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PROFORMA FOR FIRST LISTING

SECTION PIL

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

- () Central Act: (Title)_the Constitution of India, 1949
 () Articles: 21
 () Central Rule: (Title) NA
 () Rule No (s): NA
 () State Act: (Title) NA
 () State Rule:(Title) NA
 () Impugned Interim Order : (Date) NA
 () Impugned Final Order : (Date) NA
 () High Court : (Name)_ NA
 () Names of Judges: NA
 () Tribunal/Authority: (Name) NA

1. Nature of matter: (Yes) Civil () Criminal
2. (a) Petitioner/Appellant No. 1: Reepak Kansal
 (b) e-mail ID: reepak.kansal@gmail.com
 (c) Mobile phone number: 9212250235
3. (a) Respondent No. 1: Union of India.
 (b) e-mail ID:_NA
 (c) Mobile phone number: _NA
4. (a) Main category classification:_18
 (b) Sub classification:_1807
5. Not to be listed before:_ NA
6. (a) Similar disposed off with citation if any: No similar disposed off matter.

- 6.(b) Similar pending matter with case detail: W.P (C) No. 554/2021 titled as Reepak Kansal Vs Union of India & Ors.
7. Criminal Matters: NA
- (a) Whether accused/convict has surrendered:()Yes() No
- (b) FIR No. NA Date: NA
- (c) Police Station:___ NA
- (d) Sentence Awarded: _ NA
- (e) Sentence Undergone:___NA
8. Land Acquisition Matter: NA
- (a) Date of Section 4 notification: _ NA
- (b) Date of Section 6 notification: ___ NA
- (c) Date of Section 17 notification: ___ NA
9. Tax Matters: State the tax effect:___ NA
10. Special Category (first petitioner/appellant only): NA
- () Senior citizen > 65 years () SC/ST () Woman/child () Disabled () Legal Aid case () In custody NA
11. Vehicle Number (in case of Motor Accident Claim matters) : NA

Date: 13.06.2021


Harisha S R

AOR for Petitioner (s)
Registration No._2761
harishasrdv@gmail.com

A/3

IN THE SUPREME COURT OF INDIA
CIVIL ORIGINAL JURISDICTION

WRIT PETITION (Civil) No. _____/2021

IN THE MATTER OF:

Reepak Kansal

...Petitioner

Versus

Union of India &Ors.

...Contesting Respondents

PAPER BOOK

(FOR INDEX KINDLY SEE INSIDE)

ADVOCATE FOR PETITIONER : HARISHA S R

INDEX OF RECORD OF PROCEEDINGS

SYNOPSIS

The petitioner is filing this petition in public interest seeking an intervention of this Hon'ble Court to provide ex gratia monetary compensation of Rs. 4 lacs/ notified ex gratia monetary compensation to the families of deceased who have succumbed to the side effect / post COVID-19 decease i.e. black, yellow, white fungus, in view of Section 12 of The Disaster Management Act, 2005.

That a majority of patient with mucormycosis, or black, yellow & white fungus etc are those who have recovered from COVID 19. The treatment of COVID 19 leads to a weaken immune system, preventing the body from effectively preventing against infection. As a result, individuals recovering from COVID 19 are at risk for mucormycosis, or black, yellow or white fungus. The COVID 19 suppresses the immune system, so the immune system cannot clear other bacteria or fungi.

That the Steroid treatments for COVID 19 is also act to suppress the body's immune response, contributing to these increased mucormycosis/ fungi infection.

That the petitioner also wants to bring to the judicial notice of this Hon'ble Court that this Hon'ble Court has

C

already pleased to issue notice in Writ Petition (C) No. 554 of 2021 titled as Reepak Kansal Vs Union of India, seeking ex gratia monetary compensation of Rs. 4 lacs / notified ex gratia monetary compensation to the families of deceased who have succumbed due to COVID-19.

There are several States which have also notified the mucormycosis or black fungus as notified disease under 'The Epidemic Diseases Act, 1897'.

The entire benefits / ex—gratia compensation under section 12 Disaster Management Act, 2005 for patients of COVID 19 may also be extended to the patients of post COVID 19 disease i.e. black fungus, yellow fungus and white fungus etc.

As per Section 12 of the Disaster Management Act, 2005, The National Authority shall recommend guidelines for the minimum standards of relief to be provided to persons affected by disaster, which shall include ex gratia assistance on account of loss of life.

Section 12 (iii) of the Disaster Management Act, 2005 is reproduced as under:

D

Section 12 in the Disaster Management Act, 2005
12 Guidelines for minimum standards of relief. —The National Authority shall recommend guidelines for the minimum standards of relief to be provided to persons affected by disaster, which shall include,—
[\(iii\)](#) ex gratia assistance on account of loss of life as also assistance on account of damage to houses and for restoration of means of livelihood;

LIST OF DATES

- 2005 The Disaster Management Act, 2005 was enacted.
- 11.06.2021: This Hon'ble Court has already pleased to issue notice in Writ Petition (C) No. 554 of 2021 titled as Reepak Kansal Vs Union of India, seeing ex gratia monetary compensation of Rs. 4 lacs / notified ex gratia monetary compensation to the families of deceased who have succumbed due to COVID-19.
- 13.06.2021 Hence, this writ petition is being filed

IN THE SUPREME COURT OF INDIA
CIVIL ORIGINAL JURISDICTION
WRIT PETITION (Civil) NO. /2021

IN THE MATTER OF:

Reepak Kansal, aged about 43 years, Petitioner
s/o Sh. Hansraj Kansal, WB-211, Lane
No. 3, Near Krishna Mandir, Baramad,
Shakarapur, East Delhi, Delhi-92.

Versus

1. Union of India through Secretary,
Ministry of Home and Affairs,
North Block, Central Secretariat,
New Delhi, 110001. Contesting
respondent
1
2. Union of India through Secretary,
Ministry of Finance, South Block,
Central Secretariat, New Delhi
110001. Contesting
respondent
2
3. Union of India through Secretary,
Ministry of Health and Family
Affairs, Near Udyog Bhavan Metro
Station, Maulana Azad Road, New
Delhi, 110001. Contesting
Respondent
3
4. Union of India through Secretary,
Ministry of External Affairs, South
Block, Central Secretariat, New
Delhi, 110001. Contesting
respondent
4

	2
5. State of Haryana through Secretary, Haryana Civil Secretariat, Sector-1, Chandigarh.	Contesting respondent 5
6. State of Punjab through Secretary, Punjab Civil Secretariat, Chandigarh – 160001.	Contesting respondent 6
7. State of Oddisha through Secretary, Government of Oddisha, General Admn. Dept. Orrisa Secretariat, Bhubaneshwar -751001.	Contesting respondent 7
8. Government of Gujarat through Secretary, Block No.1, 3rd floor, New Sachivalaya Complex, Gandhinagar -382010.	Contesting respondent 8
9. Government of Andhra Pradesh through Secretary, Secretariat Building, Hyderabad-500 001	Contesting respondent 9
10. Government of Arunachal Pradesh through Secretary, Secretariat Itanagar-791 111.	Contesting respondent 10

- | | |
|----------------------------------------------------------------------------------------------------------|--------------------------|
| 11. Government of Assam through Secretary, Block-C, 3rd Floor, Secretariat, Dispur, Guwahati-781006. | Contesting respondent 11 |
| 12. Government of Bihar through Secretary, Old Secretariat, Patna-800 015. | Contesting respondent 12 |
| 13. Government of Chhattisgarh through Secretary, D K S Bhavan, Room No. 207, Mantralay, Raipur-492 001. | Contesting respondent 13 |
| 14. Government of Goa through Secretary, Secretariat, Porvoriam, Goa-403001. | Contesting respondent 14 |
| 15. Government of Himachal Pradesh through Secretary, Secretary, Secretariat, Shimla-171001. | Contesting respondent 15 |
| 16. Government of Jammu & Kashmir, through Secretary, Secretary, Civil Secretariat, Shrinagar-190001. | Contesting respondent 16 |
| 17. Government of Jharkhand through its' Secretary, Secretariat, Ranchi, 834001 (Jharkhand). | Contesting respondent 17 |

- | | |
|------------------------------------------------------------------------------------------------------------------------------|-----------------------------|
| 18. Government of Karnataka through Secretary, Secretary, Vidhana Soudha, Bangalore-560001. | Contesting respondent
18 |
| 19. Government of Maharashtra through Secretary, Secretary, Room No.518, 5th Floor, Main Building Mantralaya, Mumbai-400032. | Contesting respondent
19 |
| 20. Government of Madhya Pradesh through Secretary, Vallabh Bhavan,Bhopal-462003. | Contesting respondent
20 |
| 21. Government of Manipur through Secretary, Room No.171 South Block, Secretariat, Imphal-795001. | Contesting respondent
21 |
| 22. Government of Meghalaya through Secretary, Secretary, Main Secretariat Building,Shilong-793001. | Contesting respondent
22 |
| 23. Government of Mizoram through Secretary, Civil Secretariat, Block -C, Aizwal -796001. | Contesting respondent
23 |

- | | |
|----------------------------------------------------------------------------------------------------------------|-----------------------------|
| 24. Government of Nagaland through Secretary, Secretariat, Kohima-797001. | Contesting respondent
24 |
| 25. Government of Pondicherry No. 1 through Secretary, Beach Road, Pondicherry. | Contesting respondent
25 |
| 26. Government of Rajasthan through Secretary, Secretariat , Jaipur-302005. | Contesting respondent
26 |
| 27. Government of Sikkim through Secretary, Department of Education, Tashiling Secretariat, Gangtok -737101 | Contesting respondent
27 |
| 28. Government of Tamil –Nadu through Secretary, Secretariat, Chennai-600009 | Contesting respondent
28 |
| 29. Government of Tripura through Secretary, Civil Secretariat, Agaartala-799001 | Contesting respondent
29 |
| 30. Government of Uttar Pradesh, through Secretary, Lal Bahadur Shastri Bhavan, UP Secretariat, Lucknow-226001 | Contesting respondent
30 |

- | | |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|
| 31. Government of Uttarkhand through Secretary, Uttarakhand Secretariat, 4B Shubhash Road, Dehradun -248001 | Contesting respondent
31 |
| 32. Government of West Bengal through Secretary, Writers' Building, Kolkata -700001. | Contesting respondent
32 |
| 33. Government of Kerala through Secretary, Directorate of Health Services General Hospital Services, General Hospital Junction, Thiruvananthapuram, Kerala. Pin Code - 695035. | Contesting respondent
33 |
| 34. U. T. of Andaman & Nicobar through Chief Secretary, Islands Secretariat, Port Blair, Andaman - 744101. | Contesting respondent
34 |
| 35. U.T. of Chandigarh through Adviser to Administrator, Secretariat, Chandigarh -160036. | Contesting respondent
35 |
| 36. U .T. of Dadar& Nagar Haveli through Administrator, Secretariat, Silvassa-396230. | Contesting respondent 36 |

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37. U. T. of Lakshadweep through Administrator, Secretariat, Kavaratti – 682555.	Contesting respondent 37
38. U. T. of Daman & Diu through Administrator, Fort Area, Secretariat Moti Daman-396220.	Contesting respondent 38
39. National Capital Territory of Delhi through Chief Secretary, Secretariat, Indraprastha- 110002, New Delhi.	Contesting respondent 39

To

Hon'ble the Chief Justice of India
and His Companion Justices of
The Supreme Court of India;

The humble petition of the Petitioner above-named

MOST RESPECTFULLY SHEWETH:

1. The petitioner is filing this Writ Petition in public interest under Article 32 read with Article 21 of the Constitution of India.
2. That, the petitioner is constrained to file this petition before the Hon'ble Supreme Court of India as relief(s) have been claimed against the different states and no other court in India has all India jurisdiction.

3. That, the petitioner is constrained to file the above writ petition before this Hon'ble Court as it has no other efficacious remedy.
4. The Petitioner is an Advocate and member of the SCBA having SCBA membership no. K- 490. The email id of the petitioner is reepak.kansal@gmail.com. The PAN of the petitioner is APAK-2025-C and Voter Card No. is IPS2138617. The annual income of the petitioner is about Rs. 3 lacs. The postal address of the petitioner is mentioned in the cause title.
5. The petitioner has no personal interest, personal gain, private motive or oblique reason in filing the present writ petition.
6. The petitioner states that no civil, criminal or revenue litigation involving the petitioner or which has or could have a legal nexus with the issue involve in the present writ petition.
7. That, the petitioner is citizen of India and filing the present writ petition for the common cause and the benefits of the society at large. The petitioner has been taking up public causes through various petitions before the Courts.

8. There is violation of Article 21 of the Constitution of India.

9. The injury caused to citizens who have lost their family members due to side effects / post COVID-19 decease i.e. Black Fungus, White Fungus & Yellow Fungus etc. The bread earner / Member of family died which has badly affected the livelihood of other family members. Their right to live with dignity is infringed due to death of earning member of family and no financial assistance is provided by the respondent as per of Rs. 4 lacs or notified ex gratia monetary compensation to the families of deceased who have succumbed to side effects / post COVID-19, in view of Section 12 of The Disaster Management Act, 2005.

10. That the petitioner states that he has not approached this Hon'ble Court or any High Court or any government authority earlier for the relief sought in this petition.

11. That the petitioner has not filed any similar petition previously before this Hon'ble Court or before any High Court seeking relief in the present Writ Petition.

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BRIEF FACTS

12.1 The Disaster Management Act, 2005 was enacted.

12.2 This Hon'ble Court has already pleased to issue notice in Writ Petition (C) No. 554 of 2021 ON 11/06/21 seeing ex gratia monetary compensation of Rs. 4 lacs / notified ex gratia monetary compensation to the families of deceased who have succumbed due to side effects / post COVID-19 disease.

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- A. Because, Article 21 of the Indian Constitution recognizes every individual’s right to equality, which the Supreme Court has held includes the right to health.

- B. Because, the affected persons from side effects / post COVID-19 decease i.e. Black Fungus, White Fungus & Yellow Fungus etc. and their respective families require financial assistance under the State Disaster Response Fund (SDRF) & National Disaster Response Fund (NDRF).

- C. Because, the respondents are unjustified in not giving ex gratia monetary compensation of Rs. 4 lacs to the families of deceased who have succumbed to side effects / post COVID-19 decease i.e. Black Fungus, White Fungus & Yellow Fungus etc., in view of Section 12 of The Disaster Management Act, 2005.

- D. Because, the patients suffering or died due to side effects / post COVID-19 disease i.e. Black Fungus, White Fungus & Yellow Fungus etc. may also be included in the category of COVID 19, a notified disaster.
- E. Because, the family members of the side effects / post COVID diseases are also entitled for ex-gratia compensation in view of Section 12 of The Disaster Management Act, 2005.
- F. Because, majority of patient with mucormycosis, or black, yellow & white fungus etc are those who have recovered from COVID 19. The treatment of COVID 19 leads to a weakened immune system, preventing the body from effectively preventing against infection. As a result, individuals recovering from COVID 19 are at risk for mucormycosis, or black, yellow or white fungus. The COVID 19 suppresses the immune system, so the immune system cannot clear other bacteria or fungi.
- G. Because, the Steroid treatments for COVID 19 also act to suppress the body's immune response, contributing to these increased mucormycosis/ fungi infection.

- H. Because, the petitioner also wants to bring to the judicial notice of this Hon'ble Court that this Hon'ble Court has already pleased to issue notice in Writ Petition (C) No. 554 of 2021 seeking ex gratia monetary compensation of Rs. 4 lacs / notified ex gratia monetary compensation to the families of deceased who have succumbed due to COVID-19.
- I. There are several States which have also notified the mucormycosis or black fungus as notified disease under 'The Epidemic Diseases Act, 1897'.
- J. The entire benefits / ex—gratia compensation under section 12 Disaster Management Act, 2005 for patients of COVID 19 may also be extended to patients of side effects / post COVID 19 disease i.e. black fungus, yellow fungus and white fungus etc.
- K. Because it is obligation on the State to provide adequate relief to the victims of side effects / post COVID-19 decease i.e. Black Fungus, White Fungus & Yellow Fungus etc.
- L. Because without any financial assistance by the respondents in their respective State, the right to live with dignity of victim / family members of deceased, are violated which may kindly be protected.

- M. Because, due to death of bread earner / member of the family, the other members of family have been suffering without any financial assistance by their respective States.
- N. Because, there is a constitutional and legal obligation on the State and its different organs to take care of victims of the calamity and their family members, in the position of a guardian of parent of the people of the society.
- O. Because as per Art. 38. 1[(1)] of the Constitution of India, the State shall strive to promote the welfare of the people by securing and protecting as effectively as it may a social order in which justice, social, economic and political, shall inform all the institutions of the national life.

PRAYER

It is, therefore, most respectfully prayed that your lordships may be pleased to allow this writ petition and may further be pleased:-

- (i) to issue an appropriate writ, order or direction in the nature of mandamus to the respondents Central / State Governments to provide ex gratia monetary compensation of Rs. 4 lacs or notified ex gratia monetary compensation to the families of deceased who have succumbed to side effects / post COVID-19 decease i.e. Black Fungus, White Fungus & Yellow Fungus etc., in view of Section 12 of The Disaster Management Act, 2005; and /or


- (ii) to issue an appropriate writ, order or direction in the nature of mandamus to respondents State Governments to fulfill their obligation to take care of victims of the calamity and their family members: and
- (iii) to issue an appropriate writ, order or direction in the nature of mandamus to the respondents Central / State Governments to to pass such other writ(s), order(s) or direction(s) as is deemed fit and proper in the premises of the case, which is not specifically prayed for hereinabove.

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

Drawn by:
Reepak Kansal

Filed by:

Date of drafting: 12.06.21
Date of filing: 13.06.21


(Harisha S R)
Advocate for the Petitioner

IN THE SUPREME COURT OF INDIA
CIVIL ORIGINAL JURISDICTION

WRIT PETITION (Civil) No. _____/2021

IN THE MATTER OF:

Reepak Kansal

...Petitioner

Versus

Union of India &Ors.

...Contesting Respondents.

AFFIDAVIT

I, Reepak Kansal s/o Sh. Hansraj Kansal, r/o WB-211, Lane No. 3, Near Krishna Mandir, Baramad, Shakarpur, East Delhi, Delhi-92 do hereby solemnly affirm and state as under:

- 1 I am petitioner in the aforesaid matter and I am fully conversant with the facts and circumstances of the case.
- 2 The contents of the synopsis from pages B to D, writ petition from pages 1 to 17, and paper -book has total 22 pages have understood by me and I say that the facts mentioned therein are true to my personal knowledge and record.
- 3 The petitioner has no personal gain, private motive or oblique reason in filing the present writ petition.

Deponent

Verification

Verified at Delhi on this 12th June, 2021 that the contents of the paragraphs in the above affidavit from para 1 to 3 are true and correct to my knowledge and belief. Nothing is false and nothing material has been concealed there from.

Deponent

APPENDIX

The Constitution of India, 1949.

21. Protection of life and personal liberty No person shall be deprived of his life or personal liberty except according to procedure established by law.

The Disaster Management Act, 2005

Section 12

12 Guidelines for minimum standards of relief. —The National Authority shall recommend guidelines for the minimum standards of relief to be provided to persons affected by disaster, which shall include,—

- (i) the minimum requirements to be provided in the relief camps in relation to shelter, food, drinking water, medical cover and sanitation;
- ii) the special provisions to be made for widows and orphans;
- (iii) ex gratia assistance on account of loss of life as also assistance on account of damage to houses and for restoration of means of livelihood;
- (iv) such other relief as may be necessary.

IN THE SUPREME COURT OF INDIA
CIVIL ORIGINAL JURISDICTION
WRIT PETITION (C) NO. ___/ 2021
(Writ Petition Under Article 32 Of The Constitution Of India)

In the matter of:

Reepak Kansal

...Petitioner

Versus

Union of India &Ors.

...Respondents

Index

1. Writ Petition with affidavit 1+3	520/-
2. Vakalatnama I	10/-

530/-



Harisha S R
Advocate on Record
CC NO. 2761
Ch-233, Setalvad Block,
Supreme Court, Delhi-01.

harishscadv@gmail.com

13.06.2021

8851421203 ; 9953906139

IN THE SUPREME COURT OF INDIA AT NEW DELHI
W P (C) No. 2021

IN THE MATTER OF:

REEPAK KANSALPetitioner

Versus

Union of India & Ors.Respondent(s)

V A K A L A T N A M A

I Reepak Kansal, Petitioner in the above petition do hereby appoint and retain Mr. Harisha S R Adv, Ch 233, Setalvad Block, Supreme Court Delhi, to perform the following besides the other, which he may deem necessary:-

1. To act, appear, plead, prosecute (or defend), to compromise, withdraw the proceedings along-with others that may arise or be taken in respect of any application connected with the same or may be any decree or order passed therein including proceedings in taxation and review etc. to file affidavit and documents and to obtain the return of the same, to prefer cross objections, to deposit and receive money on my/ our behalf in the said case, connecting proceedings and applications, and to submit the case to arbitration , if he feels proper
2. The undersigned further agree not to hold the appointee or his substitute advocates responsible for any consequence arising in the court.
3. That undersigned further agree that in the event of the whole or any part thereof the fees agreed to or expenses payable being unpaid, the above named appointee shall be entitled to withdraw from the case without any liability and without any notice.

Dated this 12th Day of June, 2021.

hr

(Harish S R)
 Adv for Petition
 CC 2761

**Accepted, Identified,
 Certified and satisfied.**

Reepak Kansal

Reepak Kansal
 (Petitioner)

MEMO OF APPEARANCE

To

The Registrar
Supreme Court of India
New Delhi.

Kindly enter my appearance on behalf of the petitioner/
appellant /applicant/ respondent(s) in the aforesaid matter.

Dated this the 12th June, 2021



Harisha S R
Advocate for petitioner/
Supreme Court of India,
New Delhi.

To
The Registrar,
Supreme Court of India.
New Delhi.
Sub: LETTER OF URGENCY

Sir,


That the present writ petition has been filed by petitioner as a Public Interest Litigation and the benefits of the families of deceased who have succumbed to post COVID-19 decease i.e. Black Fungus, White Fungus & Yellow Fungus etc which may be read as the part and parcel of this mentioning application.

This Hon'ble Court has already pleased to issue notice on 11/06/2021 in related Writ Petition (C) No. 554 of 2021 titled as Reepak kansal Vs. Union of India, seeking ex gratia monetary compensation of Rs. 4 lacs/ notified ex gratia monetary compensation to the families of deceased who have succumbed due to COVID-19. The petitioner is agreeing for hearing the present Writ Petition through video conference and undertakes to follow the instructions of the registry for the same.

That the contact number of petitioner is 9212250235, email id reepak.kansal@gmail.com .

It is therefore, most respectfully prayed that this Hon'ble Court may graciously be pleased to allow the urgency letter and list the matter before the Hon'ble court with the Writ Petition (C) No. 554/2021 listed on 21/06/2021

Signed and Verified By


Harisha S R
(Advocate for Petitioner)

Drawn on 12.06.2021
Filed on: 13.06.2021

Filed by


Harisha S R
(Advocate for Petitioner)
Code No. 2761

भारत सरकार
GOVERNMENT OF INDIA

MP
103W 807988 018
113-Agencia

रीपक कानसल
Reepak Kansal
जन्म वर्ष/YoB:1977
पुल्ल माले
90017 10000

9756 1497 1990

श्री. आर्य. आम आदमी का अधिकार



भारतीय विशिष्ट पहचान प्राधिकरण
UNIQUE IDENTIFICATION AUTHORITY OF INDIA



पता: S/O, हंसराज कंसल,
उदयपुरी-211, गली नं. 3,
कुशा मंदिर के पास
शकरपुर, शकर पुर बरामदा,
शकरपुर, पूर्वी दिल्ली
दिल्ली, 110092

Address:

S/O, Hansraj Kansal, WB-211,
Gali No. 3, Near Krishna Mandir
Shakarpur, Shakar Pur
Baramada, Shakarpur, East
Delhi
Delhi, 110092

SECRET

Aadhaar - Aam Aadmi ka Adhikar