circumstance the FIR was registered under the serious criminal charges. There is wide spread discontent among doctor's fraternity who had faced arbitrary criminal charges under the garb of medical negligence. Hence, the Petitioner's organization is professionally/socially obligated to raise this issue before the Hon'ble Court by this petition of public interest litigation on the grounds inter-alia the following grounds as mentioned herein below:-

- (a) **Because**, state government has failed to institute enquiry in the whole incident which led to the death of young treating doctor leaving behind her minor children by committing a suicide on 29.03.2022. While, the state police become accomplice to the whole incident and played active role in

torturing the deceased doctor and her family.

- (b) **Because**, such incidents are quite common across the country and there is no regulation on prevention of the such unfortunate incidents and large number of doctors are becoming deceased on account of unprotected atmosphere of profession.
  - (c) **Because**, there is an urgent need for laying down a comprehensive guideline for immediate protection of treating doctors in a circumstance when there is allegation of medical of negligence on a doctor and the treating doctor is constantly being exposed to threats from the attendants of the patients as well as the local police.
  - (d) **Because**, the state police have not acted in a manner which can repose faith of treating doctors and hence the doctor community is having no faith on state police and it is urgently required that CBI enquiry may be instituted to find out the real culprit who are responsible to the death of treating doctor.
5. That it is submitted that the Petitioners craves the leave of this Hon'ble Court to plea and urge any other further grounds which may be taken by the Petitioners during the course of arguments on the present petition and same will be filed at the earliest on direction of this Hon'ble Court.
6. That it is submitted that the authorities in India must ensure that the policy decision relating to regulating the health sector by laying down the affirmed policy. It is further submitted that the Petitioners, in the interest of the general public at large is filing the present petition to stress the need for a comprehensive regulatory with detailed guidelines to regulate the healthcare sector in India.

**PRAYER**

In view of the above and in the interests of justice, it is most respectfully prayed that this Hon'ble Court may be pleased to:

- (a) Issue a direction in nature of mandamus or any other appropriate writ, order/direction or directions for constituting a CBI enquiry into the circumstances which led to unfortunate death of young gynecologist doctor by committing suicide under the mysterious conditions in order to find out the actual perpetrators of the entire incident and bring them to justice to deter other such potential wrong doer.

and/or

- (b) Issue a comprehensive guideline for protection of doctors who are regularly falling victim of physical assault at the slightest suspicion over treatment and delay recovery of the patients.

and/or

- (c) Issue a direction to the respondents for evolving a mechanism to compensate the family and dependents of such deceased doctors who lost their lives to the cause of public service.

and/or

- (d) Pass such further order(s) as may be deemed fit and proper under the facts and in the circumstances of the case.

AND FOR THIS ACT THIS KINDNESS THE APPLICANT AS IN DUTY BOUND SHALL EVER PRAY.

DRAWN BY:  
(Shashank Deo Sudhi)  
**Associates & Solicitors**  
(Strategic Legal Counsel)  
105-B, First Floor,  
Pocket-2, Sector-6, Dwarka  
New Delhi-110075  
Drawn on .01.2020

FILED BY:  
(.....)  
Advocate

**IN THE SUPREME COURT OF INDIA**  
(EXTRA-ORDINARY CRIMINAL WRIT JURISDICTION)  
(UNDER ARTICLE 32 OF THE CONSTITUTION OF INDIA)

**CRIMINAL WRIT PETITION NO.                      OF 2022**  
**(PUBLIC INTEREST LITIGATION)**

**IN THE MATTER OF:**

**Indian Medical Association (Dwarka)**

... **Petitioner**

**Union of India and Ors**

... **Respondents**

**AFFIDAVIT**

I, **Dr Mukesh Verma**, aged about 46 years, S/o, Sh. Ram Swaroop Verma, R/o 2, Nathu Ram Park, Tehsil Road Najafgarh, New Delhi-110043, being the authorized representative of petitioner's petitioner association, do hereby solemnly affirm and declare as under:-

1. That I am one of the authorized representatives of the petitioner's associations and as such I am well conversant with the facts and circumstances of the present case and am competent to swear this affidavit.
2. That accompanying Writ Petition under Article 32 of Constitution of India has been drafted by me and the facts stated therein are true and correct to the best of my knowledge and belief. The contents of Para 01 to Para .... including synopsis, list of dates & events and prayer of the accompanied public interest litigation are true and correct to the best of my knowledge belief. The contents of the same are not being reproduced herein for the sake of brevity and may be read as part and parcel of this affidavit.

DEPONENT

**VERIFICATION**

Verified at New Delhi on this 2<sup>nd</sup> day of April 2022 that the contents of the above affidavit are true and correct to my knowledge and belief and nothing material has been concealed there from.

DEPONENT

**IN THE SUPREME COURT OF INDIA**  
(EXTRA-ORDINARY CRIMINAL WRIT JURISDICTION)  
(UNDER ARTICLE 32 OF THE CONSTITUTION OF INDIA)

**CRIMINAL WRIT PETITION NO.                      OF 2022**  
**(PUBLIC INTEREST LITIGATION)**

**IN THE MATTER OF:**

**Indian Medical Association (Dwarka)**

... **Petitioner**

**Union of India and Ors**

... **Respondents**

**AFFIDAVIT**

I, **Dr Mukesh Verma**, aged about 46 years, S/o, Sh. Ram Swaroop Verma, R/o 2, Nathu Ram Park, Tehsil Road Najafgarh, New Delhi-110043, being the authorized representative of petitioner's petitioner association, do hereby solemnly affirm and declare as under:-

1. That I am one of the authorized representatives of the petitioner's associations and as such I am well conversant with the facts and circumstances of the present case and am competent to swear this affidavit.
2. That the contents of the affidavit stating that there is no personal gain, private motive or oblique reasons in filling the public interest litigation.

DEPONENT

**VERIFICATION**

Verified at New Delhi on this 02<sup>nd</sup> day of April 2022 that the contents of the above affidavit are true and correct to my knowledge and belief and nothing material has been concealed there from.

DEPONENT

**IN THE SUPREME COURT OF INDIA**  
(EXTRA-ORDINARY CRIMINAL WRIT JURISDICTION)  
(UNDER ARTICLE 32 OF THE CONSTITUTION OF INDIA)

**CRIMINAL WRIT PETITION NO.            OF 2022**  
**(PUBLIC INTEREST LITIGATION)**

**IN THE MATTER OF:**

**Indian Medical Association (Dwarka)**

... **Petitioner**

**Union of India and Ors**

... **Respondents**

**AFFIDAVIT**

I, **Dr Mukesh Verma**, aged about 46 years, S/o, Sh. Ram Swaroop Verma, R/o 2, Nathu Ram Park, Tehsil Road Najafgarh, New Delhi-110043, being the authorized representative of petitioner's petitioner association, do hereby solemnly affirm and declare as under:-

1. That I am one of the authorized representatives of the petitioner's associations and as such I am well conversant with the facts and circumstances of the present case and am competent to swear this affidavit.
2. That accompanying application under section 151 C.P.C seeking exemption from filling certified copies and typed true copies of dim annexures has been drafted by my counsel and the facts stated therein are true and correct to the best of my knowledge and belief. The contents of Para 01 to Para 04 including prayer of the application are true and correct to the best of my knowledge belief.

DEPONENT

VERIFICATION

Verified at New Delhi on this 02<sup>nd</sup> day of April 2022 that the contents of the above affidavit are true and correct to my knowledge and belief and nothing material has been concealed there from.

DEPONENT

**IN THE SUPREME COURT OF INDIA**  
(EXTRA-ORDINARY CRIMINAL WRIT JURISDICTION)  
(UNDER ARTICLE 32 OF THE CONSTITUTION OF INDIA)

**CRIMINAL WRIT PETITION NO.                      OF 2022**  
**(PUBLIC INTEREST LITIGATION)**

**IN THE MATTER OF:**

**Indian Medical Association (Dwarka)**

... **Petitioner**

**Union of India and Ors**

... **Respondents**

**AFFIDAVIT**

I, **Dr Pritam Pankaj**, aged about 49 years, S/o Sh. Chandra Nand Thakur, R/o 1/5A Upper Ground Floor, Mohan Garden, Uttam Nagar, New Delhi-110059, being the authorized representative of petitioner's petitioner association, do hereby solemnly affirm and declare as under:-

1. That I am one of the authorized representatives of the petitioner's associations and as such I am well conversant with the facts and circumstances of the present case and am competent to swear this affidavit.
2. That accompanying Writ Petition under Article 32 of Constitution of India has been drafted by me and the facts stated therein are true and correct to the best of my knowledge and belief. The contents of Para 01 to Para .... including synopsis, list of dates & events and prayer of the accompanied public interest litigation are true and correct to the best of my knowledge belief. The contents of the same are not being reproduced herein for the sake of brevity and may be read as part and parcel of this affidavit.

DEPONENT

**VERIFICATION**

Verified at New Delhi on this 2<sup>nd</sup> day of April 2022 that the contents of the above affidavit are true and correct to my knowledge and belief and nothing material has been concealed there from.

DEPONENT

**IN THE SUPREME COURT OF INDIA**  
(EXTRA-ORDINARY CRIMINAL WRIT JURISDICTION)  
(UNDER ARTICLE 32 OF THE CONSTITUTION OF INDIA)

**CRIMINAL WRIT PETITION NO.                      OF 2022**  
**(PUBLIC INTEREST LITIGATION)**

**IN THE MATTER OF:**

**Indian Medical Association (Dwarka)**

... **Petitioner**

**Union of India and Ors**

... **Respondents**

**AFFIDAVIT**

I, **Dr Pritam Pankaj**, aged about 49 years, S/o Sh. Chandra Nand Thakur, R/o 1/5A Upper Ground Floor, Mohan Garden, Uttam Nagar, New Delhi-110059, being the authorized representative of petitioner's petitioner association, do hereby solemnly affirm and declare as under:-

1. That I am one of the authorized representatives of the petitioner's associations and as such I am well conversant with the facts and circumstances of the present case and am competent to swear this affidavit.
2. That the contents of the affidavit stating that there is no personal gain, private motive or oblique reasons in filling the public interest litigation.

DEPONENT

**VERIFICATION**

Verified at New Delhi on this 02<sup>nd</sup> day of April 2022 that the contents of the above affidavit are true and correct to my knowledge and belief and nothing material has been concealed there from.

DEPONENT

**IN THE SUPREME COURT OF INDIA**  
(EXTRA-ORDINARY CRIMINAL WRIT JURISDICTION)  
(UNDER ARTICLE 32 OF THE CONSTITUTION OF INDIA)

**CRIMINAL WRIT PETITION NO.                      OF 2022**  
**(PUBLIC INTEREST LITIGATION)**

**IN THE MATTER OF:**

**Indian Medical Association (Dwarka)**

... **Petitioner**

**Union of India and Ors**

... **Respondents**

**AFFIDAVIT**

I, **Dr Pritam Pankaj**, aged about 49 years, S/o Sh. Chandra Nand Thakur, R/o 1/5A Upper Ground Floor, Mohan Garden, Uttam Nagar, New Delhi-110059, being the authorized representative of petitioner's petitioner association, do hereby solemnly affirm and declare as under:-

1. That I am one of the authorized representatives of the petitioner's associations and as such I am well conversant with the facts and circumstances of the present case and am competent to swear this affidavit.
2. That accompanying application under section 151 C.P.C seeking exemption from filling certified copies and typed true copies of dim annexures has been drafted by my counsel and the facts stated therein are true and correct to the best of my knowledge and belief. The contents of Para 01 to Para 04 including prayer of the application are true and correct to the best of my knowledge belief.

DEPONENT

VERIFICATION

Verified at New Delhi on this 02<sup>nd</sup> day of April 2022 that the contents of the above affidavit are true and correct to my knowledge and belief and nothing material has been concealed there from.

DEPONENT

**IN THE SUPREME COURT OF INDIA**  
(EXTRA-ORDINARY CRIMINAL WRIT JURISDICTION)  
(UNDER ARTICLE 32 OF THE CONSTITUTION OF INDIA)

**CRIMINAL WRIT PETITION NO.                      OF 2022**  
**(PUBLIC INTEREST LITIGATION)**

**IN THE MATTER OF:**

**Indian Medical Association (Dwarka)**

... **Petitioner**

**Union of India and Ors**

... **Respondents**

**V A K A L A T N A M A**

We, **Dr Mukesh Verma**, aged about 46 years, S/o, Sh. Ram Swaroop Verma, R/o 2, Nathu Ram Park, Tehsil Road Najafgarh, New Delhi-110043, and **Dr Pritam Pankaj**, aged about 49 years, S/o Sh. Chandra Nand Thakur, R/o 1/5A Upper Ground Floor, Mohan Garden, Uttam Nagar, New Delhi-110059, being the petitioners, do hereby appoint and retain the Advocates of Supreme Court of India to act and appear for me in the above Petition on my behalf to conduct and prosecute (or defend) or withdraw the same and all proceedings that may be taken in respect of any application connected with the same or any decree or order passed therein, including proceedings in taxation and application for Review, to file and obtain return of documents and to deposit and receive money on my behalf in the said Petition and in application for Review and to represent me and to take all necessary steps on my/our behalf in the above matter. I agree to ratify all acts done by the aforesaid Advocate in pursuance of this Authority.

Dated this the 2<sup>nd</sup> day of April 2022

PETITIONER/APPLICANT

Accepted & Identified .....

[\_\_\_\_\_]. Advocates