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CODE NO.
P. I. L. BENCH 2020
DISTRICT-LUCKNOW

**IN THE HON'BLE HIGH COURT OF JUDICATURE AT
ALLAHABAD, LUCKNOW BENCH, LUCKNOW**

Writ Petition No. (M/B) of 2020 (P.I.L.)

Krishan Kanhaya Pal

-----Petitioner
(In Person)

Versus

Union of India & others

-----Opposite Parties

I N D E X

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LUCKNOW

DATED: 08/09/2020

KK Pal

(KRISHAN KANHAYA PAL)

Advocate

Petitioner In Person

U.P.E. No. 1190/2002

Advocate on roll No. B/K0231

Mobile No. 9415839759

Krishan
n
Kanhaya
Pal

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Kanhaya Pal

DN: CN=Krishan Kanhaya

Pal, O=A.O.R. No.

B/k0231, OU="Mobile no.

8839321807, 9415839759",

E=advocatekkpal@gmail.c

om, C=IN

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**IN THE HON'BLE HIGH COURT OF JUDICATURE AT
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LIST OF DATES AND EVENTS

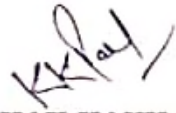
Sl. No.	Dates	Events
1.	---	That Virgin Bhaskar an Indian Web Series the second season, in which, the name of the girls hostel has been named/mentioned i.e. Ahilyabai Girls Hostel.
2.	---	That the Virgin Bhaskar is a Indian Hindi Language Web Series, Virgin Bhaskar Season-2 was released on 29.08.2020 on ALT Balaji and Zee-5, Anant Joshi and Rut Panna Aishwarya are main cost of Virgin Bhaskar Web Series. Virgin Bhaskar Season-2 is directed by Sakshat dalvi and Sangeeta Rao, ALT Balaji is a Indian Subscription based video on demand platform which is wholly owned Subsidiary of Balaji telefilms Ltd., Launched on 16.04.2017, ALT Balaji is the group's foray into the digital entertainment sphere to create Original OTT Content, Owner Balaji

		telefilms, CEO- Nachiket Pant vaidya (November 2017), Founder -F.K.T.A. Kapoor, Founded 2000, Headquarters location : Mumbai, ZEE-5 is an Indian video on demand service run by Essel group via its subsidiary Zee entertainment enterprises. It was launched in India on 14.02.2018 with content in 12 language, the zee mobile app is available on web androvid, smart TVS, among other devices, Owner zee entertainment enterprises (Essel group) headquarters-Mumbai India, Area served 1904 countries. Users : 150 millien + worldwide (total), it is relevant to mention here that in the above mentioned web series the name of the Girls Hostel has been mentioned i.e. Ahilyabai Girls Hostel, which is highly objectionable and defamatory because the name Ahilyabai is the same name, and similar name to Devi/Maharani Ahilyabai Holkar, Devi/Maharani Ahilyabai holkar was the hereditary noble Sardar of the Maratha Empire, Devi/Maharani Ahilyabai holkar was born in the village of chandi in Jakhed Ahmed Nagar Maharashtra, she moved the seat of her fiefdom to Mahashwar sauth of Indore on the Narmada rivers, Religion- Hindusim, Ahilyabai holkar (31.05.1725 - 13.08.1795).
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3.	---	That the petitioner is practicing advocate at Allahabad High Court Sitting at Lucknow and he is also member of Awadh Bar Association of Allahabad High Court sitting at Lucknow and the petitioner's religion is "Hindu" and he belong to shepherd caste and have great respect for Devi Ahilyabai Holkar.
4.	---	That it is relevant to mention here that, after release of the above mentioned web series the people namely belongs to Hindu Religion and shepherd community, are agitating and organizing protest all over the country.
5.	---	That by mentioning the name of girls hostel i.e. Ahilyabai Girls hostel, in the web series (Virgin Bhaskar Season-2), heart the sentiments of the public at large, across the India as well as other countries of the world.
		Hence the present Writ Petition (PIL).

LUCKNOW

DATED: 08/09/2020


(KRISHAN KANHAYA PAL)

Advocate

Petitioner In Person

U.P.E. No. 1190/2002

Advocate on roll No. B/K0231

Mobile No. 9415839759

**IN THE HON'BLE HIGH COURT OF JUDICATURE AT
ALLAHABAD, LUCKNOW BENCH, LUCKNOW**

C.M. Application No. (M/B)/2020

In re:

Writ Petition No. (M/B) of 2020 (P.I.L.)

Krishan Kanhaya Pal Advocate S/o Daya Ram Pal
Resident of 3/81 Vishwas Khand Gomti Nagar Lucknow.

..... Petitioner
(In Person)

Versus

1. **Union of India** Through its Secretary Ministry of Home affairs North Block New Delhi-110001.
2. Secretary, Ministry of information and broadcasting Government of India Room No. 665, A Wing Shastri Bhawan New Delhi-110001.
3. Censor Board of film certification through its chief Executive officer, Fims Division Complex, Phase-1 building 9th floor, Dr. G. Deshmukh Marg Mumbai-400026.
4. Balaji Telefilms Limited, through its founder/C.E.O., C-13 Balaji House Dalia Industrial Estate opp, Laxmi Industrial Estate New link Road, Andhere (w), Mumbai 400053, Maharashtra.
5. Zee -5 through its C.E.O., corporate and registered office 18th floor, A-wing, Marathon futerex Lower Parel Mumbai, Maharashtra, India.

..... Opposite parties

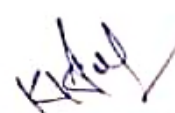
APPLICATION FOR INTERIM RELIEF

The applicant/petitioner, named above most respectfully begs to submit as under:-

For the facts, reasons and circumstances revealed in the memo of writ petition, it is most respectfully prayed that this Hon'ble Court may graciously be pleased direct to opposite party No. 2 & 3 to stay the broadcasting of the web series i.e. Virgin Bhaskar Season-2, immediately in the interest of justice.

Any other order or direction which this Hon'ble Court may deem, fit and proper under the circumstances of the case may also be passed in favour of the petitioner.

LUCKNOW
DATED: 08/09/2020


(KRISHAN KANHAYA PAL)
Advocate
Petitioner In Person
U.P.E. No. 1190/2002
Advocate on roll No. B/K0231
Mobile No. 9415839759

7

**IN THE HON'BLE HIGH COURT OF JUDICATURE AT
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Writ Petition No.

(M/B) of 2020 (P.I.L.)

Krishan Kanhaya Pal Advocate S/o Daya Ram Pal
Resident of 3/81 Vishwas Khand Gomti Nagar Lucknow.
..... Petitioner
(In Person)

Versus

1. **Union of India** Through its Secretary Ministry of Home affairs North Block New Delhi-110001.
2. **Secretary, Ministry of information and broadcasting** Government of India Room No. 665, A Wing Shastri Bhawan New Delhi-110001.
3. **Censor Board of film certification** through its chief Executive officer, Fims Division Complex, Phase-1 building 9th floor, Dr. G. Deshmukh Marg Mumbai-400026.
4. **Balaji Telefilms Limited**, though its founder/C.E.O., C-13 Balaji House Dalia Industrial Estate opp, Laxmi Industrial Estate New link Road, Andhere (w), Mumbai 400053, Maharashtra.
5. **Zee -5** through its C.E.O., corporate and registered office 18th floor, A-wing, Marathon futerex Lower Parel Mumbai, Maharashtra, India.

.....Opposite parties

KK/Pal

WRIT PETITION UNDER ARTICLE 226 OF THE
CONSTITUTION OF INDIA

To,
The Hon'ble Chief Justice and his companion
Judges of this Hon'ble Court.

The petitioner named above most respectfully begs
to submit as under: -

1. That no notice, information or copy of caveat petition has been received to the petitioner from any one either by registered post or by any other means till today.
2. That legislature made a balance between public interest and private interest, and whenever private interest proceeds to supersede public interest then chaotic situation erupts out, that in compliance of the provisions of chapter XXII R.1 sub rule 3-A of the Allahbad High Court rules it submitted that the petitioner has no personal interest in the present matter, that the result of the litigation will not lead to any undue gain to the petitioner nor to anyone associated with him or undue loss to any person or body persons or state in the present writ petition, that there is no authoritative pronouncement in the present matter by Hon'ble Apex Court & High Court.

KKJ /

3. That the petitioner makes very clear that petitioner is filing the present writ petition for the welfare of public at large.
4. That by means of present writ petition in the nature of PIL filed by the petitioner against the arbitrariness of the opposite parties concerned whereby the opposite party no. 2, 3, 4 & 5 released the Web Series i.e. "Virgin Bhaskar Season-2" was released on 29.08.2020 on ALT Balaji and Zee-5, Anant Joshi and Rut Panna Aishwarya are main cost of Virgin Bhaskar Web Series. Virgin Bhaskar Season-2 is directed by Sakshat dalvi and Sangeeta Rao, ALT Balaji is a Indian Subscription based video on demand platform which is wholly owned Subsidiary of Balaji telefilms Ltd., Launched on 16.04.2017, ALT Balaji is the group's foray into the digital entertainment sphere to create Original OTT Content, Owner Balaji telefilms, CEO- Nachiket Pant vaidya (November 2017), Founder -F.K.T.A. Kapoor, Founded 2000, Headquarters location : Mumbai, ZEE-5 is an Indian video on demand service run by Essel group via its subsidiary Zee entertainment enterprises. It was launched in India on 14.02.2018 with content in 12 language, the zee mobile app is available on web androvid, smart TVS,

K. K. Joshi

among other devices, Owner zee entertainment enterprises (Essel group) headquarters-Mumbai India, Area served 1904 countries. Users : 150 millien + worldwide (total), it is relevant to mention here that in the above mentioned web series the name of the Girls Hostel has been mentioned i.e. Ahilyabai Girls Hostel, which is highly objectionable and defamatory because the name Ahilyabai is the same name, and similar name to Devi/Maharani Ahilyabai Holkar, Devi/Maharani Ahilyabai holkar was the hereditary noble Sardar of the Maratha Empire, Devi/Maharani Ahilyabai holkar was born in the village of chandi in Jakhed Ahmed Nagar Maharashtra, she moved the seat of her fiefdom to Mahashwar sauth of Indore on the Narmada rivers, Religion- Hindusim, Ahilyabai holkar (31.05.1725 - 13.08.1795).

5. That the brief facts of the Petition are that Virgin Bhaskar an Indian Web Series the second season, in which, the name of the girls hostel has been named/mentioned i.e. Ahilyabai Girls Hostel, the copy of the scene of the web series (Virgin Bhaskar Season-2) is being annexed herewith as **ANNEXURE NO. 1** with this writ petition.

6. That the Virgin Bhaskar is a Indian Hindi Language Web Series, Virgin Bhaskar Season-2 was released on 29.08.2020 on ALT Balaji and Zee-5, Anant Joshi and Rut Panna Aishwarya are main cost of Virgin Bhaskar Web Series. Virgin Bhaskar Season-2 is directed by Sakshat dalvi and Sangeeta Rao, ALT Balaji is a Indian Subscription based video on demand platform which is wholly owned Subsidiary of Balaji telefilms Ltd., Launched on 16.04.2017, ALT Balaji is the group's foray into the digital entertainment sphere to create Original OTT Content, Owner Balaji telefilms, CEO- Nachiket Pant vaidya (November 2017), Founder -F.K.T.A. Kapoor, Founded 2000, Headquarters location : Mumbai, ZEE-5 is an Indian video on demand service run by Essel group via its subsidiary Zee entertainment enterprises. It was launched in India on 14.02.2018 with content in 12 language, the zee mobile app is available on web androvid, smart TVS, among other devices, Owner zee entertainment enterprises (Essel group) headquarters-Mumbai India, Area served 1904 countries. Users : 150 millien + worldwide (total), it is relevant to mention here that in the above mentioned web series the name of the Girls Hostel has been mentioned i.e.

KKP

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7. That the petitioner is practicing advocate at Allahabad High Court Sitting at Lucknow and he is also member of Awadh Bar Association of Allahabad High Court sitting at Lucknow and the petitioner's religion is "Hindu" and he belong to shepherd caste and have great respect for Devi Ahilyabai Holkar.
8. That it is relevant to mention here that, after release of the above mentioned web series the people namely belongs to Hindu Religion and shepherd community, are agitating and organizing protest all over the country.



9. That by mentioning the name of girls hostel i.e. Ahilyabai Girls hostel, in the web series (Virgin Bhaskar Season-2), hurt the sentiments of the public at large, across the India as well as other countries of the world.
10. That proper exercise of power conferred by legislature is also the main limb of democracy and it is being done then in differentness may hurt the inevitable interest of public at large and it is clear violation of Article 14 of the Constitution of India.
11. That petitioner has no any efficacious, speedy and adequate remedy so that petitioner is filing this writ petition on the following grounds amongst other:-

G R O U N D S

- A. That the brief facts of the Petition is that Virgin Bhaskar an Indian Web Series the second season, in which, the name of the girls hostel has been named/mentioned i.e. Ahilyabai Girls Hostel.
- B. That the Virgin Bhaskar is a Indian Hindi Language Web Series, Virgin Bhaskar Season-2 was released on 29.08.2020 on ALT Balaji and Zee-5, Anant Joshi and Rut Panna Aishwarya are main cost of Virgin Bhaskar Web Series. Virgin Bhaskar Season-2 is directed by Sakshat dalvi and Sangeeta Rao, ALT Balaji is a Indian Subscription based video on

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K.A.S. /

Maharashtra, she moved the seat of her fiefdom to Mahashwar south of Indore on the Narmada rivers, Religion- Hindusim, Ahilyabai holkar (31.05.1725 - 13.08.1795).

- C. That the petitioner is practicing advocate at Allahabad High Court Sitting at Lucknow and he is also member of Awadh Bar Association of Allahabad High Court sitting at Lucknow and the petitioner's religion is "Hindu" and he belong to shepherd caste and have great respect for Devi Ahilyabai Holkar.
- D. That it is relevant to mention here that, after release of the above mentioned web series the people namely belongs to Hindu Religion and shepherd community, are agitating and organizing protest all over the country.
- E. That by mentioning the name of girls hostel i.e. Ahilyabai Girls hostel, in the web series (Virgin Bhaskar Season-2), heart the sentiments of the public at large, across the India as well as other countries of the world.

PRAYER

Wherefore, it is most respectfully prayed that this Hon'ble Court may graciously be pleased to: -

- i) to issue a writ, order or direction in the nature of Mandamus thereby Commanding/directing the

opposite party no. 2 & 3 to stay the broadcasting of the web series i.e. Virgin Bhaskar Season-2 immediately.

- ii) to issue a writ, order or direction in the nature of Mandamus thereby Commanding/directing the opposite party no. 2 & 3 to delete/change the name i.e. Ahilyabai Girls Hostel from the scene of web series Virgin Bhaskar season-2 .
- iii) to issue any other writ, order or direction which this Hon'ble Court may deem fit and proper in the circumstances of the case.
- iv) to allow the writ petition with costs.

LUCKNOW
DATED: 08/09/2020

K. Kanhaya Pal /

K. Kanhaya Pal /

(KRISHAN KANHAYA PAL)

Advocate

Petitioner In Person

U.P.E. No. 1190/2002

Advocate on roll No. B/K0231

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**IN THE HON'BLE HIGH COURT OF JUDICATURE AT
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Krishan Kanhaya Pal Versus Union of U.P. & others

ANNEXURE NO. 1



**IN THE HON'BLE HIGH COURT OF JUDICATURE AT
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Writ Petition No. (M/B) of 2020 (P.I.L.)
Krishan Kanhaya Pal Versus Union of U.P. & others
ANNEXURE NO. 2



11 MAY 1725 – 11 AUGUST 1795

A queen, a ruler
and an politician



The Queen of Malwa, apart from being a brave queen and proficient ruler, was also an erudite politician. She observed the bigger picture when the Maratha Peshwa couldn't pin down the agenda of the British.

In latter days from Brahma came,

To rule our land, a noble dame,

Kind was her heart and bright her fame,

Ahilya was her honoured name," writes poet

Joanna Baillie in 1849 in honour of one of the

KH



(31 MAY 1725 – 13 AUGUST 1795)

A queen, a ruler
and an politician.



The Untold Story of the Brave Maratha Warrior Queen Ahilyabai Holkar!

The Queen of Malwa, apart from being a brave queen and proficient ruler, was also an erudite politician. She observed the bigger picture when the Maratha Peshwa couldn't pin down the agenda of the British.

“In latter days from Brahma came,
To rule our land, a noble dame,
Kind was her heart and bright her fame,
Ahilya was her honoured name,” writes poet
Joanna Baillie in 1849 in honour of one of the

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greatest Maratha woman rulers of Malwa Born in the village of Chondi in Jamkhed, Ahmednagar, Maharani Ahilyabai or as she was fondly referred to Rajmata Ahilyabai Holkar was the Holkar Queen of the Malwa kingdom



Her father, Mankoji Rao Shinde, was the Patil (chief) of the village. Despite women's education being a far cry in the village, her father homeschooled her to read and write.

K.K.S. /

While Ahilya did not come from a royal lineage, most deem her entry into history a twist of fate. It dates back to when the acclaimed Lord of the Malwa territory, Malhar Rao Holkar, spotted an eight-year-old Ahilyabai at the temple service feeding the hungry and poor, on his stop in Chaundi while travelling to Pune.

Moved by the young girl's charity and strength of character, he decided to ask her hand in marriage for his son Khanderao Holkar. She was married to Khanderao Holkar in 1733 at the tender age of 8.

But distress was quick to befall the young bride when her husband Khanderao was killed in the battle of Kumbher in 1754, leaving her a widow at only 29.

When Ahilyabai was about to commit Sati, her father-in-law Malhar Rao refused to let it happen.

He had been her strongest pillar of support at the time. But a young Ahilyabai could see her kingdom fall like a pack of cards after her father-in-law passed away in 1766, only 12 years after the death of his son Khanderao.

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The old ruler's death led to his grandson and Ahilyabai's only son Male Rao Holkar ascending the throne under her regency.

The last straw came when the young monarch Male Rao too died, a few months into his rule, on 5 April 1767, thus creating a vacuum in the power structure of the kingdom.

One can imagine how a woman, royalty or not, would suffer after losing her husband, father-in-law and only son. But Ahilyabai stood undeterred. She did not let the grief of her loss affect the administration of the kingdom and the lives of her people.

She took matters into her own hands. She petitioned the Peshwa after her son's death, to take over the administration herself. She ascended the throne and became the ruler of Indore on 11 December 1767.

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While there was indeed a section of the kingdom that objected to her assumption to the throne, her army of Holkars stood by her and supported their queen's leadership.

Just a year into her rule, one saw the brave Holkar queen protect her kingdom – fighting off invaders tooth and nail from plundering Malwa. Armed with

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swords and weapons, she led armies into the battlefield.

There she was, the queen of Malwa, slaying her enemies and invaders on battlefronts with four bows and quivers of arrows fitted to the corners of the howdah of her favourite elephant.

Her confidante on military matters was Subhedar Tukojirao Holkar (also Malhar Rao's adopted son) whom she appointed the head of the military.

The Queen of Malwa, apart from being a brave queen and proficient ruler, was also an erudite politician. She observed the bigger picture when the Maratha Peshwa couldn't pin down the agenda of the British.

In her letter to the Peshwa in 1772, she had warned him, calling the British embrace a bear-hug: "Other beasts, like tigers, can be killed by might or contrivance, but to kill a bear it is very difficult. It will die only if you kill it straight in the face, Or else, once caught in its powerful hold; the bear will kill its prey by tickling. Such is the way of the

KK/1

English. And given this, it is difficult to triumph over them."

Work and Achievement .



From a tiny village to a flourishing city, Indore prospered during her 30-year rule. She was famous for having built numerous forts and roads in Malwa, sponsoring festivals and giving donations to many Hindu temples.

Even outside her kingdom, her philanthropy reflected in the construction of dozens of temples, ghats, wells, tanks and rest-houses stretching from the Himalayas in the north to the pilgrimage centres in the south

Khal /

The Holkar queen also embellished and beautified various sites including Kashi, Gaya, Somnath, Ayodhya, Mathura, Hardwar, Kanchi, Avanti, Dwarka, Badrinarayan, Rameshwar and Jaganathpuri as recorded by the Bharatiya Sanskritikosh.

Her capital at Maheshwar was a melting pot of literary, musical, artistic and industrial achievements. She opened her capital's doors to stalwarts like Marathi poet Moropant, Shahir Anantaphandi and Sanskrit scholar, Khushali Ram.

Her capital was known for its distinct craftsmen, sculptors and artists who were paid handsomely for their work and kept in high regards by the Queen. She also moved on to establishing a textile industry in the city.

Ahilya, the compassionate ruler

KK/21



Ahilyabai held public audiences every day to help address the grievances of her people. She was always available to anyone who needed her ear.

Historians write how she encouraged all within her realm and her kingdom to do their best. During her reign, the merchants produced their most elegant clothes and trade flourished to no end. No more was the farmer a mere victim of oppression but a self-sufficient man in his own right.

KK/21

“Far and wide the roads were planted with shady trees, and wells were made, and rest-houses for travellers. The poor, the homeless, the orphaned were all helped according to their needs. The Bhils, who had long been the torment of all caravans, were routed from their mountain fastnesses and persuaded to settle down as honest farmers. Hindu and Musalman alike revered the famous Queen and prayed for her long life,” writes Annie Besant.

A woman ahead of her times, Ahilyabai's greatest sorrow continued to remain the irony that her daughter jumped into the funeral pyre and became a Sati upon the death of her husband, Yashwantrao Phanse.

She was 70 when she died and was succeeded by her commander-in-chief, Tukoji Rao Holkar I.

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“Indore long mourned its noble Queen, happy had been her reign, and her memory is cherished with deep reverence unto this day,” writes Besant.

K/21

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Writ Petition No. (M/B) of 2020(P.L.L.)

Krishan Kanhaya Pal & others -----Petitioner
(In Person)

Versus

Union of India & others -----Opposite Parties

AFFIDAVIT

I, **Krishan Kanhaya Pal** aged about 44 years S/o
Daya Ram Pal, R/o 3/81 Vishwas Khand Gomti Nagar
Lucknow, Religion-Hindu, Qualification-LL.B.,
Occupation-Advocate, do hereby solemnly affirm and
states on oath as under :-

1. That the deponent is the petitioner himself and as such is well conversant with the facts and the circumstances of the case deposed to hereunder.
2. That the result of the Litigation will not lead to any undue gain to the petitioner nor to anyone associated with them or undue loss to any person or body of persons or state in the present writ petition.
3. That the contents of paras of
the writ petition are true to my personal knowledge

K.K.Pal

(31)

of the writ petition are based on the information derived from records.

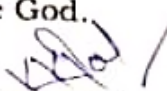
Lucknow :
Dated :


Deponent

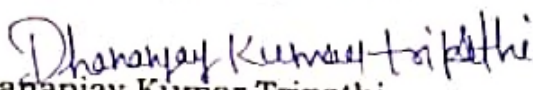
VERIFICATION

I the above named deponent do hereby verify that the contents of paras 1 to 3 of this affidavit are true to my personal knowledge and no part of it is false and nothing material has been concealed. So help me God.

Lucknow :
Dated :


Deponent

I, identify the deponent who has signed before me on the basis of record.


Dhananjay Kumar Tripathi
Advocate
Reg. No. 5942/2007
Advocate on roll no. B/D0159

Solemnly affirmed before me on _____ at _____ a.m./p.m.
by the deponent Krishan Kanhaya Pal, who is identified
by Dhananjay Kumar Tripathi, Advocate, High Court,
Lucknow Bench Lucknow.

I have satisfied myself by examining the deponent that he understands the contents of this affidavit which have been read over and explained by me to him.

OATH COMMISSIONER



भारतीय विशिष्ट पहचान अधिकरण

भारत सरकार

Unique Identification Authority of India
Government of India

नामांकन क्रम / Enrolment No 1424/26215/04441

To,
कृष्ण कन्हैया पाल
Krishan Kanhaya Pal
S/O. Daya Ram Pal
3/61
Vishwas Khand 3
Gomti Nagar
Gomti Nagar Bakshi Ka Talab Lucknow
Uttar Pradesh 226010
9415839759

Ref: 157 / 20E / 214893 / 215356 / P



SE111498995FT



आपका आधार क्रमांक / Your Aadhaar No. :

2118 2475 9465

आधार - आम आदमी का अधिकार



भारत सरकार
Government of India

कृष्ण कन्हैया पाल
Krishan Kanhaya Pal
जन्म तिथि / DOB : 10/01/1976
पुरुष / Male



2118 2475 9465

आधार - आम आदमी का अधिकार

INDIA e - Court Fee System



:: Verify e-Court Fee Receipt

Government of Uttar Pradesh
e-Court Fee Receipt

Issue Date & Time : 07-SEP-2020 19:36:32
Name of The Acc : ANUJ NISHAD
Location : UTTAR PRADESH
Receipt Type : Court Fee Receipt
Name of Litigant : KRISHAN KANHAYA PAL
e-Court Fee Receipt No : UPCT073212036T212
e-Court Fee Amount : 125
(Rupees One Hundred Twenty-Five Only)

Particulars	Amount (Rs.)
Memo	: 100
Stay Application	: 5
Delay Condonation Application	: 0
Affidavits	: 10
Vakalatnama / Parcha	: 5
Misc Applications	: 5
Other Annextures, if Any	: 0

Status : Not Locked

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**IN THE HON'BLE HIGH COURT OF JUDICATURE AT
ALLAHABAD, LUCKNOW BENCH, LUCKNOW**

Writ Petition No. (M/B) of 2020 (P.I.L.)

Krishan Kanhaya Pal

-----Petitioner
(In Person)

Versus

Union of India & others

-----Opposite Parties

APPLICATION FOR EXEMPTION FROM FILING AFFIDAVIT

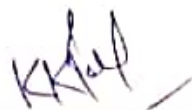
My Lord,

It is humbly submitted that due to Covid-19 pandemic the petitioner is unable to come to Hon'ble High Court to swear the affidavit, the same shall be filed whenever it will be required before the Hon'ble High Court hence kindly exempt the petitioner from filing the affidavit.

Thanking you.

LUCKNOW

DATED: 08/09/2020


(KRISHAN KANHAYA PAL)

Advocate
Petitioner In Person
U.P.E. No. 1190/2002
Advocate on roll No. B/K0231
Mobile No. 9415839759

PROFORMA FOR FRESH FILING

1. Category : P/B (Public Interest Litigation)
 2. Cognizable by : Single Judge / Division Bench / Larger Bench
 3. District : Lucknow
 4. Petitioner / Appellant / Applicant : Krishan Kantaya Pal Advocate (In Person)
 Age _____ Gender _____ Mobile _____

E-Mail :

5. Respondent : Union of India & others
 6. Petitioner's Advocate Name & Roll No. : Krishan Kantaya Pal Advocate
 (In Person) Roll No - B/K0231
 7. Respondent's Advocate Name & Roll No. :
 8. Notice No. (If any) :
 9. Court Fee Paid :
 10. No. of Affidavits attached :

CRIME DETAILS (If Any)

11. Crime No. & Year :
 12. Under Section :
 13. Police Station & Crime District :

LOWER / HIGH COURT DETAILS (If Any)

14. Lower / High Court Case No. details :
 15. Lower / High Court order dated :
 16. Lower / High Court order passed by :

EXTRA PARTIES & ADVOCATES (Add additional sheet if required)

17. Extra Parties (Petitioner) (Mob / email) :
 18. Extra Parties (Respondent) (Mob / email) :
 19. Extra Advocates (Pet)(With Roll No. :
 20. Extra Advocates (Res)(With Roll No. :

ACTS & SECTIONS (Mandatory)

21. Title of Act involved (Center / State) :
 22. Sections :
 23. Title of Rule involved (Center / State) :
 24. (i) Vires of Acts / Rule Challenged (Yes / No) Act :

Rule :

(ii) Particulars of cases involving similar / Identical challenge

25. Remarks (if any) : Krishan Kantaya Pal Advocate
 Advocate's name & signature (In Person)

For Office use Only

CNR No. (UNIQUE id)
 Date of Reporting
 Reporter

Compose

Inbox 7

Starred

Snoozed

Important

Sent

Meet

Start a meeting

Join a meeting

Hangouts

KK

fmds

Notice for P.I.L. Krishan kanhaya Pal Vs. Un

K K Pal <advocate.kkpal@gmail.com>
to suryabhan.15



Krishan kanhaya P...

Reply

Forward

DR. VIKAS MAHATME

Member of Parliament (Rajya Sabha)
Padmashri Awarded Eye Specialist
Member

- Standing Committee on Coal and Steel
- Consultative Committee on Railway
- Committee on Subordinate Legislation
- Indian Nursing Council



डॉ. विकास महात्मे

सांसद (राज्य सभा)
पद्मश्री पुरस्कृत नेत्रतज्ञ

- सदस्य
- कोयला एवं इस्पात स्थायी समिति
- रेल्वे सलाहकार समिती
- अधीनस्थ विधान संवर्धनी समिती
- भारतीय नर्सिंग काउंसिल

ता. 6 सितम्बर 2020

प्रति,

मा. प्रकाश जी जावडेकर

केन्द्रीय सूचना एवं प्रसारण मंत्री

नई दिल्ली

विषय : एकता कपूर द्वारा निर्मित वेबसिरिज में राजमाता पुण्यश्लोक
अहिल्यादेवी होलकर को अपमानित किये जाने के बारे में

मा. महोदय,

ZEE 5 तथा ATAL BALAJI चैनल पर Vergin Bhaskar नामक सिरीज का प्रसारण हो रहा है। यह सिरीज किसी गर्ल्स होस्टेल में चल रहे सेक्स स्कैन्डल के बारे में है। इसमें जो गर्ल्स होस्टेल दिखाया है उसका नाम "अहिल्याबाई महिला छात्रावास" ऐसा दिखाया गया है। निम्नलिखित लिंक पर यह वीडियो देखा जा सकता है।

<https://youtu.be/VL9cTZhFOd0>

इसका एक स्क्रीन शॉट भी ईमेल में संलग्नित किया है।

इस बात से संपूर्ण देश के केवल 20 करोड़ धनगर ही नहीं बल्कि पुण्यश्लोक अहिल्यादेवी होलकर को माननेवाले अनगिनत अनुयायियों की भावना को ठेस पहुँची है।

मेरा आप से अनुरोध है कि इस बात की गंभीरता को समझते हुए इसपर आप तुरंत कारवाई करें और माता अहिल्या का सन्मान कायम रखें।

धन्यवाद !

(डॉ. विकास महात्मे)

“डॉ. बाबासाहेब के स्वप्न को संपूर्ण साकार करने का संकल्प”

New Delhi : C-704, Swarna Jayanti Sadan, Near RML Hospital, Dr. B.D. Marg, New Delhi - 110001. Tel: 011-23724788

Nagpur : 16, Central Excise Colony, Ring Road, Chhatrapati Sq., Nagpur - 440015 (Maharashtra).

Tel: 0712-2222556/3 Fax: 0712-2242202 Mobile: +919975590908/8888277722 Email: mp.mahatme@sansad.nic.in

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