

**BEFORE THE HON'BLE SUPREME COURT OF INDIA
CIVIL ORIGINAL JURISIDCTION
PUBLIC INTEREST LITIGATION
WRIT PETITION (CIVIL) NO. _____ OF 2016**

IN THE MATTER OF:

MARTIN C. MACWAN

...PETITIONER

versus

UNION OF INDIA & ORS.

...RESPONDENTS

PAPER BOOK
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FUZAIL AHMAD AYYUBI: COUNSEL FOR THE PETITIONER

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SYNOPSIS AND LIST OF DATES

That the present writ petition is being filed in public interest under Article 32 of the constitution. The Petitioner is seeking directions to various State Governments to take immediate and necessary actions against the Cow Protection Groups also referred as GauRaksha Dals and to the Central Government to ban such gangs/groups. The Petitioner is further praying for the removal of violent content uploaded by these Gau Raksha Dals on various modes of Social Media. The Petitioner is also seeking compensation from the concerned State Governments for the victims of violence committed by these Vigilantes.

The Petitioner humbly submits that the menace caused by the so called Cow Protection Groups is spreading fast to every nook and corner of the Country and is creating disharmony among various communities and castes.

The Petitioner submits that the series of violence is in furtherance of caste atrocities that Dalits have been subjected to since antiquity. It is a matter of great national dishonor that even in 21st Century, in our democratic nation based upon the principles of rule of law, certain communities and castes are being subjected to severe violence only due to accident of their birth in that particular caste.

The Petitioner submits that even though Article 17 of the Constitution of India abolishes untouchability, the same is still prevalent in our Country. It is submitted that in a study conducted by the Petitioner's Navsrajan Trust, it was found that in 98.1% of villages surveyed, a Dalit cannot rent a house in a non-

Dalit community. Further, in 97.6% of villages, Dalits must not touch the water pots or utensils of non-Dalits as such contact is considered defilement.

The violence committed by the so called GauRaksha groups have reached to such proportions that even the Hon'ble Prime Minister has declared them as people who are destroying the society.

These vigilantes groups are operating beyond the realm of law and are known to frequently take law in their hands with Police acting either as a mute spectator or found acting in concert with them. The atrocities committed by these vigilantes groups are punishable under various provisions of IPC as well as under Schedule Caste and Scheduled Tribes (Prevention of atrocities) Act, 1989 but to no avail.

The Petitioner humbly submits that the State Governments provide identification cards to such vigilantes. These Vigilante Groups in the garb of cow protection enjoy an unlawful protection from their State Governments. Like the Gujarat Animal Prevention Act, 1956 provides that all persons exercising powers under this Act shall be deemed to be public servants within the meaning of Section 21 of the Indian Penal Code. It further provides that no suit, prosecution or other legal proceedings shall be instituted against any person for anything which is done in good faith or intended to be done under this Act or the rules made thereunder. These provisions are mutatis mutandis with the Maharashtra Animal Prevention Act, 1956 as well as with the Karnataka Prevention of Cow Slaughter and Cattle Preservation Act, 1964.

Further, the Gujarat Animal Prevention (Amendment) Rules, 2011 provides that the authorized person will also include office bearers of

Panjarapol, Infermaries, Gaushalas, and Societies for prevention of cruelty to animals (SPCA) and Animal Welfare Organizations. It is submitted that there are over 200 hundred GauRakshaDals operating in Gujarat alone who frequently resort to violence.

Further, the Prevention of Cruelty to Animals Act, 1960 states that apart from the Officer concerned, any other person so recognized will have power of seizure and Section 40 provides that such persons will have immunity from prosecution for acts done in bonafide belief.

Further, Prevention of Cruelty to Animals (Establishment and Regulation of Societies for Prevention of Cruelty to Animals) Rules, 2001 provides for establishment of Society for Prevention of Cruelty to Animals and gives it the power of search and seizure of animals as well as their licenses.

The Petitioner submits that these laws and the protection granted therewith act as a catalyst to violence perpetrated by these vigilantes. This Hon'ble Court has directed to disband such groups in case of NandiniSundarVs State of Chhattisgarh as reported in (2011) 7 SCC 547.

This Hon'ble Court observed that the culture of unrestrained selfishness and greed spawned by modern neo-liberal economic ideology, and the false promises of ever increasing spirals of consumption leading to economic growth was the root cause of menace spread by SalwaJudum. Similarly, in the present case, the root cause of all the violence spread by the Vigilantes is caste as well as economic. The vigilantes groups appear to be goons conducting extortion in the guise of GauRakshaks.

The Petitioner further submits that in most cases the Police and other law enforcement agencies are either complicit in such illegal actions or have merely been a mute spectators against such a breakdown of rule of law.

The Petitioner submits that the actions of these cow vigilantes groups are in complete violation of Article 21 of the Constitution of India as it takes away the victims "Right to life and personal liberty". These actions undermine the rule of law in the country.

The Petitioner further submits that the videos of such atrocities are readily available on Social Media and are inter alia spreading tension and causing enmity between caste and communities beyond doubt.

The Petitioner most humbly submits that sting operations conducted by various News Channels clearly show that these vigilante groups are mere extortionists in the garb of Cow Protection and are feeding on fear psychosis of victim as well as the community or caste that person belongs to. Similar aspersions were casted by the Hon'ble Prime Minister in one of his public speeches that 80% of such groups are anti social elements in the garb of GauRakshaks,

The Petitioner humbly submits that the actions of these vigilantes are in violation of Article 19(1) (g) of the Constitution of India as the Dalits who were attacked at Unaor at East Godavri were only doing their traditional profession of skinning the already dead cow to provide leather to tanneries. Further, the Traders of livestock who carry valid licenses are also feeling threatened due to multiple attacks.

Multiple self-declared Cow Protection groups are active on Social Networking websites wherein they spread rumors as well as hatred between different communities and castes.

The Petitioner humbly submits that these groups need to be regulated and banned in the interest of social harmony, public order, morality and rule of law in the Country.

Hence the present Writ Petition.

LIST OF DATES

- 1956 Maharashtra Animal Prevention Act, 1956 was enacted which was later on adopted by State of Gujarat as The Gujarat Animal Prevention Act, 1956. A copy of the Gujarat Animal Prevention Act, 1956 is marked and annexed hereto as **Annexure P-1**.
- 1964 The Karnataka Prevention of Cow Slaughter and Cattle Preservation Act, 1964 was enacted. A copy of the Karnataka Prevention of Cow Slaughter and Cattle Preservation Act, 1964 is marked and annexed hereto as **Annexure P-2**.
- 1976 The Maharashtra Animal Prevention Act, 1976 was enacted which repealed the former Maharashtra Animal Prevention Act, 1956. A copy of

Maharashtra Animal Prevention Act, 1976 is marked and annexed hereto as **Annexure P-3**.

2001 Prevention of Cruelty to Animals (Establishment and Regulation of Societies for Prevention of Cruelty to Animals) Rules, 2001 was enacted by the Central Government. A copy of Prevention of Cruelty to Animals (Establishment and Regulation of Societies for Prevention of Cruelty to Animals) Rules, 2001 is marked and annexed hereto as **Annexure P-4**.

2011 Gujarat Animal Prevention (Amendment) Rules, 2011 were promulgated providing inter alia that the office bearers of Cow Protection Societies will be designated as Authorised Persons for the purposes of search and seizure. A copy of Gujarat Animal Prevention (Amendment) Rules, 2011 is marked and annexed hereto as **Annexure P-5**.

25.09.2015 One Mohammad Akhlaq was lynched in his home in Dadri, Uttar Pradesh on suspicion of consumption of beef by Cow Protection Vigilantes. A news item reporting the said incident is marked and annexed hereto as **Annexure P-6**.

17.10.2015 One Noman, aged 20 years, was lynched in Lawasa village in Sirmour district of Himachal Pradesh on

October 17, 2015, allegedly by vigilantes on suspicion of carrying cows for slaughter. A news item reporting the said incident is marked and annexed hereto as **Annexure P-7**.

18.10.2015

One Zahid Ahmad of Anantnag, cleaner of the truck died of burns suffered during the petrol-bombing of the Valley-bound vehicle on October 9 in Udhampur by a vigilante mob on suspicion of carrying cow. A news item reporting the said incident is marked and annexed hereto as **Annexure P-8**.

18.03.2016

Cattle traders Majloom Ansari (35) and Imtiyaz Khan (12) were beaten, robbed and hanged from a tree in Jhabra village in the Balumath police station area of Latehar district in Jharkhand by a vigilante mob. A news item reporting the said incident is marked and annexed hereto as **Annexure P-9**.

31.05.2016

In ChhotiSadadi, Pratapgarh, Rajasthan vigilantes beat up three truck occupants and set the truck on fire. FIR and even attacked Police when they tried to intervene. The truck was alleged to be carrying cows. A news item reporting the said incident is marked and annexed hereto as **Annexure P-10**.

06.06.2016 One Waseem, aged 20 was thrashed by a group of Vigilantes in District Sohna, Haryana on the allegation that he was carrying beef. The attackers belonging to GauRaksha Dal-Haryana, later uploaded the photographs and video of the same on Social Networking Website. An FIR was registered against the victim and no FIR was registered against the perpetrators of violence. A news item reporting the said incident is marked and annexed hereto as **Annexure P-11.**

11.06.2016 Some 35 GauRakshaks attacked 7 Dalits in MotaSamadhiyala village of UnaTaluka in GirSomnath district of Gujarat by accusing them of slaughtering a cow. The Dalits were tied to a car and publicly beaten with iron rods and sticks, they were then taken around the city while publically being flogged. A news item reporting the said incident is marked and annexed hereto as **Annexure P-12.**

12.06.2016 Cow vigilante groups threatened soap manufacturing unit in Punjab for allegedly using bye products of cow. A news item reporting the said incident is marked and annexed hereto as **Annexure P-13.**

29.06.2016 A group of vigilantes forced two men to eat cow dung on the allegation of transporting cow at Kundli-Manesar-Palwal (KMP) Expressway in Haryana. A

copy of news report dated 29.06.2016 is marked and annexed hereto as **Annexure P-14.**

26.07.2016 Two Muslim women were beaten by vigilantes at Mandsaur railway station, Madhya Pradesh on suspicion of carrying beef. A news item reporting the said incident is marked and annexed hereto as **Annexure P-15.**

06.08.2016 The violence perpetrated by these vigilante groups have gained such proportion that Hon'ble Prime Minister publicly expressed his anguish on the same. A copy of the news item reporting the same is marked and annexed hereto as **Annexure P- 16.**

08.08.2016 An expose conducted by India Today shows how the so called GauRakshaDals are running an extortion racket in the garb of cow protection. A copy of the report of the expose dated 08.08.2016 is marked and annexed hereto as **Annexure P- 17.**

09.08.2016 Two Dalits were beaten up by a mob of Vigilantes while they were skinning a dead cow which had died due to electrocution in East Godavri District, Andhra

Pradesh. A copy of news report dated 10.08.2016 is marked and annexed hereto as **Annexure P-18.**

Undated

Members of various GauRakshaDals have presence all over the Social Media where they pose with deadly weapons and exhort people to take up weapon. They further instigate violence and justify their evil actions. A copy of the screenshots of various GauRakshaDals/ Vigilante groups is marked and annexed hereto as **Annexure P-19.**

Undated

These vigilante groups upload the videos of their violence on internet in order to motivate crime and cause terror in heart of a section of society. Further, NDTV and other news channels conducted sting on these Vigilantes exposing their modus operandi and complicity with Police. A Compact Disk containing such videos is marked and annexed hereto as **Annexure P- 20.**

Undated

The Petitioner's Navsrajan trust along with Robert F. Kennedy Center for Justice & Human Rights conducted a survey on caste discrimination and untouchability in 1589 villages of Gujarat. The report reflects the caste discrimination prevalent therein. A copy of report titled "Understanding

Untouchability” is marked and annexed hereto as

Annexure P-21.

2016

Hence, this Writ Petition.

IN THE SUPREME COURT OF INDIA
CIVIL ORIGINAL JURISDICTION
WRIT PETITION (CIVIL) NO. _____ OF 2016

IN THE MATTER OF:

Martin ChhotubhaiMacwan
S/o ChhotubhaiKhanabhaiParmar
R/o 42 Sulay Row House
Makarba Road
Vejalpur,
Ahmedabad- 380 051

... Petitioner

Versus

1. Union Of India

Through Ministry
Of Home Affairs,
North Block,
Central Secretariat,
New Delhi.

....Respondent No.1

2. Ministry Of Agriculture

& Farmers Welfare,
Government Of India,
KrishiBhawan
Rajendra Prasad Road,
New Delhi-110001

....Respondent No.2

3. State of Gujarat,

Through Chief Secretary,

Gandhinagar – 382020.

.....Respondent No.3

4. State of Maharashtra,
Through Chief Secretary,
Mantralaya,
Mumbai – 400 032

..... Respondent No.4

5. State of Uttar Pradesh,
Through Chief Secretary,
PICUP Bhawan,
Lucknow

....Respondent No.5

6. State of Karnataka,
Through Chief Secretary,
Government of Karnataka
VidhanaSoudha
Bangalore-560001

.....Respondent No.6

7. State of Rajasthan,
Through Chief Secretary,
Secretariat
Jaipur-302005

.....Respondent No. 7

8. State of Jharkhand
Through Chief Secretary,
1st Floor, Project Building,
Dhurwa,

WRIT PETITION UNDER ARTICLE 32 OF THE CONSTITUTION OF INDIA

To,

The Hon'ble Chief Justice of India

And his companion judges of the Hon'ble Supreme Court

Most respectfully showeth:

That the present writ petition is being filed in public interest under Article 32 of the constitution. The Petitioner is seeking directions to various State Governments to take immediate and necessary actions against the Cow Protection Groups and also to Central Government in the form of banning such groups. The Petitioner is further praying for the immediate removal of violent content uploaded by these GauRakshaDals on various modes of Social Media. The Petitioner also seeks compensation from the concerned State Government for the victims of violence committed by the said Vigilantes.

1A. That the petitioner is a public spirited person who is a Dalit human rights activist in Gujarat. He founded the Navsrajan Trust in 1989 to promote the right of Dalits. He has been awarded Robert F. Kennedy Human Rights Award in 2000 from the U.S. Based RobertF. Kennedy Centre for Justice and Human. The same year, Human Rights Watch named him one of the year's five "outstanding human rights defenders". He has been recognised internationally for his work on the annihilation of caste discrimination. He has in the past addressed the question of caste violence, the practice of manual scavenging and untouchability. As National Convener of the National Campaign on Dalit Human Rights (NCDHR), he has twice led the Indian

Dalit Contingent to the World Conference against racism, Racial Discrimination, Xenophobia and Related Intolerance in Durban, South Africa.

Further, this Hon'ble Court has held in the case of S.P. Gupta v. Union of India as reported in AIR 1982 SC 149 that;

“Where a legal wrong or a legal injury is caused to a person or to a determinate class of persons by reason of violation of any constitutional or legal right . . . and such person or determinate class of persons is by reasons of poverty, helplessness, or disability or socially or economically disadvantaged position, unable to approach the Court for any relief, any member of the public can maintain an application for an appropriate direction, order or writ.”

The Petitioner has no personal interest, or private/oblique motive in filling the instant petition. There is no civil, criminal, revenue or any litigation involving the petitioner which has or could have a legal nexus with the issues involved in the PIL.

2. That all of the documents annexed with the present writ petition are in public domain.

Brief facts of the case:

3. That the Maharashtra Animal Prevention Act, 1956 was enacted which was later on adopted by State of Gujarat as The Gujarat Animal Prevention Act, 1956.
4. That the Karnataka Prevention of Cow Slaughter and Cattle Preservation Act, 1964 was enacted in year 1964.

5. That the Maharashtra Animal Prevention Act, 1976 was enacted which repealed the former Maharashtra Animal Prevention Act, 1956.
6. That the Prevention of Cruelty to Animals (Establishment and Regulation of Societies for Prevention of Cruelty to Animals) Rules, 2001 was enacted by the Central Government.
7. That in year 2011, Gujarat Animal Prevention (Amendment) Rules, 2011 was promulgated providing inter alia that the office bearers of Cow Protection Societies will be designated as Authorised Persons for the purposes of search and seizure.
8. That on 25.09.2015, One Mohammad Akhlaq was lynched in his home in Dadri, Uttar Pradesh on suspicion of consumption of beef by Cow Protection Vigilantes.
9. That on 17.10.2015, One Noman, aged 20 years, was lynched in Lawasa village in Sirmour district of Himachal Pradesh on October 17, 2015, allegedly by Cow Protection Vigilantes on suspicion of carrying cows for slaughter.
10. That on 18.10.2015, One Zahid Ahmad of Anantnag, cleaner of the truck died of burns suffered during the petrol-bombing of the Valley-bound vehicle on October 9 in Udhampur by Cow Protection Vigilante mob on suspicion of carrying cow.

11. That on 18.03.2016, Cattle traders Majloom Ansari and Imtiyaz Khan (12) were beaten, robbed and hanged from a tree in Jhabra village in the Balumath police station area of Latehar district in Jharkhand by a Cow Protection Vigilante mob.
12. That on 31.05.2016, In Chhoti Sadadi, Pratapgarh, Rajasthan Cow Protection Vigilantes beat up three truck occupants and set the truck on fire and even attacked Police when they tried to intervene. The truck was allegedly carrying bullocks.
13. That on 06.06.2016, one Waseem, aged 20 was thrashed by a group of Cow Protection Vigilantes in District Sohna, Haryana on the allegation that he was carrying beef. The attackers belonging to Gau Raksha Dal-Haryana later uploaded the photographs and video of the same on Social Networking Website creating further fear among the masses.
14. That on 11.06.2016, a batch of Gau Rakshaks attacked 7 Dalits in Mota Samadhiyala village of Una Taluka in Gir Somnath district, Gujarat accusing them of slaughtering a cow. The Dalits were tied to a car and publicly beaten with iron rods and sticks; they were then taken around the city while being publicly flogged.
15. That on 12.06.2016, Cow Protection Vigilantes threatened soap manufacturing unit in Punjab for allegedly using by-products of cow.

16. That on 29.06.2016, Cow Protection Vigilantes forced two men to eat cow dung on the allegation of transporting cow at Kundli-Manesar-Palwal (KMP) Expressway in Haryana.
17. That on 26.07.2016, two women were beaten by vigilantes at Mandsaur railway station, Madhya Pradesh on suspicion of carrying beef.
18. That on 31.07.2016, one person was beaten by Cow Protection Vigilantes for allegedly slaughtering cows outside Malout, Muktsar district in Punjab and later booked under cow slaughter Act.
19. That on 06.08.2016, the Hon'ble Prime Minister on being anguished by the increase in violence, denounced such vigilante groups.
20. That on 08.08.2016, an expose conducted by India Today shows how the so called Cow Protection Vigilantes/GauRakshaDals are running an extortion racket in the garb of cow protection.
21. That on 09.08.2016, two Dalits were beaten up by a mob of Cow Protection Vigilantes while they were skinning a dead cow which had died due to electrocution in East Godavri District, Andhra Pradesh.
22. That the Petitioner's Navsrajan trust along with Robert F. Kennedy Center for Justice & Human Rights conducted a survey on caste discrimination and untouchability in 1589 villages of Gujarat. The report reflects the caste discrimination prevalent in one of the most developed state of India.
23. Therefore, the Petitioner is filing the present writ petition seeking direction to the State Government to take immediate and necessary actions against the Cow

Protection Groups and also to Central Government to ban such groups. The Petitioner is further praying for removal of violent content uploaded by these GauRakshaDals on Social Media. The Petitioner has not filed any other petition raising the issue raised in the present writ petition in any other court of this country.

24. The present writ petition is being filed on the following grounds amongst others:

GROUND

- A. BECAUSE the existence of such violent vigilante groups who believe in mob justice is a threat to rule of law established by the Constitution of India.

- B. BECAUSE the State Governments provide identification cards to such vigilantes through which they assert legitimacy to their patently illegal actions. These Vigilante Groups in the garb of cow protection in a way enjoy protection from the State Government while conducting their mob proceedings against the rule of law.

- C. BECAUSE The Gujarat Animal Prevention Act, 1956 provides that all persons exercising powers under this Act shall be deemed to be public servants within the meaning of section 21 of the Indian Penal Code. It further provides that no suit, prosecution or other legal proceedings shall be instituted against any person for anything which is done in good faith or intended to be done under this Act or the rules made thereunder. These provisions are mutatis mutandis with the Maharashtra Animal Prevention Act, 1956 as well as with the

Karnataka Prevention of Cow Slaughter and Cattle Preservation Act, 1964.

- D. BECAUSE the Gujarat Animal Prevention (Amendment) Rules, 2011 provide that the authorized person will also include Office Bearers of Panjarapol, Infirmaries, Gaushalas, Societies for prevention of cruelty to animals (SPCA) and Animal Welfare Organizations.
- E. BECAUSE Prevention of Cruelty to Animals (Establishment and Regulation of Societies for Prevention of Cruelty to Animals) Rules, 2001 provides for establishment of Society for Prevention of Cruelty to Animals and gives it the power of search and seizure of animals as well as license of the concerned persons.
- F. BECAUSE the abovementioned laws and the protection granted therewith act as a catalyst to the violence perpetrated by these vigilantes group tarnishing the image of the Country as well as destroying the fabric of fraternity and harmony at large. This Hon'ble Court has directed to disband such groups in case of *NandiniSundar v. State of Chhattisgarh* as reported in (2011) 7 SCC 547.
- G. BECAUSE this Hon'ble Court observed that the culture of unrestrained selfishness and greed spawned by modern neo-liberal economic ideology, and the false promises of ever increasing spirals of consumption leading to economic growth is the root cause of menace spread by SalwaJudum. Similarly, in the present case, the root cause of all the violence spread by the Vigilantes is caste as well as economic. The vigilantes groups appear to be extortionists in the guise of GauRakshaks.

H. BECAUSE the Police and other law enforcement agencies have either been found to be complicit with these vigilantes groups or have merely been a mute spectator thus abandoning their constitutional duty to uphold the rule of law.

I. BECAUSE though Article 17 of the Constitution of India abolishes untouchability, the same is still prevalent in our Country. It is submitted that in a study conducted by the Petitioner's Navsrajan Trust, it was found that in 98.1% of villages surveyed, a Dalit cannot rent a house in a non-Dalit community. Further, in 97.6% of villages, Dalits must not touch the water pots or utensils of non-Dalits as such contact is considered defilement. Such Cow Protection Vigilantes take advantage of this discrimination for perpetrating further violence against Dalits.

J. BECAUSE the menace caused by the so called Cow Protection Groups is spreading fast to every nook and corner of the Country and is creating disharmony among various communities and castes apart from defaming the country at large.

K. BECAUSE these vigilante groups are operating beyond the realm of law and are known to take law in their hands. The atrocities committed by these vigilantes groups are punishable under various provisions of IPC as well as under Schedule Caste and Scheduled Tribes (Prevention of atrocities) Act, 1989 but the series of unabated incidences of such violence committed with impunity across the country by such Cow Protection Groups smacks of callousness and collusion with the law enforcement agencies.

L. BECAUSE the actions of Cow Protection groups infringe the personal liberty of the victim. The actions of public flogging, urinating on the victim forcing them to eat cow dung demeans the constitutional liberties provided by the Constitution, established by the founding fathers with so much pain and sacrifice.

M. BECAUSE the Cow Protection Groups infringe the Article 19(1) (g) of the Constitution of India as the Dalits who were attacked at Una were only doing their traditional profession of skinning the already dead cow for livelihood. Further, the Traders of livestock who carry valid licenses are also feeling threatened due to multiple attacks.

N. BECAUSE in a civilised democratic society like ours no group should be allowed to take law into their hands.

O. BECAUSE the actions of the Cow Protection Groups downgrades the rule of law in the Country.

P. BECAUSE the said Cow Protection Groups use social media to spread hatred often exhorting a particular community to take up weapons and break the laws thus further terrorising their victims.

Q. BECAUSE the Cow Protection Group spread the videos of their acts on Social Media thus causing tension between different communities and castes.

R. BECAUSE the said Vigilante groups also collect donations from public which are used to perpetrate violence and atrocities on the

people belonging to Scheduled Caste/ Scheduled tribes and minorities.

S. BECAUSE the said Vigilante Groups require to be banned for their activities.

T. BECAUSE these groups need to be regulated and banned in the interest of social harmony, public order, morality and rule of law in the Country.

PRAYERS

In view of the aforementioned facts and circumstances, this Hon'ble Court may be pleased to pass the following orders:

- (a) Issue a writ of Mandamus directing the Respondent State Governments to take immediate and necessary actions against the Cow Protection Groups indulging in violence;
- (b) Issues a writ of mandamus directing the concerned State Government to provide adequate compensation to the victims of violence perpetrated by GauRakshaks and create necessary mechanism for rehabilitation of such victims;
- (c) Issue a writ of mandamus or any other writ or direction to remove the violent and obscene content from the Social Media uploaded and hosted by these Cow Protection Groups;
- (d) Issue a writ of certiorari or any other writ or direction to hold Section 40 of Prevention of Cruelty to Animals act, 1960, Section 12 of the Gujarat Animal Prevention Act, 1954, Section 13 of Maharashtra Animal Prevention Act, 1976, Section 15 of Karnataka Prevention of Cow Slaughter and Cattle Preservation Act, 1964 as Unconstitutional.
- (e) Pass any other order as this Hon'ble court may deem fit and proper.

Petitioner

Through

Dated

(FUZAIL AHMAD AYYUBI)

Advocate on Record for the Petitioner

NEW DELHI-

Drawn by

ANAS TANWIR

(ADVOCATE)