

IN THE SUPREME COURT OF INDIA
EXTRA-ORDINARY ORIGINAL JURISDICTION
(UNDER ARTICLE 32 OF THE CONSTITUTION OF INDIA)
WRIT PETITION (CIVIL) NO. _____ OF 2025
PUBLIC INTEREST LITIGATION

IN THE MATTER OF:

SHAKTI BHATIA

...PETITIONER

VERSUS

UNION OF INDIA & ORS.

...RESPONDENTS

PAPER-BOOK
(KINDLY SEE INSIDE)

SHYAM D NANDAN
ADVOCATE FOR THE PETITIONER
Filed on: 12.08.2025

RECORD OF PROCEEDINGS

<u>SL. NO.</u>	<u>DATE OF RECORD OF PROCEEDINGS</u>	<u>PAGES</u>
1.	Court's Order dated _____	
2.	Court's Order dated _____	
3.	Court's Order dated _____	
4.	Court's Order dated _____	
5.	Court's Order dated _____	
6.	Court's Order dated _____	
7.	Court's Order dated _____	
8.	Court's Order dated _____	
9.	Court's Order dated _____	
10.	Court's Order dated _____	
11.	Court's Order dated _____	
12.	Court's Order dated _____	

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OFFICE REPORT ON LIMITATION

1. The Petition is within time against the impugned final judgment and Order dated
2. The Petition is barred by time and there is delay of _____ days in filing the same against the impugned final judgment and order dated _____ and petition for condonation of _____ days delay has been filed.
3. There is delay of _____ days in refilling the petition and petition for condonation of _____ days delay in refilling has been filed.

Section Officer

New Delhi

Dated: 12.08.2025

A-1

PROFORMA FOR FIRST LISTING

SECTION - _____

The case pertains to (Please tick/check the correct box):

- ☐ Central Act: (Title) _____
☐ Section: _____
☐ Central Rule: (Title) _____
☐ Rule No(s): _____
☐ State Act: (Title) _____
☐ Section: _____
☐ State Rule: (Title) _____
☐ Rule No(s): _____
☐ Impugned Interim Order: (Date) _____
☒ Impugned Final Order/Decree: (Date) _____
☒ High Court: (Name) _____
☒ Names of Judges: _____
☐ Tribunal/Authority: (Name) _____

1. Nature of matter: ☐ Civil ☐ Criminal
2. (a) Petitioner/Appellant No.1: SHAKTI BHATIA
(b) e-mail ID: _____
(c) Mobile Phone Number: _____
3. (a) Respondent No.1: UNION OF INDIA
(b) e-mail ID: _____
(c) Mobile Phone Number: _____
4. (a) Main category classification: _____
(b) Sub classification: _____
5. Not to be listed before: _____
6. (a) Similar disposed of matter with citation, if any, & case details:
No Similar matter disposed of
- (b) Similar pending matter with case details: No Similar matter pending

A-2

7. **Criminal Matter:**

- (a) Whether accused/convict has surrendered: ☐ Yes ☒ No
- (b) FIR/C.R. No. _____ Date: _____
- (c) Police Station: _____
- (d) Sentence Awarded: _____
- (e) period of sentence undergone including period of Detention/Custody undergone _____
- (f) Whether any earlier case between the same parties is filed: N/A
- (g) Particulars of the FIR and Case: _____
- (h) Whether any bail application was preferred earlier and decision thereupon: _____

8. **Land Acquisition Matter:**

- (a) Date of Section 4 notification: _____
- (b) Date of Section 6 notification: _____
- (c) Date of Section 17 notification: _____

9. **Tax Matter:** State the tax effect: _____

10. **Special Category (first Petitioner/Appellant Only):** _____

- ☐ Senior Citizen > ☐ SC/ST ☐ Woman/Child ☐ Disabled ☐ Legal
65 years
Aid case ☐ In custody

11. **Vehicle Number (in case of Motor Accident Claim Matters):** N/A

12. **Whether there was/is litigation on the same point of law, if yes, details thereupon** _____

Filed by

[]
Advocate for the Petitioner/Respondent

Place: New Delhi

Date:

Shyam D Nandan
Advocate for the Petitioner

ANNEXURE 'Y'ADVOCATE'S CHECK LIST (TO BE CERTIFIED BY ADVOCATE-ON-RECORD)

Indicate Yes or NA

1. SLP(C) has been filed in Form No. 28 with certificate. ☐
2. The Petition is as per the provisions of Order XV Rule 1. ☐
3. The papers of SLP have been arranged as per Order XXI, Rule (3)(1)(f). ☐
4. Brief list of dates/events has been filed. ☐
5. Paragraphs and pages of paper books have been numbered consecutively and correctly noted in Index. ☐
6. Proper and required number of paper books (1 + 1) have been filed. ☐
7. The particulars of the Impugned Judgment passed by the court(s) below are uniformly written in all the documents. ☐
8. In case of appeal by certificate the appeal is accompanied by judgment and decree appealed from and order granting certificate. ☐
9. The Annexures referred to in the petition are true copies of the documents before the court(s) below and are filed in chronological order as per List of Dates. ☐
10. The annexures referred to in the petition are filed and indexed separately and not marked collectively. ☐
11. In SLP against the order passed in Second Appeal, copies of the orders passed by the Trial Court and First Appellate Court have been filed. ☐
12. The complete listing proforma has been filled in, signed and included in the paper books. ☐
13. In a petition (PIL) filed under clause (d) of Rule 12(1) Order XXXVIII, the Petitioner has disclosed: ☐
 - (a) his full name, complete postal address, e-mail address, phone number, proof regarding personal identification, occupation and annual income, PAN number and National Unique Identity Card number, if any;
 - (b) the facts constituting the cause of action;

- (c) the nature of injury caused or likely to be caused to the public;
 - (d) the nature and extent of personal interest, if any, of the petitioner(s);
 - (e) details regarding any Civil, Criminal or revenue litigation, involving the Petitioner or any of the petitioners, which has or could have a legal nexus with the issue(s) involved in the Public Interest Litigation.
14. In case of appeals under Armed Forces Tribunal Act, 2007, the Petitioner/appellant has moved before the Armed Forces Tribunal for granting certificate for leave to appeal to the Supreme Court. ☐
15. All the paper-books to be filed after curing the defects shall be in order. ☐

I hereby declare that I have personally verified the petition and its contents and it is in conformity with the Supreme Court Rules 2013. I certify that the above requirements of this Check List have been complied with. I further certify that all the documents necessary for the purpose of hearing of the matter have been filed.

Signature

AoR's Name

AoR Code

Contact No.



SHYAM D. NANDAN

2253

9654848621

New Delhi

Date: 12.08.2025

IN THE SUPREME COURT OF INDIA

EXTRA-ORDINARY ORIGINAL JURISDICTION

(UNDER ARTICLE 32 OF THE CONSTITUTION OF INDIA)

WRIT PETITION (CIVIL) NO. _____ OF 2025 (P.I.L)

PUBLIC INTEREST LITIGATION

IN THE MATTER OF:

1. SHAKTI BHATIA

S/O. MR. SAHDEV KUMAR BHATIA

R/O. 140-B, GROUND FLOOR, BLOCK-C,

MOTI NAGAR, RAMESH NAGAR,

NEW DELHI-110015

EMAIL:

...PETITIONER

VERSUS

1. UNION OF INDIA

THROUGH ITS SECRETARY,

DEPARTMENT OF FINANCIAL SERVICES,

MINISTRY OF FINANCE,

JEEVAN DEEP BUILDING,

SANSAD MARG,

NEW DELHI – 110001

EMAIL: SOBO3-DFS@NIC.IN

....RESPONDENT NO. 1

2. SECURITIES AND EXCHANGE BOARD OF INDIA

THROUGH ITS CHAIRMAN,

SEBI BHAVAN, PLOT NO. C4-A,

G BLOCK, BANDRA KURLA COMPLEX,

BANDRA EAST, MUMBAI - 400051,

MAHARASHTRA, INDIA

EMAIL: SEBI@SEBI.GOV.IN

....RESPONDENT NO. 2

3. RESERVE BANK OF INDIA

THROUGH ITS CHIEF GENERAL MANAGER

& CHIEF GENERAL OFFICER

CENTRAL OFFICER BUILDING, 20TH FLOOR,

SHAHID BHAGAT SINGH ROAD, MUMBAI 400001,

MAHARASHTRA, INDIA

EMAIL: CVO@RBI.ORG.IN

....RESPONDENT NO. 3

4. MINISTRY OF CORPORATE AFFAIRS

THROUGH ITS SECRETARY,

5TH FLOOR, A-WING,

SHASTRI BHAWAN,

NEW DELHI-110001

EMAIL: SECY.MCA@NIC.IN

.... RESPONDENT NO. 4

WRIT PETITION IN PUBLIC INTEREST UNDER
ARTICLE 32 OF THE CONSITUTION OF INDIA
SEEKING ISSUANCE OF, *INTER ALIA*, WRIT OF
MANDAMUS OR ANY OTHER APPROPRIATE WRIT
OR ORDER OR DIRECTION THEREBY DIRECTING
THE RESPONDENTS, PARTICULARLY, RESPONDENT
NOS. 2 TO 4 TO TAKE APPROPRIATE ACTION AND
INVESTIGATE INTO ALLEGED FRAUD, FINANCIAL
MANIPULATIONS, PRICE RIGGING, AND
REGULATORY VIOLATIONS BEING COMMITTED BY
PUBLIC LISTED ENTITIES NAMELY VEDANTA
LIMITED, HINDUSTAN ZINC LIMITED, AND VEDANTA
RESOURCES LIMITED ALONG WITH ITS SISTER
CONCERNS

TO
THE HON'BLE CHIEF JUSTICE OF INDIA AND
HIS COMPANION JUSTICES OF THIS
HON'BLE COURT

THE HUMBLE
PETITION OF THE
PETITIONER ABOVE NAMED

MOST RESPECTIVELY SHOWETH:

1. The present Petition under Article 32 of the Constitution of India, invoking extra-ordinary original jurisdiction of this Hon'ble Court, is being preferred by the Petitioner herein in public interest, seeking issuance of, *inter alia*, writ of mandamus or any other appropriate writ or order or direction thereby directing the Respondents, particularly, Respondent Nos. 2 to 4 to take appropriate action and investigate into alleged fraud, financial manipulations, price rigging, and regulatory violations committed by public listed entities namely Vedanta Limited (listed as "VEDL"), Hindustan Zinc Limited (listed as "HZL") , and Vedanta Resources Limited (listed as "VRL PropCo") along with its sister concerns.

ABOUT THE PETITIONER

2. The Petitioner is a resident of India. The Petitioner is a practising advocate and registered with the Bar Council of Delhi, bearing enrolment number D/4315/2018. The Petitioner has an experience of over 7 years. The present writ petition is being filed by the Petitioner in public interest. The present Petition is the first petition being filed by the Petitioner in public interest before this Hon'ble Court and the Petitioner declares that he has not filed any other

public interest litigation petition in his name either before this Hon'ble Court or any other Constitutional Court(s) of the country. The average annual income of the Petitioner for the last financial year (FY 2024-2025) is approximately Rs. 9,80,000/- (Rupee Nine Lakhs Eighty Thousand Only) and PAN number is AKLPB9297P. The Petitioner's Aadhaar number is 371163804003.

3. The Petitioner has no personal interest in the litigation and the Petition is not guided by self-gain or for gain of any other person/institution/body and that there is no motive other than public interest in filing the present writ petition.
4. That the petitioner is filing the present Petition on his own and not at the instance of someone else. The litigation cost, including the advocate's fee and the travelling expense of the advocate, if any, are being borne by the Petitioner himself.

ABOUT THE RESPONDENTS

5. The Respondent No.1 herein is Union of India, Department of Financial Services, Ministry of Finance. The Respondent No.2 is Securities and Exchange Board of India (SEBI) which is a statutory body established under the Securities and Exchange Board of India Act, 1992. The Respondent No.2's function is to protect the interests of investors in

securities and to promote the development of, and to regulate the securities market and for matters connected therewith or incidental thereto. The Respondent No.3 is established in accordance with the provisions of the Reserve Bank of India Act, 1934. The Respondent No.3's function is to regulate the issue of bank notes and keeping of reserves with a view to securing monetary stability in India and to operate the currency and credit system of the country to its advantage. The Respondent No.3 is also obligated to maintain price stability while keeping in mind the objective of growth. The Respondent No. 4 is Ministry of Corporate Affairs, through its secretary. The Respondent No. 4 is primarily concerned with administration of the Companies Act 2013, the Companies Act 1956, the Limited Liability Partnership Act, 2008 & other allied Acts and rules & regulations framed there-under mainly for regulating the functioning of the corporate sector in accordance with law. The Respondent No. 4 is also responsible for administering the Competition Act, 2002 to prevent practices having adverse effect on competition, to promote and sustain competition in markets, to protect the interests of consumers through the commission set up under the Act.

6. It is thus crystal clear that the Respondents are ‘State’ within the meaning of Article 12 of the Constitution of India and thus, amenable to the writ jurisdiction of this Hon’ble Court.

BRIEF FACTUAL MATRIX

7. That on 10.07.2025, the Petitioner while reading newspaper as well as while going through online news articles learnt that a Delaware, United States based investigative financial research firm and short seller namely Viceroy Research LLC has published a Research Report on 09.07.2025 highlighting commission of fraud, financial manipulations, price rigging, and regulatory violations by public listed entities namely Vedanta Limited (listed as “VEDL”), Hindustan Zinc Limited (listed as “HZL”), and Vedanta Resources Limited (listed as “VRL PropCo”) along with its sister concerns. Copy/Printouts of Newspaper Articles/ Online News Articles highlighting publication of research report by Viceroy Research LLC is annexed herewith as

ANNEXURE P-1.

8. The said Research Report published on 09.07.2025 by the Viceroy Research LLC is in public domain and is titled “Vedanta -Limited Resources”. The said Research Report “Vedanta -Limited Resources” is available online on the

website of Viceroy Research LLC at URL:

[https://viceroyresearch.org/2025/07/09/vedanta-limited-](https://viceroyresearch.org/2025/07/09/vedanta-limited-resources/)

[resources/](https://viceroyresearch.org/2025/07/09/vedanta-limited-resources/). The said Research Report “Vedanta -Limited Resources” broadly highlights and alleges following against Vedanta Limited (hereinafter referred to as “VEDL”), Hindustan Zinc Limited (hereinafter referred to as “HZL”), and Vedanta Resources Limited along with its sister concerns (hereinafter referred to as “VRL PropCo”):

- A. VEDL, HZL and VRL PropCo indulging in fraudulent and unfair trade practices in terms of SEBI (Prohibition of Fraudulent and Unfair Trade Practices) Regulations, 2003 (“PFUTP Regulations”).
- B. Systemic misrepresentations in financial disclosures by VEDL, HZL and VRL PropCo.
- C. Ongoing related-party siphoning of funds by VEDL, HZL and VRL PropCo through questionable brand and management fee arrangements.
- D. Ongoing related-party siphoning of funds VEDL, HZL and VRL PropCo through unfair, non-arms-length trading arrangements with promoter-owned entities.
- E. Misuse of VEDL's financial position to service promoter-level debt and execute control-enhancing share acquisitions.

- F. Breaches of obligations under the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“SEBI LODR Regulations”) and the Companies Act, 2013, including violations of internal control, related party transactions, fair disclosure, and board responsibilities.
- G. Misuse of upstream dividends, improper encumbrances, and subversion of shareholder rights.
- H. Failure to disclose material events under Regulation 30 and 30A of SEBI LODR Regulations.
- I. Abuse of audit and corporate structure to obscure liabilities and avoid scrutiny.

Copy of Research Report published on 09.07.2025 by the Viceroy Research LLC is annexed herewith as **ANNEXURE P-2.**

9. On 25.07.2025, the Viceroy Research LLC on their website at URL - <https://viceroyresearch.org/2025/07/25/vedanta-our-letter-to-the-securities-and-exchange-board-of-india/>, published their Letter-cum-Complaint dated 14.07.2025 addressed and issued to the Respondent No.2, premised on their Research Report “Vedanta -Limited Resources”. The reasons cited for such publication were, *inter alia*, lack of any public statement from the Respondent No.2, no

response or action taken by the Respondent No.2, publication in public domain in the interest of transparency and public accountability and gravity and seriousness of the issues raised in the Research Report and Letter-cum-Complaint dated 14.07.2025. Copy of Article dated 25.07.2025 along with Letter-cum-Complaint dated 14.07.2025 addressed and issued to the Respondent No.2 by the Viceroy Research LLC is annexed herewith as **ANNEXURE P-3.**

10. Thereafter, 06.08.2025, the Viceroy Research LLC on their website at URL - <https://viceroyresearch.org/2025/08/06/vedanta-our-letter-to-the-reserve-bank-of-india/>, published their Letter-cum-Complaint dated 15.07.2025 addressed and issued to the Respondent No.3, premised on their Research Report “Vedanta -Limited Resources”. The reasons cited for such publication were, *inter alia*, lack of any public statement from the Respondent No.3, no response or action taken by the Respondent No.3, publication in public domain in the interest of transparency and public accountability and gravity and seriousness of the issues raised in the Research Report and Letter-cum-Complaint dated 15.07.2025. Copy of Article dated 06.08.2025 along with Letter-cum-

Complaint dated 15.07.2025 addressed and issued to the Respondent No.3 by the Viceroy Research LLC is annexed herewith as **ANNEXURE P-4.**

11. From a bare perusal of the Research Report “Vedanta - Limited Resources”, it is abundantly clear that it raises grave and serious issues and concerns against VEDL, HZL and VRL PropCo with regard to unauthorized foreign exchange remittances, regulatory evasions, chronic and systematic underinvestment in operating subsidiaries, unsustainable debt structures and disguised liabilities, extractive, non-arm’s-length brand fees, opaque auditor networks and compromised governance, hidden liabilities and borrowings. Further, consequent Letters-cum-Complaints dated 14.07.2025 and 15.07.2025 addressed and issued to the Respondent No.2 and the Respondent No.3 respectively also highlights the imminent threat the alleged illegal actions and inactions of VEDL, HZL and VRL PropCo would pose to countless working-class investors of Indian society.
12. In fact, the said Research Report “Vedanta -Limited Resources” categorically and unequivocally sets out instances and methods by way of which the said listed entities VEDL, HZL and VRL PropCo have been siphoning

of funds through related party transactions under the garb of brand and/or management fee, which would have otherwise benefit minority shareholders or been reinvested into the business. There have been specific allegations of donations being made by said listed entities to Anil Agarwal foundation which is a promoter-controlled entity, precisely Anil Agarwal being promoter.

13. The Petitioner, to test and ascertain the veracity of the instances with regard to related party transactions and brand and/or management fee which have been highlighted in the Research Report “Vedanta -Limited Resources”, further indulged in his own market research. It appears that the allegation pertaining to related party transactions under the garb of brand and/or management fee, holds some water.
14. It is obligatory and mandatory upon the VEDL, HZL and VRL PropCo in terms of Regulation 23 of SEBI LODR Regulations, 2015 and Section 188 of the Companies Act, 2013 to disclose related party transactions. It is thus submitted that if upon investigation by the Respondent Nos. 2 to 4, it is found that there has been failure on the part of VEDL, HZL and VRL PropCo to disclose related party transactions, then it would constitute material breach of

provisions of SEBI LODR Regulations, 2015 and the Companies Act, 2013.

15. It is further submitted that concealing the existence of related parties undermines minority shareholder rights and facilitates siphoning of corporate resources without scrutiny.
16. It also came to the attention of the Petitioner while going through the said Research Report “Vedanta - Limited Resources” that the Report identifies a network of related parties not disclosed in statutory filings, including entities with common directors and/or family, shared addresses, and transactional links with Vedanta group companies. These findings were cross-verified by the Petitioner through MCA21 records, SEBI’s listed entity disclosures under Regulation 23 of the SEBI LODR Regulations, 2015 and Registrar of Companies filings, which reveal that certain counterparties in high-value transactions were neither declared as related parties nor subjected to shareholder approval as required under the law.
17. The non-disclosure of related party transactions would not only constitute breach and violation of regulatory provisions, but would also tantamount to financial fraud which in turn would severely impact investors in Indian market including but not limited to working-class investors.

The Respondent No.4 is responsible for investigating into alleged financial fraud.

18. In light of the foregoing, it is incumbent and obligatory upon the Respondent Nos.2 to 4 to take concrete action and investigate into serious allegations made in the Research Report “Vedanta -Limited Resources”, in order to safeguard and prevent the citizens of India from being duped by an apprehended financial fraud. The present Petition is being preferred by the Petitioner to also seek safeguard of the fundamental rights of the Indian investors as enshrined in the Constitution of India, particularly Article 14 and Article 21.
19. **Source of Information:** The Petitioner relies on the information available in the public domain and news reports as well as the relevant statutes governing the field.
20. **Nature of Personal Interest, if any, of the Petitioner:** The Petitioner has no personal interest in this Petition and it is being filed in Public Interest.
21. **Details of Remedies Exhausted:** The Petitioner has not approached any authority for relief for the subject matter of this petition.
22. The petitioner has no other efficacious alternative remedy except to invoke the writ jurisdiction of this Hon’ble Court.

This Hon'ble Court has the jurisdiction to entertain and adjudicate the instant Petition. Hence, this instant Writ Petition is maintainable.

23. That the petitioner has not filed any other Writ Petition before this Hon'ble Court or any other High Court relating to the subject matter of the present Petition,
24. The Annexures annexed to the present Writ Petition are true copies of the respective originals.
25. The instant Writ Petition is *bona fide* and in the interest of public and justice.

PRAYER

In light of above-mentioned facts and circumstances, it is most respectfully prayed that this Hon'ble Court may kindly be pleased to:-

- i) Issue a writ of mandamus or any other appropriate writ or order or direction thereby directing Respondent Nos. 2 to 4 to take appropriate action and investigate into alleged fraud, financial manipulations, price rigging, and regulatory violations committed by public listed entities namely Vedanta Limited (listed as "VEDL"), Hindustan Zinc Limited (listed as "HZL"), and Vedanta Resources Limited (listed as "VRL PropCo") along with its sister concerns; and/or

- ii) Pass any other such further Order(s) which this Hon'ble Court may deem fit and proper in the facts and circumstances of the present case.

AND FOR THIS ACT OF KINDNESS THE PETITIONER AS
IN DUTY BOUND

Place: New Delhi
Filed on: 12.08.2025

Filed by:



Shyam D Nandan
Advocate for the Petitioner

B-20, Nizamuddin East,
New Delhi – 110013

Email Id – Nandan.Shyam@Gmail.Com

AOR Code - 2253

**IN THE SUPREME COURT OF INDIA
EXTRA-ORDINARY ORIGINAL JURISDICTION
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IN THE MATTER OF:

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...RESPONDENTS

AFFIDAVIT

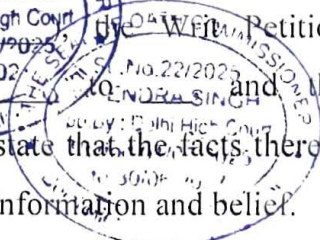
I, Shakti Bhatia, S/o. Mr. Sahdev Kumar Bhatia, aged about 40 years, R/o. 140-B, Ground Floor, Block-C, Moti Nagar, Ramesh Nagar, New Delhi-110015, do hereby solemnly affirm and state as under:

That I am the Petitioner in the captioned Writ Petition in Public Interest; and as such, I am well conversant with the facts and circumstances of the present case, and thus, I am competent to swear and depose the present affidavit.

2. That I have read and understood the contents of the synopsis and list of dates (Pages 1 to 10) of the Writ Petition (Pages 1 to 10) and the accompanying applications, if any. I state that the facts therein are true to the best of my knowledge, information and belief.

3. That the annexures to the Writ Petition are true and/ or typed copies of their respective originals.

4. I state that I have accordingly instructed my Advocate-on-Record to draft the Writ Petition. I have fully understood and I am aware that on the basis of my instructions the advocate on record will file a certificate certifying the above before this Hon'ble Court.



5. That the instant petition is based on information available in public domain, media reports and official documents.
6. That I have done whatever inquiry / investigation that was in my power to do and collected all data/material which was available and which was relevant for this court to entertain the instant petition. I further confirm that I have not concealed in the present petition any data/material/information which may have enabled this Hon'ble Court to form an opinion whether to entertain the instant petition or not and/or whether to grant any relief or not.



That the Petitioner herein has no personal interest in the litigation and neither myself nor anybody in whom the Petitioner herein is interested would in any manner benefit from the relief sought in the present litigation save as member of general public. This petition is not motivated by self-gain of any person, institution or body and there is no motive other than that of public interest in filing this petition and I am ready to pay the costs if Hon'ble Court directs me to pay.

Self

I identify the deponent who
has signed in my presence

12/3/2018

Kalish Bloties

DEPONENT

VERIFICATION:

12 AUG 2025

I, the above-named Deponent, do hereby verify that the contents of the above Affidavit are true and correct to my knowledge, no part of it is false and nothing material is concealed therefrom.

Verified at New Delhi on this ____ day of August, 2025

CERTIFIED THAT THE DEPONENT
Shri/Smt./Kmr. *Sush Shal*
S/o W/o *S/o Shal*
R/o *S/o Shal*
Identified by Shri/Smt. *Sush Shal*
Has solemnly affirmed before me at Delhi
on *12 AUG 2025*
that the contents of the affidavit which have
been read & explained to me are true and
correct to his knowledge

(Oath Commissioner Delhi)

12 AUG 2025

Kalish Bloties

DEPONENT