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MEMORANDUM OF WRIT PETITION
(Under Article 226 of the Constitution of India)

IN THE HIGH COURT OF JUDICATURE AT MADRAS

(Special Original Jurisdiction)

W.P. No. of 2020

Revenue Bar Association
New No.115 (First Floor)
Luz Church Road, Mylapore,
Chennai – 600 004
Represented by its Secretary
Mr.K.A.Parthasarathi … Petitioner

v.

1. **Union of India**
   Ministry of Finance
   (Department of Revenue)
   No. 137, North Block,
   New Delhi, 110001
   Represented by its Jt. Secretary

2. **Union of India**
   Ministry of Law and Justice
   4th Floor, A Wing,
   Rajendra Prasad Road
   Shastri Bhavan,
   New Delhi- 110 001
   Represented by its Secretary, … Respondents

AFFIDAVIT OF K.A. PARTHASARATHI

I,… , do hereby solemnly state and sincerely affirm as follows:

1. I am the Secretary of the petitioner association herein and as such, I am well acquainted with the facts and circumstances of this case.
2. It is submitted that the present writ petition is filed under Article 226 of the Constitution of India seeking a Writ of Declaration to declare the Tribunal,

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Appellate Tribunal and other Authorities (Qualifications, Experience and other Conditions of Service of Members) Rules, 2020 framed by the first respondent *vide* Notification No. GSR 109(E) dated 12th February, 2020, as void, defective and unconstitutional being violative of Articles 14, 21 and 50 of the Constitution of India and the Doctrine of Separation of Powers and Independence to Judiciary, which are part of the basic structure of the Constitution of India, and further contrary to the principles laid down by the Hon'ble Supreme Court of India in ***Union of India v. R. Gandhi*** (2010) 11 SCC 1 and ***Rojer Mathew v. South Indian Bank Ltd.*** Civil Appeal No.8588 of 2019, dated November 13, 2019.

3. The petitioner herein is a society formed in the year 1963 and registered under the Societies Registration Act, 1860. This petition is being preferred in the representative capacity as advocates practising across various courts, tribunals and other quasi-judicial *fora* and as such, it has *locus standi* to maintain this writ petition. The petitioner is aggrieved by the Tribunal, Appellate Tribunal and other Authorities (Qualifications, Experience and other Conditions of Service of Members) Rules, 2020 ("impugned rules"), and its adverse impact on independence and proper administration of nineteen tribunals mentioned therein and access to justice, which is a fundamental right guaranteed under Article 21 of the Constitution of India.

4. The first respondent is the Ministry of Finance which is responsible for the issuance of the impugned rules. The impugned rules have been notified under the powers delegated to it under section 184 of the Finance Act, 2017.

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5. The second respondent is the Ministry of Law and Justice, which, through various orders of the Hon'ble Supreme Court ought to be the umbrella body under which all the tribunals must function in India.

6. The petitioner submits that through Part XIV of the Finance Act, 2017, in one stroke, the authority and jurisdiction of 26 tribunals administered under 26 diverse central laws stood modified. The powers to prescribe the eligibility criteria, selection process, removal, salaries and allowances, tenure and other service conditions pertaining to members of 19 tribunals were sub-delegated to the rule making powers of the Central Government. Thereafter, the Central Government issued the Tribunal, Appellate Tribunal and other Authorities (Qualifications, Experience and other Conditions of Service of Members) Rules, 2017 ("2017 rules), which replaced the selection process and other conditions of service of members of 19 tribunals.

7. The constitutional validity of the 2017 rules was challenged in the Supreme Court of India through multiple writ petitions. On 13th November, 2019, in ***Rojer Mathew*** a Constitution Bench declared the 2017 rules as unconstitutional and violative of the previous Constitution Bench decisions in ***R. Gandhi*** and ***Madras Bar Association v. Union of India,*** (2014) 10 SCC 1. In paragraph 228 of the majority opinion, the Central Government was also directed to reformulate the rules strictly in conformity and in accordance with the principles laid down by the Supreme Court.

8. As a result, on 12th February, 2020, the first respondent notified the impugned rules.

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9. It is submitted that the impugned rules also suffer from the same defects and are violative of the principles laid down in ***R. Gandhi*** and ***Rojer Mathew*** decisions.

10. Rule 9 of the impugned rules states that a member shall hold office for a term of 4 years or till he attains the age of 65 years, whichever is earlier. It must be noted that in ***R. Gandhi***, at para 120(ix), the Court had held as follows:

> *"(ix)* ***The term of office of three years shall be changed to a term of seven or five years subject to eligibility for appointment for one more term.*** *This is because considerable time is required to achieve expertise in the concerned field. A term of three years is very short and by the time the members achieve the required knowledge, expertise and efficiency, one term will be over. Further the said term of three years with the retirement age of 65 years is perceived as having been tailor-made for persons who have retired or shortly to retire and encourages these Tribunals to be treated as post- retirement havens.* ***If these Tribunals are to function effectively and efficiently they should be able to attract younger members who will have a reasonable period of service.****"* (emphasis added)

11. In the 2017 Rules, a similar rule provided that members shall hold office for a term of 3 years. In ***Rojer Mathew***, at para 178, the majority opinion criticised such short tenure of the members of the Tribunal and held that it "*has the effect of discouraging meritorious candidates to accept posts of Judicial Members in Tribunals"*. This was also reiterated in the concurring opinion of Chandrachud J. in para 94 of his opinion. The directions in *R. Gandhi* was to increase the tenure of office from 3 years to 5 years or 7 years. When this is the binding direction given by the Supreme Court, the Central Government cannot, as a cosmetic change, increase the tenure from 3 years in the 2017 Rules to 4 years in the 2020 Rules. Therefore, it is submitted that

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rule 9 of the impugned rules is violative of the directions given in both ***R. Gandhi*** and ***Rojer Mathew*** decisions.

12. Further, it is pertinent to note that rule 11 of the impugned rules provides for salary of all the members of the tribunal including the Chairman/ Chairperson/President of the tribunal or the appellate tribunal. It is submitted that this rule suffers from severe infirmity and is against the doctrine of separation of powers and independence of judiciary, which forms the basic structure of the constitution.

13. It is submitted that the salaries of the members of the tribunals and appellate tribunals cannot be, in any circumstance, provided by way of a delegated legislation. It must be provided in the parent statute, and as such, must be protected from the rule-making powers of the Executive. Fixed salary and fixed tenure, that are hallmarks of independent judiciary, must also be followed in the cases of tribunals.

14. Further, it is submitted that rule 14 of the impugned rules, which provides for the Chairman to apply to the Central Government for sanction of leave is violative of principles of independence of judiciary, which is enshrined in Article 50 of the Constitution of India.

15. It is submitted that rule 15 of the impugned rules classifies the Chairman and members of the tribunals in the category of Group 'A' officers of Government of India for the purposes of house rent allowance. Further, under rule 18, it is provided that other conditions of service of the chairman and other members with respect to which no express provisions have been made, shall be such as are applicable to Group 'A' Officers of the Government of India of

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corresponding status. It is submitted that such grouping of Chairman and members under rules that are applicable to Group 'A' Officers of the Government of India violates independence of judiciary.

16. The Schedule to the rules provides for qualification of chairman, all members and the composition of Search-cum-Selection Committee for 19 tribunals. Before explaining the current scheme, it is pertinent to note the directions of the Supreme Court in ***R. Gandhi*** with respect to the Search-cum-Selection Committee. In para 120(viii), it was held as follows:

> *"(viii) Instead of a five-member Selection Committee with Chief Justice of India (or his nominee) as Chairperson and two Secretaries from the Ministry of Finance and Company Affairs and the Secretary in the Ministry of Labour and Secretary in the Ministry of Law and Justice as members mentioned in section 10FX, the Selection Committee should broadly be on the following lines:*
> *(a) Chief Justice of India or his nominee - Chairperson (with a casting vote);*
> *(b) A senior Judge of the Supreme Court or Chief Justice of High Court - Member;*
> *(c) Secretary in the Ministry of Finance and Company Affairs - Member; and*
> *(d) Secretary in the Ministry of Law and Justice - Member."*

17. It is submitted that the above observation of the Supreme Court is not restricted only to judicial members of the NCLT under the Companies Act, 1956. These observations are also applicable to all members of all tribunals in India. This has been acknowledged by the First Bench of this Hon'ble Court in ***Shamnad Basheer v. Union of India***, 2005-2-L.W.941. Needless to say, this is again reiterated in ***Madras Bar Association*** and ***Rojer Mathews***.

18. In ***Rojer Mathew***, in the concurring opinion of Chandrachud J. in para 90, it was held as follows:

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> *"Barring the National Company Law Appellate Tribunal, the Search-cum-Selection Committee for all other seventeen tribunals specified in the Schedule is constituted either entirely from personnel within or nominated by the Central Government or comprises a majority of personnel from the Central Government. The Search-cum-Selection Committee of the National Company Law Appellate Tribunal consists of an equal number of members from the judiciary as well as from the Central Government with no casting vote to the Chief Justice of India or their nominee:*
>
> > *(B) Search-cum-Selection Committee for the post of the Judicial Member and Technical Member of the Appellate Tribunal, - (i) Chief Justice of India or his nominee - chairperson; (ii) a senior Judge of the Supreme Court or a Chief Justice of a High Court-member; (iii) Secretary to the Government of India, Ministry of Corporate Affairs- member (iv) Secretary to the Government of India, Ministry of Law and Justice-member."*

19. In other words, in ***Rojer Mathew***, the Supreme Court noted that only the Search-cum-Selection Committee of NCLAT was valid, which had indeed followed the directions in ***R. Gandhi***. This essentially means that by "judicial primacy in selection committees", the Supreme Court always intended to have two judges of the Supreme Court or one judge of Supreme Court and Chief Justice of the High Court and 2 secretaries of the Government of India.

20. In the impugned rules, in place of the second judge, the Central Government has now included the President or the outgoing President, as the case may be, as a member of the selection committee. This is problematic because it will be seen that in certain cases, a non-judicial member can become the President (or Chairman/Chairperson, as the case may be) of the tribunal. When this happens, the only remaining judge will become a numerical minority, giving primacy to the Executive in the appointment of members.

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21. It is also submitted that in para 120 (i) of ***R. Gandhi***, the Supreme Court had held that members of Indian Legal Service cannot be appointed as judicial members. This was again reiterated by this Hon'ble Court in decision dated September 20, 2019 in ***Revenue Bar Association v. Union of India***, in W.P. No. 21147 & 48 of 2018.

22. It is submitted that the active promotion of Indian Legal Service candidates for the post of judicial member cannot be read in isolation. In many tribunals, under the impugned rules, only if an advocate has more than 25 years of experience, can he/she apply to the post of judicial member. In few cases, advocates are totally excluded from the eligibility criteria to apply to the post of judicial members. This includes tribunals like Central Administrative Tribunal and the Railway Claims Tribunals. It should also be noted that under rule 18(ii) of the impugned rules, the members shall not practice before the tribunal after retirement from service. Therefore, the net effect is that, there will not be any good applicants from advocates to the post of judicial members. Consequently, all these posts will be manned by members of the Indian Legal Service. This, it is submitted that, the impugned rules are completely contrary to the explicit directions and spirit of the judgment of the Supreme Court in ***R. Gandhi, Madras Bar Association*** and ***Rojer Mathew.***

23. The petitioner association is concerned about the independency of tribunals and hence it is filing this writ petition under Article 226 of the Constitution of India as a public interest litigation.

24. It is further submitted that the petitioner has not filed any other petition seeking similar remedy in this court or any other court. However, in 2017, the

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petitioner had challenged the 2017 Rules in the Supreme Court of India, which was heard along with ***Rojer Mathew***.

25. The petitioner is directly filing this writ petition under Article 226 of the Constitution as the impugned rules are arbitrary and violative of Articles 14, 21 and 50 of the Constitution of India. The right to life under Article 21 includes right to justice by an independent judiciary and by a tribunal that is free from executive or political influence/interference. The petitioner association is vitally concerned with the administration of justice and maintenance of rule of law which is held to be a basic structure of the Constitution of India.

26. The glaring infirmities and consequences to the independent judicial functioning of nineteen tribunals and the respondents' disregard for directions of the Supreme Court has compelled the petitioner association to file the present writ petition under Article 226 of the Constitution of India for the following among other:

GROUNDS

A. The impugned rules violate the principles of separation of powers which is not only a part of basic structure of the Constitution but also an elementary component of the rule of law. That in *Kesavananda Bharati v. State of Kerala*, AIR 1973 SC 1461 and in *Minerva Mills Ltd. v. Union of India*, (1980) 3 SCC 625, larger benches of the Supreme Court have held, *inter alia*, that an independent judiciary is among the basic features of the Constitution.

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B. A Constitution Bench in *S. P. Sampath Kumar v. Union of India*, (1987) 1 SCC 124 at para 7, speaking through Bhagwati, CJ, has held that,

> *"It can no longer be disputed that total insulation of the judiciary from all forms of interference from the co-ordinate branches of the Government is a basic essential feature of the Constitution, the same independence from possibility of Executive pressure or influence must also be ensured to the Chairman, vice Chairman and Members of the Administrative Tribunals... The Constitution makers have made anxious provision to secure total independence of the judiciary from executive pressure or influence."*

C. Article 50 of the Constitution is a part of the basic structure of the Constitution, and is one example of a specific constitutional provision embodying the basic features of separation of powers and rule of law.

Search-Cum-Selection-Committee

D. In *R. Gandhi*, while examining the constitutional validity of the National Company Law Tribunal established under the erstwhile Companies Act, 1956, a Constitution Bench of the Supreme Court examined various facets of a Tribunal necessary for just and fair dispensation of justice. Apart from functional autonomy, the Supreme Court underscored the sanctity of the selection process of members in ensuring unbiased adjudication. To this end, the Court heavily castigated the selection committee under section 10FX of the erstwhile Companies Act, 1956. Section 10FX of the Companies Act, 1956 provided for a selection committee consisting of the Chief Justice of India or his nominee, Secretary in the Ministry of Finance and Company Affairs, Secretary in the Ministry of Labour, Secretary in

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the Ministry of Law and Justice, Secretary in the Ministry of Finance, and Secretary of Finance and Company Affairs (Department of Company Affairs). This composition under section 10FX was held to be unconstitutional by the Supreme Court. Instead of this composition, the Supreme Court, in paragraph 120 (viii), directed that the selection committee should broadly be on the following lines:

a. Chief Justice of India or his nominee-Chairperson with casting vote;

b. A senior judge of the Supreme Court or Chief Justice of High Court-Member;

c. Secretary in the Ministry of Finance and Company Affairs-Member;

d. Secretary in the Ministry of Law and Justice-Member;

In other words, the heavy tilt towards the executive was revised with a composition which had equal representation from the judiciary.

E. In *Madras Bar Association v. Union of India & Others*, (2015) 15 SCC 583, the Supreme Court reiterated the principles laid down in *R. Gandhi*. Furthermore, the Constitution Bench reiterated that the Selection Committee should have even representation from the Higher Judiciary, with the Chief Justice (or his nominee) having a 'casting vote' in case of any disagreement.

F. Following the above precedents, the Madras High Court, in *Shamnad Basheer* struck down various provisions of the Trade Marks Act, 1999, *inter alia*, struck down the composition of the Search-cum-Committee comprising of members of Executive as being an affront to the basic structure of the constitution. Thereafter, the Hon'ble Supreme Court

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upheld the findings of this Hon'ble High Court *vide* Order 27.07.2015 and held that there is no "*legal and valid ground for interference*."

G. In *Shamnad Basheer*, this Hon'ble High Court struck down the constitution of the committee for appointment of members, both for the Vice Chairman, Judicial Member and Technical Member of the Intellectual Property Appellate Board and held:

> *9.4. As the Constitution of the Committee, as referred above, is obviously loaded in favour of Executive, which is impermissible in law, as held by the Supreme Court in the judgments referred above, the then Chairman of IPAB raised an issue about the role assigned in the selection process. However, it was decided to stick on to the very same procedure notwithstanding the decision rendered in Union of India v. R. Gandhi, President, Madras Bar Association, ((2011) 10 SCC 1) with a justification that it does not have any bearing on the present case. Resultantly the selection process has been left entirely to the Executive, though the functions of the Tribunal are judicial. This act is a direct affront to the basic structure, which is fundamental to the Constitution of India. The 1st respondent has totally overstepped and acted in disregard to the law laid down by the Supreme Court in Union of India v. R. Gandhi, President, Madras Bar Association, ((2011) 10 SCC 1) by turning a blind eye. The directions issued therein are meant to be applicable to all the Tribunals. The 1st respondent cannot take a stand that for one enactment they can maintain basic structure by their action and violate through another. The need to protect the independence of judiciary has been dealt with and decided in all the decisions referred supra. It has been consistently held that the judiciary should have a substantial role in the selection. It was also held*

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> *that the process of appointment should substantially be that of members of judiciary. We also note that under the Constitutional Scheme for the State Subordinate Judiciary, it is the High Court, which has got the primacy along with its administrative control. The directions issued in paragraphs (viii), (xii) and (xiii) of its conclusion in Union of India v. R. Gandhi, President, Madras Bar Association, ((2011) 10 SCC 1) with regard to the composition are binding on the 1st respondent and therefore they ought to have followed the same. The Committee as it exists today is packed with an over-dose of Executive with the lone voice of the Chairman of IPAB is restricted to that of a member.*

INDIAN LEGAL NEWS

In short, the selection committee which comprises of members only from the executive was held to be unconstitutional and violative of the basic structure of the Constitution. It is submitted that using the same reasoning, the selection committee mentioned in Rule 3 of the impugned rules is clearly unconstitutional and violative of the directions of this Hon'ble Court and the Supreme Court.

H. The directions in *R. Gandhi* was once again reiterated by a Constitution Bench in *Rojer Mathew*, which struck down the entire 2017 Rules as unconstitutional.

I. All the judgments cited above proceeded on the basis that the Search-Cum-Selection-Committee must have equal representation from higher judiciary, a model which was first envisaged in *R. Gandhi.* Therefore, the inclusion of President/Chairman/Chairperson or the outgoing President/Chairman/Chairperson does not amount to participation of

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higher judiciary in the selection process. This is even more problematic when non-judicial members, who become heads of tribunals, get a chance to become a part of the selection committee. When that happens, the Supreme Court judge will be the only representation from the judiciary. Therefore, the Search-Cum-Selection-Committee as provided in the impugned rules, is completely contrary to the principles laid down in *R. Gandhi* and *Rojer Mathew.*

Members of Indian Legal Service cannot become judicial members

J. The impugned rules violate *R. Gandhi* wherein it was categorically held that only advocates and judges can be appointed as judicial members. Adding further, it also held that members of Indian Legal Service cannot be appointed as judicial members.

K. This was again reiterated by this Hon'ble Court in *Revenue Bar Association*, wherein, section 110(1)(b)(iii) of the CGST Act, 2017 was struck down for violating this direction in *R. Gandhi.*

L. It is submitted that the impugned rules are therefore contrary to directions in *R. Gandhi* and *Revenue Bar Association.*

Tenure of four years

M. In *R. Gandhi*, the Supreme Court had directed to provide members a longer tenure of five or seven years with an option of reappointment.

N. This was reiterated in *Rojer Mathew* wherein, in para 176 of the majority opinion, it was held as follows-

> *"It was observed that short tenures also discourage meritorious members of Bar to sacrifice their flourishing practice to join a Tribunal as a Member for a short tenure of merely three years.*

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> *The tenure of Members of Tribunals as prescribed under the Schedule of the Rules is anti-merit and attempts to create equality between unequals. A tenure of three years may be suitable for a retired Judge of High Court or the Supreme Court or even in case of a judicial officer on deputation. However, it will be illusory to expect a practising advocate to forego his well-established practice to serve as a Member of a Tribunal for a period of three years."*

O. The three-year tenure, which was provided in the 2017 Rules, was struck down in *Rojer Mathew*. The impugned rules, now, provide a tenure of four years to members. It is submitted that a mere increase of one year i.e. three years to four years, will not cure the defect, which was highlighted by the Court in *Rojer Mathew*.

Exclusion of advocates

P. In the impugned rules, for tribunals like CAT, advocates are now excluded from the eligibility criteria for judicial members. In *R. Gandhi*, there was an express direction in para 120(i) that only "judges and advocates" can be considered to be appointed as judicial members.

Q. When only judges and advocates can be considered to be appointed as judicial members, the respondents cannot, through a subordinate legislation, exclude advocates altogether from the eligibility criteria for judicial members.

R. The advocates have a right to be considered for the post of judicial members as they are qualified to become both High Court and Supreme Court judges. The exclusion of advocates is thus arbitrary, and is liable to

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be struck down for being manifestly arbitrary, as provided in the decision of *Shayara Bano v. Union of India* (2017) 9 SCC 1, 99.

25-year experience is arbitrary

S. In those tribunals where advocates are eligible to apply for the post of judicial member, it is provided in the impugned rules that, he or she must have an experience of 25 years at the Bar. Such a requirement is not required even to become a High Court judge. This, again, is manifestly arbitrary, and is liable to be struck down using the test for manifest arbitrariness as provided in *Shayara Bano.*

T. The 25-year requirement is again violative of *R. Gandhi* and *Rojer Mathew*, wherein, time and again, the court had held that there is a need to attract young and meritorious candidates from the Bar. With 25-year experience requirement and no option of reappointment, it can be safely said that no meritorious advocate will apply to these posts.

Leave Sanctioning authority

U. The impugned rules has conferred the responsibility on the Central Government to act as the Leave Sanctioning Authority to the President/Chairman/Chairperson of tribunals. It is instructive to note that a similar provision was included in the draft Tribunals Bill, and the Standing Committee criticized this provision in the following words: "… *The Committee is not in agreement with the Clause 20 of Bill mainly for two reasons. Firstly, if leave sanctioning authority remains with the ministry-in-charge it would affect the independence of the Tribunals as the concerned Ministry is one of the parties to the disputes that come for*

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adjudication before the Tribunal and secondly, it affects the status of Tribunals."

Service Conditions

V. The service conditions of Members - such as salaries, leave, pay, TA, HRA and other benefits – is made equivalent to Group 'A' officers of the Government of India of a corresponding status. However, the Supreme Court has repeatedly stated that the service conditions admitted to Members of Tribunals should be equivalent or comparable to that of High Court Judges.

Ministry of Law and Justice

W. The administrative assistance and support to all tribunals have continued to remain under the Nodal Ministry, contrary to the guidelines prescribed by the Supreme Court in *R. Gandhi*, wherein it was categorically held that the administrative support has to come from the Department of Law & Justice. It is submitted that the dependence of Tribunals on their 'parent' Ministry/Department is not only a clear case of conflict of interest, but has an enduring and debilitating effect on the independence of the Tribunal.

27. The petitioner craves leave of this Hon'ble Court to raise additional grounds at the time of hearing.

28. The petitioner has not filed any other writ petition or any other legal proceedings seeking the relief claimed in the present writ petition.

29. The petitioner has no alternative or efficacious remedy except to invoke the writ jurisdiction of this Hon'ble Court under Article 226 of the Constitution of India.

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30. The petitioner is self-funded in the filing and conduct of this writ petition.

31. The petitioner has a *prima facie* case as the impugned rules are violative of at least three Constitution Bench decisions of the Supreme Court and two decisions of this Hon'ble Court. It is further submitted that irreparable hardship would be caused to lot of litigants if the members of 19 tribunals appointed in accordance with the impugned rules, which have been framed in the most unconstitutional, improper manner, are permitted to adjudicate on issues involving complicated questions of law. The rules and balance of convenience also favour the petitioner as it will be highly improper if the impugned rules are allowed to be in operation as it would amount to contempt of Supreme Court of India.

32. It is therefore prayed that this Hon'ble Court may be pleased to pass an order of stay of the operation of the Appellate Tribunal and other Authorities (Qualifications, Experience and other Conditions of Service of Members) Rules, 2020, framed by the first respondent *vide* Notification No. Notification No. GSR 109(E) dated 12th February, 2020, pending disposal of the present writ petition and pass such further or other orders that this Hon'ble Court may deem fit and necessary in the facts and circumstances of the case and thus render justice.

33. It is therefore prayed that this Hon'ble Court may be pleased to issue any writ, order or direction, more particularly in the nature of a Writ of Declaration to declare the Tribunal, Appellate Tribunal and other Authorities (Qualifications, Experience and other Conditions of Service of Members) Rules, 2020 framed by the first respondent *vide* Notification No. GSR 109(E)

Bar & Bench (www.barandbench.com)

dated 12th February, 2020, as void, defective and unconstitutional being violative of Articles 14, 21 and 50 of the Constitution of India and the Doctrine of Separation of Powers and Independence to Judiciary, which are part of the basic structure of the Constitution of India, and further contrary to the principles laid down by the Hon'ble Supreme Court of India in *Union of India v. R. Gandhi* (2010) 11 SCC 1 and *Rojer Mathew v. South Indian Bank Ltd.* Civil Appeal No.8588 of 2019, dated November 13, 2019.

Bar & Bench
INDIAN LEGAL NEWS

Solemnly affirmed at Chennai
on this the day of February,
2019 and signed his name in my
presence.

BEFORE ME

ADVOCATE:

CHENNAI

Page No:
No: of Corrections: