

Dear friend,

Social Jurist has filed a PIL in the Delhi High Court highlighting the fact that thousands of students with disabilities and particularly those suffering from blindness, hearing impairment and mental retardation, studying in 1000 Delhi Government and 1800 MCD run schools, are without trained teachers including teachers qualified in sign language and/or Braille. The petitioner has also highlighted the fact that the students with disabilities do not get a barrier free environment in these schools. The petitioner has further highlighted the fact that special books and equipment needed for the education of the students with disabilities is also not being provided to them by the schools.

The Hon'ble Delhi High Court by Orders dated 15.10.2008 constituted a committee under the Secretary (Education), Govt. of NCT of Delhi to make recommendations to the Court, both long term and short term for providing effective and quality education to the disabled children. The report of the committee is to be submitted to the Court by 26th November 2008. The Chairperson has been asked to convene a meeting of the representatives of the Department of Social Welfare, Department of Education, MCD, NDMC, DCB besides advocates Ashok Agarwal and S.K Rungta within 10 days. It is open to the chairperson to invite experts in the field to the meeting.

The meeting is likely to take place on any day on or before 25.10.2008. I would request you to send your suggestions to me at ashokagarwal1952@hotmail.com as early as possible to be included in the suggestions to be placed before the committee. A copy of the PIL is attached hereto for your ready reference.

With Regards

(Ashok Agarwal)
Advocate
Advisor, Social Jurist
M: 9811101923

IN THE HIGH COURT OF DELHI AT NEW DELHI

W. P. (C) NO. 6771 OF 2008

(PUBLIC INTEREST LITIGATION)

IN THE MATTER OF: Public Interest Litigation;

AND

IN THE MATTER OF: Writ petition under Article 226
of the Constitution of India;

AND

IN THE MATTER OF: Violation of Human and
Fundamental Right to
Education of thousands of
students with disabilities
studying in Delhi Government
and MCD run schools in Delhi
as guaranteed to them under
Articles 14, 15, 21, 21-A and
38 of the Constitution of India
read with the provisions of
Delhi School Education Act,
1973, UN Convention on the
Rights of the Child (1989),
Salamanca Statement
(UNESCO, 1994), Persons
with Disabilities (Equal
Opportunities, Protection of
Rights and Full Participation)
Act, 1995, National Charter
for Children, 2003 and UN
Convention on the Rights of
Persons with Disabilities
(2008);

AND

IN THE MATTER OF: Failure on the part of the
Government of Delhi and the
Municipal Corporation of
Delhi to provide specially

trained teachers including teachers qualified in sign language and/or Braille to the students with disabilities studying in these schools and particularly suffering from disabilities like, blindness, hearing impairment and mental retardation;

AND

IN THE MATTER OF:

Failure on the part of the Government of Delhi and the Municipal Corporation of Delhi to provide barrier free environment to the students with disabilities in their schools;

AND

IN THE MATTER OF:

Failure on the part of the Government of Delhi and the Municipal Corporation of Delhi to provide special books and equipments needed for the education of the students with disabilities;

AND

IN THE MATTER OF:

- (1) Constitution of India
- (2) Delhi School Education Act, 1973
- (3) UN Convention on the Rights of the Child (1989)
- (4) Salamanca Statement (UNESCO, 1994)
- (5) Persons with Disabilities (Equal Opportunities, Protection of Rights and

Full Participation) Act,
1995

(6) National Charter for
Children, 2003 and UN
Convention on the Rights
of Persons with Disabilities
(2008)

AND

IN THE MATTER OF:

Social Jurist, A Civil Rights Group,
Through Advocate M. N. Singh, Coordinator
C 29, Sector 14 Extension,
Janyug Apartments, Rohini,
Delhi-110085.
Petitioner

Versus

1. Government of NCT of Delhi
Through its Chief Secretary,
Secretariat, I. P. Estate,
New Delhi-110002
2. Municipal Corporation of Delhi
Through its Commissioner,
Town Hall, Chandni Chowk,
Delhi-110006.
.....Respondents

To

THE HON'BLE CHIEF JUSTICE OF HIGH
COURT AT NEW DELHI AND ITS COMPANION
JUSTICES OF THE SAID HIGH COURT

The humble petition of the petitioner named above

MOST RESPECTFULLY SHOWETH-

1. The petitioner by the present Public Interest Litigation has highlighted the fact that thousands of students with

disabilities and particularly those suffering from blindness, hearing impairment and mental retardation, studying in 1000 Delhi Government and 1800 MCD run schools, are without trained teachers including teachers qualified in sign language and/or Braille. The petitioner has also highlighted the fact that the students with disabilities do not get a barrier free environment in these schools. The petitioner has further highlighted the fact that special books and equipment needed for the education of the students with disabilities is also not being provided to them by the schools. It is submitted that the said inactions on the part of the respondents result in violation of the Human and Fundamental Right to education of thousand of students with disabilities as guaranteed to such students under Articles 14, 15, 21, 21-A and 38 of the Constitution of India read with the provisions of Delhi School Education Act, 1973, UN Convention on the Rights of the Child (1989), Salamanca Statement (UNESCO, 1994), Persons with Disabilities (Equal Opportunities, Protection of Rights and Full Participation) Act, 1995, National Charter for Children, 2003 and UN Convention on the Rights of Persons with Disabilities (2008).

2. The facts of the case so far as relevant for the purposes of present petition are given in brief as under.

3. The petitioner submits that the Government of NCT of Delhi runs about 1000 schools whereas Municipal Corporation of Delhi runs about 1800 schools in Delhi. It is submitted that about 12 lakh students study in Delhi Government schools whereas about 10 lakh students study in MCD run schools. It is submitted that almost every school has two to three students with disabilities. It is submitted that there was a time when these schools were flatly refusing admission to the children with disabilities. The situation, fortunately, has now changed to some extent. The children with disabilities, though reluctantly, are given admission in the schools but the schools do not know how to deal with them. Such children particularly those suffering from blindness, hearing impairment and mental retardation are however not given any education, attention or care and even discouraged and cursed by the school. The result is that the children those who are in schools do not learn anything and those who are out of school do not dare to attend the school.

4. The petitioner submits that few instances would suffice to make out a case. A three-member team consisting of Advocate Ashok Agarwal, Social Worker Akbar Ali and Law Student Ms. Priya Bhatia visited MCD Primary Schools, C and H Block, Jhangirpuri, Delhi on 19.01.2008. During their visit, they met Azad, Nuruddin, Chandu and also the school principals and teachers. Azad and Nuruddin, 11 yrs and 8 yrs old, are deaf and dumb students of III and I standards respectively of the MCD

School, C Block, Jahangirpuri, Delhi. Mr. Surinder Kumar is the class teacher of student Azad who has passed ETE course from Haryana DIET whereas Mr. Raj Kumar is the class teacher of student Nuruddin who has passed ETE from Delhi DIET. Both these teachers candidly admit that they do not know how to teach these students as they have never been given any training in this regard. It is unfortunate that the Principal of the school is still carrying an age-old notion that such students should be admitted in special schools only.

] Similarly, 10 yrs old student Chandu, suffering from the disability of mental retardation, is the student of class III of MCD School, H Block, Jahangirpuri, Delhi. The school does not have any medical profile of student Chandu. None of the schoolteachers is trained to teach a student like Chandu. In his school bag, Chandu was found carrying some books and one copy. The copy was found to be blank though Chandu has already completed 10 months in class III. The teachers admit that Chandu has not learnt any thing.

5. The petitioner submits that they have brought these facts to the notice of the MCD by a letter dated 08.05.2008 stating that the children with disabilities other than the children with locomotor disabilities studying in MCD schools are the worst sufferers as the teachers attending them do not know how to teach them. The schools are totally unequipped to teach them. A copy of the report-dated 30.01.2008 titled 'Taare Zameen Par Fails to Move MCD Authorities' was also sent to MCD along with the said letter dated 08.05.2008.

True copies of the said letter dated 08.05.2008 and the report-dated 30.01.2008 are enclosed hereto as Annexure-A and B respectively.

6. The petitioner submits that they have received an evasive reply dated 25.07.08 from MCD according to which one teacher from each school has been given training under IEDC to train them how to deal with disabled children in class. School have also been made disabled friendly through infrastructural changes and development. Department was exploring the possibility through SSA to get special teachers which would be an added advantage to enhance the quality of education as well as care of such children.

A true copy of the said reply dated 25.07.2008 is enclosed hereto as Annexure-C.

7. The petitioner submits that Mr. Ashok Agarwal, Advocate met the aforementioned students, namely, Azad, Nuruddin and Chandu again on 01.09.2008. He found that trained teachers have still not been provided to Azad, Nuruddin and Chandu, who are in dire need of the same and without whom they are unable to receive any education. It is submitted that since the students Azad and Nuruddin are deaf and dumb, they need a teacher qualified in sign language.

8. The petitioner submits that Mr. Ashok Agarwal on 01.09.2008 also met 10 yr. old Avinash, who is a blind student of class III of MCD school, E Block, Jahangirpuri, Delhi. Initially admitted to the school in class I, he was promoted to class II and then in the last year to class III and in this year he is still in class III. However, there is no one to teach him in the school. He is in dire need of a specially trained teacher (qualified in Braille) without whom he cannot receive any education. He is also in need of books including reading and writing material in Braille. It is interesting to note that Avinash is so curious to learn that inspite of no one being there in the school to teach him, he is regularly attending his classes with the hope that one day the school will take care of his education by providing a trained teacher. However, he is getting frustrated because of the fact that inspite of airing his grievance through NDTV and India News channels, nothing has happened so far.

9. The petitioner submits that there are some more cases which have come to their notice where the students with hearing impairment and mental retardation (also known as intellectual impairment) studying in MCD schools are in need of specially trained teachers for their education but there is no one to teach them. Details of such children are as under:-

- (i) Pooja, student of class III of MCD Primary School, Ladosarai, is a hearing impaired.
- (ii) Geeta, student of class IV of MCD Primary School, Begumpur, is mentally retarded.
- (iii) Sania, student of class IV of MCD Primary School, Begumpur, is mentally retarded.
- (iv) Muskan, student of class Nursery of MCD Primary School, Haujrani, Saket, is mentally retarded.
- (v) Sayaid Umar, student of class III of MCD Primary School, Begumpur, is mentally retarded.

10. The failure on the part of the authorities to provide quality education, attention and care to the children with disabilities tantamounts to violation of Fundamental and Human Right to education of all such children as guaranteed to them under Articles 14 (Right to Equality), 21 (Right to Life with dignity) and 21-A (Right to Education) read with the provisions of Persons with Disabilities (Equal Opportunities, Protection of Rights and Full Participation) Act, 1995, National Charter for Children, 2003 and UN Convention on the Rights of Persons with Disabilities (2008).

11. The petitioner submits that Dr. Madan Mohan Jha in his book titled, "School Without Walls", writes as under:-

"Rights and Social Justice Perspective

The medical and diagnostic approach to disability, treating it as an individual problem and looking at it from the angle of charity and benevolence, started being questioned in a democratic society and polity, and questions of human rights, equity and social justice were raised. The charity and humanitarian approach was replaced by the entitlement of equal opportunities for the disabled and nation states were called upon to provide them for the disabled as they would for the non-disabled. Disability, instead of being regarded as an individual problem, was considered something constructed by the social order and societal arrangements. The rights movement got an impetus with a number of United Nations conventions and charters, some of which are listed here.

UN World Programme of Action Concerning Disabled Persons (1983)

Member states should adopt policies which recognize the rights of disabled persons to equal educational opportunities with others. The education of the disabled should as far as possible take place in the general education system...(Article 120).

UN Convention on the Rights of the Child (1989)

State Parties... [should] ensure that the disabled child has effective access to and receives education, training, health care services...in a manner conducive to the child's fullest possible social integration...(Article 23.1/3).

World Declaration on Education For All (1990)

The learning needs of the disabled demand special attention. Steps need to be taken to provide equal access to education to every category of disabled persons as an integral part of the education system.... (Article 3.5)

UN Standard Rules (1993)

They [persons with disability] should receive the support they need within the ordinary structures of education, health, employment and social services. (Introduction, Article 26). States should recognize the principle of equal primary, secondary and tertiary educational opportunities for children, youth and adults with disabilities, in integrated settings. They should ensure that the education of the persons with disabilities is an integral part of the education system (Rule 6).

World Conference on SEN: Access and Equity (1994)

Every child has a fundamental right to education, and must be given the opportunity to achieve and maintain an acceptable level of learning.

The World Education Forum, Dakar (2000)

There is no specific mention of education for the disabled or for children with special needs. However, Goal ii of the 'Framework for Action' refers to 'children in difficult circumstances' and 'commits' to the attainment of 'free and compulsory primary education of good quality' for them, among others, by 2015. the document also notes under paragraph 32:

No one should be denied the opportunity to complete a good quality primary education because it is unaffordable. Child labour must not stand in the way of education. The inclusion of children with special needs, from disadvantaged ethnic minorities, from remote and isolated communities and from urban and others excluded from education must be an integral part of strategies to achieve UPE by 2015 (UNESCO, 2000, p.15)."

12. The petitioner invites attention of this Hon'ble Court to the provisions of the UN Convention on the Rights of Persons with Disability as adopted by the UN General Assembly on 13.12.2006. It is submitted that India participated in the drafting of this Convention; signed it on the day it was opened for signature on 30th March 2007 and was amongst the first seven countries to

ratify the Convention on 1st October 2007. It is submitted that the said Convention came into force on 03.05.2008. The relevant Article 24 of the said Convention deals with Education and the same is reproduced as under:-

Article 24
Education

1. *States Parties recognize the right of persons with disabilities to education. With a view to realizing this right without discrimination and on the basis of equal opportunity, States Parties shall ensure an inclusive education system at all levels and life long learning directed to:*

- (a) The full development of human potential and sense of dignity and self-worth, and the strengthening of respect for human rights, fundamental freedoms and human diversity;*
- (b) The development by persons with disabilities of their personality, talents and creativity, as well as their mental and physical abilities, to their fullest potential;*
- (c) Enabling persons with disabilities to participate effectively in a free society.*

2. *In realizing this right, States Parties shall ensure that:*

- (a) Persons with disabilities are not excluded from the general education system on the basis of disability, and that children with disabilities are not excluded from free and compulsory primary education, or from secondary education, on the basis of disability;*
- (b) Persons with disabilities can access an inclusive, quality and free primary education and secondary education on an equal basis with others in the communities in which they live;*
- (c) Reasonable accommodation of the individual's requirements is provided;*
- (d) Persons with disabilities receive the support required, within the general education system, to facilitate their effective education;*
- (e) Effective individualized support measures are provided in environments that maximize academic and social development, consistent with the goal of full inclusion.*

3. *States Parties shall enable persons with disabilities to learn life and social development skills to facilitate their full and equal*

participation in education and as members of the community. To this end, States Parties shall take appropriate measures, including:

- (a) Facilitating the learning of Braille, alternative script, augmentative and alternative modes, means and formats of communication and orientation and mobility skills, and facilitating peer support and mentoring;*
- (b) Facilitating the learning of sign language and the promotion of the linguistic identity of the deaf community;*
- (c) Ensuring that the education of persons, and in particular children, who are blind, deaf or deaf blind, is delivered in the most appropriate languages and modes and means of communication for the individual, and in environments which maximize academic and social development.*

4. In order to help ensure the realization of this right, States Parties shall take appropriate measures to employ teachers, including teachers with disabilities, who are qualified in sign language and/or Braille, and to train professionals and staff who work at all levels of education. Such training shall incorporate disability awareness and the use of appropriate augmentative and alternative modes, means and formats of communication, educational techniques and materials to support persons with disabilities.

5. States Parties shall ensure that persons with disabilities are able to access general tertiary education, vocational training, adult education and lifelong learning without discrimination and on an equal basis with others. To this end, States Parties shall ensure that reasonable accommodation is provided to persons with disabilities.

A true copy of the said Convention on the Rights of Persons with Disability is enclosed hereto as Annexure-D.

13. The petitioner also invites attention of this Hon'ble Court to the provisions of the Persons with Disabilities (Equal Opportunities, Protection of Rights and Full Participation) Act, 1995. It is submitted that the relevant provisions of Sections 26 to 31 which deal with Education are reproduced as under:-

Section 26. Appropriate Governments and local authorities to provide children with disabilities free education, etc. - The appropriate Governments and the local authorities shall -

- a. ensure that every child with a disability has access to free education in an appropriate environment till he attains the age of eighteen years;*

- b. *endeavour to promote the integration of students with disabilities in the normal schools;*
- c. *promote setting up of special schools in Government and private sector for those in need of special education, in such a manner that children with disabilities living in any part of the country have access to such schools;*
- d. *endeavour to equip the special schools for children with disabilities with vocational training facilities.*

Section 27. Appropriate Governments and local authorities to make schemes and programmes for non-formal education, etc. - The appropriate Governments and the local authorities shall by notification make schemes for -

- a. *conducting part-time classes in respect of children with disabilities who having completed education up to class fifth and could not continue their studies on a whole-time basis;*
- b. *conducting special part-time classes for providing functional literacy for children in the age group of sixteen and above;*
- c. *imparting non-formal education by utilizing the available manpower in rural areas after giving them appropriate orientation;*
- d. *imparting education through open schools or open universities;*
- e. *conducting class and discussions through interactive electronic or other media;*
- f. *providing every child with disability free of cost special books and equipments needed for his education.*

Section 28. Research for designing and developing new assistive devices, teaching aids, etc. - The appropriate Governments shall initiate or cause to be initiated research by official and non-governmental agencies for the purpose of designing and developing new assistive devices, teaching aids, special teaching materials or such other items as are necessary to give a child with disability equal opportunities in education.

Section 29. Appropriate Governments to set up teachers' training institutions to develop trained manpower for schools for children with disabilities, - The appropriate Governments shall set up

adequate number of teachers' training institutions and assist the national institutes and other voluntary organisations to develop teachers' training programmes specialising in disabilities so that requisite trained manpower is available for special schools and integrated schools for children with disabilities.

Section 30. Appropriate Governments to prepare a comprehensive education scheme providing for transport facilities, supply of books, etc.- Without prejudice to the foregoing provisions, the appropriate Governments shall by notification prepare a comprehensive education scheme which shall make provision for -

- a. transport facilities to the children with disabilities or in the alternative financial incentives to parents or guardians to enable their children with disabilities to attend schools;*
- b. the removal of architectural barriers from schools, colleges or other institutions imparting vocational and professional training;*
- c. the supply of books, uniforms and other materials to children with disabilities attending school;*
- d. the grant of scholarship to students with disabilities;*
- e. setting up of appropriate fora for the redressal of grievances of parents regarding the placement of their children with disabilities;*
- f. suitable modification in the examination system to eliminate purely mathematical questions for the benefit of blind students and students with low vision;*
- g. restructuring of curriculum for the benefit of children with disabilities;*
- h. restructuring the curriculum for benefit of students with hearing impairment to facilitate them to take only one language as part of their curriculum.*

Section 31. Educational institutions to provide amanuensis to students with visual handicap.- All educational institutions shall provide or cause to be provided amanuensis to blind students and students with or low vision.

14. The petitioner submits that in the absence of specially trained teachers for the students suffering with disabilities and particularly those suffering from blindness, hearing impairment and mental retardation, such students do not learn anything on account of education, resulting in early dropout from the schools.

It is submitted that specially trained teachers for the students with disabilities are not available in both Govt. and MCD run schools. It is interesting to note that both the Govt. of Delhi and MCD have yet not created the required posts of specially trained teachers for the children with disabilities. It is submitted that such a situation is bound to discourage children with disabilities to even enter into the mainstream school system. It also leads to a situation where schools refuse admission to such children. There are several instances, which have come to the notice of the petitioner, where the schools have refused to give admission to the students suffering with disabilities like blindness, hearing impairment and mental retardation. As a matter of illustration, some such instances are given below:-

- (i) Vandana suffering from mental retardation was refused admission in MCD Primary School, Ladosarai.
- (ii) Monu suffering from mental retardation was refused admission in MCD Primary School, Ladosarai.
- (iii) Sanjay suffering from mental retardation was refused admission in MCD Primary School, Savitri Nagar.
- (iv) Gagandeeep suffering from mental retardation was refused admission in MCD Primary School, Savitri Nagar.
- (v) Amree suffering from mental retardation was refused admission in MCD Primary School, Haujrani.
- (vi) Sahil suffering from mental retardation was refused admission in MCD Primary School, Begumpur.

15. The petitioner submits that besides the non-availability of specially trained teachers for the students suffering with disabilities like blindness, hearing impairment and mental retardation, almost all Government and MCD schools lack in providing barrier free environment to the students with disabilities. The common problems being faced by the students suffering with locomotors disability is that their classes are held on upper floors though the same should be held on the ground floor, special toilets should be constructed for them and toilets should be near their classes. .As a matter of illustration, some such instances are given below:-

- (i) Sakina, a student of class VII C of the Govt. Girls Senior Secondary School, Jahangirpuri, is suffering from locomotor disability. The school toilet and the provision for drinking water are both quite far from her class due to which she has to face a lot of problem.

- (ii) Rajesh, a student of class IX C of the Govt. Boys Senior Secondary School, Jahangirpuri, is suffering from locomotor disability and both his legs are dysfunctional. His class is held on the 1st floor which causes a lot of difficulty to him. His friends have to carry him to the class and back also. There is no toilet in the school suited to his needs.
- (iii) Mobin, a student of class IV B of MCD Primary School, D Block, is suffering from locomotor disability and both his legs are dysfunctional. There is no toilet in the school suited to his needs and he has to go back to his home to use a toilet.

True copies of the students' complaints dated 01.09.2008 containing the above facts are enclosed hereto as Annexure-E Collectively.

16. It is submitted that it is needless to say that to overcome the difficulties being faced by the students with disabilities and to encourage all the children with disabilities to enter into the mainstream school system, the school authorities need to be highly sensitive.

17. The petitioner invites attention of this Hon'ble Court to an order dated 19.03.2008 of a Division Bench of this Hon'ble Court passed in a batch of PILs dealing with the issues relating to the absence of basic amenities in Government and MCD run schools where the learned Judges observed, "We are also informed that there are some disadvantaged and physically challenged students studying in these schools. Proper arrangements should be made by the Municipal Corporation of Delhi and the Govt. of Delhi for imparting education to such students". It is submitted that the authorities have not taken any steps to implement the aforementioned directions so far.

A true copy of the said order dated 19.03.2008 is enclosed hereto as Annexure-F.

18. The petitioner submits that as a result of a PIL (W.P.(C) No. 1342 of 2003) having been filed by the petitioner in this Hon'ble Court, the Govt. of India notified a comprehensive education scheme for the children with disabilities as required under section 30 of the Persons with Disabilities (Equal Opportunities, Protection of Rights and Full Participation) Act, 1995. It is submitted that the respondents till date have not implemented the provisions of this statutory scheme.

A true copy of the said notification dated 04.11.2004 is enclosed hereto as Annexure-G.

19. The petitioner submits that the respondents are constitutionally and statutorily obliged to ensure that all the children with disabilities are not only brought within the mainstream school system but also to provide them with all requisite educational environment and facilities including teachers qualified in sign language and/or Braille, so that they acquire necessary educational skills. By failing to do so, the respondents are violating the Human and Fundamental Right to Education of all these children with disabilities as guaranteed to these children under the Constitution, Statutory laws and Conventions. It is submitted that there are lakhs of children with disabilities in Delhi alone who have never attended school and the respondents have not been making any sincere effort to bring them into the mainstream school system and to educate them to make their life meaningful and liberate them from the bondage of depending on the mercy of others.

20. The petitioner submits that the present petition has been filed in public interest as thousands of students with disabilities belonging to weaker sections of society and studying in the respondents schools are deprived of their human and fundamental right to education as guaranteed to them under the Constitution of India.

21. That the petitioner submits that they have not filed any similar petition either in the Hon'ble Supreme Court or in any High Court in India.

22. That the petitioner submits that they have no other efficacious alternative remedy except to approach this Hon'ble Court by way of present PIL.

23. In the premise aforesaid, the petitioner most humbly prays that this Hon'ble Court may be pleased to:-

- a. issue any appropriate writ, order or direction, directing the respondents to forthwith provide specially trained teachers including teachers qualified in sign language and/or Braille to the students with disabilities, particularly those suffering with disabilities like blindness, hearing impairment and mental retardation;

- b. issue any appropriate writ, order or direction, directing the respondents to provide barrier free environment in the schools to the students with disabilities by providing special toilets, ramps etc;
- c. issue any appropriate writ, order or direction, directing the respondents to forthwith provide special books including reading and writing material in Braille and other equipments needed for the education of the blind students;
- d. issue any other appropriate writ, order or direction as this Hon'ble Court may deem fit and proper in the facts and circumstances of this case in favour of the petitioner and against the respondents; and
- e. allow the present PIL with costs.

New Delhi
Aggarwal)

Dated: 15.09.2008
petitioner

(Ashok Agarwal & Anuj

Advocates for the