

**HIGH COURT OF THE STATE OF TELANGANA AT JUDICATURE AT  
HYDERABAD**

W.P (P.I.L) NO.

OF 2020

**ANNEXURE –I**

Sl. No.	Date	Description of Events	Page No. in Affidavit	Para No. in Affidavit
1.	-	<p>The Petitioner herein being a public-spirited person is aggrieved by the inaction of the Respondents herein, has approached this Hon`ble Court under “Public Interest”, and also in view of the Orders of Hon`ble Supreme Court of India in Writ Petition (Civil) Diary No (s). 10965/2020, vide Order Dated 30.04.2020. The Petitioner has approached this Hon`ble Court, to question the Tweets or Messages at Social Network “Twitter”, operated by the Respondent no. 5 herein which is tending on the twitter under the name and style with Hashtags #Islamiccoronavirusjihad, #Coronajehad, #Tablighijamat, #Nizamuddinidiots, #Tablighijamatvirus or Islamophobic Posts and in many ways attaching the pandemic with the religion which is done by the social network users on Twitter which is offensive in nature as it is hurting the feelings of the particular community and is contrary to the guidelines or advisory dated 18.03.2020 issued by The World Health Organization, undoubtedly it is also contrary to laws prevailing in the territorial jurisdiction of India and the same was informed by the Petitioner to the Respondent Nos. 1 to 5 through Representations Dated 02.04.2020 and 04.04.2020 and the same is within their knowledge have failed to act upon till date and the trending is still continuing.</p>		1
2.	-	<p>Petitioner herein has / have no personal interest in the subject matter of this Petitioner is a Practicing advocate at High Court of Telangana and its Sub-Ordinate Courts. The Petitioner states that in respect of the subject matter of cause of cause of action the Petitioner earlier has filed</p>		3.2

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*[Handwritten Signature]*

		<p>Writ Petition (Civil) Diary No.10965/2020 , the Coram headed by Hon`ble Chief Justice of India after hearing about the merits of the case, have directed the petitioner to approach this Hon`ble Court as this Hon`ble Court equally enjoys wider powers under Article 226 of the Constitution of India over the subject matter involved herein for adjudicating of the issue and directed the Petitioner to withdraw the Writ Petition. The Petitioner obliged the directions of the Hon`ble Chief Justice of India and withdrawn the Writ Petition with Liberty to approach the Telangana High Court and consequently Prayer is allowed and the Writ Petition is dismissed as withdrawn with liberty aforesaid and the Petitioner is before this Hon`ble Court. The Petitioner further submits that in respect of the Cause of action herein no such petition or case is pending before any Courts or forum as on date of filing of this Writ Petition. It is submitted that this Hon'ble court has ample power and jurisdiction to treat this Present Petition as Public interest by duly relaxing the condition of Locus standi.</p>		
3.	-	<p>The Petitioner hails from Hyderabad District, is an Advocate Practicing in High Court of Judicature at Hyderabad being aggrieved by the inaction of the respondents nos. 1 to 5 to question the Tweets or Messages at Social Network "Twitter", operated by the Respondent no. 5 herein which is tending on the twitter under the name and style with Hashtags #Islamiccoronavirusjihad, #Coronajehad, #Tablighijamat, #Nizamuddinidiots, #Tablighijamatvirus and in many ways attaching the pandemic with the religion which is done by the social network users on Twitter which is offensive in nature as it is hurting the feelings of the particular community and is contrary to the guidelines or advisory dated 18.03.2020 issued by The World Health Organization, undoubtedly it is also</p>		4.1



		contrary to laws prevailing in the territorial jurisdiction of India and the same was informed by the Petitioner to the Respondent Nos. 1 to 5 through Representations Dated 02.04.2020 and 04.04.2020 and the same is within their knowledge have failed to act upon till date and the trending is still continuing.		
4.	-	That the Petitioner submits that the trending on the twitter still continues with the hashtaq attached with the particularly community are offensive in nature and despite bringing it to the knowledge of Respondent Nos. 1 to 5 for the reasons best known to them have failed to act and the trending still continues. The Continuation of trending by the Social Network Users on Twitter i.e. at Respondent No. 5 with hashtaq i.e. #Islamiccoronavirusjihad, #Coronajihad, #Tablighijamat, #Nizamuddinidiots, #TablighiJammatVirus, or Islamophobic Posts and in many ways attaching the religion to pandemic disease will warrant action against the Respondent No. 5 and against those users who are spreading it on Twitter under the Penal Laws i.e. Indian Penal Code 1860 (IPC) enshrined under Chapter XV-Offences Relating to Religion and other relevant laws prevailing , and this Hon`ble Court may direct the Respondent No. 2 to Register Criminal Case against the Twitter and its Users who are spreading the hatred as stated herein.		6.6



**ANNEXURE –II**

Under Article 226 of Constitution of India

Hyderabad

Date: 03.05.2020

**PETITIONER**

**(PARTY-IN-PERSON)**

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**HIGH COURT OF THE STATE OF TELANGANA AT JUDICATURE AT  
HYDERABAD**

**(Rule 4 (e) of the High Court of Judicature at Hyderabad for the States of  
Telangana and Andhra Pradesh PUBLIC INTEREST LITIGATION RULE,  
2015)**

W.P. (PIL) NO. OF 2020

Between:

Khaja Aijazuddin, S/o. Late Khaja Moinuddin

... Petitioner

And

1. The Cabinet Secretary, Govt. of India,  
Room No. 18, Cabinet Secretariat,  
Rashtrapati Bhawan, New Delhi-110004.
2. The Home Secretary,  
Ministry of Home Affairs,  
Govt. of India, North Block,  
New Delhi-110001.
3. The Director General Of Police,  
Telangana State, Lakdikapul,  
Hyderabad-500004. Telangana State
4. The Commissioner of Police,  
Hyderabad Police Commissionerate,  
Basheerbagh, Hyderabad-500001.
5. Twitter Inc.,  
Represented by Chief Executive Officer,  
Mr. Jack Dorsey, 1335 Market Street, Suite 900,  
San Francisco, CA 94103, United States of America  
And C-20, G Block, Near MCA Bandra Kurla Complex,  
Bandra (E) Mumbai, Mumbai City, Maharashtra-400051.

.....Respondents



1. **PARTICULARS OF THE CAUSE/ORDER AGAINST WHICH**

The Petitioner herein being a public-spirited person is aggrieved by the inaction of the Respondents herein, has approached this Hon`ble Court under “Public Interest”, and also in view of the Orders of Hon`ble Supreme Court of India in Writ Petition (Civil) Diary No (s). 10965/2020, vide Order Dated 30.04.2020. The Petitioner has approached this Hon`ble Court, to question the Tweets or Messages at Social Network “Twitter”, operated by the Respondent no. 5 herein which is trending on the twitter under the name and style with Hashtags #Islamiccoronavirusjihad, #Coronajehad, #Tablighijamat, #Nizamuddinidiots, #Tablighijamatvirus or Islamophobic Posts and in many ways attaching the pandemic with the religion which is done by the social network users on Twitter which is offensive in nature as it is hurting the feelings of the particular community and is contrary to the guidelines or advisory dated 18.03.2020 issued by The World Health Organization, undoubtedly it is also contrary to laws prevailing in the territorial jurisdiction of India and the same was informed by the Petitioner to the Respondent Nos. 1 to 5 through Representations Dated 02.04.2020 and 04.04.2020 and the same is within their knowledge have failed to act upon till date and the trending is still continuing and seeks intervention of this Hon`ble Court and hence the present Writ Petition.

2. **SUBJECT MATTER IN BRIEF:**

2.1 The Present Writ Petition is filed as a Public Interest Litigation under Article 226 of the Constitution of India, in larger Public Interest aggrieved by the inaction of the respondents nos. 1 to 5 to question the Tweets or Messages at Social Network “Twitter”, operated by the Respondent no. 5 herein which is trending on the twitter under the name and style with Hashtags #Islamiccoronavirusjihad, #Coronajehad, #Tablighijamat, #Nizamuddinidiots, #Tablighijamatvirus and in many ways attaching the pandemic with the religion which is done by the social network users on Twitter which is offensive in nature as it is hurting the feelings of the particular community and is contrary to the guidelines or advisory dated 18.03.2020 issued by The World Health Organization, undoubtedly it is also contrary to laws prevailing in the territorial jurisdiction of India and the same was informed by the Petitioner to the Respondent Nos. 1 to 5 through Representations Dated 02.04.2020 and 04.04.2020 and the same is within their knowledge have failed to act upon till date and the trending is still continuing. The Respondent Nos. 1 to 4 was



informed by the Petitioner about the illegal tweeting or messaging going on by the social network users on Twitter being operated by Respondent No. 5 and it is source of medium where the expressions of any one can be expressed and will be viewed across the world. The Petitioner having gone through the gravity of the issue and the viewers of the tweets are spread across Pan India and in those compelling circumstances the Petitioner have approached the Hon`ble Supreme Court of India under Article 32 of the Constitution of India by way of Writ seeking directions to the Respondent Nos. 1 to 5 for stopping illegal trending on the twitter and also sought for restraining order for all Online sites being operated in India for the reasons the Respondent Nos. 1 & 2 been vested with statutory powers have got wider powers to prevail upon respondent no. 5 for stoppage of the illegality as the laws of the land will not permit of the same. The Hon`ble Supreme Court on 30.04.2020 heard the Writ Petition (Civil) Diary No.10965/2020 , the Coram headed by Hon`ble Chief Justice of India after hearing about the merits of the case, have directed the petitioner to approach this Hon`ble Court as this Hon`ble Court equally enjoys wider powers under Article 226 of the Constitution of India over the subject matter involved herein for adjudicating of the issue and directed the Petitioner to withdraw the Writ Petition. The Petitioner obliged the directions of the Hon`ble Chief Justice of India and withdrawn the Writ Petition with Liberty to approach the Telangana High Court and consequently Prayer is allowed and the Writ Petition is dismissed as withdrawn with liberty aforesaid and the Petitioner is before this Hon`ble Court seeking for adjudication of the issue involved as this Hon`ble Court is been vested with wider Powers under the Constitution of India.

- 2.2 The Petitioner`s Representations Dated 02.04.2020 and 04.04.2020 to the Respondent Nos. 1 to 5 though they are in receipt of the same have failed to act upon and the Respondent Nos. 1 to 4 who are mandated under the Rule of Law to act upon have failed to consider the same for the reasons best known to them is nothing but there is violation of Rule of Law and the Petitioner`s rights have been infringed and it is Violative of Article 14 of the Constitution of India as the “State” is duty bound to show utmost impartially towards its Citizens to maintain equality of law or protections of law within the territory of India and so also there is Violation of Article 21 of the Constitution of India. In other word protection of the Fundamental Rights of the Citizens are guaranteed under the Constitution of India and the same is violated herein by the respondent nos. 1 to



4 in redressing the grievance of the Petitioner so also of the Particular Community and hence the Present Writ Petition under "Public Interest" is filed.

**3. LOCUS STANDI:**

- 3.1 I, Khaja Aijazuddin, S/o. Late Khaja Moinuddin, aged: 40 Years, Occ: Advocate, R/o. Flat No. 102, Moin Block, My Splendor Residency, 3-5-807/1/C, Hyderguda, Hyderabad-500029, Telangana State, do hereby swear under Oath and sincerely affirm as follows and I am the Petitioner herein and I am fully acquainted with the facts of the case.
- 3.2 I hereby affirm and state on Oath that the Petitioner herein has / have no personal interest in the subject matter of this Petitioner is a Practicing advocate at High Court of Telangana and its Sub-Ordinate Courts. The Petitioner states that in respect of the subject matter of cause of cause of action the Petitioner earlier has filed Writ Petition (Civil) Diary No.10965/2020, the Coram headed by Hon`ble Chief Justice of India after hearing about the merits of the case, have directed the petitioner to approach this Hon`ble Court as this Hon`ble Court equally enjoys wider powers under Article 226 of the Constitution of India over the subject matter involved herein for adjudicating of the issue and directed the Petitioner to withdraw the Writ Petition. The Petitioner obliged the directions of the Hon`ble Chief Justice of India and withdrawn the Writ Petition with Liberty to approach the Telangana High Court and consequently Prayer is allowed and the Writ Petition is dismissed as withdrawn with liberty aforesaid and the Petitioner is before this Hon`ble Court. The Petitioner further submits that in respect of the Cause of action herein no such petition or case is pending before any Courts or forum as on date of filing of this Writ Petition. It is submitted that this Hon'ble court has ample power and jurisdiction to treat this Present Petition as Public interest by duly relaxing the condition of Locus standi.

**4. PARTICULARS OF THE PETITIONER:**

I, Khaja Aijazuddin, S/o. Late Khaja Moinuddin, aged: 40 Years, Occ: Advocate, R/o. Flat No. 102, Moin Block, My Splendor Residency, 3-5-807/1/C, Hyderguda, Hyderabad-500029, Telangana State, do hereby solemnly affirm and state on oath as follows:



4.1 The Petitioner hails from Hyderabad District, is an Advocate Practicing in High Court of Judicature at Hyderabad being aggrieved by the inaction of the respondents nos. 1 to 5 to question the Tweets or Messages at Social Network "Twitter", operated by the Respondent no. 5 herein which is trending on the twitter under the name and style with Hashtags #Islamiccoronavirusjihad, #Coronajehad, #Tablighijamat, #Nizamuddinidiots, #Tablighijamatvirus and in many ways attaching the pandemic with the religion which is done by the social network users on Twitter which is offensive in nature as it is hurting the feelings of the particular community and is contrary to the guidelines or advisory dated 18.03.2020 issued by The World Health Organization, undoubtedly it is also contrary to laws prevailing in the territorial jurisdiction of India and the same was informed by the Petitioner to the Respondent Nos. 1 to 5 through Representations Dated 02.04.2020 and 04.04.2020 and the same is within their knowledge have failed to act upon till date and the trending is still continuing.

4.2 The present PIL is filed based on the information available to the Petitioner, which is believed to be true. The Petitioner is willing and ready to bear the costs and to face the consequences, if the facts and pleadings made hereunder are found not to be correct. The Petitioner further submits that the Petitioner is not involved in any Civil, Criminal and Revenue Cases.

##### **5. DECLARATION AND UNDERSTANDING OF THE PETITIONER:**

I, Khaja Aijazuddin, S/o. Late Khaja Moinuddin, aged: 40 Years, Occ: Advocate, R/o. Flat No. 102, Moin Block, My Splendor Residency, 3-5-807/1/C, Hyderguda, Hyderabad-500029, Telangana State, do hereby solemnly affirm and state on oath as follows:

5.1 I am the Petitioner herein and I am fully acquainted with the facts of the case.

5.2 I respectfully submit that by way of filing of the above writ petition, I, as an individual, am not going to achieve any personal benefit. It is only intended to be for the public good and strictly public in nature.

5.3 I respectfully submit that the entire litigation costs, to the extent of clerical expenses and filing charges are being borne by me.

5.4. I respectfully submit that the Petitioner herein has previously never approached this Hon'ble court seeking for the relief similar/identical to the reliefs which are being sought in the Present Petition. However, earlier the Petitioner herein has filed a W.P. (Civil) Diary No.10965/2020, before the Hon'ble Supreme Court and the

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Hon`ble Supreme Court vide it`s Orders Dated 30.04.2020 gave liberty to me approach before this Hon`ble Court and in view of the said directions I am before this Hon`ble Court.

5.5 I respectfully submit that the Petitioner has understood that in the course of hearing of this petition, the Court may require any security to be furnished towards costs or any other charges and the Petitioner shall have to comply with such requirements. In the event of this Hon`ble Court, for any reason, comes to a conclusion that the above writ petition is not intended for any public purpose and decides to impose costs, I, being the petitioner herein shall stand obligated to comply with the same.

**6. FACTS IN BRIEF:**

The facts necessary for the purpose of this Writ Petition (Public Interest Litigation) are stated as follows:

6.1 It is most respectfully submitted that the Petitioner submits that there was Religious Congregation was conducted from 13<sup>th</sup> March 2020 to 15<sup>th</sup> March 2020 at Delhi organized by Tablighi Jamat at Nizamuddin, Delhi where Scholars or attendees have come from across the World and from different States of India and the Organizers have housed them by providing necessary day to day facilities.

6.2 It is submitted that after the conclusion of the meeting somewhere after 20.03.2020 there was massive spread of Coronavirus resulting the Government of India declaring 22.03.2020 as “Janata Curfew”, all over the Country which means entire Country on that particular date shall be closed fully and thereafter lockdown was announced by the Government of India on 24.03.2020 till 14.04.2020 and thereafter extended till 17.05.2020.

6.3 That the Petitioner submits that the attendees after getting dispersed to their respective States and during or after arriving their respective places there was some cases of detection of Coronavirus symptoms i.e. Positive and the attendees who have come from abroad and are staying at Nizamuddin, Delhi where congregation took place were tested positive and the “State” took them for Quarantine as per the norms and due to massive publicity given by the media that many of the positive cases of symptoms of Coronavirus were found from Tablighi Jamaat at Nizamuddin, Delhi. There was massive trending on the Twitter attached to the religion of the disease coronavirus and in those circumstances I have issued Representation/Petition Dated 02.04.2020 thru email to the Cabinet Secretary, Govt. of India, Union home Secretary, Govt. of India, The Director General of Police, Telangana State, Hyderabad City, The Commissioner

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of Police, Hyderabad City, and another and the sum and substance of the said representation dated 02.04.2020 was that in view of the particular community is attached to the Coronavirus which is totally contrary to the Guidelines issued by the WHO, Dated 18.03.2020 i.e. Para Nos. 1 & 2 therein in the Guidelines mandated that religion shall not be attached with the pandemic i.e. Coronavirus and due to trending on Twitter to take action against the Twitter by blocking the unwarranted tweets or usages which is affecting the particular community and to uphold the "Rule of Law" necessary action may be taken.

6.4 That the respondent nos. 1 to 4 though they are in receipt of representation dated 02.04.2020 which was send thru emails have failed to give any reply to petitioner till date and on date of filing the present petition the trending on the twitter still continues. That the Petitioner submits that on 04.04.2020, respondent no. 5 was served notice thru email to immediately act upon about the trending illegally on twitter and the representation dt. 02.04.2020 send to respondent nos. 1 to 4 was also stated in the said notice. Despite the same, no action has been taken by the respondent no. 5 till date and the illegal trending continues. That the Petitioner is aggrieved with trending on Twitter under the name and styled #Islamiccoronavirusjihad, #Coronajihad, #Tablighijamat, #Nizamuddinidiots, #TablighiJamatVirus, and in many ways attaching the religion to pandemic disease which is done by Social Network Users on Twitter is highly unwarranted, illegal and unconstitutional.

6.5 That the Petitioner in view of the inaction on the part of the Respondent nos. 1 to 4 i.e. Official respondents who have failed to take cognizance of the representation dated 02.04.2020 send by the Petitioner, in view of the issue grave in nature have approached Hon`ble Supreme Court of India under Article 32 of the Constitution of India by way of Writ seeking directions to the Respondent Nos. 1 to 5 for stopping illegal trending on the twitter and also sought for restraining order for all Online sites being operated in India for the reasons the Respondent Nos. 1 & 2 been vested with statutory powers have got wider powers to prevail upon respondent no. 5 for stoppage of the illegality as the laws of the land will not permit of the same. The Hon`ble Supreme Court on 30.04.2020 heard the Writ Petition (Civil) Diary No.10965/2020, the Coram headed by Hon`ble Chief Justice of India after hearing about the merits of the case, have directed the petitioner to approach this Hon`ble Court as this Hon`ble Court equally enjoys wider powers under Article 226 of the Constitution of India over the subject matter involved herein for adjudicating of the issue and directed the Petitioner to withdraw the Writ Petition. The Petitioner obliged the directions of the Hon`ble Chief Justice of India and withdrawn the Writ Petition with Liberty to approach

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the Telangana High Court and consequently Prayer is allowed and the Writ Petition is dismissed as withdrawn with liberty aforesaid and the Petitioner is before this Hon`ble Court seeking for adjudication of the issue involved as this Hon`ble Court is been vested with wider Powers under the Constitution of India.

6.6 That the Petitioner submits that the trending on the twitter still continues with the hashtaqs attached with the particularly community are offensive in nature and despite bringing it to the knowledge of Respondent Nos. 1 to 5 for the reasons best known to them have failed to act and the trending still continues. The Continuation of trending by the Social Network Users on Twitter i.e. at Respondent No. 5 with hashtaqs i.e. #Islamiccoronavirusjihad, #Coronajihad, #Tablighijamat, #Nizamuddinidiots, #TablighiJamatVirus, or Islamophobic Posts and in many ways attaching the religion to pandemic disease will warrant action against the Respondent No. 5 and against those users who are spreading it on Twitter under the Penal Laws i.e. Indian Penal Code 1860 (IPC) enshrined under Chapter XV-Offences Relating to Religion and other relevant laws prevailing , and this Hon`ble Court may direct the Respondent No. 2 to Register Criminal Case against the Twitter and its Users who are spreading the hatred as stated herein.

6.7 That the Petitioner submits that the Petitioner is having Twitter handle account @KhajaAijazuddin and while on noticing the same therein on 02.04.2020 immediately gave consolidated representation on 02.04.2020 to the respondent nos. 1 to 4 and submits to this Hon`ble Court the Petitioner who hails from Hyderabad City, Telangana State made Respondent Nos. 3 & 4 as parties for the reasons those instrumentalities who are law enforcement authorities are mandated under law to prevail upon the respondent no. 5 to delete the inflammatory trending going on as the same may disturb communal harmony of the Hyderabad City and Telangana State at first instance, the authorities neither have taken any action to remove the same nor replied to me , presuming that the trending which is going on is warranted and the trending is still going on and in fact it's going on. The Petitioner intends to furnish the copies of the inflammatory trending going on twitter as the same is not furnished herein for the reason the printing command for printing those pages are not getting printed.

6.8 That the Petitioner submits that the Respondent Nos. 1 & 2 who are supervisory authorities and have got wider powers to prevail upon the Respondent No. 5 for stoppage of illegal trending as they have got Jurisdiction or control over the territory of India , for the reasons best known to them failed to act as they were within the knowledge through the Representation Dated 02.04.2020 given by the Petitioner and

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in these circumstances the Respondents being Public Functionaries ought to have acted upon and restricted the respondent no. 5 to remove the hashtags which are hurting the religious feelings , neither the respondent nos. 1 & 2 have taken any action against the respondent no. 5 nor replied to my representation dated 02.04.2020 and in these circumstances this goes on to show that there is discrimination on the part of the Respondent nos. 1 & 2

6.9 That the Petitioner further submits that the entire world countries are taking precautions and following the advisory of the World Health organization (WHO) to curb the spread of the Pandemic i.e. Coronavirus or Covid-19 and in view of the same, the WHO through its Guidelines Dated 18.03.2020 clearly mandates that the name of the religion shall not be attached with the pandemic i.e. Coronavirus and it is the duty of the "State" to follow and obey the guidelines and in fact entire world countries including India are following the WHO Guidelines from time to time and the present trending on the social media i.e. Twitter despite bringing it to the knowledge of the Respondent nos. 1 to 4 to remove those trending which are Islamophobic posts on social media which are not only against the WHO Guidelines Dated 18.03.2020 but also offending in nature warranting Penal Action as per the Laws Prevailing over the territorial Jurisdiction of India. Despite the same no action have been taken for stoppage of the trending on Twitter till date and if the trending still continues there is every possibility of disturbance of the Communal Harmony of the Country which the petitioner seeks immediate intervention of this Hon`ble Court to intervene and direct to the official respondents i.e. 1 to 4 to act upon against the Respondent No. 5 in particular and prepare guidelines by mandating the Respondent nos. 1 & 2 to curb this menace in future through online sites.

It is submitted that, in the above circumstances, the Petitioner is left with no other alternative and efficacious remedy, other than to approach this Hon`ble High Court under Article 226 of the Constitution of India, as Liberty was given by Hon`ble Supreme Court of India for necessary relief. It is submitted that Petitioner has not filed any other suit except the disposed matter before Hon`ble Supreme Court in Diary No. 10965-2020 , Dated 30.04.2020 nor any other matter relating to this case is pending in any other court of law, as on the date of filing of this writ petition.



**7. SOURCE OF INFORMATION**

I submit that the source of information for filing of the said Writ Petition (PIL) have been acquired by the Petitioner from the twitter handle account of the Petitioner @KhajaAijazuddin of the Respondent No. 5 and moreover the illegal trending is open to all the general public .

**8. NATURE OF EXTENT OF INJURY CAUSED/APPREHENDED:**

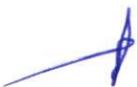
I submit that the inaction of the Respondents herein will cause irreparable and irretrievable loss to the very existence of the people belonging to Particular Community and so the General Citizens. The intervention of this Hon'ble court is warranting, in order to maintain Communal Harmony of the Country and to Protect the Constitutional Rights of the Citizens.

**9. ANY REPRESENTATION ETC., MADE**

The Petitioner have given Representations Dated 02.04.2020 and 04.04.2020 to the Respondent Nos. 1 to 5 herein by email only for the reason in view of the lockdown the same was not send through Postal Mail, Copies of the representations dated 02.04.2020, 04.04.2020 which was downloaded from the mail box of the Petitioner and on perusal of the same it is clearly demonstrates the email addresses of the respondent nos. 1 to 5. The Petitioner is also annexing Copies of the WHO Guidelines Dated 18.03.2020, Order of the Hon`ble Supreme Court in Writ Petition (Civil) Diary No. 10965/2020, Copy of the Synopsis and Lists of Dates and Writ Petition filed under Article 32 of the Constitution of India of Writ Petition (Civil) Diary No. 10965/2020

**10. DELAY IF ANY:**

That the Petitioner submits that there is no delay on the part of the petitioner in filing the present petition and therefore , in the event of this Hon`ble Court coming to a conclusion that there is any delay in approaching this Hon`ble Court, the same may be condoned.



11. **DOCUMENTS RELIED UPON ARE:**

**All Annexures are shown as:** Material Papers below

	<b><u>Material Papers</u></b>	
P-1	A Copy of the Representation send to Respondent Nos. 1 to 4 Through email.	02.04.2020
P-2	A Copy of the Representation send to Respondent No. 5 through email.	04.04.2020
P-3	Copy of Guidelines or Advisory of The World Health Organization	18.03.2020
P-4	Copy of Order of Hon`ble Supreme Court in Writ Petition (Civil) Diary No. 10965/2020	30.04.2020
P-5	Copy of Writ Petition and Synopsis of Hon`ble Supreme Court in Writ Petition (Civil) Diary No. 10965/2020	18-04-2020
P-6	Copy of Aadhar Card of the Petitioner	15-05-2013
P-7	Copy of PAN Card of the Petitioner	N/A

12. It is submitted that, in the above circumstances, the Petitioner is left with no other alternative and efficacious remedy, other than to approach this Hon`ble High Court under Article 226 of the Constitution of India, for necessary relief. It is submitted that Petitioner has not filed any other suit nor any other matter relating to this case is pending in any other court of law, except this writ petition.

**RELIEF PRAYED IS AS FOLLOWS:**

In the circumstances, stated above, the Petitioner herein prays that this Hon`ble Court may be pleased to issue a Writ, Order or direction more particularly one in the nature of "Writ of Mandamus" and therefore in light of the above facts and circumstances, it is prayed that this Hon`ble Court be pleased to:

- issue a Writ of Mandamus or any other appropriate writ/direction, directing the Respondent nos. 1 to 4 to direct the respondent no. 5 to stop the illegal trending on the Social Network of Respondent No. 5 i.e. Twitter under the name #Islamiccoronavirusjihad, #Coronajihad, #Tablighijamat, #Nizamuddini diots, #TablighiJamatVirus, or Islamophobic Posts and in many ways attaching the religion to pandemic disease which is done by Social Network Users on Twitter is highly unwarranted, illegal and unconstitutional.




- issue further directions to the respondent nos. 1 & 2 that all online social media networks or sites operated in territorial jurisdiction of India and restrain all online social media networks operating in India not to carry any Islamophobic Posts or messages hurting or insulting the feelings of the particularly community,
- issue directions to the Respondent No. 2 to Register Criminal Cases against the Respondent No. 5 and the Users i.e. Social Network users who are spreading hatred messages on Twitter i.e. Respondent No. 5 under Chapter XV-Offences Relating to Religion of Indian Penal Code 1860 (IPC) and other relevant laws prevailing ,
- pass any such other and/or further orders as this Hon`ble Court may deem fit and proper in the facts and circumstances of the case.

**INTERIM PRAYER:-**

Pending disposal of the present case, as an interim relief, it is prayed that this Hon`ble Court may be pleased to direct the Respondent Nos. 1 to 4 directing the Respondent No. 5 to stop the illegal trending on the Social Media Network i.e. Twitter under the name #Islamiccoronavirusjihad,#Coronajihad,#Tablighijamat,#Nizamuddinidiots, #TablighiJamatVirus, or Islamophobic Posts and in many ways attaching the religion to pandemic disease and pass such other order or orders may deem fit and proper in the circumstances of the case.

13. **CAVEAT:**

I submit that no notice has been received of lodging a Caveat by the Respondents.

14. I submit that I have not faced Contempt of Court proceedings under the Contempt Courts Act, 1971.

15. I have not been ordered by the Honorable High Court or any other court not to file Public Interest Litigation Cases.

16. I submit that I am not involved in a Civil, Criminal and Revenue Cases which have any nexus with present Public Interest Litigation.



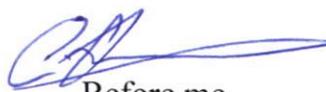

17. I hereby solemnly state under Oath affirm and declare that the Writ Petition is being instituted purely in Public Interest and not at the instance of any other person or organization other than the Petitioner.

18. I hereby solemnly state on oath and affirm and declare that the question raised in Writ Petition has not been raised earlier before this Hon`ble Court and that there are no other case (s) or Petition(s) filed or that are pending before this Hon`ble Court or any other forum or court to the best of my knowledge and research and belief.

Hyderabad

03.05.2020

  
Petitioner



Before me

Advocate, Hyderabad

[C. KUMAR]

VERIFICATION STATEMENT

I, Khaja Aijazuddin S/o Khaja Moinuddin, Aged about: 40 years, Occ: Advocate, R/o Flat No. 102, Moin Block, My Splendor Residency, 3-5-807/1/C, Hyderguda, Hyderabad-500029, Telangana State, being the petitioner/person acquainted with the facts do hereby verify and state that the contents of above paras are true to my personal knowledge, based on records and believed to be correct.

Hence, Verified at Hyderabad, on this the 03<sup>rd</sup> day of May, 2020.

Hyderabad

03.05.2020

  
Petitioner