



E-FILING NO - EF-HCK-2026-033612

BEFORE THE HON'BLE HIGH COURT OF KERALA AT ERNAKULAM

WP(C) No Of Year 2026

152.00 MISC.-OTHER THAN SUBJECTS MENTIONED ELSEWHERE

152.00 MISC.-OTHER THAN SUBJECTS MENTIONED ELSEWHERE

PETITIONER(S)

1. NEETHU

VS

RESPONDENT(S)

1. UNION OF INDIA
AND OTHERS

MEMORANDUM OF WRIT PETITION (CIVIL) FILED UNDER ARTICLE 226 OF THE CONSTITUTION OF
INDIA

FILING NATURE : URGENT

FEES PAID & STATUS - 820 (SUCCESS)

C.F : 500 Under Schedule II Article 9 (m) (iii) of the Kerala Court Fees and Suit valuation Act

SERVED ON

ASG OF INDIA

GOVERNMENT PLEADER

FILED BY

1. PADMA LAKSHMI

Sd/-

E-VERIFIED

PADMA LAKSHMI(K/000652/2023)



BEFORE THE HONOURABLE HIGH COURT OF KERALA AT ERNAKULAM

WP(C) No Of Year 2026

PETITIONER : NEETHU

V/S

RESPONDENT : UNION OF INDIA

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Sd/-

E-VERIFIED

PADMA LAKSHMI

K/000652/2023

BEFORE HON'BLE HIGH COURT OF KERALA, AT ERNAKULAMWPC.NO. OF 2026Petitioner

Neethu

v/s

Respondent

Union of inida & others

Synopsis

1. The present Writ Petition is filed under Article 226 of the Constitution of India challenging the constitutional validity of the Transgender Persons (Protection of Rights) Amendment Act, 2026 (hereinafter referred to as the "impugned Act"), which received Presidential assent on 30.03.2026 and has come into force with immediate effect.
2. The petitioner is biological male identifies as girl she has been experiencing gender incongruence since the age of 6-7 years which further exacerbated during her adolescence.
3. This Caused significant psychological distress and preoccupation interfering with her academic and interpersonal functioning due to humiliation and sexual abuse faced from society and even family members. The petitioner discontinued her studies at 7 the standard . Her father passed away during her childhood ,and her mother has been doing daily wages labor to meet the basic needs of the family .
4. Due to feminine characteristics of the petitioner she was sexually exploited by her cousins. Because of this sexual abuse and trauma, the petitioner dropped out of school subsequently she started daily wage work to support her mother, However she again faced sexual harassment and exploitation at the workplace.
5. Later, she migrated to kochi and tried to behave like boy but her true identity could not be suppressed and she again faced sexual abuse there. There after she migrated to Bangalore in search of a peaceful life but unfortunately she continued to face sexual harassment from co-workers and there friends.

6. Due to continuous harassment and unbearable mental distress, the petitioner once decided to end her life and made 2 attempt however she was survived by god's grace and prayer of her mother. After that, she returned to kerala and started rearing cows and dogs to earn her livelihood and for personal safety Eventually her family realized her gender and charaterstics ,but instead of supporting her they abandoned her from house There after the petitioner started counseling from Renai medcity .
7. After NALSA v. Union of India. (2014) **AIR 2014 SC 1863** petitioner took transgender identity card from National portal Transgender persons protection of rights act 2019 passed by the Indian Parliament aim to protect the right of transgender individuals prohibit discrimination and ensure welfare. It defines a transgender person allows for self perceived identity and prohibit discrimination in education, employment, and healthcare Subsequently petitioner changed her name and gender to connected documents pan card ,ration card ,Adhar card etc as per section 6 of transgender person protection of rights act 2019.
8. Then petitioner started hormone replacement therepy under supervision of [REDACTED] subsequently in order to queer her gender in congruence she decided to do her surgery then she approached amritha hospital Ernakulam ,from where docter diagnosed case of severe hypo dysfibrinogenemia,which can have spontaneous bleeding or trauma /surgery induced bleeding that can cause excessive clotting The petitioner reports experiencing gender incongruence so ,petitioner is a transgender as per section 4(2) of transgender person protection of rights act 2019 The Transgender Persons (Protection of Rights) Amendment Bill, 2026, introduced in the Lok Sabha on 13 March 2026, has been passed by Parliament and received Presidential assent on 30 March 2026, thereby becoming the *Transgender Persons (Protection of Rights) Amendment Act, 2026* (hereinafter "impugned Act"). This hon'ble court ,in Lata singh vs

state of up(2006)(5)scc475(DB),Shafin Jahan vs Ashokan K.M(2018)16 SCC 368 (FB) and Laxmibai chandaragi B VS State of Karnataka (2021)scc3 scc360(DB),has held that Article 21 guarantees that an adult person has the right to marry a person of their choice . The autonomy of individuals to enter into a relationship of marriage and family are crucial facets of freedom of conscience and right to privacy .

9. one heterosexual men approached to marry the petitioner she believed his promise then he sexually assaulted and looted money from her hand due to this grievance she filed case to perinthalmanna Police Station they Registered FIR 318/2026 .But police not ready to take further action because as per new definition of transgender she is not covered under this .so her justice denied The above said medical condition prevent her gender affirmation surgery.now her identity struck down by the central government under the preview of transgender Now petitioner afraid that the document of her may be treated as invalid election id ,transgender identity card ,Ration card Pan card etc . Now petitioner afraid of will the treatment be stopped.
10. The Petitioner has no alternative efficacious remedy and is therefore constrained to invoke the extraordinary jurisdiction of this Hon'ble Court under Article 226 of the Constitution of India.

Dated 5th April 2026


Counsel for the petitioner
Padma Lakshmi



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WP(C) No Of Year 2026

PETITIONER(S)

1. NEETHU



VS

RESPONDENT(S)

1. UNION OF INDIA

REPRESENTED BY SECRETARY MINISTRY OF SOCIAL JUSTICE AND EMPOWERMENT ,ROOM
NO:637 A-WING SHASTRI BHAWAN NEW DELHI
, PIN-110001

2. MINISTRY OF LAW AND JUSTICE

THROUGH ITS SECRETARY 4TH FLOOR, A-WING, SHASTRI BHAWAN
, PIN -110001

3. STATE OF KERALA

REPRESENTED BY CHIEF SECRETARY, SECRETARIAT, THIRUVANANTHAPURAM,
, PIN -695001

4. DIRECTOR OF SOCIAL JUSTICE DEPARTMENT

VIKAS BHAVAN, 5 TH FLOOR, THIRUVANANTHAPURAM,
, PIN -695033



MEMORANDUM OF WRIT PETITION (CIVIL) FILED UNDER ARTICLE 226 OF THE CONSTITUTION OF
INDIA BY PADMA LAKSHMI
PADMALAKSHMI ASSOCIATES ,ORIENTAL BUSINESS CENTRE KALOOR-17
PIN - 0

STATEMENT OF FACTS

1. The petitioner is biological male identifies as girl she has been experiencing gender incongruence since the age of 6-7 years which further exacerbated during her adolescence. This Caused significant psychological distress and preoccupation interfering with her academic and interpersonal functioning due to humiliation and sexual abuse faced from society and even family members. The petitioner discontinued her studies at 7 the standard .
2. Her father passed away during her childhood ,and her mother has been doing daily wages labor to meet the basic needs of the family .
3. Due to feminine characteristics of the petitioner she was sexually exploited by her cousins. Because of this sexual abuse and trauma, the petitioner dropped out of school.
4. subsequently she started daily wage work to support her mother, However she again faced sexual harassment and exploitation at the workplace.
5. Later, she migrated to kochi and tried to behave like boy but her true identity could not be suppressed and she again faced sexual abuse there.
6. Thereafter she migrated to Bangalore in search of a peaceful life but unfortunately she continued to face sexual harassment from co-workers and there friends.
7. Due to continuous harassment and unbearable mental distress, the petitioner once decided to end her life and made 2 attempt however she was survived by god's grace and prayer of her mother .
8. After that, she returned to kerala and started rearing cows and dogs to earn her livelihood and for personal safety .
9. Eventually her family realized her gender and characteristics ,but instead of supporting her they abandoned her from house .

10. There after the petitioner started counseling from Renai medcity .After NALSA v. Union of India. (2014) AIR 2014 SC 1863 petitioner took transgender identity card from National portal . **True copy of transgender identity card issued by the district magistrate as per section 6 of Transgender persons protection of rights act 2019 dated 08/11/2021 herewith and marked as Exhibit P-1**
11. Transgender persons protection of rights act 2019 passed by the Indian Parliament aim to protect the right of transgender individuals prohibit discrimination and ensure welfare. It defines a transgender person allows for self perceived identity and prohibit discrimination in education, employment, and healthcare. **True copy of transgender person protection of rights act 2019 is produced herewith and marked as Exhibit P-2.**
12. Subsequently petitioner changed her name and gender to connected documents pan card ,ration card ,Adhar card etc as per section 6 of transgender person protection of rights act 2019.
13. Then petitioner started hormone replacement therapy under supervision of [REDACTED]. subsequently in order to queer her gender in congruence she decided to do her surgery then she approached amritha hospital Ernakulam ,from where doctor diagnosed case of severe hypo dysfibrinogenemia, which can have spontaneous bleeding or trauma /surgery induced bleeding that can cause excessive clotting **true copy of hospital document showing her diagnosis [REDACTED] dated 25/03./2022 here with and marked as Exhibit P3.**
14. The petitioner reports experiencing gender incongruence so ,petitioner is a transgender as per section 4(2) of transgender person protection of rights act 2019.
15. The Transgender Persons (Protection of Rights) Amendment Bill, 2026, introduced in the Lok Sabha on 13 March 2026, has been passed by

Parliament and received Presidential assent on 30 March 2026, thereby becoming the *Transgender Persons (Protection of Rights) Amendment Act, 2026* (hereinafter “impugned Act”). **A true copy of Transgender Persons (Protection of Rights) Amendment Act, 2026 is produced herewith and marked as Exhibit P4.**

16. This hon’ble court, in *Lata singh vs state of up* (2006)(5)scc475(DB), *Shafin Jahan vs Ashokan K.M* (2018)16 SCC 368 (FB) and *Laxmibai chandaragi B VS State of Karnataka* (2021)scc3 scc360(DB), has held that Article 21 guarantees that an adult person has the right to marry a person of their choice. The autonomy of individuals to enter into a relationship of marriage and family are crucial facets of freedom of conscience and right to privacy.

17. one heterosexual men approached to marry the petitioner she believed his promise then he sexually assaulted and looted money from her hand due to this grievance she filed case to perinthalmanna Police Station they Registered FIR 318/2026 **True copy of Fir dated 23/03/2026 herewith and marked as Exhibit P-5**

18. In *Anamika v. Union of India* (MANU/TN/8598/2007) This is a significant order as it records that the police recognised the coverage of the criminal law against sexual harassment in the IPC to be applicable to transgender persons. But police not ready to take further action because as per new definition of transgender she is not covered under this. so her justice denied.

19. The above said medical condition prevent her gender affirmation surgery. now her identity struck down by the central government under the preview of transgender.

20. Now petitioner afraid that the document of her may be treated as invalid election id, transgender identity card, Ration card Pan card etc

21. Now petitioner afraid of will the treatment be stopped.some psychiatrist from renai medcity denied treatment .After this amendment act .
22. Surgery is the only way to cure petitioner gender dysphoria there is no other option for her however terms of this impugned act restrict right of proper treatment of the petitioner and other person who phase gender dysphoria .
23. Petitioner also a transgender activist she is afraid of future of the child phasing gender incongruence .
- 24.As per impugned act Transgender Persons (Protection of Rights) Amendment Act, 2026 section 2 (k) not defined about gender incongruence ,right of transexual transmen etc.
- 25.The cause of action arose on 30 March 2026, when the impugned Act Transgender Persons (Protection of Rights) Amendment Act, 2026 came into force, directly affecting the fundamental rights of petitioner & transgender persons across the country, including within the State of Kerala
- 26.The section 5 of Transgender Persons (Protection of Rights) Amendment Act, 2026_and

In section 7 of the principal Act,—

(a) in sub-section (1), for the words “such person may”, the words “such person shall” shall be substituted;

(b) after sub-section (1), the following sub-section shall be inserted,

namely:—

“(1A) The medical institution in which the person who has undergone surgery to change gender, either as male or female, shall furnish the details of such person to the concerned District Magistrate

and the authority in such form and manner as may be prescribed.”;

(c) for sub-section (2), the following sub-section shall be substituted, namely:—

“(2) A person referred to in sub-section (1) shall also make an application to the District Magistrate who shall, on receipt of an application along with the certificate issued by the Medical Superintendent or Chief Medical Officer, and on being satisfied with the correctness of such certificate, issue a certificate indicating change in gender in such form and manner and within such time, as may be prescribed.”;

(d) sub-section (3) and the proviso shall be omitted.

After surgery most of the people phasing medical issues due to inappropriate care and inappropriate surgery .petitioner need support from the system but impugned act Transgender Persons (Protection of Rights) Amendment Act, 2026 excluded transexual from definition of transgender and exclude oll the right and care under the section .

In the landmark, PuttaSwami Case, the majority Heald the right to privacy is protected as an intrinsic part of the right to life and personal liberty in article 21 and as part of the freedom guaranteed by part three of the constitution justice k s puttaswamy(retd)vs union of india 2017 O Supreme (sc)772

27. The impugned Act removes the inclusive definition of “transgender person” under the 2019 Act and substitutes it with a restrictive classification, thereby excluding:

- a. Transmen and transwomen without medical intervention,
- b. Non-binary and genderqueer persons,

- c. Individuals identifying solely on the basis of self-perceived gender identity.
28. The impugned act questions the sexual orientation of petitioner and transgender community .
29. The community required proper medical care and insurance ,shelter job ,reservation but the The impugned act not cover anything for the welfare of the marginalized community .
30. The impugned act not protected the right of the transsexual peoples .
31. The impugned act Transgender Persons (Protection of Rights) Amendment Act, 2026 not protected right of the transgender students ,petitioner as a transgender activist have concern about transgender students reservation scholarship ,available hostel facility ,etc.what will be the future of existing students and coming out students ,who phasing gender incongruence .
32. The impugned act Transgender Persons (Protection of Rights) Amendment Act, 2026 will adversely affect working of shelter home and life of the person who abandoned from family .
33. Right to choose dress ,expression also fundamental right that was also questioned by The impugned act Transgender Persons (Protection of Rights) Amendment Act, 2026 petitioner afraid rights will be lost .
34. The petitioner afraid of using women toilet in our country gender neutral toilet are not available .
35. The impugned Act dilutes Section 4(2) of the parent legislation, thereby undermining the right to self-identification of gender, as recognized by the Hon'ble Supreme Court in *NALSA v. Union of India*. (2014) AIR 2014 SC 1863.
36. The requirement of certification by a medical board imposes invasive and coercive conditions, violating dignity, privacy, and bodily autonomy. The provision requiring certification by a medical board is arbitrary, invasive,

and violative of the right to privacy and dignity. It subjects individuals to unnecessary scrutiny and gatekeeping, discouraging access to legal recognition and forcing many towards unsafe alternatives. This is also contrary to the principles laid down in Justice K.S. Puttaswamy v. Union of India (2017) 10 SCC 1 on the right to privacy.

37.The impugned Act has been strongly criticised by medical and mental health professionals. **True copy of document dated 20 march 2026 published by Arijit Sen (AUTHER OF THE PAPER) psychologist & phd scholar here with and marked as EXHIBIT -P6.**

38.Medical consensus, including the WPATH Standards of Care (Version 8), affirms that gender identity is based on self-determination, and compulsory certification leads to adverse mental health outcomes

39.The impugned Act is inconsistent with international human rights standards, including:

- a. Yogyakarta Principles and Yogyakarta Principles +10
- b. WHO classification removing gender incongruence as a mental disorder
- c. UN Human Rights Council protections on gender identity

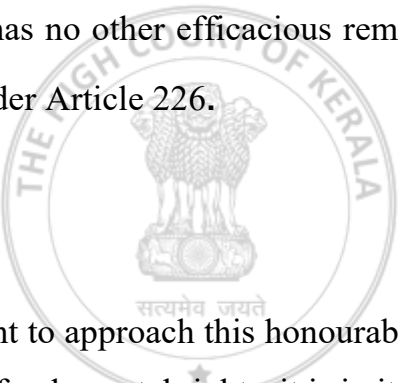
40.Comparative jurisdictions such as Argentina and Malta legally recognize self-identified gender without medical intervention, demonstrating evolving global standards

41.In Kerala, transgender persons predominantly identify as transmen, transwomen, and non-binary individuals, and not strictly within socio-cultural identities such as hijra or kinner. The impugned Act effectively erases local lived realities

42.The impugned Act violates the right to expression under Article 19(1)(a), which includes expression of identity through appearance, behaviour, and personal choices.

43. The Act introduces vague penal provisions such as criminalizing “influencing someone to become transgender,” which are prone to misuse against activists and healthcare providers.
44. The Act fails to provide adequate safeguards in areas of healthcare, education, housing, and social security.
45. Following the enactment, members of the transgender community are experiencing severe psychological distress, including suicidal ideation, due to fear of legal exclusion and social stigma.
46. Petitioner is a transgender activist she raised voice for voiceless
47. The Petitioner has no other efficacious remedy except to approach this Hon’ble Court under Article 226.

Grounds

- 
- A. Because the right to approach this honourable court seeking redress for violation of fundamental rights, it is in itself a fundamental right protected by the constitution of India
- B. Because sexual orientation is an essential component of identity and dignity, which are embedded in the right to life
- C. Because, matter of dress and a food of ideas and ideologies of love and partnership are within, the central aspect of identity, which are constitutionally protected under article 21.
- D. In vyjayanthi vasanta mogli vs state of Telangana 2023 scc online TS1857 The court struck down the Telangana Eunuches Act 1919 as un constitutional holding that it violated Article 14 and 21 of the constitution and stigmatized transgender persons by treating them as a criminal class.

E. Because the exclusion of petitioner, transwomen transmen gender queer binary person from definition of transgender treat them unequal class for the purposes of article 14 of Constitution of India classification based on cultural identity amount to treating equals us, unequals and violates Article 14 of Constitution of India.

F. Because constitutional courts must keep in mind their own experience. In international treaties and covenants and the doctrine of flexibility.

G. VIOLATION OF ARTICLES 15 AND 16

Discrimination based on gender identity is impermissible. The impugned Act indirectly discriminates against transgender persons by denying legal recognition.

H. VIOLATION OF ARTICLE 19(1)(a)

Gender identity expression is protected speech. The impugned Act restricts expression through legal non-recognition.

I. VIOLATION OF ARTICLE 21

The right to dignity, privacy, and autonomy includes: right to self-identify gender, right to bodily integrity, right to live with dignity. The impugned Act violates all these facets.

E. VIOLATION OF BINDING PRECEDENTS

The impugned Act is contrary to: *NALSA v. Union of India* (2014) AIR 2014 SC 1863 which affirmed self-identification as fundamental right, *K.S. Puttaswamy v. Union of India* (2017) 10 SCC 1 which affirmed privacy as a fundamental Right, *Navtej Singh Johar v. Union of India* (2018) AIR 2018 SC 4321. which affirmed dignity and identity as a fundamental right. In *supriyo Chakraborty and another versus union of india* 2023 live law(sc)900 guaranteed that transgender persons in heterosexual relationships have the right to marry under existing laws, *Jane Kaushik vs union of india* 2025 INSC 1248 judgment highlights the obligation of state and private entities to prevent discrimination and implement

reasonable accommodations for transgender persons emphasizing their right to dignity and equality under the law.

F.INTERNATIONAL LAW VIOLATION

Though not enforceable, international principles guide constitutional interpretation. The impugned Act violates:

- Yogyakarta Principles
- WHO guidelines
- Global best practices

G. In *supriyo Chakraborty and another versus union of india 2023 live law(sc)900* guaranteed that transgender persons in heterosexual relationships have the right to marry under existing laws, including personal laws. The state must ensure that transgender persons are not discriminated .

H. *Jane Kaushik vs union of india 2025 INSC 1248* judgment highlights the obligation of state and private entities to prevent discrimination and implement reasonable accommodations for transgender persons emphasizing their right to dignity and equality under the law .Self perceived gender identity does not depend on surgery or medical procededures any administrative or legal requirement indirectly forcing sex reassignment surgery (SRS),OR medical certification would violate constitutional rights .

I. SECTION 2 (k) of the Transgender Persons (Protection of Rights) Amendment Bill, 2026 is violative of Articles 14, 15, 19, and 21 of the Constitution of India. The Bill removes Section 4(2) of the 2019 Act and attempts to dilute and override the principles laid down by the Hon'ble Supreme Court in *National Legal Services Authority v. Union of India (2014) AIR 2014 SC 1863*. The non-recognition of transmen and transwomen as a third gender denies them equality

before law and equal protection of law under Article 14 and infringes their right to life and dignity under Article 21.

J. It is submitted that the non-recognition of gender identity of transgender persons violates their fundamental rights guaranteed under the Constitution of India. The right to choose one's gender identity is integral to the right to live with dignity under Article 21.

K. While the Act includes persons with socio-cultural identities such as kinner, hijra, aravani, or jogta, and persons with intersex variations, the Amendment Bill removes explicit recognition of

- (i) transmen and transwomen irrespective of medical procedures, and
- (ii) genderqueer persons.

This exclusion is arbitrary and unconstitutional.

L. The right to freedom of speech and expression under Article 19(1)(a) includes the right to express one's identity through dress, behaviour, name, bodily characteristics, and personal choices. The Bill, by restricting recognition, directly interferes with this fundamental freedom.

M. The provision requiring certification by a medical board is arbitrary, invasive, and violative of the right to privacy and dignity. It subjects individuals to unnecessary scrutiny and gatekeeping, discouraging access to legal recognition and forcing many towards unsafe alternatives. This is also contrary to the principles laid down in Justice K.S. Puttaswamy v. Union of India (2017) on the right to privacy.

N. The proposed amendment is in direct contradiction to the landmark judgment of the Hon'ble Supreme Court in NALSA v. Union of India (2014) **AIR 2014 SC 1863**, which unequivocally upheld the right to self-identification of gender as a fundamental right and recognized gender identity as an intrinsic aspect of dignity, autonomy, and personal liberty.

PRAYER

In the above circumstances, it is most respectfully prayed that this Hon'ble Court may be pleased to:

- A) Issue a writ of declaration or any other appropriate writ, order, or direction declaring that the provisions of the Transgender Persons (Protection of Rights) Amendment ACT, 2026, in particular 2(k) and other related provisions, are unconstitutional, being violative of Articles 13(2), 14, 15, 19, and 21 of the Constitution of India;
- b) Issue a writ of certiorari or any other appropriate writ, order, or direction quashing the impugned provisions of the Amendment ACT, 2026, to the extent that they exclude transmen, transwomen, non-binary, and genderqueer persons from the definition and protection under law;
- c) Issue a writ of mandamus or any other appropriate writ, order, or direction declaring that the Transgender Persons (Protection of Rights) Amendment Act, 2026, is in violation of the law laid down by the Hon'ble Supreme Court in NALSA v. Union of India, (2014) 5 SCC 438 and K.S. Puttaswamy v. UOI, (2017) 10 SCC 1;
- d) Declare that the right to self-identification of gender is a fundamental right under Articles 14, 19, and 21 of the Constitution of India, and direct the Respondents to recognize and uphold the same without imposing medical or bureaucratic barriers;
- f) Issue appropriate directions to the Respondents to frame inclusive policies ensuring access to education, employment, healthcare, housing, and social security for all transgender persons, including transmen, transwomen, and non-binary individuals;
- g) The petitioner may be permitted to dispense with the production of translation of vernacular document.

h) Pass such other order or orders as this Hon'ble Court may deem fit and proper in the interests of justice.

INTERIM RELIEF

Issue appropriate directions restraining the Respondents from implementing or giving effect to the impugned provisions of the Amendment ACT, 2026, pending disposal of this writ petition;



COUNSEL FOR THE PETITIONER

PADMA LAKSHMI



BEFORE HON'BLE HIGH COURT OF KERALA, AT ERNAKULAM
WPC.NO. OF 2026

Petitioner

Neethu

v/s

Respondent

Union of inida & others

Affidavit

I, NEETHU

1. I am the petitioner in the W.P. (C). I am conversant with the fact of the case. The facts and grounds stated in the W.P(C). are true and correct. Exhibits relied on and marked in the W.P. is the true copy of its original. I am entitled for the reliefs claimed in the Writ Petition. I have not filed any other petition other than mentioned above, before this Hon'ble court/other courts for the reliefs claimed in this case.

2. What is stated above in paragraphs 1 to 47 of statement of facts and Grounds A to N are true to my knowledge and what is specified in the above paragraphs stated on information and belief derived from records and obtained from me and I believe the same to be true.

Dated this the 04th Day of April 2026.

DEPONENT

Solemnly affirmed and signed this affidavit before me by the deponent on this the 4th Day of APRIL 2026, at my office at Ernakulum.

COUNSEL FOR THE PETITIONER
 PADMA LAKSHMI