

IN THE HIGH COURT OF JUDICATURE AT MADRAS

W.P. M.P.No. of 2019

in

W.P No. 20214/2018

Twitter
Twitter Inc,
C/o Jeremy Kessel,
1355, Market Street,
Suite 900 San Francisco
CA 94103 United States of America
Grievance Officer In@Twitter.Co.

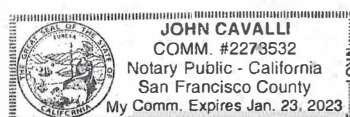
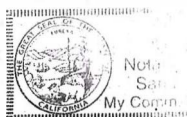
Also

Twitter International Company,
Represented by Authorised Signatory,
One, Cumberland Place, Fenian Street,
Dublin 2, D02 AX07, Ireland

.... Petitioner/ Respondent No.10

AND

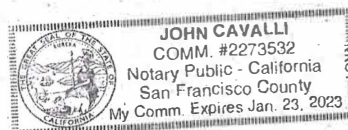
1. Mr. Anthony Clement Rubin,
Son of R.B.Rubin,
Flat No.35, Block 3,
Priyadarshini Apartments,
89, Barrack Road, Namalwarpet,
Chennai - 600 012. Respondent / Petitioner
2. The Union of India,
Rep by Home Secretary,
Ministry of Home Affairs,
North Block, New Delhi - 110001
3. Ministry of Communications,
Rep. By Its Secretary,
Department of Telecommunications,
Sanchar Bhawan, 20,
Ashoka Road, New Delhi - 110001.
4. Ministry of Electronics and Information Technology,
Rep. By Its Secretary,
Electronics Niketan, 6, CGO Complex,
Lodhi Road, New Delhi - 110003.
5. Ministry of Law and Justice,
Rep. By Its Secretary,
4th Floor A wing
Shashtri Bhawan,



PA

New Delhi - 110001.

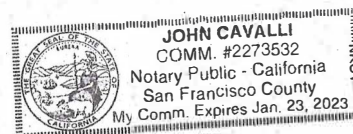
6. The Chairman,
Telecom Regulatory Authority of India (TRAI),
Mahanagar Doorsanchar Bhawan,
Jawaharlal Nehru Marg,
New Delhi - 110002
7. State of Tamil Nadu,
Rep by its Chief Secretary,
Fort St George, Chennai - 600 009
8. State of Tamil Nadu,
Rep by its Chief Secretary,
Department of Information Technology,
Fort St George, Chennai - 600 009
The Commissioner of Police,
No. 132, EVK Sampath Road,
Vepery, Periamet,
Chennai - 600 007
9. Facebook
Facebook India Headquarters,
Level 12, Building No.14, Raheja Mindspace
Hi Tech City, Vittal Road
10. Youtube LLC
Google India Head Office Address
Google India Pvt Ltd, Block 1,
Divyasree Omega, Survey No.13,
Kondapur Village, Hyderabad
11. Whatsapp,
(1) Ms. Kelya Maggessy Law Enforcement
Response Manager, Whatsapp
(2) Ms. Gayle Argon, Legal Whatsapp
Whatsapp Inc.
12. Google
Address Google India Pvt Ltd.,
No.3, RMZ Infinity Tower E,
Old Madras Road, 3rd 4th and 5th Floors,
Bangalore 560016
13. The Ministry of External Affairs,
Government Of India,
Rep by its Secretary to Government,
South Block, Raisina Hill, New Delhi -110001
(R14 Suo moto impleaded vide order
Dated 25.04.2019) ... Respondents/ Respondents



AFFIDAVIT

I, Paul Alsdorf, aged about 42 years, the Authorized Signatory of Twitter International Company, having its office at One, Cumberland Place, Fenian Street, Dublin 2, D02 AX07, Ireland, do hereby solemnly affirm and sincerely state as follows:

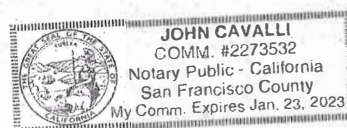
1. It is humbly submitted that the Petitioner herein has been *suo moto* impleaded in the above mentioned Public Interest Litigation as a Respondent.
2. I state that on the hearing dated 25.04.2019, the Hon'ble Bench of this Court had directed that a meeting of the technocrats of WhatsApp, Google, Youtube, Twitter and Facebook with the officers of the Law Enforcement Agencies be held between May 20, 2019 – May 27, 2019.
3. I state that the order specifies the object of the said meeting as follows:
"We direct, Government of Tamil Nadu, represented by the Chief Secretary to the Government, to arrange for an interactive meeting of all technocrats of WhatsApp, Google, Youtube, Twitter and Facebook, with the officers of the Law Enforcement Agencies, including Cyber Cell, and officials from the Information and Technology Department, Government of Tamil Nadu, between 20th and 27th of May 2019. Intermediaries shall also co-ordinate and inform the duties of the Chief Secretary, Government of Tamil Nadu, well in advance."
4. I state that the Petitioner is extremely supportive of the cause of the said meeting. However, since the Petitioner Company does not have any corporate presence in India, arrangements are underway to send the most suitable person, in terms of experience, knowledge, and language



capability to attend this meeting on behalf of the Petitioner. Mr. Chaitanya Ramachandran, who is the most suitable person to attend this meeting, is not based out of India. Owing to his prior commitments, Mr. Ramachandran will be in a position to make himself available for the aforesaid meeting in the first week of June, 2019. This being an extremely important meeting, the Petitioner is committed to depute the most suitable employee for this meeting who is well versed with the intricacies of this business and can represent the Petitioner in the best manner possible so as to ensure that the meeting is fruitful in all respects.

5. I state that the extension of time sought for is on *bonafide* grounds and shall not affect the main proceedings in any manner. The Respondents will also not suffer any hardship due to this indulgence sought for from this Hon'ble Court by the Petitioner herein. *Per contra* if it is insisted that no extension shall be granted, it will put the Petitioner to immense hardship and will render the purpose behind holding this meeting redundant since desired outcome is unlikely to be achieved if a Petitioner is compelled to compromise on the officer it deems fit to depute to attend this meeting.
6. I state that brief accommodation is being sought for and that the same is not a delaying tactic indulged by the Petitioner herein. In light of the above, the leave of this Hon'ble Court is sought for to permit the official of the Petitioner Company to meet the Chief Secretary, Government of Tamil Nadu and the Law Enforcement Agencies on any day in the first week of June 2019.

In light of the above, it is humbly prayed that this Hon'ble Court maybe pleased to extend time fixed in W.P.No. 20774 of 2018 and



W.P.No. 20214 of 2018 vide Common order dated 25.04.2019, to any day in the first week of June and thus render justice.

Solemnly affirmed at
United States of America
on this 10th

day of May, 2019

And signed his name

In my presence.



BEFORE ME

Advocate

MEMORANDUM OF WRIT MISCELLANEOUS PETITION

IN THE HIGH COURT OF JUDICATURE AT MADRAS

W. M.P.No. of 2019
in
W.P No. 20214/2018

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South Block, Raisina Hill, New Delhi -110001
(R14 Suo moto impleaded vide order
Dated 25.04.2019) ... Respondents/ Respondents

PETITION FOR EXTENSION OF TIME

For the reasons stated in the accompanying affidavit, it is humbly prayed that this Hon'ble Court maybe pleased to extend time fixed in W.P.No. 20774 of 2018 and W.P.No. 20214 of 2018 vide Common order dated 25.04.2019, to any day in the first week of June and thus render justice.

Dated at Chennai on this the 20th day of May 2019.

Counsel for Petitioner

**MEMORANDUM OF WRIT
MISCELLANEOUS PETITION**

**IN THE HIGH COURT OF
JUDICATURE AT MADRAS**

**W. M.P.No. of 2019
 in**

W.P No 20214 of 2018

PETITION FOR EXTENSION OF TIME

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**M/s. ROHINI RAVI KUMAR
MAHESHKUMAR
Counsel for Petitioner**