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IN THE SUPREME COURT OF INDIA
(CIVIL ORIGINAL JURISDICTION)
WRIT PETITION (CIVIL) NO. 807 OF 2021
(Under Article 32 of the Constitution of India)
IN THE MATTER OF:

DR SANJAY KUTEY & ANR. ... PETITIONERS

VERSUS

THE MAHARASHTRA LEGISLATIVE ASSEMBLY & ANR.
...RESPONDENTS

INDEX OF FILING

S.NO.	PARTICULARS	COPIES	COURT FEES
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		Total	-

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IN THE SUPREME COURT OF INDIA
(CIVIL ORIGINAL JURISDICTION)
WRIT PETITION (CIVIL) NO. 807 OF 2021
(Under Article 32 of the Constitution of India)

IN THE MATTER OF:

Dr Sanjay Kutey & Anr. ... Petitioner

versus

The Maharashtra Legislative Assembly & Anr. ...Respondents

(Alongwith other connected Petitions being W.P. (C) Nos. 797, 800 and 808 of 2021)

Written Submissions on behalf of Mr. Mahesh Jethmalani, Senior Advocate for the Petitioner

I. Contentions of the Respondent State:

In sum and substance, the state of Maharashtra has sought to justify the suspension of the 12 Members of the Maharashtra Legislative Assembly – the petitioners herein- for a period of 1 year on the following grounds:

A. That the petitioner was suspended for a period of 1 year for disorderly conduct/contempt of the house by the Maharashtra Legislative Assembly in exercise of its powers and privileges vested in the house by virtue of Article 194(3) of the Constitution of India.
B. That this power of the House to suspend a member of the Legislative Assembly for disorderly conduct/contempt of the House was unfettered in so far as the period of such suspension was concerned. The period of suspension was at the sole discretion of the House and imposed at the House's will and

pleasure. In other words, the House had an absolute discretion so far as the period of suspension was concerned.

C. That the decision of the Constitution Bench of this Hon'ble court in *Raja Ram Pal's* case recognized that the House even had the power of expulsion of its members for contempt of the House. If the House had the power to expel its members for contempt, by necessary implication, it had the power to suspend them for such period as it deemed fit.

D. That in exercising the power to punish for contempt/disorderly conduct, the House was not even bound by the rules framed by it under Article 208 of the Constitution of India for regulating its procedure and the conduct of its business, as breach of these rules constituted a mere irregularity of procedure within the meaning of Article 212 of the Constitution.

E. That in a decision of the Hon'ble High Court of Madras in *VC Chandhira v Legi. Assembly of TN (2013 6 CTC 506),* the act of suspension by the said Tamil Nadu Assembly of 6 MLAs for an original period of 1 year reduced to a period of 6 months vide a resolution of the House, was upheld.

F. That the scope of Judicial Review of the act of the House of suspension of its members for any length of time is limited only to the ground set out in clause (s) of paragraph 431 in *Raja Ram Pal's* case. The grounds set out in other clauses do not constitute grounds for judicial review. Barring a bald assertion to the said effect, the state of Maharashtra has offered no rationale for this argument.

II. Source of the privileges of the legislatures in India

A. The source of privileges of legislatures in India are articles 105(3) in the case of each House of Parliament and 194(3) in the case of every house of a State legislature.

Article 194(3) reads as under:

> "*In other respects, the powers, privileges and immunities of a House of the Legislature of a State, and of the members and the committees of a House of such Legislature, shall be such as may from time to time be defined by the Legislature by law, and, until so defined, shall be those of that House and of its members and committees immediately before the coming into force of Section 26 of the Constitution forty fourth Amendment Act, 1978*" (emphasis supplied)

Prior to its amendment by the said section 26 – Article 194(3) read as under:

> *"Powers, Privileges and immunities of a House of the Legislature of a State, and of the members and the committees of a House of such Legislature, shall be such as may from time to time be defined by the Legislature by law, and, until so defined shall be those of the House of Commons of the Parliament of the United Kingdom, and of its members and committees, at the commencement of this Constitution" (emphasis supplied)*

In other words, in the absence of any definition by law by a legislature (and no legislature in India has defined its powers, privileges

and immunities till today), the privileges of a House of the Legislature of the state shall be those of the House of Commons of the Parliament of United Kingdom at the commencement of the Constitution in 1950.

III. Burden of establishing the existence and extent of a privilege

In the decision of *Pandit MSM Sharma (***1959 AIR SC 395)**, this Hon'ble Court held in para 47:

> *"47. The main question, therefore, that falls to be decided is the* ***existence*** *and the* ***extent*** *of the privilege claimed by the respondents. As the privilege claimed by the respondents is in derogation of the fundamental right of a citizen, the burden lies heavily upon them to establish by clear and unequivocal evidence that the House of Commons possessed such a privilege. In the words of Coke "as the privilege is part of the law of custom of the Parliament, they must be collected out of the rolls of Parliament and other records and by precedent and continued experience". They can be found only in the Journals of the House compiled in the Journal Office from the manuscript minutes and notes of proceedings made by the clerks at the table during the sittings of the House. Decided cases and the text-books would also help us to ascertain the privileges of the Houses. The words "at the commencement of the Constitution" indicate that the privileges intended to be attracted are not of the dark and difficult days, when the House of Commons passed through strife and struggle, but only those obtaining in 1950, when it was functioning as a model Legislature in a highly democratized country. In the circumstance, a duty is cast upon the respondents to establish with exactitude that the House of Commons possessed the particular privilege claimed at the commencement of the*

Constitution." (emphasis supplied)

The petitioners do not deny the *existence* of a power and privilege in the Legislative Assembly of Maharashtra to suspend a member for disorderly conduct/contempt of the House. The petitioners however contest the *extent* of the privilege claimed by the Maharashtra Legislative Assembly in the instant case i.e. to suspend a member for 1 year and contend on the contrary for reasons hereinafter following that the extent of the power of suspension of the Maharashtra Legislative Assembly is only for the remainder of the session in which the alleged breach was committed by its members. The distinction in *Pandit MSM Sharma's case* and the present one is that in *Sharma*'s case the privilege claimed by the Bihar Legislative Assembly was in derogation of the rights of a private citizen i.e. the Editor of the English daily newspaper 'Searchlight' whereas in the instant case the privilege claimed is in derogation of the petitioner's fundamental rights as a Member of the Legislative Assembly under Articles 14 and 21 of the Constitution.

The Respondent State in the instant case far from discharging the burden of establishing that the Assembly was vested with the power to suspend the petitioners for the period of 1 year has not even attempted to disclose the basis on which it claims the extent of the privilege for the said assembly by even a cursory examination of the extent of the privilege enjoyed by the UK House of Commons in 1950. Thus, no material was relied upon by the Respondent State, which even remotely suggested that the UK House of Commons had in 1950 the power to suspend its members for disorderly behavior/contempt for a period beyond the remaining term of the session in which the alleged breach was committed.

IV. Period for which the UK House of Commons could suspend its members for disorderly behavior/contempt at the commencement of the Indian Constitution in 1950:

On the other hand, there is conclusive evidence that the House of Commons in the UK did not at any time in the 20st century right upto 1950 enjoy the power to suspend its members for a period of 1 year. The leading – and almost only case- dealing with the House's power in respect of the period of suspension of its members is *Taylor vs. Barton* (1886) 11 AC 197, a decision of the *Privy Council* on appeal from the Supreme Court of New South Wales. In that case the Legislative Assembly of New South Wales suspended a member, one Mr. Taylor for disorderly behavior by passing the following resolution:

"*That Mr A G Taylor be suspended from the service of the House*."

In short the resolution did not specify the period of suspension. The Privy Council laid down the following propositions of law:

a. That a power to exclude a member and to keep him excluded for a period of time unlimited or limited only by the discretion of the Assembly did not appear to be necessary to the existence of a Legislative Assembly or to the proper exercise of its functions. According to their Lordships at Pg 4,

> *"The principle on which the implied power is given confines it within the limits of what is required by the assumed necessity. That necessity appears to their Lordships to extend as far as the whole duration of the particular meeting or sitting of the Assembly in the course of which the offence may have been committed. It seems to be*

reasonably necessary that some substantial interval should be interposed between the suspensory resolution and the resumption of his place in the Assembly by the offender, in order to give opportunity for the subsidence of heat and passion, and for reflection on his own conduct by the person suspended ; nor would anything less be generally sufficient for the vindication of the authority and dignity of the Assembly."

b. The Privy Council also held that (Pg 5):

"*A power of unconditional suspension, for an indefinite time, or for a definite time depending only on the irresponsible discretion of the Assembly itself, is more than the necessity of self-defence seems to require, and is dangerously liable, in possible cases, to excess or abuse*"

c. Further their lordships held that (pg 6):

"*Powers to suspend toties quoties, sitting after sitting, in case of repeated offences (and, it may be, till submission or apology), and also to expel for aggravated or persistent misconduct, appear to be suffcient to meet even the extreme case of a member whose conduct is habitually obstructive or disorderly. To argue that expulsion is the greater power, and suspension the less, and that the greater must include all degrees of the less, seems to their Lordships fallacious."*

d. Further at page 6 their lordships held that:

"*The rights of constituents ought not, in a question of this kind, to be left out of sight. Those rights would be much more seriously interfered with by an unnecessarily prolonged suspension than by expulsion, after which a new election would immediately be held."*

In the said case it was contended on behalf of the appellant i.e. Mr. Barton for the Legislative Assembly of New South Wales that

the resolution passed by the New South Wales Legislative Assembly was mandated by a Standing Order of the UK House of Commons, which had been adopted by the New South Wales Assembly. The said Standing Order relied upon by *Barton* was a Standing Order of 28th February of 1880 as amended on 22nd November, 1882. This Standing Order read as under:

> *"That whenever any member shall have been named by the Speaker, Order in or by the chairman of committee of the whole house, immediately after the commission Of the offence Of disregarding the authority of the chair, or of abusing the rules of the house by persistently und willfully obstructing the business of the house, or otherwise; then, if the offence has been committed by such member in the house, the Speaker shall forthwith put the question, on a motion being made, no amendment, adjournment, or debate being allowed, 'That such member be suspended from the service of the house' ; and, if the offence has been committed in a committee of the whole house, the Chairman shall, on a motion being made, put the same question in a similar way, and if the motion is carried, shall forthwith suspend the proceedings of the committee and report the circumstance to the house and the Speaker shall thereupon put the same question, without amendment, adjournment, or debate, as if the offence had been committed in the house itself. If any member be suspended under this order, his suspension on the first occasion shall continue for one week, on thé second occasion for a fortnight, and an the third, or any subsequent occasion, for a month."*

It was in accordance with this Standing Order that the New South Wales Legislative Assembly passed the said resolution *"That*

Mr A.G. Taylor be suspended from the service of the House". The Privy Council held firstly, that the said Standing Order was not by adoption or otherwise, a rule of procedure applicable to the New South Wales Legislative Assembly. The Privy Council however, very significantly, went further and said that even if the Standing Order applied to the New South Wales Assembly then (at pages 6 & 7),

> *"The same considerations have also led their Lordships to the conclusion that even if a power of unconditional suspension during the pleasure of the Assembly did exist, a suspensory resolution not expressed (or interpreted by any Standing Order) to be conditional on something to be done by the person suspended, or to be during pleasure, or for a definite time, ought not to be held operative beyond the end of the current sitting. The resolution pleaded in this case was, " That Mr. A. G. Taylor be suspended from the " service of the House." If more was meant than to suspend him for the rest of the then current " service," their Lordships think that it ought to have been distinctly so expressed. " Suspension " must be temporary; the words, "suspended from the service of the House," may be satisfied by referring them to the attendance of the member in the House during that particular sitting. So much as this is necessary to make the suspension effective, more is not. The case is not that of the suspension of a public officer, ab offcio, by a competent judicial or executive authority, having jurisdiction over the officer or over the tenure of his office, and acting in puenum, not for self-defence only. Nor is it like that of a commitment, where the gaoler or public officer who receives a prisoner into his custody under a legal warrant is bound to detain him till he has authority for his release." (emphasis supplied)*

In other words, the Privy Council read down the scope of the said Standing Order by limiting the words "suspended from the service of the House" to prohibiting the attendance of the offending member in the House during the particular sitting in which the disorderly conduct took place. Moreover, it is significant to note that while the suspension under the Standing Order of the House of Commons as aforestated had a maximum suspension period for 1 week on the first occasion, a fortnight for the second occasion and a month on the 3rd or any subsequent occasion, there has never been an instance where the House of Commons has ever authorized suspension of its member for disorderly behavior on a first occasion for a period beyond the session of the Assembly. Most certainly, the House of Commons never claimed a power to suspend its member for a period of 1 year as the Maharashtra Legislative Assembly in the instant case has done.

V. Precise position prevailing on the question of the extent to which the UK House of commons could exercise its power of suspension of its members as on 26th January, 1950:

As on 26th January, 1950, the power of the House of Commons to suspend its members was governed by the House of Commons Standing Order Relative to Public Business 1948. The relevant Standing Order is No. 22 (1 to 4) as reproduced hereunder:

> *22. (1) Whenever a Member shall have been named by Mr. Speaker or y the chairman, immediately after the commission of the offence of disregarding the authority of the Chair, or of persistently and willfully obstructing the business of the House by abusing the rules of the House, or otherwise, then, if the offence has been committed by such Member in the House, Mr. Speaker shall forthwith put the question, on a motion being made, no amendment, adjournment, or debate being allowed, "That such Member be suspended from the service of the House"; and if the offence has been committed in a committee of the whole House \, the chairman shall forthwith suspend the proceedings of the committee and report the circumsrances to the House; and Mr. Speaker shall on a motion being made forthwith put the same question, no amendment, adjournment, or debate being allowed, as if the offence had been committed in the House itself.*

(2) If any member be suspended under this order, his suspension on the first occasion shall continue until the fifth day, and on the second occasion until the twentieth day, on which the House shall sit after the day on which he was suspended, but no any subsequent occasion until the House shall resolve that the suspension of such Member do terminate.
(3)Not more than one Member shall be named at the same time, unless two or more members, present together, have jointly disregarded the authority of the chair.
(4) If a Member, or two or more Members acting jointly, who have been suspended under this order from the service of the House, shall refuse to obey the direction of Mr. Speaker, when severally summoned under Mr. Speaker's orders by the Serjeant at Arms to obey such direction, Mr. Speaker shall call the attention of the House to the fact that recourse to force is necessary in order to compel obedience to his direction, and the Member or Members named by him as having refused to obey his direction shall thereupon and without any further question being put be suspended from the service of the House during the remainder of the session."

It is clear from a combined reading of sub-clause (2) and (4) of the above-cited Standing Order No. 22 that suspension of a member on the first occasion shall be for a period of 5 days or the remainder of the session whichever is earlier. Even for the second occasion the period of suspension shall be 20 days or remainder of the session, whichever is earlier. On any subsequent occasion the period of suspension shall be until the House shall resolve that the suspension of such member do terminate.

According to the learned author Erskine May in his treatise --- 'The Law, Privileges, Proceedings and Usage of Parliament', 15th (1950) edition, if for a subsequent occasion, in default of an order by the House that the suspension of the member shall terminate when the House orders that it shall do so, the suspension shall be for the remainder of the Session. According to the learned author further "*The first (or subsequent) occasion*" has been interpreted to mean the first or the subsequent occasion in the same session. (See Chapter VII 1950 Edn.

under the heading "Proceedings upon the naming of a Member" @ Pgs 451-452.)

Thus, the House of Commons has throughout its history never even claimed or exercised a power of suspension of its members for disorderly behavior by way of Standing Orders or otherwise on a first occasion beyond a period of a week (Standing Order of November 1882) or 5 days (Standing Order No.22). It is only on a third occasion or any occasion subsequent to the third that the House of Commons have a power to suspend its members until the House by its order suspends such termination. However, even in such a third or subsequent occasion, if the House does not pass any order that the suspension shall continue until the House itself terminates it, the suspension shall terminate at the end of the session concerned.

In the light of what is stated hereinabove, the Impugned Resolution of the Maharashtra Legislative Assembly suspending the petitioners for a period of 1 year is clearly illegal and unconstitutional inasmuch as Article 194(3) of the Constitution vests in the State Legislatures only those powers, privileges and immunities enjoyed by the House of Commons in the UK at the time of the commencement of the Indian constitution i.e. 1950. The House of Commons having no power of suspension of its members for a first act of disorderly behavior beyond the remainder of the session in which the disorderly conduct was indulged in, the suspension of the petitioners for 1 year is patently and grossly ultra vires Article 194(3) of the Constitution. Accordingly, even the contention of the Respondent State that Judicial Review is permissible only for the grounds disclosed in clause (s) of paragraph 431 of *Raja Ram Pal's* case, falls to the ground.

VI Even the power of the UK House of Commons to commit its members does not extend beyond the period of the session concerned:

In 1969, 8 members of the Orissa Legislative Assembly were committed to custody by a warrant issued by the Speaker of the said Assembly for 7 days simple imprisonment for disturbing the assembly proceedings. In a reported decision of the Orissa High Court (AIR 1973 Orissa 111), the said court declared that the detention of the 8 members from 8th October to 15th October 1969 was illegal for a period of 2 days in as much as the said Assembly had been prorogued on the 13th of October, 1969. The judgment was based on the undisputed position that the privileges of the Orissa Legislative Assembly were those of the House of Commons of the UK Parliament as at the commencement of the Constitution of India and on the basis of high authority prevalent in the UK. The court concluded that the House of Commons did not have the power to confine its members for any breach of privilege of the House beyond the session in which the breach was committed. The courts inter alia cited a passage from Erskine May's *Parliamentary Practice*, which stated:

> "*Persons committed by the Commons, if not sooner discharged by the House, are immediately released from their confinement on a prorogation, whether they have paid the fees or not. If they were held longer in custody, they would be discharged by the Courts upon a writ of habeas corpus.*"

and *Halsbury's Laws of England*, which stated:

> "*The Lords claim to have power to commit an offender for a specified period even beyond the period of a session. This course was also formerly pursued by the Commons but was later abandoned; and it would now seem that they no longer have power to keep offenders in prison beyond the period of session….*"

In other words, even for the more extreme remedy than that of suspension for breach of privilege - that of committal to prison, a

sentence imposed beyond the prorogation of the session, would be illegal and a person in custody post prorogation would be entitled to be released on a Writ of Habeas Corpus.

VII Rationale for limiting remedies for breach of privilege (except expulsion) to the end of the session in which breach committed

The rationale for limiting all remedies for breach of privilege to a session in which the House takes action for such breach is the effect of prorogation. According to Erskine May's Treatise 1950 Edition at Page 32 under the heading 'Effect of a Prorogation' it is stated as under:

> "*The effect of a prorogation is at once to suspend all business until Parliament shall be summoned again. Not only are the sittings of Parliament at an end, but all proceedings pending at the time are quashed, except impeachments by the Commons, and appeals before the House of Lords. Every bill must therefore be renewed after a prorogation, as if it had never been introduced.*"

VIII The judgment in V.C. Chandhira Kumar, MLA v Tamil Nadu Legislative Assembly, Secretariat (2013 6 CTC 506) relied upon by the Respondent State

It is humbly submitted the reliance of the said judgment by the Respondent State is totally misconceived. The period of suspension of more than 60 days was challenged by suspended members of the Tamil Nadu Legislative Assembly on ground set out in paragraph 4.28 of the judgment. Paragraph 4.28 is reproduced below:

> *"The learned Senior Counsel for the petitioners submits that suspending a member of the Legislature Assembly for more than 60 days is ultra-vires of Article 190(4) of the Constitution of India. According to the learned Senior Counsel, disqualification of*

Members are dealt with under Articles 190 to 193. As per Article 190(4), if for a period of sixty days, a member of a House of the Legislature of a State is without permission of the House absent from all meetings thereof, the House may declare his seat vacant. Therefore, the learned Senior Counsel for the petitioners contends that if a member is suspended for more than sixty days, as happened in this case, the seat of the member would become vacant and therefore, any suspension beyond a period of sixty days is ultra-vires to Article 190(4)."

That contention was rejected by the Court in para 4.29, which reads as under:

"*I am unable to accept this submission also. I am again referring to Raja Ram Pal's case, wherein the Hon'ble Supreme Court held that the term vacancy, disqualification and expulsion have different meanings and they do not overlap. Disqualification strikes at the very root of the candidate's qualification and renders a member unable to occupy a member seat. Expulsion on the other hand deals with a member who is otherwise qualified, but in the House of the Legislature is unworthy of membership. While disqualification operates to prevent a candidate from re-election, expulsion occurs after the election of the member and there is no power of re-election. As far as the term vacancy is concerned, it is a consequence of the fact that a member cannot continue to hold membership. The reason may be any one of the several possible reasons which prevents the member from continuing membership, for example, disqualification, death or expulsion.*"

From the above, it is clear that the powers and privileges of the House of Commons at the commencement of the Constitution in respect of the period of the suspension that it could impose against a member guilty of disorderly behavior/contempt was never raised by the petitioners or considered in the judgment. It was never pointed out to the Court that at the commencement of the constitution the UK House of Commons could not suspend a member for at any rate a first case of disorderly conduct on his part for a period beyond the period of the session. In this view of the matter, it is respectfully submitted that the judgment of the Hon'ble Madras High Court, not having dealt with the vital premises underlining the power, privileges and immunities of a State legislature enshrined in Article 194(3) deserves to be overruled.

IX Grounds of Judicial Review set out in paragraph 431 of *Raja Ram Pal's* case that are applicable to the instant case [apart from ground (s)- substantive illegality & unconstitutionality already dealt with above]:

1. The decision of the House on the period of suspension of its members is a quasi-judicial decision as per clause (b) of paragraph 431. The decision of the House has a legal effect in as much as it affects the rights of the petitioner MLAs. Hence it is amenable to judicial review.
2. As per clause (g) of paragraph 431 of *Raja Ram Pal's* case "there is no foundation to the plea that a legislative body cannot be attributed jurisdictional error". In as much as the Maharashtra Legislative Assembly has exceeded the jurisdiction vested in the UK House of Commons at the time of the commencement of the Constitution on the issue of period of suspension of its members it is manifestly guilty of a jurisdictional error, amenable to judicial review.

3. Paragraph 431 (j) of *Raja Ram pal's* case is attracted because the petitioner MLAs complained that their fundamental rights under Articles 14, 19 and 21 have been infringed upon by the Impugned Order passed by the Maharashtra Legislative Assembly. Article 14 is attracted because the House's decision is arbitrary and without jurisdiction and Article 21 comes into play as the Impugned decision has been passed contrary to the procedure established by law. The procedure established by law consists not only of the procedure of the House of Commons prevailing at the time of the commencement of the Constitution through its Standing Orders but also the rules framed by the Maharashtra Legislative Assembly under Article 208 of the Constitution, which as per the decision in *Pandit MSM Sharma's* case also constitutes procedure established by law.
4. As regards paragraph 431 (n), Article 212(1) has no applicability as the quantum of suspension of a Member is not a ground of mere irregularity of procedure but a question of substantive justice.
5. Ground (r) in paragraph 431 indicates that at the very least the substantial Rules of Procedure and Conduct of Business of the House ought to be followed. In the instant case Rule 53 of the Maharashtra Legislative Assembly Rules of Business mandate that there shall be no suspension even for a second occasion of a breach of privilege by a member beyond the period of a session. The provisions of Rule 53 are not mere formal rules, the breach of which constitute a mere irregularity but are provisions of substantive justice and most certainly an aspect of procedure established by law within the meaning of paragraph 28 of *Pandit MSM Sharma's* case. A breach of Rule 53, it is respectfully submitted, is by itself a ground for judicial review.

6. As regards the grounds set out in paragraph 431 (u) of *Raja Ram Pal's* case, it has already been stated for reasons mentioned hereinabove that the Impugned Order of the House is subject to judicial review for lack of jurisdiction, gross illegality and violation of the constitutional mandate under Article 194(3). In addition, it is respectfully submitted that a decision to suspend members for a period contrary to that prescribed in Rule 53, which the Legislature in its wisdom has itself framed, manifestly suffers from the vice of irrationality and the longer the period of suspension than the prescribed one of 'till the remainder of the session' the more perverse the decision becomes. Thus, the impugned period of suspension imposed by the Maharashtra Legislative Assembly is both manifestly irrational and grossly perverse.

   The petitioners accordingly pray that the Impugned resolution of the Maharashtra Legislative Assembly dated 05.07.2021 be quashed and set aside.

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