

**BEFORE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI
Original Application No. 1287/2024**

IN THE MATTER OF:

News Item titled "How this, river of filth claimed teen's life" appearing in the Times of India dated 09.11.2024

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Through Advocate

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Advocate
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Supreme Court of India
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Place: New Delhi
Date: 09.12.2025

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**BEFORE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI
Original Application No. 1287/2024**

IN THE MATTER OF:

News Item titled "How this, river of filth claimed teen's life" appearing in the Times of India dated 09.11.2024

**COMPLIANCE REPORT ON BEHALF OF RESPONDENT I.E.
MUNICIPAL CORPORATION OF DELHI IN THE ORIGINAL
APPLICATION NO. 1287/2024**

MOST RESPECTFULLY SHOWETH:

1. That the instant compliance report is filed on behalf of Respondent No.4 i.e. Municipal Corporation of Delhi in compliance of the Order dated 31.10.2025 passed by this Hon'ble Tribunal in Original Application No. 1287/2024.
2. That vide order dated 31.10.2025, this Hon'ble Court directed counsel for Respondent No. 4 to place on record the full details of the Writ Petition filed before the High Court of Delhi seeking enhancement of compensation. True Copy of the Order dated 31.10.2025 is annexed herein and marked as under **ANNEXURE 4/15.**
3. That it is submitted that Writ Petition No. 16379/2025 titled "Ranbir v. State of NCT Delhi & Ors." has been filed by the father of the deceased child before the Hon'ble High Court of Delhi seeking enhancement of compensation.
4. That it is humbly submitted that the petitioner in W.P.(C) No. 16379/2025 has approached the Hon'ble High Court of Delhi Court seeking compensation of Rs.50 Lakhs for the untimely demise of his son, who tragically fell into KSN Drain. In compliance of the Order dated 31.10.2025, the true e-copy of W.P.(C) No. 16379/2025 titled "*Ranbir v. State of NCT*

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Delhi & Ors.” along with the orders passed by the Hon’ble High Court of Delhi is being annexed herein and marked as under **ANNEXURE 4/16.**

PRAYER

In view of the aforesaid submissions, it is most respectfully prayed that this Hon’ble Court may be pleased to

- a. Take on record the present Compliance report.
- b. Pass any other order(s) as this Hon’ble Court may deem fit and proper in the facts and circumstances of the case.



Through Advocate

DR. DIVYA SWAMY

Advocate

Reg. No.: D/1160/2014

Ch. No. 203, Setalvad Lawyers Block

Supreme Court of India

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Contact: +91-8860050449

Place: New Delhi

Date: 09.12.2025

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ANNEXURE 4/15

Item No. 08

Court No. 1

**BEFORE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI**

Original Application No. 1287/2024

News Item titled "how this, river, of filth claimed teen's life" appearing in the Times of India dated 09.11.2024

Date of hearing: 31.10.2025

**CORAM: HON'BLE MR. JUSTICE PRAKASH SHRIVASTAVA, CHAIRPERSON
HON'BLE DR. A. SENTHIL VEL, EXPERT MEMBER**

Respondent: Dr. Divya Swamy, Mr. Yagyawalkya Singh & Ms. Pragya Patel, Advs. for R - 4
Ms. Jyoti Mendiratta & Ms. Ananya Basudha, Advs. for R - 3 & 5

ORDER

1. Learned Counsel appearing for respondent no.4 submits that Writ Petition No. 16379/2025 has been filed by father of the deceased child before the High Court of Delhi seeking enhancement of compensation. She is directed to place on record the full details of the Writ Petition including a copy thereof along with any order passed by High Court in that Writ Petition within six weeks.

2. List on 09.01.2026.

Prakash Shrivastava, CP

Dr. A. Senthil Vel, EM

October 31, 2025
Original Application No. 1287/2024
JG.

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ANNEXURE 4/16



e True Copy



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* **IN THE HIGH COURT OF DELHI AT NEW DELHI**

+ W.P.(C) 16379/2025

RANBIR

.....Petitioner

Through: Ms. Sakshi, Mr. Devender Singh
Dahiya, Mr. Devashish Shandilya and
Ms. Riya Sisodiya, Advocates along
with petitioner in person.

versus

STATE NCT OF DELHI & ORS.

.....Respondents

Through: Advocate (appearance not given) for
R-1 to R-3 (GNCTD).
Mr. Manu Chaturvedi, SC for MCD
(through VC)

CORAM:**HON'BLE MR. JUSTICE SACHIN DATTA****ORDER**
27.11.2025

%

A pass-over is sought by the learned counsel for the Government of NCT of Delhi (GNCTD). Since it is not feasible to pass-over the matter, re-notify on 27.01.2026.

SACHIN DATTA, J**NOVEMBER 27, 2025/r**



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* **IN THE HIGH COURT OF DELHI AT NEW DELHI**

+ W.P.(C) 16379/2025

RANBIR

.....Petitioner

Through: Ms. Sakshi, Mr. Devender Singh
Dahiya and Ms. Riya Sisodiya,
Advocates along with petitioner.

versus

STATE NCT OF DELHI & ORS.

.....Respondents

Through: Mr. Sumit K. Batra, Advocate for R-1
to R-3.Mr. Manu Chaturvedi, Standing
Counsel for MCD.**CORAM:****HON'BLE MR. JUSTICE SACHIN DATTA****ORDER**

%

29.10.2025**CM APPLs.67140/2025, 67141/2025, 67142/2025 (Exemption)**

1. Allowed, subject to all just exceptions.
2. The applications stand disposed of.

W.P.(C) 16379/2025

3. The present petition has been filed by the petitioner seeking compensation of Rs.50 Lakhs on account of the untimely death of the petitioner's son on account of falling into an open and uncovered drainage channel in Nangloi, Delhi.
4. During the course of hearing, learned counsel for the MCD/respondent no.4, who appears on advance notice, draws attention to the fact that although an *ex-gratia* amount of Rs.5 Lakhs has been paid by the Government of NCT of Delhi/respondent no.1, the Government of NCT of Delhi/respondent no.1 is considering enhancement of the said amount,



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pursuant to an order dated 30.07.2025 passed by the National Green Tribunal, New Delhi in Original Application No.1287/2024 (IA No.497/2025).

5. Learned counsel for the GNCTD, who also appears on advance notice, seeks some time to take instructions.
6. List on 27.11.2025, in the category of “Admission Matters”.

SACHIN DATTA, J

OCTOBER 29, 2025/r

This is a digitally signed order.

The authenticity of the order can be re-verified from Delhi High Court Order Portal by scanning the QR code shown above.

The Order is downloaded from the DHC Server on 07/11/2025 at 12:30:53

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IN THE HIGH COURT OF DELHI AT NEW DELHI

[EXTRA ORDINARY JURISDICTION]

W.P.(C)/ 16379 /2025

IN THE MATTER OF:

RANBIR

...PETITIONER

Versus

STATE NCT OF DELHI & ORS

...RESPONDENT

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Filed by:

LEXACTO & CO.
Advocate for Petitioner

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Nanda Enclave, Dwarka Sector-19
New Delhi-110075
Mob. No.: 8800696082; 9873130563
Tel No: 011-4705865
Email Id: lexactoandco@gmail.com

Place: Delhi

Date: 22.09.2025

NOTE:

1. The copy of the petition is supplied to the counsel of the respondent. The petition is properly bookmarked, and OCR is done. Typed copy of the dim and ill-eligible documents are annexed.
2. Application for seeking exemption from filing true typed translated copies of the Annexure-P5.



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IN THE HIGH COURT OF DELHI AT NEW DELHI
[EXTRA ORDINARY JURISDICTION]

W.P.(C)/ 16379 /2025

IN THE MATTER OF:

RANBIR

...PETITIONER

Versus

STATE NCT OF DELHI & ORS

...RESPONDENT

NOTICE OF MOTION

Sir,

The enclosed writ petition in the aforesaid matter is being filed on behalf of the petitioner and is likely to be listed on _____ or any date thereafter. Please take notice accordingly.

Filed by:

LEXACTO & CO.
Advocate for Petitioner

203, Kartik Plaza,
Nanda Enclave, Dwarka Sector-19
New Delhi-110075

Mob. No.: 8800696082; 9873130563

Tel No: 011-4705865

Place: Delhi

Date: 22.09.2025

Email Id: lexactoandco@gmail.com



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IN THE HIGH COURT OF DELHI AT NEW DELHI
[EXTRA ORDINARY JURISDICTION]

W.P.(C)/ 16379 /2025

IN THE MATTER OF:

RANBIR

...PETITIONER

Versus

STATE NCT OF DELHI & ORS

...RESPONDENT

URGENT APPLICATION

Sir,

Kindly treat this accompanying writ petition as urgent according to the Delhi High Court Rules and Orders. The grounds of urgency are prayed for and have been enlisted in detail in the urgent mentioning form.

Filed by:

LEXACTO & CO.
Advocate for Petitioner

203, Kartik Plaza,
Nanda Enclave, Dwarka Sector-19
New Delhi-110075

Mob. No.: 8800696082; 9873130563

Tel No: 011-4705865

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Date: 22.09.2025

Email Id: lexactoandco@gmail.com



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IN THE HIGH COURT OF DELHI AT NEW DELHI
[EXTRA ORDINARY JURISDICTION]

W.P.(C)/16379 /2025

IN THE MATTER OF:

RANBIR

...PETITIONER

Versus

STATE NCT OF DELHI & ORS

...RESPONDENT

COURT FEES

:: Court Fee Receipt Details

Litigant Name	RANBIR
Location Name	NCT OF DELHI
Account Reference	LEXACTO AND CO
Court Fee UIN	DLCT2509I2534R572
Court Fee Amount	100

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IN THE HIGH COURT OF DELHI AT NEW DELHI
[EXTRA ORDINARY JURISDICTION]

W.P.(C)/ 16379 /2025

IN THE MATTER OF:

RANBIR ...PETITIONER

Versus

STATE NCT OF DELHI & ORS ...RESPONDENT

MEMO OF PARTIES

RANBIR

S/o. Ran Singh

R/o. H. No.111, Ward No. Dhani Dariyapur,
Bhiwani, Haryana-127040

Email: lexactoandco@gmail.com ...PETITIONER

VERSUS

1. STATE NCT OF DELHI

Through Chief Secretary

Address:

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New Delhi-110002.

Email Id: standingcounselgnctd@gmail.com

2. IRRIGATION AND FLOOD CONTROL DEPARTMENT

Through Secretary

Address:

L.M Bund Office Complex

Shastri Nagar, New Delhi-110002.

Email Id: standingcounselgnctd@gmail.com

3. PUBLIC WORKS DEPARTMENT

Through Principal Secretary

Address:

Vikas Marg, ITO, Balmiki Basti,

IP Estate, New Delhi-110002

Email id: standingcounselgnctd@gmail.com

4. MUNICIPAL CORPORATION OF DELHI

Through Commissioner

Address:

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Dr. S. P. Mukherjee Civic Center,
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...RESPONDENTS

Filed by:

LEXACTO & CO.
Advocate for Petitioner

203, Kartik Plaza,
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New Delhi-110075
Mob. No.: 8800696082; 9873130563
Tel No: 011-4705865
Email Id: lexactoandco@gmail.com

Place: Delhi
Date: 22.09.2025



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SYNOPSIS

The present Writ Petition under Article 226 of the Constitution of India is being filed by the Petitioner, a grieving father, who has lost his minor son, Master Vikas (aged 14 years), in a horrific and entirely preventable tragedy caused due to the gross negligence, apathy, and dereliction of statutory duty by the Respondents.

On 08.11.2024, the Petitioner's son accidentally fell into an open, uncovered, and unguarded drainage channel (*Naala*) situated at Nangloi, Delhi. The said Naala, being completely exposed, unbarricaded, and camouflaged under layers of garbage and polythene, posed a grave and obvious risk to public safety. Despite being located in a densely populated residential area frequented by school-going children and pedestrians, no safety measures such as fencing, warning signage, or barricading had been installed by the concerned authorities.

An FIR No. 768/2024 dated 09.11.2024 was registered, clearly recording that the Naala was left unattended, choked with garbage, and lacked all basic preventive safeguards. The site inspection report as well as subsequent police investigation categorically confirmed that no precautionary or safety measures were ever taken at or around the site. The incident received wide coverage in both print and electronic media, which highlighted the failure of the authorities and public outrage over the avoidable death of a young boy.

Despite repeated representations dated 18.01.2025 and 28.02.2025, demanding just and fair compensation of Rs. 50,00,000/-, the Respondents have neither acknowledged nor addressed the lawful claim of the Petitioner. Instead, Respondent No. 3 sought to pressurize the family into abandoning their



rightful protest by coercively tendering a meagre *ex gratia* amount of Rs. 5,00,000/- on 09.07.2025, thereby attempting to suppress the pursuit of justice.

The Respondents are statutory authorities, falling within the definition of “State” under Article 12 of the Constitution, and are duty-bound to maintain civic infrastructure and ensure safety of citizens. Their failure to clean, cover, fence, or safeguard the Naala constitutes actionable negligence, violation of statutory duty, and a direct infringement of the fundamental right to life under Article 21 of the Constitution of India.

It is a settled law that where the negligence or omission of public authorities results in death or injury, compensation is payable under public law remedies. The Hon’ble Supreme Court in *MCD v. Uphaar Tragedy Victims Association* (2011) 14 SCC 481 and the Hon’ble Delhi High Court in *Munna Singh v. State of NCT of Delhi* [W.P. (CrI.) 1657/2024] have categorically held that failure to maintain civic infrastructure and ensure safety amounts to violation of the Right to Life and entitles the victims to monetary compensation.

In view of the above, the Petitioner seeks issuance of an appropriate writ, order or direction, directing the Respondents to grant just, fair, and adequate compensation of Rs. 50,00,000/- to the Petitioner for the untimely death of his son, and further direct the Respondents to adopt remedial measures to cover all open drains, install safety barricades and signage, and conduct periodic inspections to prevent recurrence of such tragedies.

LIST OF DATES AND EVENTS

08.11.2024 At about 3:45 PM, the petitioner’s minor son, Master Vikas (aged 14 years), accidentally fell into



an open and uncovered drainage channel (*Naala*) at Nangloi, Delhi, and tragically died. Rescue operation conducted with assistance of local police and fire brigade; body of the deceased recovered and taken to Sanjay Gandhi Memorial Hospital, Mangolpuri; Medico-Legal Case (MLC) registered.

- 09.11.2024 FIR No. 768/2024 registered at the concerned Police Station, recording that the Naala was open, choked with garbage and polythene, and lacked fencing, signage or protective measures. Site inspection conducted by police; report confirmed absence of safety measures and noted that the Naala was hazardous and camouflaged by accumulated debris. Navbharat Times published a news report titled “नाले में डूबने से बच्चे की मौत” highlighting negligence of authorities. Aaj Tak News Channel broadcasted breaking news of the incident, underscoring absence of fencing, signage, and safety measures, and questioning accountability of authorities.
- 18.01.2025 Petitioner submitted a written representation to Respondents demanding compensation of Rs. 50,00,000/- for the irreparable loss caused by Respondents negligence.
- 28.02.2025 Petitioner sent a second detailed representation to all Respondents reiterating the demand for compensation and remedial action.
- 09.07.2025 Respondent no.3 transferred Rs. 5,00,000/- (Rupees Five Lakhs only) into the account of the Petitioner as an ex gratia payment, attempting to coerce settlement.



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.09.2025 Hence, this Writ Petition.



IN THE HIGH COURT OF DELHI AT NEW DELHI
[EXTRA ORDINARY JURISDICTION]

W.P.(C)/ 16379/2025

IN THE MATTER OF:

RANBIR ...PETITIONER

Versus

STATE NCT OF DELHI & ORS ...RESPONDENT

**WRIT PETITION UNDER ARTICLE 226 OF THE
 CONSTITUTION OF INDIA, 1950, FOR THE ISSUANCE
 OF A WRIT OF MANDAMUS OR ANY OTHER
 APPROPRIATE WRIT, ORDER, OR DIRECTION,
 DIRECTING THE RESPONDENTS TO GRANT JUST,
 FAIR, AND ADEQUATE COMPENSATION TO THE
 PETITIONER ON ACCOUNT OF A HORRIFIC
 TRAGEDY ARISING OUT OF GROSS NEGLIGENCE ON
 THE PART OF THE RESPONDENTS.**

*TO THE HONBLE CHIEF JUSTICE AND OTHER PUISINE
 JUSTICES OF THE HON'BLE HIGH COURT OF DELHI,
 THE HUMBLE PETITION OF THE PETITIONER ABOVE
 NAMED IS AS FOLLOWS:*

RESPECTFULLY SUBMITTED THAT:

1. That the Petitioner is a law-abiding and responsible citizen of India and is entitled to invoke the extraordinary writ jurisdiction of this Hon'ble Court under Article 226 of the Constitution of India for the enforcement of his fundamental and legal rights.
2. That the Petitioner has always lived a peaceful and dignified life; however, he has been shattered and devastated due to the



untimely and tragic loss of his son, who died in a horrific and entirely preventable incident caused solely due to the gross negligence, dereliction of duty, and omission on the part of the Respondents. The inaction and apathy of the Respondents directly led to this irreplaceable personal loss, for which the Petitioner seeks justice and fair compensation through this Hon'ble Court.

3. That Respondent No. 1 is the Government of National Capital Territory of Delhi (GNCTD), which is the overarching executive authority responsible for governance, coordination, and policy implementation through its various departments, including those dealing with public works, flood control, sanitation, and public safety. Respondent No. 2 is the Irrigation and Flood Control Department, which is entrusted with the responsibility of carrying out works relating to flood control, drainage, and maintenance of water channels/Naalas, and is duty-bound to ensure that such works are executed in a manner that prioritizes public safety and prevents hazards. Respondent No. 3 is the Public Works Department (PWD), which is responsible for construction, development, repair, and maintenance of public infrastructure such as roads, bridges, and footpaths, and for ensuring that such infrastructure complies with civic norms and safety standards. Respondent No. 4 is the Municipal Corporation of Delhi (MCD), which is statutorily responsible for sanitation, solid waste management, cleaning of drains, and overall hygienic maintenance of the city. It is submitted that Respondent Nos. 2 to 4 function under the administrative and supervisory control of Respondent No. 1, and therefore, Respondent No. 1 is vicariously liable for the acts of omission, negligence, and



failure on the part of its subordinate departments and agencies.

4. That on 08.11.2024, at around 3:45 PM, the Petitioner's son, Master Vikas (hereinafter referred to as the "Deceased"), a minor aged only 14 years, met with a tragic and untimely death after accidentally falling into an open, unguarded, and uncovered drainage channel (hereinafter referred to as "Naala") located in Nangloi, Delhi. The said drain, being completely exposed and lacking any kind of protective fencing, boundary wall, safety covering, or warning signage, was left in a highly dangerous and neglected condition, despite being situated in a densely populated residential area frequented by school-going children and pedestrians.
5. The Deceased was a student of Class IX at New Sarswati Public School, Nangloi, Delhi-110041, and was known for his academic sincerity, good moral conduct, and disciplined nature. He harbored aspirations for a bright future and was considered one of the promising students of his class. The incident has not only caused an irreparable personal loss to the Petitioner and his family but also highlights the shocking level of administrative apathy and negligence on the part of the concerned public authorities, who failed to take even basic safety precautions in relation to a known public hazard. True copy of the academic performance/result of the deceased, Master Vikas, issued by New Sarswati Public School, Nangloi, Delhi-110041, showing his scholastic achievement and potential of deceased, is annexed herewith and marked as **ANNEXURE -P1**.
6. That the said *Naala* was completely choked and concealed under a thick layer of debris, garbage, and waste material,



rendering it virtually indistinguishable to the naked eye. Owing to the accumulation of solid waste and lack of any visible boundary or structural indicator, it was impossible for any passerby, especially children, to recognize the presence of an open and hazardous drain beneath the trash heap usually looked like a flat surface covered with solid wastes. True copies of the photographs of the Naala taken on the relevant day, clearly depicting the hazardous condition and the absence of any safety or sanitation measures, are annexed herewith and marked as **ANNEXURE -P2**.

7. That Respondent No. 2 to 4, which is duty-bound to carry out regular cleaning, desilting, and maintenance of such public drains, had grossly failed to discharge its obligations, as the Naala had not been cleaned or attended to for an inordinately long period of time. The sheer negligence and inaction on the part of the said Respondents in ensuring the regular upkeep and visibility of the drain constitute a serious dereliction of statutory duty and have directly contributed to the tragic incident in question.
8. That there was no fencing, boundary wall, barricading, or any form of safety measure installed at or around the site of the said *Naala*. The area was completely exposed and unprotected, thereby posing a serious risk to the safety of the general public, particularly children and pedestrians using the adjoining path.
9. It is pertinent to mention that Respondent No. 2 and Respondent No. 3 are statutorily and morally bound to take adequate and preventive safety measures around such hazardous public utilities to ensure that no member of the general public, especially vulnerable individuals like minors,



can inadvertently access such dangerous zones. These measures may include fencing, signboards, warning notices, boundary walls, or restricted access zones.

10. That there were no proper arrangements for garbage bins or waste disposal units in and around the area adjoining the said Naala which is a responsibility of respondent no. 2 to 4. The complete absence of dustbins or any designated waste collection infrastructure compelled local residents and passersby to dispose of their household and street garbage directly into the Naala, resulting in its gradual choking, concealment, and transformation into a dumping ground.
11. That lack of basic civic infrastructure like lacking in maintaining the cleanliness, protective measure, fencing, guarding, lighting, significantly contributed to the dangerous condition of the Naala, rendering it invisible beneath the layers of accumulated garbage and directly leading to the unfortunate incident that claimed the life of the Petitioner's minor son. That due to the gross negligence utter dereliction of duty, and failure to take adequate safety measures on the part of MCD in leaving the said drain/channel open and unguarded, a young boy fell there in, which directly resulted in his unfortunate and untimely death. The said incident is attributable solely to the negligence and breach of statutory duty on the part of the respondent corporation. The Respondents, despite being fully aware of the public's reliance on the area for movement and the absence of waste disposal options, failed to take preventive or corrective measures to manage solid waste and prevent environmental and physical hazards.
12. That it is due to the gross and sheer negligence of the



Respondents that the Deceased fell into the canal and lost his life due to drowning and suffocation. An FIR bearing No. 768/2024, dated 09.11.2024, was registered immediately after the incident. The contents of the said FIR and the site inspection report clearly record that the *Ganda Naala* was filled with garbage and trash, and its surface was covered with floating polythene and waste, making it impossible to visually identify the existence of water or estimate the depth of the drain.

13. It was further observed that the lanes leading to the Naala were open and provided unrestricted access, the Naala itself was uncovered, had no fencing, and no precautionary signboards or warning notices were installed anywhere in or around the site. The report categorically notes that no precautionary or safety measures were taken by the concerned departments to ensure that neither human beings nor animals accidentally fall into the Naala.
14. The facts as recorded during site inspection and the contents of the FIR itself leave no room for any doubt that the tragic death of a 14-year-old school-going child could have been easily avoided. The gross negligence in the present case is of the highest degree, amounting to a complete failure of public duty and administrative responsibility. A true copy of FIR No. 768/2024, registered at PS Nangloi u/s 106(1) of BNS, 2023 along with its translated extract and site inspection remarks is annexed herewith and marked as **ANNEXURE -P3**.
15. That with the assistance of the local police officials and the fire brigade team, a search and rescue operation was carried out, following which the body of the Deceased was recovered from the canal after considerable effort and delay. Upon



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recovery, the body was immediately taken to Sanjay Gandhi Memorial Hospital, Mangolpuri, where the Medico-Legal Case (MLC) was duly registered and conducted in accordance with procedure. The recovery of the body and subsequent medical examination further confirms the nature of the incident as a tragic consequence of administrative inaction and lack of preventive measures at the site of the incident. A true and correct copy of the MLC/ post-mortem of Deceased on 09.11.2024 is annexed herewith and marked as **ANNEXURE -P4**.

16. That further, during the course of investigation, the police authorities categorically found and recorded that no precautionary or safety measures had been adopted or implemented by the concerned Respondents at or around the site of the *Naala*. It was clearly observed that the canal was uncovered, unfenced, and lacking any warning signs or barriers, thereby posing a significant danger to public safety, especially to minors.
17. The investigation report further confirms that it was solely due to the gross negligence and failure of duty on the part of the concerned Respondents that the 14-year-old Deceased accidentally fell into the canal and died. These findings are explicitly stated in the FIR itself, thereby establishing a direct causal link between the inaction of the Respondents and the unfortunate demise of the Petitioner's son.
18. That the tragic incident received wide media coverage, and was prominently reported by various news outlets, including Navbharat Times, dated 09.11.2024, under the headline: "नाले में डूबने से बच्चे की मौत" (Child dies after falling into canal) with the subheading:



- "अगर बाउंड्री वॉल होती तो नाले में नहीं गिरता बच्चा" (Had there been a boundary wall, the child would not have fallen into the canal).
19. This coverage not only highlights the gravity of the incident but also reflects the public outcry and concern regarding the absence of basic safety infrastructure around the Naala. The media report squarely attributes the incident to the lack of fencing or boundary wall, thereby corroborating the Petitioner's contention that the death of his son was a direct consequence of the Respondents' negligence and failure to discharge their public duty. A true copy of the said news report published in Navbharat Times, dated 09.11.2024, is annexed herewith and marked as **ANNEXURE -P5**.
20. That in addition to the print media coverage, the incident was also broadcast as breaking news by Aaj Tak News Channel on 09.11.2024, which further underscores the seriousness and public importance of the tragedy. The broadcast highlighted the lack of preventive infrastructure such as fencing and signboards and directly questioned the accountability of the government authorities whose negligence led to the avoidable death of a 14-year-old child. The electronic media coverage served as a mirror to public sentiment, emphasizing that the unfortunate death of the Petitioner's son was not merely an accident but a result of administrative failure and dereliction of duty by the Respondents.
21. That it is evidently established through official records, site inspection, police investigation, and media coverage that the canal in question was open, uncovered, and devoid of any boundary wall or protective fencing, thereby posing a grave risk to public safety. This condition clearly reflects gross negligence and omission of duty on the part of Respondent



No. 2 and Respondent No. 3, both of whom function under the administrative control of Respondent No. 1 the Government of NCT of Delhi.

22. In light of the above, it is submitted that Respondent Nos. 1 to 3 are jointly and severally responsible for the unfortunate and untimely death of the Petitioner's minor son, who fell victim to an entirely preventable hazard. The Respondents' failure to discharge their statutory duties and to ensure minimum safety standards amounts to a serious breach of public trust, for which the Petitioner is entitled to just, fair, and adequate compensation in accordance with law.

23. That on 18.01.2025 the Petitioner sent a representation to all the Respondents, demanding compensation of Rs 50,00,000/- (Rupees Fifty Lakhs only) on account of the irreparable loss suffered by the Petitioner due to the joint and collective negligence of the Respondents. Subsequently, the Petitioner again sent a detailed representation dated 28.02.2025 to all the Respondents, reiterating his demand for compensation and seeking urgent remedial action. However, despite the lapse of considerable time, the Respondents have neither acknowledged nor replied to the said representation. A True copy and correct copy of the representation dated 17.01.2025 and 24.02.2025 sent by the petitioner through counsel to the all respondents along with postal tracking is annexed herewith and marked as **ANNEXURE -P6**.

24. That it is most pertinent to submit that after the unfortunate and untimely death of the petitioner's minor son, Respondent No. 3, instead of discharging its statutory duty with accountability and ensuring justice, sought to pressurize the grieving family into abandoning their rightful agitation and



lawful protest against the said negligence. It is further submitted that the respondents, with the sole intention of suppressing the voice of the aggrieved family and evading legal consequences, tendered a cheque of merely Rs. 5,00,000/- on 09.07.2025 as an *ex-gratia* amount, coercing them to accept the same in lieu of foregoing their legitimate pursuit of justice. The aforesaid conduct of the respondents is arbitrary, oppressive, and violative of the fundamental rights of the petitioner guaranteed under Article 21 of the Constitution of India, 1950. A true and correct copy of screenshot of payment on 09.07.2025 which received in petitioner account Petitioner towards compensation for the irreparable loss caused due to the negligence of the Respondents, is annexed herewith and marked as **ANNEXURE -P7**.

25. This clearly demonstrates the casual and indifferent attitude of the Respondents towards the lawful and justified claim of the Petitioner, leaving the Petitioner with no other efficacious remedy except to invoke the extraordinary jurisdiction of this Hon'ble Court under Article 226 of the Constitution of India on the following, amongst other, grounds:

GROUNDS

- A. Because the Respondents, being government authorities, are duty-bound to maintain public infrastructure, including open canals, and ensure safety measures like fencing, signage, and regular cleaning to prevent accidents. Their failure to do so amounts to gross negligence and dereliction of public duty.
- B. Because the tragic death of the Petitioner's minor son was not an act of God, but a foreseeable and preventable incident, directly resulting from the omission and inaction on the part



- of the Respondents.
- C. Because the Respondents are "State" authorities within the meaning of Article 12 of the Constitution of India, and are therefore amenable to the writ jurisdiction of this Hon'ble Court under Article 226 for enforcement of legal and fundamental rights.
- D. Because the deceased was a minor child of merely 14 years of age, a bright student with a promising future, whose life was tragically cut short due to the inaction and negligence of the public authorities.
- E. Because it is a settled principle of law that where there is a tortious act or negligence by public authorities, resulting in death or injury, the State is liable to compensate the victim or their legal heirs, without prejudice to any other remedies.
- F. Because multiple media reports, the police FIR, and investigation records all confirm that the canal was open, unguarded, and filled with debris, lacking even basic precautionary signage or fencing, which amounts to actionable negligence.
- G. Because the incident has caused irreparable emotional, psychological, and financial damage to the Petitioner and his family, and therefore, compensation is not only warranted but necessary in the interest of justice.
- H. Because Respondent Nos. 1 to 4 function under an integrated administrative and supervisory framework. Therefore, they are jointly and severally liable for the tragic incident resulting from failure to discharge their duties, and the Petitioner is entitled to compensation from all of them.
- I. Because the Hon'ble Supreme Court in *Municipal Corporation of Delhi v. Uphaar Tragedy Victims Association*



& Ors., (2011) 14 SCC 481, held that gross negligence on the part of municipal authorities in enforcing building and safety regulations amounts to a breach of fundamental rights of the victims. The Apex Court directed compensation to the victims' families and stated that when a statutory authority causes or contributes to an incident resulting in death, it cannot escape liability by citing bureaucratic procedures or lack of direct involvement.

- J. Because the Hon'ble Delhi High Court in *Munna Singh v. State of NCT of Delhi & Ors. [W.P. (Crl.) 1657/2024]*, dealt with a similar case where a child lost his life by falling into an open and unattended municipal drain in a residential locality. The Court observed:

"The existence of such dangerous and open civic infrastructure within residential or school areas, without fencing, boundary, signage, or regular maintenance, amounts to a serious violation of the Right to Life under Article 21 of the Constitution of India. The state and its agencies are under a constitutional obligation to prevent such avoidable fatalities."

26. That the Hon'ble Supreme Court and various High Courts have repeatedly held that when a public authority fails to perform its statutory and constitutional duties, especially in ensuring public safety, and such failure leads to loss of life, the concerned authority is liable under public law to pay compensation. Such liability arises not only under tort law but also under Article 21 of the Constitution, which guarantees the Right to Life.
27. The Hon'ble Court in that case awarded monetary compensation to the family and issued directions to the



concerned municipal authorities for periodic inspection and covering of all such public hazards.

28. In the present case, the minor son of the Petitioner, aged just 14 years and a student of Class IX, died by falling into an open and uncovered Naala located in Nangloi, Delhi. The Naala was neither barricaded nor fenced, nor were there any warning signs placed by the concerned departments. In addition, the Naala was filled with trash and polythene which camouflaged the water body and made it indistinguishable from the surroundings, as also recorded in the FIR. The fatal incident took place directly due to the lack of preventive measures and maintenance by the Respondents.
29. The act of omission and failure on the part of the Respondents No. 2 and 3, who are directly responsible for the maintenance, safety, and cleanliness of such public utilities, and who operate under Respondent No. 1 – Govt. of NCT of Delhi, reflects a clear and gross violation of their public duties. The entire sequence of negligence—including absence of fencing, accumulation of garbage, failure to install signage, and lack of periodic cleaning—collectively constitute a serious breach of public trust and statutory responsibility.
30. Therefore, in the light of the above authoritative judicial pronouncements and the facts of the present case, the Petitioner most respectfully submits that all Respondents are jointly and severally liable to pay compensation to the Petitioner. The unfortunate and avoidable death of his minor son was caused solely due to the gross negligence, inaction, and failure to perform public duties as imposed upon them by law.
31. That petitioner had not filed any petition or appeal before this



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Hon'ble court or any other court praying the same or like relief from the parties to the case.

PRAYER

In the view of facts and circumstances and submissions made above, it is kindly prayed to this Hon'ble Court may kindly be pleased to pass an appropriate order to allow:

- a. Issue a **writ of Mandamus or any other appropriate writ, order, or direction** thereby directing the Respondents to pay a compensation of **Rs. 50,00,000/- (Rupees Fifty Lakhs only)** to the Petitioner for the untimely and unfortunate death of his 14-year-old son due to the gross negligence, omission, and failure of public duty on the part of the Respondents, and/or;
- b. Issue appropriate writ, order, or direction directing the Respondents to conduct a time-bound inquiry into the incident and fix accountability on the concerned officers/officials responsible for the lapse, and/or;
- c. Direct the Respondents to immediately take remedial steps to cover all open Naalas/drains, install safety barricades, proper signage, and undertake periodic cleaning and maintenance to prevent recurrence of such tragic incidents, and/or;
- d. Any other relief which this Hon'ble Court deem fit, just and appropriate under the facts and circumstances of the case in favor of the petitioner or against the respondent in the interest of justice.

AND FOR THIS ACT OF KINDNESS, THE PETITIONER AS IN DUTY BOUND SHALL EVER PRAY.

Ranbir

**Petitioner
[RANBIR]**



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Through

A handwritten signature in blue ink, appearing to be 'Sud' with a large flourish.

LEXACTO & CO.**Advocate for Petitioner**

203, Kartik Plaza,

Nanda Enclave, Dwarka Sector-19

New Delhi-110075

Mob. No.: 8800696082; 9873130563

Tel No: 011-4705865

Email Id: lexactoandco@gmail.com

Place: Delhi

Date: 22.09.2025



IN THE HIGH COURT OF DELHI AT NEW DELHI.
W. P. (C) NO. 16379 /2025

IN THE MATTER OF:-

SH. RANBIR

...PETITIONER

VERSUS

STATE NCT OF DELHI & ORS.

...RESPONDENTS

AFFIDAVIT

I, Ranbir S/o Ran Singh, aged about 39 yrs R/o. H. No.111, Ward No. Dhani Dariyapur, Bhiwani, Haryana-127040, presently at Delhi, do hereby solemnly affirm and declare as under:-

1. That the deponent is the petitioner in the above-mentioned writ petition as such well conversant with the facts of the case and hence competent to swear this affidavit.
2. That the contents of the writ petition are true and correct to the best of knowledge and belief and have been drafted by my counsel on my instructions and the same has been read over to me in vernacular language.
3. That contents of the writ petition may be read as part and parcel of this affidavit and same are not being repeated herein for the sake of brevity.



Ranbir
DEPONENT

A
I identify the deponent who has signed in my presence

VERIFICATION:-

22 SEP 2025

Verified at Delhi on this day of September 2025 that the contents of the above affidavit are true and correct to my knowledge, no part of it is false and nothing material has been concealed therefrom.

22 SEP 2025

THAT THE DEPO.
Sd/- Smt. Kmt ...
S/o W/o D/o ...
Generated by Smt/Smt. Ankit Sloana
affirmed before me a
at St. No.
that the Contents of the affidavit which have
be read and explained to him are true and
net to his knowiwddg.

Ankit Sloana
DEPONENT

R
Oath Commissioner



6

□□□E□□RE P□

NEW SARASWATI PUBLIC SCHOOL
(RECOGNISED & AFFILIATED TO CB. S.E)
 TYAGI VIHAR, EXTN. -2, NANGLO, NEW DELHI-110041,
 Office-011-25949073, E-mail : Npschool@gmail.com

2024-25 VIKAS

	FATHER'S NAME: RANVIR
	CLASS / SEC. : VI-B
	D.O.B. : 27-01-2010
	ADMIN. : 4480
	CONTACT NO. : 9911320823
	ADDRESS : H.NO.-317,EXT.-2D,GALI NO.-

[Signature]
Principal Signature

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School ID : 1617160

PH.: 2594907:



New Saraswati Public School

(RECOGNISED & AFFILIATED TO C.B.S.E.) Affiliation No. : 2730514

Main Road, Nangloi Extn.2, Delhi-110041

E-mail : nspschool@gmail.com • Website : www.newsaraswatipublicschool.com

Ref. No. NSP/2025/

Dated: 17/04/2025

Character Certificate

It is certified that Name **VIKAS S/o RANBIR** was a student of class **6TH** in this school till **08/11/2024**. His moral character was very high. He was sincere well disciplined, well behaved, obedient, devoted, dutiful and a promising student. He took part in all academic as well as co-curricular activities eagerly. The school is missing him profoundly.

Sarash
Principal
NSPS

PRINCIPAL
New Saraswati Public School
Ext.-II, Nangloi, Delhi-110041

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Baba Mungipa Vidya Peeth Sr. Sec. School



18th Mile Stone from Tosham on TOSHAM-BEHAL highway.

V&PO: Bushan (Tosham) Bhiwani, Haryana (INDIA)

Phone: 081999-37501 (OIL)

Dated...19.03.2025

TO WHOM SO EVER IT MAY CONCERN

It is certified that VIKAS S/o Sh. RANBIR was a bonafied student of this school during session 2022-23 in class 5th. His personal particulars are appended below:-

Mother's Name - Smt MONIKA
 Date of Birth - 27-01-2010
 Admission no. - 2003
 Village - Dariyapur

Result of 5th Class

Sr. No	Subject	Marks Obtained	Maximum Marks
1	Hindi	60	100
2	English	58	100
3	Mathematics	61	100
4	E.V.S.	65	100
5	General Knowledge	72	100
6	Computer	73	100
TOTAL		389	600

Total Marks Obtained: 389
 Maximum Mark: 600

I wish for his bright future.

original.

Principal
 Baba Mungipa Vidya Peeth
 Senior Sec. School
 BUSHAN (Tosham) Bhiwani
 532024/42031
 19/03/2025
 T. Tosham



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BABA MUNGIPA VIDYA PEETH SR. SEC. SCHOOL

18th Mile Stone from Tosham on TOSHAM-BEHAL, highway,

V&PO: Bushan (Tosham) Bhiwani, Haryana (INDIA)

Phone : 08199-37501 (Off.)

Dated 19.03.2025

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6	Computer	73	100
Total		389	600

Total Marks Obtained: 389

Maximum Mark: 600

I wish for his bright future.

Sd/illegible
PRINCIPAL

-//TRUE AND TYPED COPY//-

413

□□□E□□RE□□

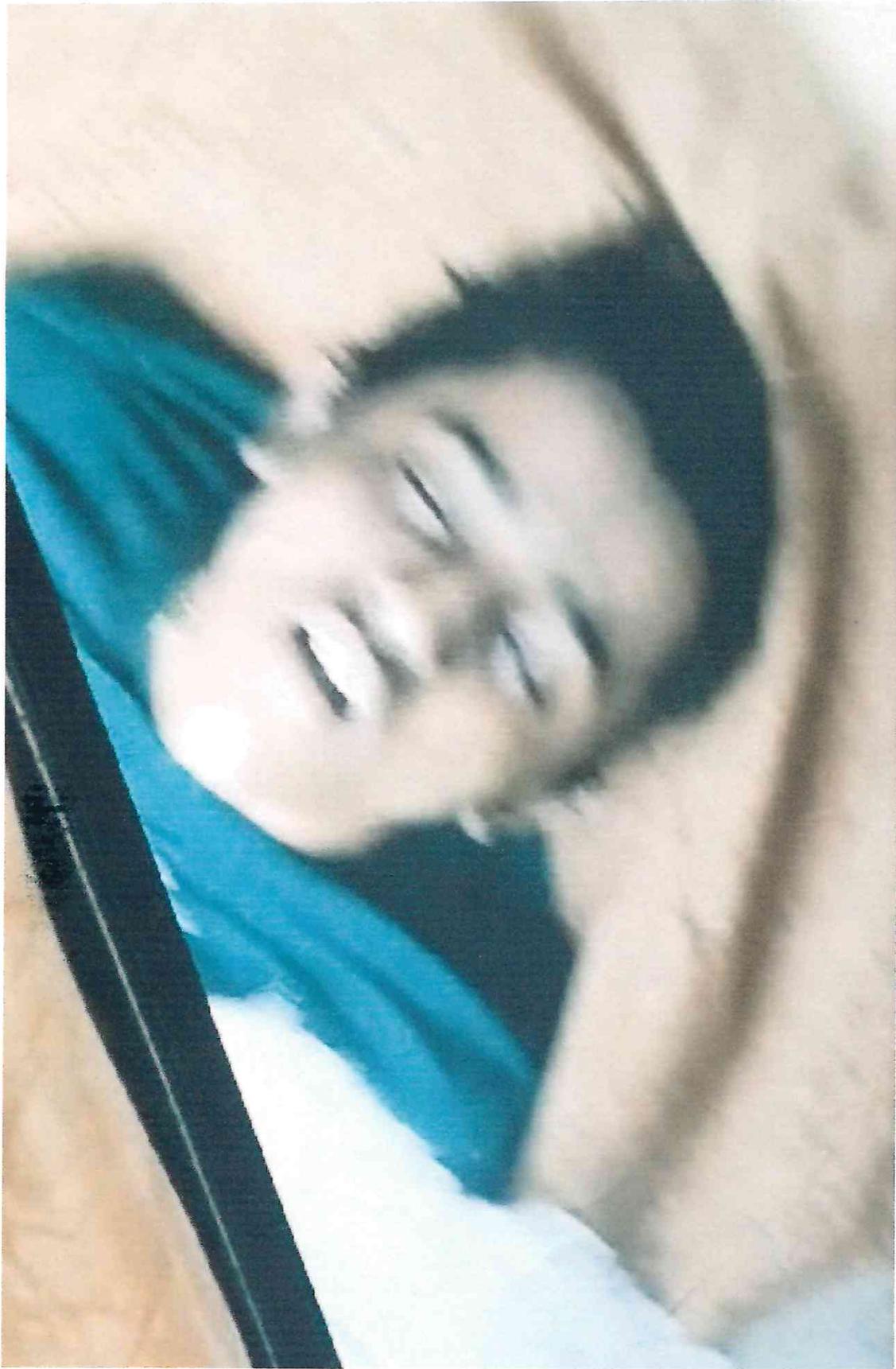






416

clear original photographs-



417



418





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E-REPORT



FIRST INFORMATION REPORT

(Under Section 173 B.N.S.S.)

(प्रथम सूचना रिपोर्ट)

(धारा 173 बी. एन. एस. के अन्तर्गत)

1. District (ज़िला): OUTER DISTRICT P.S.(थाना): NANGLOI Year(वर्ष): 2024 FIR No(प्र.सू.रि.सं.): 0768 Date : 09/11/2024

2. Act(s)(अधिनियम): Section(s)(धारा(एँ)):

- THE BHARATIYA NYAYA SANHITA (BNS), 2023 106(1)

3. Occurrence of Offence (अपराध की घटना):

(a) Day(दिन): FRIDAY Date From(दिनांक से): 08/11/2024 Date To(दिनांक तक): 08/11/2024

Time Period (समय अवधि): Time From (समय से): 15:43 hrs Time To (समय तक): 15:43 hrs

(b) Information received at P.S.(थाना जहाँ सूचना प्राप्त हुई): Date(दिनांक): 09/11/2024 Time (समय): 12:35 hrs

(c) General Diary Reference (रोजानामचा संदर्भ): Entry No.(प्रविष्टि सं.): 059A Date/Time(दिनांक/समय): 09/11/2024 13:23

4. Type of Information (सूचना का प्रकार): Written

5. Place of Occurrence (घटनास्थल):

(a) Direction and Distance from P.S (थाना से दूरी और दिशा): N/A , 1.5 Km(s)

Beat No(बीट सं.): 50

(b) Address(पता): GANDA NALA ,RAJENDRA PARK 5/6 NANGLOI

(c) In case, Outside the limit of the Police Station (यदि थाना सीमा के बाहर हैं):

Name of P.S(थाना का नाम):

District(ज़िला):

6. Complainant / Informant (शिकायतकर्ता/सूचनाकर्ता):

(a) Name(नाम): ANKIT SINGH

(b) Date/Year of Birth (जन्म तिथि /वर्ष): 15/02/1993

Nationality (राष्ट्रियता): INDIA

(c) Passport No.(पासपोर्ट सं.):

Date of Issue (जारी करने की तिथि):

Place of Issue (जारी करने का स्थान):

(d) Occupation (व्यवसाय): NOT KNOWN

(e) Address(पता): PS NANGLOI, NANGLOI, OUTER DISTRICT, DELHI, INDIA, 9911003164, ANKIT.
16190356@DELHIPOLICE.GOV.IN

7. Details of Known/Suspect/Unknown accused with full particulars(attach separate sheet if necessary)(जात/ संदिग्ध /अज्ञात अभियुक्त का का पुरे विवरण सहित वर्णन):

8. Reason for delay in reporting by the complainant/informant (शिकायतकर्ता / सूचनाकर्ता द्वारा रिपोर्ट देरी से दर्ज कराने के कारण):

NO DELAY

9. Particulars of the properties stolen/involved (attach separate sheet if necessary):

Sl.No. (क्र.सं.) Property Type(Description)

Est. Value(Rs.)(मूल्य (रु में))

10. Total value of property stolen (चोरी हुई सम्पत्ति का कुल मूल्य):

11. Inquest Report / U.D. Case No., if any (मृत्यु समीक्षा रिपोर्ट / यू.डी. प्रकरण न., यदि कोई हो):



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District : OUTER DISTRICT

P.S: NANGLOI

Year: 2024

FIR No: 0768

Date: 09/11/2024

12.F.I.R. Contents (attach separate sheet, if required)(प्रथम सूचना रिपोर्ट तथ्य):

GENERAL DIARY District : OUTER DISTRICT (DELHI) P.S./Section: NANGLOI GD No. : 0099A Date: 08/11/2024 Time: 15:43:55 Entry Made For : Rank / Name / PIS No. of Police Officer : HEAD CONSTABLE / NAVEEN KUMAR/ 28103460 GD Type(s) : PCR Call GD Subject: इतला आमद PCR Call Assigned to: SI (Sub-Inspector)/ANKIT SINGH/16190356 GD Brief : Ref. Event ID - 10170948, Incident Address: RAJENDRA PARK EXTENSION 5-6, Incident Description: CALLER BOL RHA HAI KI 3-4 FOOT KA BACCHA HAI JO 12 FOOT GEHRE NAALE MEIN GIR GYA HAI NIKAL NHI PAA RHE HAIN NEED HELP, Mobile No: 9718896193, 9718896193, From: CT MEENAKSHI, 10137/PCR, हस्व आमद इतला PCR CALL दर्ज COMPUTER करके SI ANKIT D-6496 साहब को BY PHONE बतलाया गया। जो मुनासिब कार्यवाही अमल मे लायेगे। BY SELF/DO NOTE: COMPUTER COPY Signature HEAD CONSTABLE / NAVEEN KUMAR/28103460 श्रीमान duty officer साहब थाना नांगलोई राजकीय कार्य हेतु निवेदन है कि दिनांक 08.11.2024 को मन SI day emergency duty पर तैनात था | जो दौराने day Emergency Duty PCR Call vide DD NO. 99A dated 08.11.2024 मन SI को मार्क की गयी जो PCR Call मिलने पर मन SI मय स्टाफ Ct. Manjeet No. 1746/OD जाय मौका गन्दा नाला , राजेंद्र पार्क 5/6, नांगलोई दिल्ली पहुंचा , जहाँ पर काफी भीड़ जामा थी | जो मौका पर दरियाफ्त पर पता चला की एक लड़का गन्दा नाला , राजेंद्र पार्क 5/6, नांगलोई दिल्ली में डूब गया है | मौका पर थाना नांगलोई के स्टाफ और Fire Brigade की गाड़ी को तलब किया गया | fire brigade की मदद से लड़के की body को गंदे नाले से निकला गया और मौके के crime team/Outer District द्वारा Inspection & Photographs कराये गए | दरियाफ्त पर deceased का नाम पता Vikas S/o Ranbir R/o H.NO. 388/2, 2C Block, Gali No. 18, Nangloi Extension, Delhi. Age-14 years पायी गयी | Deceased Vikas की body को Medical examination vide MLC No. 22816 के बाद Mortuary, Sanjay Gandhi Hospital, Mangolpuri में deposit करवाया गया | मौके पर कोई भी eye witness की खोज की गयी पर कोई eye witness नहीं पाया गया | जो मौके के निरिक्षण पर पाया गया कि गंदे नाले में कूड़ा कचरा से भरा पड़ा है और गंदे नाले के ऊपर polythene Float कर रही है , जिसकी वजह से गंदे नाले में पानी नहीं दिखाई पड़ रहा और गंदे नाले की गहराई नहीं पता चल रही | गन्दा नाला की तरफ आने वाली गलियाँ खुली हुई है, नाला ढंका नहीं है , नाले की boundary पर कोई fencing नहीं है | किसी भी प्रकार का कोई Precautionary sign board नाले के पास नहीं लगा हुआ है | जो Concerned Department द्वारा किसी भी प्रकार की कोई भी Precautionary Measures नहीं लिए गए है ताकि कोई व्यक्ति या जानवर गंदे नाले में ना गिर जाए ,It was a sheer negligence of highest nature which has resulted into the death of a 14 years old young boy . अगर यह लापरवाही नहीं होती तो Vikas की म्रत्यु की वारदात को avoid किया जा सकता था | जो तमाम हालात SHO Nangloi साहब को बतलाए गए व हालात Senior Officer से discuss किये गए | जो हालात से , PCR call से , मौका मुलाहिजा से , मुलाहिजा Dead body से अपराध U/s 106(1) BNS होना पाया गया | लिहाजा एक हिंदी/English लेख तैयार कर आपके सामने दर पेश है , मुकदमा register करके मुकदमा no से अवगत कराया जाए | मन SI investigation में व्यस्त हूँ |Date and Time of incident :- 08.11.2024 at around 3:43 PM Place of Incident :- गन्दा नाला , राजेंद्र पार्क 5/6, नांगलोई ,दिल्ली Date and Time of Producing Tehrir :- 09.11.2024 at 12:35 PM SD English SI Ankit Singh PS Nangloi Dt.09.11.2024 पुलिस कार्यवाही अज थाना एक हिन्दी लिखित लेख अनुसार SI Ankit Singh No D-6496 साहब के द्वारा मन HC/DO को एक दरपेश लेख मिला जो लेख मिलने पर मुकदमा नं० 768/2024 U/s 106(1) BNS दर्ज करके स्वम DO की देखरेख मे DUTY पर हाजिर CCTNS OPERATORसे CCTNS मे FEED करवाकर असली लेख के साथ COMPUTER COPY FIR को बाहुकम जनाब SHO साहब SI Ankit Singh No D-6496 साहब के हवाले की जा रही है । जो आगे की कार्यवाही अमल में लायेगी । नकल प्रतिलिपिया डाक के द्वारा वरिष्ठ उच्च अधिकारियो को भिजवाई जाएगी। SUBMITTED BY HC /DO



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District: OUTER DISTRICT

P.S: NANGLOI

Year: 2024

FIR No: 0768

Date: 09/11/2024

13. Action Taken Since the above information reveals commission of offence(s) u/s as mentioned at Item No. 2:

(की गयी कार्यवाही: चूंकि उपरोक्त जानकारी से पता चलता है कि किया गया अपराध मद सं.2.में उल्लेख धारा के तहत है):

(i) Registered the case and took up the investigation:

OR (या)

(प्रकरण दर्ज किया गया और जांच के लिए लिया गया):

(ii) Directed (Name of the I.O.)(जांच अधिकारी का नाम): ANKIT SINGH

Rank (पद):

SI (SUB-INSPECTOR)

No(सं.): 16190356

to take up the investigation (को जांच आपने पास में लेने के लिए निर्देश दिया गया) OR(या)

(iii) Refused investigation due to(जांच के लिए):

OR (के कारण इंकार किया या)

(iv) Transferred to P.S(name)(थाना):

District(ज़िला):

on point of jurisdiction (को क्षेत्राधिकार के कारण हस्तांतरित)

F.I.R read over to the complainant/informant, admitted to be correctly recorded and a copy given to the complainant/informant, free of cost : (शिकायतकर्ता / सूचनाकर्ता को प्राथमिकी पढ़ कर सुनाई गयी, सही दर्ज हुई माना और एक कॉपी निशुल्क शिकायतकर्ता को दी गयी) :

R.O.A.C.(आर.ओ.ए.सी.):

14. Signature / Thumb Impression of the Complainant / Informant:

(शिकायतकर्ता / सूचनाकर्ता के हस्ताक्षर / अंगूठे का निशान):

Signature of Officer

Name(नाम): MONU

Rank (पद): HC (HEAD CONSTABLE)

No.(सं.): 28104278

15. Date and Time of despatch to the court:

(अदालत में प्रेषण की दिनांक और समय):



9

FIRST INFORMATION REPORT

(Under Section 154 Cr.P.C.)

1. District OUTER DISTRICT DELHI P.S. Nangloi Year: 2024

FIR No.0768

Date 09.11.2024

2. Act(s) Section

(i) THE BHARATIYA NYAYA SANHITA (BNS), 2023

106(1)

3 (a) Occurrence of offence: Unknown date and time:

Day: Friday Date from : 08.11.2024 Date to: 08.11.2024

Time Period Time From: 15:43 hrs Time to: 15:43 hrs

(b) Information received at P.S. Date: 09.11.2024 Time 12.35 hrs.

(c) General Diary Reference: Entry No: 059A Date/Time
09.11.2024 13:23 hrs.

4. Type of Information : Written

5. Place of Occurrence:

(a) Direction and distance from P.S.: N/A, 1.5km(s) Beat No. NA

(b) Address: Ganda Nala, Rajendra Park 5/6 Nangoli

(c) In case, outside the limit of this Police Station:

423



Name of P.S. :

District :

6. Complainant /Informant

(a) Name: SI Ankit Singh, PIS No. 16190356, Beat No. D/6496

(b) Date/ Year of birth: Nationality: INDIA

(c)Passport No.- Date of issue.- Place of Issue-

(d) Occupation : Not Known

(e) Address: PS Nangoli, Nangoli, Outer District, Delhi, India,
9911003164, Ankit. 16190356@ DelhiPolice.Gov.in7. Details of known/suspected/unknown accused with full
particulars (Attach separate, sheet if necessary):

8. Reasons for delay in reporting by the complainant/informant:

NO DELAY

9. Particulars of properties stolen (Attach separate sheet, if
necessary) :

<u>Sl.No.</u>	<u>Property Type(Description)</u>	<u>Est.Value(Rs)</u>	<u>Status</u>
---------------	-----------------------------------	----------------------	---------------

10. Total value of property stolen :

11. Inquest Report/U.D. Case No., if any :

12. F.I.R. contents (Attach separate sheet, if required):



GENERAL DIARY DISTRICT: OUTER DISTRICT (DELHI)
P.S./Section: NANGLOI GD No.: 0099A Date: 08/11/2024 Time:
15:33:05 Entry Made for: Rank / Name / PIS No. of Police Officer:
HEAD CONSTABLE / NAVEEN KUMAR / 28103460 GD
Type(s): PCR Call GD Subject: HEAD HMCR Cal Assigned to:
SI (Sub-Inspector)/ANKIT SINGH/19199356 GD Brief: Ref.
Event ID - 10170948, Incident Address: RAJENDRA PARK
EXTENSION 5-6, Incident Description: CALLER BOL RHA
HAI KI 3-4 FOOT KA BACCHA HAI JO 12 FOOT GEHRE
NAALE MEIN GIR GYA HAI NIKAL NHI PAA RHE HAIN
NEED HELP, Mobile: 9718896193, 9718896194, From: CT
MEENAKSHI, 10137/PCR, Senior Duty Officer Nangloi Police
Station has received the request for DD No. 99A on 08.11.2024
regarding SI manning duty for the day. The DD was sent to SI
Manjeet, 1746/OD, Jaat Mohalla Nangloi, Rajendra Park 5/6,
Nangloi Delhi for necessary action. The information was received
that a child had fallen into a drain near Jaat Mohalla Nangloi,
Rajendra Park 5/6, Nangloi, Delhi. A police team from PS Nangloi
and a crime team/Outer District Dra Inspection & Photographs
arrived at the spot. The deceased was identified as Vikas S/o
Ranbir R/o H.No. 388/2, 2C Block, Gali No. 18, Nangloi
Extension, Delhi, aged 14 years, male. The deceased Vikas's body
was examined by Medical Examination Vide MLC No. 22816 at
Mortuary, Sanjay Gandhi Hospital. The body was deposited at the
mortuary. The family members of the deceased did not want a
post-mortem. The family members did not want any legal action.
The body was handed over to the family members without post-
mortem. The drain does not have a boundary. The drain is not deep
enough to be considered a dangerous area. This incident could be
due to precautionary measures not being taken. It seems to be a



case of negligence of a highly precautionary nature which has resulted in the death of a 14-year-old young boy. The boy fell into the drain while playing. The family members do not want any action. SHO Nangloi has been informed. PCR call has been made. The deceased's body is kept in U/S 106(1) BNS. Further action will be taken after receiving the report. The post-mortem report has not yet come. SI investigation is ongoing. Date and time of incident: 08.11.2024 at around 3:43 PM Place of Incident: - Ganda Nala - Rajendra Park 5/6, Nangloi, Delhi. Date and time of Producing Tehrir: - 09.11.2024 at 12:35 PM. SD English SI Ankit Singh PS Nangloi Dt.09.11.2024 Police officials have written this. SI Ankit Singh No D-6496 has been assigned to do the work. The work has been done by me. The information has been sent to the COMPUTER COPY FIR through the SHO. SI Ankit Singh No D-6496 has been ordered to do the work. The work has been done by me. Further action will be taken as per rules. SUBMITTED BY HC/DO*

13. Action Taken (Since the above information reveals commission of offence(s) u/s as mentioned at item No.2:

(i) Registered the case and took up the investigation

OR

(ii) Directed (Name of the I.O.): Ankit Singh Rank: S.I.
No. 16190356 to take up the investigation,

OR

(iii) Refused investigation due to

OR

426



(iv) Transferred to P.S. (name):

OR

on point of jurisdiction.

District

FIR. Read over to the complainant/informant, admitted to be correctly recorded and a copy given to the complainant/informant, free of cost:

R.O.A.C.

14.

Signature/Thumb impression

Signature of

Officer

of the complainant/informant:

Name: MONU

Rank: HC (Head
Constable)

PIS.No.28104278

15. Date and Time of dispatch to the court:

-//TRUE AND TYPED TRANSLATION COPY//-

427

□□□E□□RE□□

1245/24



DEPARTMENT OF FORENSIC MEDICINE & TOXICOLOGY
SANJAY GANDHI MEMORIAL HOSPITAL
MANGOLPURI, NEW DELHI – 110083

Post-Mortem Report No. 1245/24 Dated: 09/11/2024 Time: 11:15 AM
Conducted By - Dr. Chander Prakash Meena
Name: Vikas s/o Ranbir Age: 14 years Sex: Male
R.O. No. 3882, 2C-Block, Gali No. 18, Nangol Extn, Delhi
INVESTIGATING OFFICER: SI Ajay D-3560
175 Nangol, New Delhi

IDENTIFIED BY:

1. Ranbir (Son)
2. Jangvir (Nephew)

BRIEF HISTORY AS PER I/O: As per DD No. 99A Dated 8/11/24. Alleged history of found body in Ganda Nala on 08/11/2024 at around 03:45 PM and He was brought to Sanjay Gandhi Memorial Hospital, Mangolpuri, where he was declared as brought dead at 6:00 PM on 08/11/2024 vide MLC No. 22816/24. Body was shifted to the mortuary for medico legal examination.

EXTERNAL GENERAL APPEARANCE:

Clothes: green colored lower, green colored t-shirt, blue black colored underwear. Others: black color of scared thread in neck.

Face: Average. Eyes: Closed. Cornea: Hazy. Conjunctiva: congested. Mouth: Closed. Both Pupils: Intact. Other natural orifices: NAD. Mud particles and dung like material was present all over the body.

POST MORTEM CHANGES:

Hypostasis: Present on the back of body except on contact flattening areas. Fixed Rigor: Moris well developed, felt in all major joint of the body.
Post Mortem Changes: Nil.

EXTERNAL EXAMINATION (Injuries etc.): NilINTERNAL EXAMINATION:Neck Structures:

No injury seen to any muscles, cartilages and hyoid bone. Trachea: Some blackish color mud particles were also present in lower half tracheal lumen. Mucosa was congested.

Chest:

- Axillar Bone: Sternum: Ribs: NAD.
- Pleural Cavity: NAD.
- Lung: Right: Left: Grossly edematous, congested. Left lung weighed 407 grams and right lung weighed 463 grams. Fine, pink, foamy frothy material seen on cut sections. Petechial hemorrhages were present on lung surfaces. Both lungs floated well in bucket full of water test.
- Heart: Petechial hemorrhages were present on heart surface.

Abdomen:

- Peritoneum, Peritoneal Cavity: NAD.
- Stomach: empty. Small intestine: 12 without digested food particles present.
- Spleen: 12 grams, 12 cm.

*legible
original
and true typed
copy*

428



1245-24

- * Intestines: NAD.
- * Liver: Congested.
- * Spleen: weight 90 gram, Congested.
- * Kidneys: weight Right 130 gram / left 140 gram, Congested.

Pelvis:

- * Pelvic cavity: NAD.
- * Pelvic bones: NAD.
- * Bladder: NAD.
- * Genitals: NAD.

Spinal Column: NAD.Head:

- * Scalp: NAD.
- * Skull: NAD.
- * Brain: Congested.

TIME SINCE DEATH: about 20-24 hours (as per the inquest papers)OPINION:

Cause of death is asphyxia as a result of ante mortem drowning.
However subsequent opinion will be given after receiving viscera chemical analysis and diatom test report.

Chander Prakash Meena
Dr. Chander Prakash Meena
Senior Medical Officer
SGM Hospital, Mangolpuri

NOTE: P.M. Report in Original along with dead body and the following:

1. 10 Inquest papers
2. Sealed Viscera (preserved in saturated solution of common salt) & blood sample) - Yes
3. Sterna bone for Diatom test.
4. Sample seal of Department -- Yes

Handed over to the IO.



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**DEPARTMENT OF FORENSIC MEDICINE &
TOXICOLOGY SANJAY GANDHI MEMORIAL
HOSPITAL.**

MANGOLPURI, NEW DELHI- 110083

Post-Mortem Report No. 1245/24 Dated: 09.11.2024 Time:
11:15 am

Conducted by: Dr. Chander Prakash Meena

Name: Vikas S/o Ranbir Age: 14 years
Sex: Male

R/o H. No. 388/2, 2C- Block, Gali No. 18, Nangloi Extn. Delhi.

INVESTIGATING OFFICER: SI Ajay D-3560

IDENTIFIED BY:

1. Ranbir (Son)
2. Jangvir (Nephew)

BRIEF HISTORY AS PER I/O: As per DD No. 99A Dated 8/11/24. Alleged history of found drowned in Ganda Nala on 08.11.2024 at around 03:45 PM and He was brought to Sanjay Memorial Hospital. Mangol Pari where he was declared as brought dead at 6:00 PM on 08 11 2024 vide MLC No. 2281624 Body was shifted to the mortuary for medico legal examination.

EXTERNAL GENERAL APPEARANCE:

Clothes: green colored lower, green colored t-shirt, blue black colored underwear. Others, black Colored scared thread in neck.

Average Eyes: Closed Cornea Hars. Conjunctiva congested. Mouth: Closed. Both nenums intact. Other natural orificest. NAD Mud particles and dung like material was present all over the body.

POST-MORTEM CHANGES:

Hypostasis Present on the back of body except on contact flattening areas. Fixed Rigor Mortise well developed, felt in all major joint of the body.



Decomposition Changes, Nil.

EXTERNAL EXAMINATION (Injuries etc): Nil.

INTERNAL EXAMINATION:

Neck Structures:

No injury seen to any muscles, cartilages and hyoid bone. Trachea: Some blackish color mud particles were also present in lower half tracheal lumen Mucosa was congested.

Chest

- Collar Bone Sternum Ribs: NAD
- Pleural Cavity: NAD
- Lung Right Left: Grossly edematous and enlarged left lung weighed 107 grams and right lung weighed 463 grams Fine, pink, lathery froth was oozing out on cut sections. Petechial hemorrhages were present on lung surfaces. Both lungs floated well in bucket full of water test.
- Heart: Petechial hemorrhages were present on heart surface.

Abdomen

- Peritoneum. Peritoneal Cavity: NAD
- Stomach about 500ml of dirty greenish fluid with semi digested food particles present.
- Walls greenish grey mud particles attached mucosa.
- Intestines: NAD
- Liver Congested
- Spleen weight 90 gram. Congested
- Kidneys weight Right 130 gram / left 140 gram, Congested.

Pelvis:

- Pelvic cavity: NAD
- Pelvic Bones: NAD
- Bladder NAD
- Genitals NAD

Spinal Column: NAD

- **Head:**

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- Scalp: NAD
- Skull NAD
- Brain Congested.

TIME SINCE DEATH: about 20-21 hours (as per the interest papers)

OPINION:

Cause of death is asphyxia as a result of ante mortem drowning

However subsequent opinion will be given after receiving viscera chemical analysis and diatom

test report.

Sd/illegible

Dr. Chander Prakash Meena
Senior Medical Officer
SGM Hospital. Mangolpuri

NOTE: P.M. Report in Original along with dead body the following:

1. 10 inquest papers.
2. Sealed Viscera (preserved in saturated solution of common salt) & blood sample) – Yes.
3. Sternal bone for Diatom test
4. Sample seal of Department--Yes

Handed over to the IO

--//TRUE AND TYPED COPY//--



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SAKSHI & ASSOCIATES

 ADVOCATES & SOLICITORS EREP6

High Court of Delhi

Chamber No. 615, Lawyer Chamber Rohini Court, Delhi

Mob. No. 9818712068



Speed post

Ref. no.019/LN/2025

Dated: 17.01.2025

To,

1. GOVERNMENT OF NCT OF DELHI

Through Chief Secretary

Address:

 3rd Level, Delhi Secretariat, IP Estate

New Delhi-110002.

2. IRRIGATION AND FLOOD control DEPARTMENT

Through its secretary

Address:

L. M. Bund Office Complex, Shastri Nagar,

New Delhi-110031

3. PUBLIC WORKS DEPARTMENT

Through Principal secretary

Address:

Vikas marg, ITO, Balmiki Basti,

IP Estate, New Delhi-110002

4. MUNICIPAL CORPORATION OF DELHI

Through Commissioner

Address:

Dr. S. P. Mukherjee Civic Center,

Minto Road, New Delhi-110002

**SUBJECT: COMPENSATION FOR THE DEATH CAUSED BY SHEER
NEGLIGENCE OF THE HIGHEST NATURE BY THE ADDRESSEES**

Dear Sir /Madam,

On behalf of and from Sh. Ranbir S/o. , R/o. H. No.111, Dhani Dariyapur, Bhiwani, Haryana-127040, (Hereinafter referred as My Client)Father of Late Mst. Vikas, I hereby serve you this notice under following terms:

1. That addressee no.2 is government department responsible for maintaining the *Naala* (Canal) in all over Delhi and also to assure that no harm or no mishappening take place



SAKSHI & ASSOCIATES
ADVOCATES & SOLICITORS
 High Court of Delhi
 Chamber No. 615, Lawyer Chamber Rohini Court, Delhi
 Mob. No. 9818712068

related to general public.

2. That addressee no.3 is government department responsible for public construction work in Delhi.
3. That the addressee no.4 is government department responsible for the cleanliness of Delhi as well as of public safety.
4. That all the authorities i.e. addressee no.2, 3 and 4 come under addressee no.1 i.e. Govt. of NCT of Delhi.
5. That on 09/11/2024 at about 3:45 PM, my client's son namely Vikas (hereinafter referred as "deceased"), who was fourteen years old, fell into an open/unboundried/uncovered canal (GANDA NALA) situated in Nangloi, Delhi.
6. That the *naala* was fully covered with the debris and trash which made it impossible to distinguish whether there is any Naala beneath the debris or not. It is further mention that the addressee no.2 which is responsible for cleaning the *Naala*, had not cleaned and clear the same since a long time.
7. That it is submitted that there was no fencing, wall or any kind safety measure present at the site of *Naala*. It is pertinent to mention here that addressee no.2 and 3 are responsible to taking adequate measures and to assure that no general people could reach to the sites of *Naala* as same could endanger their life but unfortunately, addressee no.2 and 3 failed to perform their duties by not installing or putting any such fencing or wall and remained negligent through the period.
8. That it is also submitted that there was not proper arrangement of bins near and all along the *Naala* due to which people were compelled to through all their garbage and trash into the *Naala* which was also a major reason behind the unfortunate demise of son of my client.
9. That it is due to the sheer negligence of the addresses, deceased fell into the canal and died due to suffocation. An FIR bearing 768/2024 was registered and is hereby annexed as Annexure No.1.
10. That with the help of police and fire brigade official, the body of deceased was recovered after following the operation and was taken to the Sanjay Gandhi Hospital,



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SAKSHI & ASSOCIATES

ADVOCATES & SOLICITORS

High Court of Delhi

Chamber No. 615, Lawyer Chamber Rohini Court, Delhi

Mob. No. 9818712068



Mangolpuri, following which the MLC was conducted in the said hospital.

11. That further, during investigation, the police officials also found that no precautionary measures were taken by the concerned addresses and due to the sheer negligence of the addresses, the 14 year old deceased fell into the canal and died. The same is also stated in the FIR.
12. That it was evident that the canal was opened, uncovered and was without boundary, which shows the sheer negligence and omission on the part of the addressee no.2, 3 and 4 comes under the addressee no.1. And as addressee no.2 3 and 4 comes under the addressee no.1, all the addressees are collectively responsible for the unfortunate demise of son of my client and liable to compensation to my client for the same.

I hereby call upon you all the addressees to pay compensation of **Rs.20,00,000/- (Rs. Twenty Lakh only)** to my client for the tragic loss he has suffered in form of death of his **only** son due to sheer negligence and omission on part of the you all the addressees.

My client reserves his right to file appropriate civil/criminal proceedings against you in case you don't pay the compensation and, in that event, you alone shall be liable for all the consequences and legal fees which may be incurred by my client. The copy of the above said notice is kept in office for future references.

SAKSHI
(Advocate)



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SAKSHI & ASSOCIATES

ADVOCATES & SOLICITORS

High Court of Delhi

Chamber No. 615, Lawyer Chamber Rohini Court, Delhi

Mob. No. 9818712068



Speed post

Ref. no.035/LN/2025

Dated: 24.02.2025

To,

1. GOVERNMENT OF NCT OF DELHI

Through Chief Secretary

Address:

3rd Level, Delhi Secretariat, IP Estate

New Delhi-110002.

2. IRRIGATION AND FLOOD control DEPARTMENT

Through its secretary

Address:

L. M. Bund Office Complex, Shastri Nagar,

New Delhi-110031

3. PUBLIC WORKS DEPARTMENT

Through Principal secretary

Address:

Vikas marg, ITO, Balmiki Basti,

IP Estate, New Delhi-110002

4. MUNICIPAL CORPORATION OF DELHI

Through Commissioner

Address:

Dr. S. P. Mukherjee Civic Center,

Minto Road, New Delhi-110002

SUBJECT: REPRESENTATION QUA LEGAL NOTICE DATED 17/01/2025 HAVING REFERENCE NUMBER REF. NO. 019/LN/2025 HAVING SUBJECT "COMPENSATION FOR THE DEATH CAUSED BY SHEER NEGLIGENCE OF THE HIGHEST NATURE BY THE ADDRESSEES"

Dear Sir /Madam,

On behalf of and from Sh. Ranbir S/o. , R/o. H. No.111, Dhani Dariyapur, Bhiwani,



SAKSHI & ASSOCIATES
ADVOCATES & SOLICITORS
High Court of Delhi
Chamber No. 615, Lawyer Chamber Rohini Court, Delhi
Mob. No. 9818712068

Haryana-127040, (Hereinafter referred as My Client) Father of Late Mst. Vikas, I hereby serve you with this representation cum notice under following terms:

1. That my client served you all the addressees with legal notice dated 17/01/2025 Ref. No.19/LN/2025 in which my client called upon you all the addressees to pay compensation of **Rs.20,00,000/- (Rs. Twenty Lakh only)** to my client for the tragic loss he has suffered in form of death of his only son due to sheer negligence and omission on part of the you all the addressees.
2. That now it is apparent that the notice sent by my client had not been paid any attention by you the addressees as till date, my client had not received any response from you the all addresses.
3. That in legal notice (*supra*), my client made it clear how you all the addresses are responsible for the sad demise of the only son of my client but despite the fact, You the addressees had chosen to remain silent which further strengthen the point that the son of my client has lost his life due to gross negligence and omission on your part.
4. That as my client has not received any response from you the addressees, my client is of the view that he reserves right to have knowledge about the actions taken by you with regarding the legal notice (*supra*) sent by him.

Therefore, I hereby serve upon you this representation requesting you the all addresses to inform my client about all the actions you have taken so far upon the legal notice dated 17/01/2025 Ref. No.19/LN/2025 and pay compensation as demanded by my client in said notice.

As already mentioned by my client in previous notice dated 17/01/2025 Ref. No.19/LN/2025, my client reserves right to file appropriate civil/criminal proceedings against you in case you don't pay the compensation and, in that event, you alone shall be liable for all the consequences and legal fees which may be incurred by my client. The copy of the above said notice is kept in office for future references.

SAKSHI
(Advocate)



ED92128785IN IVR:696877
 SP ROHINI COURTS SO <110002
 Counter No:3,05/02/2025,13
 To:PUBLIC WORK D,I P ESTATE
 PIN:110002, Indraprastha HD
 From:SMGHI,CH NO 615 RC
 Wt:50gms
 Amt:17.78,Tax:2.78,Ant.Paid:18.00(Cash)
 <Track on www.indiapost.gov.in>
 (Dial 18002666888)-(Wear mask -Stay safe)

ED92128784IN IVR:696877
 SP ROHINI COURTS SO <110002
 Counter No:3,05/02/2025,13
 To:GOV NCT DELHI, I P ESTATE
 PIN:110002, Indraprastha HD
 From:SMGHI,CH NO 615 RC
 Wt:50gms
 Amt:17.78,Tax:2.78,Ant.Paid:18.00(Cash)
 <Track on www.indiapost.gov.in>
 (Dial 18002666888)-(Wear mask -Stay safe)

ED92128783IN IVR:696877
 SP ROHINI COURTS SO <110002
 Counter No:3,05/02/2025,13
 To:IRRIGATION AN,SHASTRI NAGAR
 PIN:110021, Sanzhi Nagar SO East Delhi
 From:SMGHI,CH NO 615 RC
 Wt:50gms
 Amt:17.78,Tax:2.78,Ant.Paid:18.00(Cash)
 <Track on www.indiapost.gov.in>
 (Dial 18002666888)-(Wear mask -Stay safe)

ED92128782IN IVR:696877
 SP ROHINI COURTS SO <110002
 Counter No:3,05/02/2025,13
 To:MCD COMMISSIONER,DIVIC CENTER
 PIN:110002, Indraprastha HD
 From:SMGHI,CH NO 615 RC
 Wt:50gms
 Amt:17.78,Tax:2.78,Ant.Paid:18.00(Cash)
 <Track on www.indiapost.gov.in>
 (Dial 18002666888)-(Wear mask -Stay safe)

भारतीय डाक
 ED738006395IN IVR:6946
 SP ROHINI COURTS SO
 Counter No:3,18/01/2025,11:20 AM
 To:PUBLIC WORKS , I P ESTATE
 PIN:110002, Indraprastha HD
 From:SAKSHI,CH NO 415 RD
 Wt:50gms
 Amt:17.70,Tax:2.70,Amt.Paid:18.00(Cash)
 <Track on www.indiapost.gov.in>
 <Dial 18002666868> <Wear Masks, Stay Safe>

भारतीय डाक
 ED738006404IN IVR:6946
 SP ROHINI COURTS SO
 Counter No:3,18/01/2025,11:20 AM
 To:MCD COMMISSIONER,CIVIC CENTER
 PIN:110002, Indraprastha HD
 From:SAKSHI,CH NO 415 RD
 Wt:50gms
 Amt:17.70,Tax:2.70,Amt.Paid:18.00(Cash)
 <Track on www.indiapost.gov.in>
 <Dial 18002666868> <Wear Masks, Stay Safe>

भारतीय डाक
 ED738006382IN IVR:6946
 SP ROHINI COURTS SO
 Counter No:3,18/01/2025,11:20 AM
 To:IRRIGATION AN,BHASTRI NAGAR
 PIN:110031, Bandhi Nager SO East Delhi
 From:SAKSHI,CH NO 415 RD
 Wt:50gms
 Amt:17.70,Tax:2.70,Amt.Paid:18.00(Cash)
 <Track on www.indiapost.gov.in>
 <Dial 18002666868> <Wear Masks, Stay Safe>

भारतीय डाक
 ED738006293IN IVR:6946
 SP ROHINI COURTS SO
 Counter No:3,18/01/2025,11:20 AM
 To:SDM OF DELHI , I P ESTATE
 PIN:110002, Indraprastha HD
 From:SAKSHI,CH NO 415 RD
 Wt:50gms
 Amt:17.70,Tax:2.70,Amt.Paid:18.00(Cash)
 <Track on www.indiapost.gov.in>
 <Dial 18002666868> <Wear Masks, Stay Safe>





440



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हिन्दी

भारतीय डाक
डाक सेवा-जन सेवा
India Post
Dak Seva-Jan Seva

G20
भारत 2023

75
Azadi Ka
Amrit Mahotsav

सत्यमेव जयते

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Tools

Track Consignment

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* Indicates a required field.

* Consignment Number

[Track More](#)

Booked At:	Rohini Courts SO
Booked On:	18/01/2025 11:27:34
Destination Pincode:	110002
Tariff:	17.70
Article Type:	Inland Speed Post
Delivery Location:	Indraprastha HO
Delivery Confirmed On:	20/01/2025 18:31:03

Event Details For : ED738006395IN

Current Status : Item Delivered(Addressee)

Date:	20/01/2025
Time:	18:31:03
Office:	Indraprastha HO
Event:	Item Delivered(Addressee)
Date:	20/01/2025
Time:	11:33:58
Office:	Indraprastha HO
Event:	Out for Delivery



441



11:47 0.01 KB/s 86

Track Consignment
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India Post
Dak Seva Jan Seva

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* Consignment Number

ED738006404IN [Track More](#)

Booked At:	Rohini Courts SO
Booked On:	18/01/2025 11:27:34
Destination Pincode:	110002
Tariff:	17.70
Article Type:	Inland Speed Post
Delivery Location:	Indraprastha HO
Delivery Confirmed On:	20/01/2025 17:59:12

Event Details For : ED738006404IN
Current Status : Item Delivered(Addressee)

Date:	20/01/2025
Time:	17:59:12
Office:	Indraprastha HO
Event:	Item Delivered(Addressee)
Date:	20/01/2025
Time:	11:29:01
Office:	Indraprastha HO
Event:	Out for Delivery



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India Post
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* Consignment Number

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Booked At:	Rohini Courts SO
Booked On:	18/01/2025 11:27:34
Destination Pincode:	110031
Tariff:	17.70
Article Type:	Inland Speed Post
Delivery Location:	Gandhi Nagar SO East Delhi
Delivery Confirmed On:	20/01/2025 17:08:26

Event Details For : ED738006302IN

Current Status : Item Delivered(Addressee)

Date:	20/01/2025
Time:	17:08:26
Office:	Gandhi Nagar SO East Delhi
Event:	Item Delivered(Addressee)
Date:	20/01/2025
Time:	11:02:06
Office:	Gandhi Nagar SO East Delhi
Event:	Out for Delivery



443



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* Consignment Number

ED738006293IN Track More

Booked At:	Rohini Courts SO
Booked On:	18/01/2025 11:27:34
Destination Pincode:	110002
Tariff:	17.70
Article Type:	Inland Speed Post
Delivery Location:	Indraprastha HO
Delivery Confirmed On:	20/01/2025 18:17:34

Event Details For : ED738006293IN

Current Status : Item Delivered(Addressee)

Date:	20/01/2025
Time:	18:17:34
Office:	Indraprastha HO
Event:	Item Delivered(Addressee)

Date:	20/01/2025
Time:	12:38:31
Office:	Indraprastha HO



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← | JM-KOTAKB-S



9/7/2025 Wed 17:34

Rs. [500000](#) credited to your Kotak Bank a/c XX8850 via RTGS from beneficiary PAO XX GNCT NEW DELHI. UTR Ref. SBINR52025 070911617792



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445



IN THE HIGH COURT OF DELHI AT NEW DELHI

67140

CMPP OO OF

I

W.P.(C)/16379 /2025

IN THE MATTER OF:

RANBIR

...PETITIONER

Versus

STATE NCT OF DELHI & ORS

...RESPONDENT

**APPLICATION FOR EXEMPTION MANDATORY
NOTICE UNDER SECTION 80 READ WITH SECTION
151 OF THE CIVIL PROCEDURE CODE.**

MOST RESPECTFULLY SHOWETH THAT:

1. That the present application is filled by the Petitioner in the present Writ Petition. The present petition is pending before the Hon'ble court for acceptance and issuance of notice to the respondents.
2. That facts of the writ petition are not repeated here for the sake of brevity of matter and hence applicant request the Hon'ble court to read the petition along with present application.
3. The applicant understands the significance and importance of complying with Section 80 of the Civil Procedure Code, which requires a mandatory notice period before filing a suit against the government or public officer. However, due to the exceptional circumstances surrounding the matter at hand, the applicant along kindly requests an exemption from the said provision.
4. The urgency of the matter arises the Petitioner's son suffered a tragic and untimely death due to gross negligence on the part of the Respondents. Delay in granting relief caused by issuance of notice under Section 80 CPC would result in



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undue hardship, prolong the trauma of the grieving family, and defeat the very purpose of justice.

5. The Petitioner had already sent multiple detailed representations dated 18.01.2025 and 28.02.2025 to the Respondents demanding compensation and remedial action. Despite lapse of considerable time, the Respondents have failed to acknowledge or respond to the same, demonstrating that serving formal notice would be a futile exercise.
6. The relief sought is not only for the Petitioner's individual grievance but also in the larger public interest, to ensure that open drains/Naalas are covered, fenced, and maintained, preventing recurrence of such avoidable tragedies. Delay in issuance of directions will continue to expose the public to similar hazards.
7. The applicant assures the Hon'ble court that this application is made in good faith and with due regard for the legal processes. The applicant is fully aware of the importance of complying with the procedural requirements, but the circumstances demand an immediate resolution to prevent further harm or injustice. Considering the above, applicants humbly request the honorable court to consider and grant an exemption from the mandatory notice period as prescribed by Section 80 of the Civil Procedure Code in the interest of justice and fairness.

PRAYER

In the light of the present facts and circumstances the applicant humbly prays before the Hon'ble court:

- a) To allow the present application by exempting applicant from complying with the mandatory notice period as prescribed by Section 80 of the Civil Procedure Code and grant an



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exemption, and/or;

- b) To pass any or further order this Hon'ble court may deem fit and proper in interest of Justice.

Ranbir

**PETITIONER
[RANBIR]**

Through

**LEXACTO & CO.
Advocate for Petitioner**

203, Kartik Plaza,
Nanda Enclave, Dwarka Sector-19
New Delhi-110075
Mob. No.: 8800696082; 9873130563
Tel No: 011-4705865
Email Id: lexactoandco@gmail.com

Place: Delhi
Date: 22.09.2025



IN THE HIGH COURT OF DELHI AT NEW DELHI.
 C.M. APPL. NO. _____ OF 2025
 IN
 W. P. (C) NO. _____ /2025

IN THE MATTER OF:-

SH. RANBIR ...PETITIONER

VERSUS

STATE NCT OF DELHI & ORS. ...RESPONDENTS

AFFIDAVIT

I, Ranbir S/o Ran Singh, aged about 39 yrs R/o. H. No.111, Ward No. Dhani Dariyapur, Bhiwani, Haryana-127040, presently at Delhi, do hereby solemnly affirm and declare as under:-

1. That the deponent is the petitioner in the above-mentioned writ petition as such well conversant with the facts of the case and hence competent to swear this affidavit.
 2. That the contents of the misc. application are true and correct to the best of knowledge and belief and have been drafted by my counsel on my instructions and the same has been read over to me in vernacular language.
- That contents of the misc. application may be read as part and parcel of this affidavit and same are not being repeated herein for the sake of brevity.

Ranbir
DEPONENT

The Seal of Oath Commissioner.
 S.L. No. 51/2025
 RAHUL KUMAR
 App. By. Delhi High Court
 Period-16/07/2025
 to 14/07/2027
 Tis Hazari Court, Delhi-110054

I identify the deponent who has signed in my presence.

VERIFICATION:- 22 SEP 2025

Verified at Delhi on this day of September 2025 that the contents of the above affidavit are true and correct to my knowledge, no part of it is false and nothing material has been concealed therefrom.

CERTIFIED THAT THE DEPU.
 Shri/Smt./K...
 W/o D/o...
 22 SEP 2025
 Attested by Shri/Smt. Ankit Sharma
 Solemnly affirmed before me a
 on..... at Sl. No.....
 the Contents of the affidavit which have
 read and explained to him are true and
 his knowidge.

Ranbir
DEPONENT



449



I E I CO R OF E I E I
 C M P P O 67141 OF

I

P C 16379

IN THE MATTER OF:

RANBIR

...PETITIONER

Versus

STATE NCT OF DELHI & ORS

...RESPONDENT

**APPLICATION UNDER SECTION 151 OF CPC, 1908 FOR
 EXEMPTION FROM FILLING ORIGINAL DOCUMENT
 ALONG WITH EXEMPTION FOR ALLIGNMENT OF
 DOCUMENTS ANNEXED IN WRIT PETITION.**

MOST RESPECTFULLY SHOWETH THAT

1. That the present application is the part of accompanying writ petition in above mentioned writ before this Hon'ble court and the contents of accompanying writ may kindly be read as the part of this present application and the same has not been repeated herein for the sake of brevity.
2. That the petitioners/ applicants have filled this writ petition along with all necessary documents required to prove the facts/grounds of petitioners. That the following writ petition is also accompanied by several documents.
3. That few of documents provided by govt. offices may seem to be out of order/ alignment of those documents are not as per the prescribed format given by this Hon'ble court.
4. That applicants seek the permission of this Hon'ble Court to allow this present application of applicants to be filled without original documents and with improper alignment.

PRAYER

In the view of above-mentioned facts and circumstances, it is respectfully and most humbly prayed that this Hon'ble Court



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may graciously be pleased to pass:

- A. To allow the applicants to file this accompanying writ without original documents, and/or;
- B. To allow the applicants to file writ documents having improper/non-aligned documents, and/or;
- C. Pass such other and further order that this court may deem fit and proper in the facts and circumstances of the present case.

Ranbir

**PETITIONER
[RANBIR]**

Through

**LEXACTO & CO.
Advocate for Petitioner**

203, Kartik Plaza,
Nanda Enclave, Dwarka Sector-19
New Delhi-110075
Mob. No.: 8800696082; 9873130563
Tel No: 011-4705865
Email Id: lexactoandco@gmail.com

Place: Delhi
Date: 22.09.2025



IN THE HIGH COURT OF DELHI AT NEW DELHI.
W. P. (C) NO. _____/2025

IN THE MATTER OF:-

SH. RANBIR ...PETITIONER

VERSUS

STATE NCT OF DELHI & ORS. ...RESPONDENTS

AFFIDAVIT

I, Ranbir S/o Ran Singh, aged about 39 yrs R/o. H. No.111, Ward No. Dhani Dariyapur, Bhiwani, Haryana-127040, presently at Delhi, do hereby solemnly affirm and declare as under:-

1. That the deponent is the petitioner in the above-mentioned writ petition as such well conversant with the facts of the case and hence competent to swear this affidavit.
2. That the contents of the writ petition are true and correct to the best of knowledge and belief and have been drafted by my counsel on my instructions and the same has been read over to me in vernacular language.
3. That contents of the writ petition may be read as part and parcel of this affidavit and same are not being repeated herein for the sake of brevity.



Ranbir
DEPONENT

A
I identify the deponent who has signed in my presence

VERIFICATION:- 22 SEP 2025

Verified at Delhi on this day of September 2025 that the contents of the above affidavit are true and correct to my knowledge, no part of it is false and nothing material has been concealed therefrom.

22 SEP 2025

THAT THE DEPO.
shri/Smt. K...
s/o W/o D/o ...
Generated by Smt/Smt. Ankit Sloana
... affirmed before me a
... at St. No.
that the Contents of the affidavit which have
be read and explained to him are true and
net to his knowiwdgo.

Ankit Sloana
DEPONENT

R
Oath Commissioner



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IN THE HIGH COURT OF DELHI AT NEW DELHI

CRL. M.A. No. ⁶⁷¹⁴² OF 2025

IN

W.P.(C) No. ¹⁶³⁷⁹ OF 2025

IN THE MATTER OF:

RANBIR

...PETITIONER

Versus

STATE NCT OF DELHI & ORS

...RESPONDENT

**APPLICATION U/S 151 C.P.C ON BEHALF OF THE
PETITIONER SEEKING EXEMPTION FROM FILING
TRUE TYPED TRANSLATED COPIES OF THE
ANNEXURE-P5.**

MOST RESPECTFULLY SHOWETH:

1. That the present application is filled by the Petitioner in the present Writ Petition. The present petition is pending before the Hon'ble court for acceptance and issuance of notice to the respondents.
2. That the petitioner seeks leave of this Hon'ble Court to exempt the petitioner from filing the true typed translated copies of the Annexure-P5.
3. That if the present petition is not heard in absence of true typed translated copies of the Annexure-P5 the petitioner will suffer miscarriage of justice.

PRAYER

In the lights of facts and circumstances of the present case it is therefore most respectfully prayed that the present application of the petitioner be allowed, and the accompanying petition and application may be heard in absence of true typed translated



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copies of the Annexure-P5 and to file translated typed copy of the same within file two weeks.

Ranbir

**Petitioner
[RANBIR]**

Through

**LEXACTO & CO.
Advocate for Petitioner**

203, Kartik Plaza,
Nanda Enclave, Dwarka Sector-19
New Delhi-110075
Mob. No.: 8800696082; 9873130563
Tel No: 011-4705865
Email Id: lexactoandco@gmail.com

Place: Delhi
Date: 22.09.2025



IN THE HIGH COURT OF DELHI AT NEW DELHI.
W. P. (C) NO. _____/2025

IN THE MATTER OF:-

SH. RANBIR

...PETITIONER

VERSUS

STATE NCT OF DELHI & ORS.

...RESPONDENTS

AFFIDAVIT

I, Ranbir S/o Ran Singh, aged about 39 yrs R/o. H. No.111, Ward No. Dhani Dariyapur, Bhiwani, Haryana-127040, presently at Delhi, do hereby solemnly affirm and declare as under:-

1. That the deponent is the petitioner in the above-mentioned writ petition as such well conversant with the facts of the case and hence competent to swear this affidavit.
2. That the contents of the writ petition are true and correct to the best of knowledge and belief and have been drafted by my counsel on my instructions and the same has been read over to me in vernacular language.
3. That contents of the writ petition may be read as part and parcel of this affidavit and same are not being repeated herein for the sake of brevity.

Ranbir

DEPONENT

Ankit Sharma
Identify the deponent who
has signed in my presence

VERIFICATION:- - 4 OCT 2025

Verified at Delhi on this day of September 2025 that the contents of the above affidavit are true and correct to my knowledge, no part of it is false and nothing material has been concealed therefrom.

702
The Seal of Oath Commissioner
S.L. No. 51/2025
RAHUL KUMAR
App. By. Delhi High Court
Period-15/07/2025
to 14/07/2027
Tis Hazari Court, Delhi-110054

VERIFIED THAT THE DEPO.
Shri/Smt./Kun Ranbir
W/o D/o Ran Singh
Identified by Shri/Smt. Ankit Sharma
as solemnly affirmed before me
at Sl. No. 4 OCT 2025
that the contents of the affidavit which have
been read and explained to him are true and
correct to his knowledge.

Ranbir

DEPONENT

Oath Commissioner



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VAKALATNAMA
IN THE HIGH COURT OF DELHI AT NEW DELHI.
W.P. (C) NO. 16379 OF 2025

In re:

RANBIR**...PETITIONER****VERSUS****STATE OF NCT DELHI AND ORS****...RESPONDENT**

KNOW ALL to whom these presents shall come that I, Ranbir S/o Ran Singh, aged about 39 yrs R/o. H. No.111, Ward No. Dhani Dariyapur, Bhiwani, Haryana-127040

The above-named PETITIONER do hereby appoint: -

Ankit Sharma(D/2513/2018)/Shraveen Kr. Verma(D/2652/2019), Diwas Kr. (D/2892/2019), Shivam Sharma (D/4053/2021), Ananya Verma (D/9783/2019), Diksha Verma (D/8569/2021)/ Ashish (D/11803/2024)/ Sakshi Thakur/ Geet Gulzar.

LEXACTO & CO. LAW FIRM
ADVOCATES

Chamber: 314, C.K. Daphtary Block, New Lawyers Chamber, Supreme Court of India, ND-001.

Office: 203, Kartik Plaza, Nanda Enclave, Dwarka Sector-19, New Delhi-110075.

Tele: 011-47058652; Mob- 9873130563 & 8800696082; Email- lexactoandco@gmail.com

(herein after called the advocate/s) to be my/our Advocate in the above noted case authorized him:-

To act, appear and plead in the above-noted case in this Court or in any other Court in which the same may be tried or heard and also in the appellate Court including High Court subject to payment of fees separately for each Court by me/ us.

To sign, file verify and present pleadings, appeals cross objections or petition withdrawal, compromise or other petitions or affidavits or other document proper for the prosecution of the said case in all its stages.

To file and take back documents to admit and/or deny the documents of oppo:

To withdraw or compromise the said case or submit to arbitration any differences or disputes that may arise touching or in any manner relating to the said case.

To take execution proceedings.

The deposit, draw and receive money, cheques, cash and grant receipts thereof and to do all other things which may be necessary to be done for the progress and in the course of the prosecution of the s

To appoint and instruct any other Legal Practitioner, authorizing him to exercise the power and author conferred upon the Advocate whenever he may think it to do so and to sign the Power of Attorney on c And I/We the undersigned do hereby agree to ratify and confirm all acts done by the Advocate or his in the matter as my/our own acts, as if done by me/us to all intents and purposes.

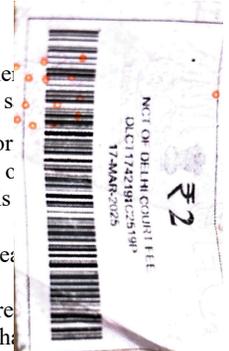
And I/We undertake that I / we or my /our duly authorized agent would appear in the Court on all he will inform the Advocates for appearance when the case is called.

And I /we undersigned do hereby agree not to hold the advocate or his substitute responsible for the re said case. The adjournment costs whenever ordered by the Court shall be of the Advocate which he sh and retain himself.

And I /we the undersigned do hereby agree that in the event of the whole or part of the fee agreed by me/us to be paid to the Advocate remaining unpaid he shall be entitled to withdraw from the prosecution of the said case until the same is paid up. The fee settled is only for the above case and above Court. I/We hereby agree that once the fee is paid. I /we will not be entitled for the refund of the same in any case whatsoever. If the case lasts for more than three years, the advocate shall be entitled for additional fee equivalent to half of the agreed fee for every addition three years or part thereof.

IN WITNESS WHEREOF I/We do hereunto set my/our hand to these presents the contents of which have been understood by me/us on this 25th day of September 2025.

Accepted subject to the terms of fees.



[Handwritten signatures of Ankit Sharma, Shraveen Kr. Verma, Diwas Kr., Shivam Sharma, Ananya Verma, Diksha Verma, Ashish, and Sakshi Thakur]
Advocate

[Handwritten signature of Ranbir]

Client

I identify the Signature/Thumb impression of the below mentioned person, Who has been signed in my presence. The Client.



456

PROOF OF SERVICE



lexacto&co. <lexactoandco@gmail.com>

advance copy of WP(C) No. of 2025

1 message

lexacto&co. <lexactoandco@gmail.com>

Mon, Oct 27, 2025 at 8:40 PM

To: Sameer Vashisht <standingcounselgnctd@gmail.com>, CLO PS <clomcdhq@gmail.com>

Please find out the attachment.



Ranbir writ.pdf

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Thanks with Regards.**Lexacto & Co.****Law Firm****Telephone: 011-47058652****Mob. No.: 7678600320; 8800696082,****[Linkedin](#)**



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lexacto&co. <lexactoandco@gmail.com>

Advance copy of WP (C) OF 2025

1 message

lexacto&co. <lexactoandco@gmail.com>

Tue, Oct 14, 2025 at 9:38 PM

To: standingcounselgnctd@gmail.com, clomcdhq@gmail.com

Please find out the attachment.

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Thanks with Regards.



Lexacto & Co.

Law Firm

Telephone: 011-47058652

Mob. No.: 7678600320; 8800696082,

[LinkedIn](#)



Ranbir writ.pdf

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