

**IN THE SUPREME COURT OF INDIA**

**CIVIL ORIGINAL JURISDICTION**

**I.A. NO.      OF 2022**

**IN**

**WRIT PETITION (CIVIL) NO. 1383 OF 2021**

**(PIL UNDER ART. 32 OF THE CONSTITUTION OF INDIA)**

**IN THE MATTER OF:**

Dr. Ridhi Arora & Others

...PETITIONERS

Versus

Union of India

...RESPONDENT

**Application seeking permission to place on record Additional Facts along  
with Documents on behalf of the Petitioner**

**WITH**

**I.A. No. \_\_\_\_\_ of 2022**

Application for Exemption from filing duly affirmed  
copy of the Affidavit.

**I.A. No. \_\_\_\_\_ of 2022**

Application seeking exemption from filing official  
translation of Annexures.

**Filed on: 17.02.2022**

**ADVOCATE FOR THE PETITIONER: SATYA MITRA**

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To

Hon'ble. The Chief Justice of India and

His Companion Justices of the Hon'ble Supreme Court of India

**MOST RESPECTFULLY SHOWETH:**

1. That, the above captioned Writ Petition is pending adjudication before this Hon'ble Court. The contents of the petition are not repeated herein for the sake of brevity but the same may be read as part and parcel of the instant Application.

2. That, the Petitioners seek to file certain additional documents and place on record additional facts before this Hon'ble Court supporting the averments made in the Writ Petition.
3. It is humbly submitted that the Petition had been filed by the Petitioners in the exigency of the matter. Subsequently, petitioner has become aware of the additional facts, which are crucial and material for a complete and fair adjudication of the matter.
4. That, the said documents are necessary for fair, effective, and complete adjudication of the case by this Hon'ble Court.
5. The Petitioners, therefore, most humbly crave for the permission of this Hon'ble Court to bring on record the following additional facts along with relevant documents:

#### A. COVID VACCINE ADVERSE EVENTS

The Petitioners rely on the following media / social media reports regarding Adverse Events experienced by Pregnant Women or Lactating Mothers (*None of this data is available on Cowin portal or MoHFW website, there is no way to verify if these cases have been registered as AEFI*):

##### i. Biraul, Pandaul Jilla, Madhubani, Bihar

1.5 month old baby of a breastfeeding mother died on 6-Dec-2021. Puja Devi took Covaxin earlier that day at a vaccination camp after advice from Asha health staff. 3 hours later, the mother breastfed milk to her child, but the baby suddenly died on the same night around 10 pm. The child was

normal that day laughing and playing.

- ii. Madhya Pradesh: Datia district, Bhandar tehsil, Berachh village. 24 y/o pregnant woman Rinki Rajak & her 8 month old unborn baby died on Wednesday, October 13, 2021, less than 2 weeks after receiving COVID-19 vaccine. She was forcefully vaccinated by a nurse at the local hospital on Sept 30th, despite her refusal.

- iii. Madhya Pradesh: Gwalior district,

A 7-month old baby died due to premature delivery of mother Rinku Kushwaha (28), resident of Ajaypur village, due to severe fever a day after receiving the first dose of COVID-19 vaccine.

- iv. Karnataka:

Koppal district, an unborn baby died with 25 year old pregnant woman, Manjula Yamanurappa Meti, resident of Sebankatti village of Kushtagi tehsil, who died early morning of August 06, due to heavy bleeding whichy started few hours of receiving first dose of COVID-19 vaccine.

- v. Tamilnadu: Theni district, Village: Badrakalipuram, Tehsil: Dombucheru 6 month old unborn baby of Sylvia (23), died in womb, on July 10, a day after she was vaccinated with the first dose of Covishield COVID-19 vaccine on advice of Dombucheru PHC staff, where she went for a pregnancy test.

**vi. Jharkhand:**

Dumka, Ranchi: A Nine months pregnant woman allegedly died within 24 hours of being administered first dose of COVID-19 vaccine at Shikaripara in Dumka. According to the complaint lodged by her husband, Jatin Murmu, she was forcefully administered the jab while she had gone to withdraw money from Shikaripara on November 17 and died the very next day.

**vii. Tamil Nadu: Tiruvallur district:**

A 9-month old unborn baby died with mother, Lavanya (25), resident of Thiruttani town, who died on September 29, due to sudden breathlessness, just within 8 hours after receiving second dose of COVID-19 vaccine.

**The true translated copy of abovementioned social media and newspaper reports are compiled, annexed herewith and marked as Annexure P-1, pg. 24-34.**

**viii.** Relevant excerpts of Video testimony of the petitioner no. 2 who lost his daughter post Covid vaccination (confirmed by National AEFI committee as a Vaccine Product Related Reaction which cause Thrombosis with Thrombocytopenia Syndrome), are presented hereunder as a transcript:<sup>1</sup>

*Name and location of interviewee*

*My name is Mathekutty John (hereinafter referred as MJ). I stay at a place*

<sup>1</sup> Video Link: <https://u.pcloud.link/publink/show?code=XZQMoAXZ6KL6zPND1MfJqXY2pmHqC5hu1i6V>

*called Aanakallu in Kottayam district. Kanjirapalli taluk, Kanjarapally panchayath, Aanakallu. Mahima Mathew, Mahima Mathew. Can you hear me? Age when died was 31 years. At Aanakallu.*

***Health of victim before vaccination***

*MJ: There were no health issues. She was completely healthy. She was 7 weeks pregnant and the pregnancy was confirmed by doctor after vaccination. She had no other health issues. They went for vaccination after consultation with doctor, they took the pregnancy test after vaccination was taken.*

***Date of vaccination***

*MJ: 6-8-2021*

***Were you informed about the potential side effects of the vaccine?***

*MJ: Nothing was done. Daughter and daughter's husband went to gynecologist Dr. Sawitha (Dr. Sawitha Augustine) at Mar Sleeva Medicity Hospital for consultation and told doctor that they suspect pregnancy and today is date for vaccination. Doctor said that she can go and take vaccination. It's not a problem. Vaccination won't cause issue for pregnant women. So, she went and took vaccine, returned and in the evening took pregnancy test. They were also told that she is 7 weeks pregnant with twin babies.*



***Health of victim after vaccination and date of passing***

*MJ: After taking the vaccine, on 7th and 8th there were some issues but on the 13th there was a lot of headache. Husband, daughter and mother went straight to visit the doctor. They were told that it happens during pregnancy and was given dolo? A medicine called dolo was injected, she got relief from pain and they returned. On the 14th, again she had headache and so they again went to hospital. They kept her at hospital for a day and gave drip. They returned home in the evening. On 15th Sunday after afternoon she started having a very strong headache and fell down due to dizziness. We immediately took her to hospital. They admitted her to casualty and in half an hour she lost consciousness. Same day she was shifted to ventilator and then she never came back to consciousness. She died on 20th.*

*Vein in her brain burst and she has bleeding. Her platelets have reduced to 45000 and so nothing can be done. Her brain is dead. For 5-6 days she was in ventilator. Only the medications that they gave; she was in ventilator. She was unconscious.*

*They also sent for many tests outside. 18000 rupees worth of tests were done. All test results were in favor of my daughter. All of them was in favor of my daughter. Copies of all those tests are with us.*

***Has anyone from the government or hospital contacted you for further investigation?***

*MJ: When asked, Mar Sleevea Medicity Hospital gave cause of death as vaccine. I have the document. Doctors of Mar Sleevea Medicity Hospital, medical board gave us the cause of death as vaccine.*

***Has AEFI been registered?***

*MJ: Only the registration after taking vaccination is available. We went to PHC and enquired but we were told that everything is written in this certificate, this is the correct one and gave a copy of the same. We get a certificate after vaccination; right? We only have that certificate.*

**C. The Yellow Card COVID-19 AstraZeneca Vaccine Analysis Print shows a variety of adverse events reported post vaccination. AstraZeneca Vaccine is equivalent to Covishield vaccine marketed in India by Serum Institute. The true copy of relevant portions of the abovementioned Astrazeneca Vaccine Analysis report are Annexed herewith and marked as Annexure P-2, pg no. 35-38.**

**D. The Petitioners rely upon the article “Whistleblowers Reveal DoD Medical Data Showing Military Cancer Diagnoses HAVE TRIPLED Since The Rollout Of The Experimental Vaccines – Along With a 10x Increase in Neurological Disorders and a Near 5x increase in Female INFERTILITY” dated 26.1.2022 published in The Gateway Pundit website. Following are the relevant excerpts from the article:**

*“During the event, Ohio attorney Thomas Renz presented DOD medical billing data from the Defense Medical Epidemiology Database (DMED) that exposes the disturbing truth about what is happening to the health of our service members since the rollout of the jab a year ago.”*

*“We have substantial data showing that we saw, for example, miscarriages increasing by 300% over the five-year average, almost. We saw almost a 300% increase in cancer over the five-year average.”*

*“In a declaration under penalty of perjury that Renz plans to use in federal court, Drs. Samuel Sigoloff, Peter Chambers, and Theresa Long — three military doctors — revealed that there has been a 300% increase in DMED codes registered for miscarriages in the military in 2021 over the five-year average.”*

*“The five-year average was 1,499 codes for miscarriages per year. During the first 10 months of 2021, it was 4,182.”*

*“As Renz explained to me in an interview with TheBlaze, these doctors queried the numbers for hundreds of codes from 2016 through 2020 to establish a baseline five-year average. These codes were generally for ailments and injuries that medical literature has established as being potential adverse effects of the vaccines.”*

*“The data comes directly from the US military’s Defense Medical Epidemiology Database (DMED) system, which is the military’s equivalent to the US Vaccine Adverse Events Reporting System (VAERS) – but the DMED*

*system is only accessible by military doctors and records every single case in the military for insurance billing, which, unlike VAERS, makes it extremely accurate.”*

**The true copy of the article from The Gateway Pundit is annexed herewith and marked as Annexure P-3, pg. 39-43.**

#### **E. LACK OF SAFETY TRIAL DATA**

**i.** In RTI CDSCO/R/E/21/00515 filed on 23<sup>rd</sup> October 2021, a request was made as per following:

*Please provide details of any safety trials conducted on pregnant women and breast feeding women for the following Covid 19 Vaccines:*

- 1. Covishield*
- 2. Covaxin*
- 3. ZyCoV-D*

Excerpt of the response is as hereunder:

*As per information available, the firm have enrolled healthy participants in the various clinical trials of COVID-19 vaccines and as per exclusion criteria, Pregnant and lactating/ breast-feeding women were excluded.*

**The true copy of the reply of RTI CDSCO/R/E/21/00515 dated 23<sup>rd</sup> October, 2021 is annexed herewith and marked as under Annexure P-4, pg. 44.**

ii. As per “Recommendations of the SEC meeting to examine COVID-19 related proposal under accelerated approval process made in its 161st meeting held on 22.06.2021 at CDSCO, HQ New Delhi”, the recommendation given to M/S Bharat Biotech International Limited is as follows: *With regards to the use of the vaccine in pregnant women, the committee recommended that the firm should submit additional safety data.*

**The true copy of minutes of the SEC meeting dated 22.06.21 is annexed herewith and marked as Annexure P-5, pg. 45-47.**

iii. As per “Recommendations of the SEC meeting to examine COVID-19 related proposal under accelerated approval process made in its 194nd meeting held on 24.11.2021 at CDSCO” the recommendation given to M/S Bharat Biotech International Limited is as follows:

*The firm presented its proposal for conduct of Phase II/III clinical trial of Whole-Virion Inactivated SARS-CoV-2 Vaccine (COVAXIN) in pregnant women along with the clinical trial protocol.*

*After detailed deliberation, the committee recommended that firm should submit the following information before the committee for further review:*

- 1. Safety data of pregnant women vaccinated in the immunization program*
- 2. Data of developmental toxicity studies in animal.*
- 3. The safety follow up should be increased to 6 months from the date of birth.*

**The true copy of minutes of the SEC meeting dated 24.11.21 is annexed herewith and marked as Annexure P-6, pg. 48-50.**

## **F. LACK OF ACCESS TO INFORMATION**

The lack of safety trials and safety data of Covid vaccines for Pregnant women pose a challenge to informed consent. The tollfree helpline number 1075 and 104 has been reached by multiple persons pan-India and relevant excerpts of the call transcripts are presented hereunder:

### **i. Call 01: Call to 1075 from Vadodara, Gujarat**

*Caller - is it safe for pregnant women to take the Covid vaccine?*

*Responder - Yes a pregnant mother can take the vaccine.*

*Caller - Yes but is there any official Material available which has information on what the possible side effects may be expected. Or of any possible harm to the baby's health and development if any. Is there any data available from the trials?*

*Responder - No madam. There is no such problem, nothing like that. A pregnant mother may take the vaccine. But I will have you speak to the doctor and you may get their opinion.*

*Caller -- May I know your name?*

*Responder 2 -- Dr Priyanshi*

*Caller -- ok. I want to know in a pregnancy situation, that for covishield*

*or covaxin is there some trial data that it says it's safe for the child and if anything in the future... Or which is better of the two covaxin or covishield, anything like that?*

*Responder 2 -- No there is nothing like that. You may take any of the two.*

*Caller -- And are you saying this on the basis on some trial data or are you just saying it as government....?*

*Responder 2 -- Gujarat government has made put out guidelines so they has to have done so on the basis of trials*

*Caller -- So does the Factsheet have anything on pregnant women is what I wanted to know.*

***Responder 2 -- So it has been stated now in the guidelines that pregnant women can take it.***

*Caller -- Yes but like when the kind of paper insert available with medicines saying so and so side effect is possible...*

***Responder 2 -- No no. There is no such thing***

## **ii. Call 02: Call to 1075, Tonk Rajasthan**

*C : Sir I want to ask few questions. Can we take covid vaccines during pregnancy?*

*Doctor : No, you can't take but according to the guidelines, you can take it but it's on your own risk.*

*C: OK.. We can take it on our own risk but what is the risk?*

*Miscarriage or something?*

*Doctor: No no there is nothing like that.*

### **iii. Call 03: Call to 1075 from Mumbai, Maharashtra**

*Caller-Do you have vaccine clinical trial data for pregnant women for covaxin and covishield?*

*Responder-That trial data you will get from the Government, for which you will have to send a mail. But i could connect you to a Government Gynaecologist you can ask about your queries.*

*Caller-Do you have clinical trial data for vaccination of pregnant women for covaxin and covishield?*

***Responder2 - I do not have any clinical trial data, but it is understood that the results would be given after clinical trials. Since 3 July 2021 ,they have revised their instructions stating that it is safe for pregnant women to get vaccinated, for which we are arranging separate camps***

*Caller - This means you do not have any help line number, can we call on 104?*

*Responder2 - No. It cannot happen over the phone, the doctors at the place of vaccination will take care of adverse events, Though adverse events do not happen immediately.*

### **iv. Call 04: Call to 1075 from Karnataka**

**Covid Customer Care : : Ok so I'd like to inform you that it is completely**



safe for pregnant women to take the vaccine if she has no major issues.

**v. Call 05: Call to 1075 from Mumbai, Maharashtra**

*C: No I just wanted to know is it safe because I have registered myself for taking the vaccine so I just need to know how safe it is.*

*CC: Yes definitely you can take the vaccine.*

*C: But what are the side effects of the vaccine please?*

*Cc: Ok possible side effects are are maybe you may feel the pain at the injection side, swelling at the injection side, you can feel fever after the vaccine and you can feel headache. These are the common side effects.*

*C: Is there any trial data available in the market or with you?!*

*CC: Ok, so actually after trial, after experiment, government has approved. So if government guidelines has said that it is safe for pregnant women then it is clearly the experiment's based data. Ok*

**The true typed and translated copy of the call on tollfree vaccine number are annexed herewith and marked as Annexure P-7, pg. 51-60**.

**G. DEATHS ATTRIBUTED TO VACCINE PRODUCT BY NATIONAL AEFI COMMITTEE**

- i.** A total of 8 deaths have been accepted by National AEFI Committee in its causality assessment reports which are classified as “Vaccine Product Related Reaction. The details of the 8 reports are as follows:

S. N O.	NATION AL ID	AG E IN YE AR S	SEX	DATE OF VACCI NATION (DD/M M/Y YYYY)	VACCI NE	DIAGNOSIS	CLASS IFICAT ION
1	IND(CO-AEFI)MH BMC210 25	68	M	8-3-2021	COVIS HI ELD	Anaphylaxis	Vaccine product related reaction
2	IND(CO-AEFI)MH NSK2100 1	34	FEM ALE	28-1-2021	COVIS HIELD	Right transverse sinus thrombosis with right temporal haemorrhagic infarct, right posterior frontal haemorrhagic infarct with thrombocytopa enia	A1
3	IND(CO-AEFI)CG RGH2100 6	47	MAL E	3-6-2021	COVA XIN	ANAPHYLAX IS	A1
4	IND(CO-AEFI)HA HSR2100 4	68	FEM ALE	22-3-2021	COVIS HIELD	ANAPHYLAX IS	A1
5	IND(CO-AEFI)JK KUA2100 1	21	MAL E	21-4-2021	COVIS HIELD	ANAPHYLAC TIC SHOCK	A1
6	IND(CO-AEFI)TS HYD2102 2	18	FEM ALE	29-5-2021	COVIS HIELD	THROMBOSI S WITH THROMBOC YTOPENIA SYNDROME	A1

7	IND(CO-AEFI)KE APZ21040	28	FEMALE	7-6-2021	COVISHIELD	THROMBOSIS WITH THROMBOCYTOPENIA SYNDROME	A1
8	IND(CO-AEFI)KE KOT21008	32	FEMALE	6-8-2021	COVISHIELD	THROMBOSIS WITH THROMBOCYTOPENIA SYNDROME	A1

ii. The National AEFI Committee has diagnosed 4 deaths with Thrombosis with Thrombocytopenia. The death of the daughter of the petitioner has also been classified as A1 diagnosed with Thrombosis with Thrombocytopenia syndrome as shown in Serial Number 8 of table above.

The petitioners are relying on the data of AEFI committee to contest that the vaccines are not 100% safe as advertised everywhere by the Government and media.

The rest of the documents are part of the proceedings before the court below.

6. It is humbly submitted that the present application is bonafide and is being filed in the interests of justice, and taking on record of these documents would not prejudice to Respondents in any manner.

### PRAYER

In view of the facts and circumstances of the Petitioner most respectfully pray that this Hon'ble Court may be pleased to:

- (a) Allow the present Application and grant permission to bring on record the additional facts and fileaforementioned relevant additional

documents i.e. Annexures P-1 and P-7;


(b) Pass such further/order as in the facts and circumstances of this case be deemed fit and proper.

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

Drawn by: Varsha Gumashta

Place: Delhi

Date: 17.02.2022



Satya Mitra

Advocate of Petitioner

satyamitra2003@yahoo.co.in

Ph. 9811768848

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Versus

Union of India

...RESPONDENT

**AFFIDAVIT**

I, Dr. Ridhi Arora, aged about 40 years, [REDACTED]

[REDACTED] do hereby solemnly affirm and state as under:

1. That, I am the Petitioner No. 1 in the above captioned Writ Petition/PIL, and in such capacity, I am well conversant with the facts of the Petition and competent to swear this affidavit.
2. That the contents contained in the Application for filing additional documents from pages 1 to 17 and Paragraph 1 to 6 are true and correct to my knowledge and belief nothing material has been concealed.

3. That the Annexures annexed with this Application are true copies of their respective originals.
4. This Application is being filed under my instructions and the contents thereof are true to the best of my knowledge and there is no personal gain, private motive or oblique reason in filing the Application.



**DEPONENT**

**VERIFICATION:**

Verified at New Delhi on this the 17<sup>th</sup> day of February, 2022 that the contents of the above affidavit are true and correct to my knowledge, that no part of it is false and that nothing material has been concealed.



**DEPONENT**

**IN THE SUPREME COURT OF INDIA**

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Versus

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...RESPONDENTS

**AFFIDAVIT**

I, Mathukutty John, aged about 64 years, [REDACTED]

[REDACTED], do hereby solemnly affirm and state as under:

1. That, I am the Petitioner No. 2 in the above captioned Writ Petition/PIL, and in such capacity, I am well conversant with the facts of the Petition and competent to swear this affidavit.
2. That the contents contained in the Application for filing additional documents from pages 1 to 17 and Paragraph 1 to 6 are true and correct to my knowledge and belief nothing material has been concealed.

3. That the Annexures annexed with this Application are true copies of their respective originals.
4. This Application is being filed under my instructions and the contents thereof are true to the best of my knowledge and there is no personal gain, private motive or oblique reason in filing the Application.



**DEPONENT**

**VERIFICATION:**

Verified at New Delhi on this the 17<sup>th</sup> day of January, 2022 that the contents of the above affidavit are true and correct to my knowledge, that no part of it is false and that nothing material has been concealed.



**DEPONENT**



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...RESPONDENTS

**AFFIDAVIT**

I, Suman Kumari Chouhan, aged about 29 years, [REDACTED]

712102, do hereby solemnly affirm and state as under:

1. That I am the Petitioner No. 3 in the above captioned Writ Petition/PIL, and in such capacity, I am well conversant with the facts of the Petition and competent to swear this affidavit.
2. That the contents contained in the Application for filing additional documents from pages 1 to 17 and Paragraph 1 to 6 are true and correct to my knowledge and belief nothing material has been concealed.

3. That the Annexures annexed with this Application are true copies of their respective originals.
4. This Application is being filed under my instructions and the contents thereof are true to the best of my knowledge and there is no personal gain, private motive or oblique reason in filing the Application.

*Suman Chauhan*

**DEPONENT**

**VERIFICATION:**

Verified at New Delhi on this the 17<sup>th</sup> day of January, 2022 that the contents of the above affidavit are true and correct to my knowledge, that no part of it is false and that nothing material has been concealed.

*Suman Chauhan*

**DEPONENT**

**ANNEXURE P-1**

<https://twitter.com/MUKUNDJ56681511/status/1468500050435198979>

**TWEET BY MUKUND JHA @MUKUNDJ56681511**

Incident of Biraul Police Station, Pandaul District Madhubani, Bihar.

A baby died after being breast by the lactating mother within 3 hours post getting COVID vaccine. The issue must be investigated. It is demanded from the Central government and state governments to have an experts' team to help the victim.

@mangalpandeybjp @MaithilAnup @NitishKumar @ashokyadavmp

**To,**

**Shriman Civil surgeon Madhubani**

**Subject: Related to in 3 hours after taking Covid vaccine, my breast feeding son passed away**

**Sir,**

**Humble request is, I, Puja Devi, husband Shri Upendra Prasad, am a resident of Post Beraul, Block Pandol, Districi Madhubani. On 6.12.21, there was a covid vaccine camp at Primary School Beraul Makhnahi Pokhar. On the insistence of Sister Asha and ANM Shrimati Sushila Devi, I went to take the vaccine. I had told ANM that my son was born on 24.10.21 and he is still very young and I do not want to take the vaccine. But ANM Shrimati Sushila Devi pressurised and said nothing will happen to your son. There will be no effect on the milk. I was given Covaxin vaccine. I began breastfeeding my healthy son 3 hours later. He went sleep laughing-playing. When the child did not wake up till 10 in the night, we tried to wake him up but he had passed away by then. The mother has cried incessantly and she keeps saying if I had not taken the vaccine then nothing would have happened to my child.**

**I request the learned sir that I get justice and appropriate investigation is done on ANM Shrimati Sushila Devi.**

**Yours trustfully,**

**Name Puja Devi, Husband – Upendra Prasad**

[www.naidunia.com /lite/madhya-pradesh/datia-datiya-woman-dead-7098709](http://www.naidunia.com/lite/madhya-pradesh/datia-datiya-woman-dead-7098709)

## Datia: Alleged death of pregnant due to corona vaccine, CMHO said - wrong

Nai Dunia News Network : 2-2 minutes : Invalid Date

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### Datia: Alleged death of pregnant due to corona vaccine, CMHO said - wrong

Updated: | Fri, 15 Oct 2021 04:00 AM (IST)

Datia (Representative of New Zealand).

Eight months pregnant Rinki Rajak's husband Vinod Rajak (24) was administered the first dose of the corona vaccine on September 30. He died on Wednesday night. Her husband and relatives alleged that she died due to corona vaccine. CMHO Dr. R.B. Describing the corona vaccine as wrong, Kurele said that now 1.5 lakh pregnant women have been vaccinated in the state and six thousand pregnant women in the district and nothing has happened to anyone, so how is the death of this pregnant woman possible. The PM of the deceased pregnant is also being done, which will make the matter more clear.

According to the information, she had come to the pregnant woman Rajak's husband Vinod Rajak on September 30 for the vaccination of the pregnant woman in village Barrage of Bhandar tehsil of the district. On this, the nurse advised him to get the corona vaccine first and even after refusing, he was vaccinated for corona, due to which he died on Wednesday night, the family members allege that this happened due to the corona vaccine. Rinki Rajak was 8 months pregnant. He had received the first dose of corona vaccine in Bhandar. The next day the woman started having cough, phlegm, pain in hands and feet. Due to which the family members of the woman panicked and took the woman back to the hospital where doctors treated her and sent her home. Later on the night of 13 October, the woman died.

Posted By: **Nai Dunia News Network**

[www.naidunia.com /madhya-pradesh/gwalior-gwalior-vaccination-news-seven-months-pregnant-deliver...](http://www.naidunia.com/madhya-pradesh/gwalior-gwalior-vaccination-news-seven-months-pregnant-deliver...)

anil.tomar : 2-3 minutes : Invalid Date

## gwalior vaccination news: Seven months pregnant delivers two days after vaccination, baby dies

Publish Date: | Mon, 04 Oct 2021 01:44 PM (ACTUAL)

**gwalior vaccination news: Gwalior (Naiduniya Representative).** A seven-month pregnant resident of Ajaypur had a premature delivery two days after the first dose. The child died as soon as it was born. The woman had a son on three daughters, so the whole family is saddened by the death of the child. The relatives of the pregnant are now searching for the ASHA worker who had vaccinated the woman. The target was to vaccinate 32 thousand people on Sunday, but only 2316 people got vaccinated. Now on Monday, a target of immunization of 41 thousand people has been set at 224 centers.

This is the matter: Madhavi Singh, Anganwadi Supervisor of Virpur says that on September 28, the team had reached Ajaypur for vaccination. Veerpur resident Asha worker Seema Rohira was also in the team. Kiran's wife Rinku Kushwaha (age 28), a resident of Ajaypur, was seven months pregnant. Seema asked Kiran to get the vaccine, so she happily got the vaccine. On the second day of vaccination, Kiran developed fever and was admitted to Madhauganj dispensary. Here he had a premature delivery, but after a while the son's heartbeat stopped. The angry relatives of the pregnant are now looking for the ASHA worker. The panicked ASHA worker and her family are not coming out of the house. The matter has reached the Health Department and the administration, but no security arrangements have been made for the time being.

Vaccination to pregnant women was started on the instructions of the government. What is the reason for the incident, it will be investigated. If the ASHA worker is being abused or threatened, then the help of the police will be taken after talking to the government.

Dr. Manish Sharma,CMHO

Posted By: **anil.tomar**



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[Home](#) / [District](#) / [Koppal](#) /

## High Bleeding After Covid Vaccination: Pregnancy Death

Public News Updated: 09 Aug 2021, 20:54 IST



Occasional image

**Kushtagi:** A pregnant woman from Appleinakatti village in Taluk has died of severe bleeding after her family was suspected of taking the Kovid vaccine.

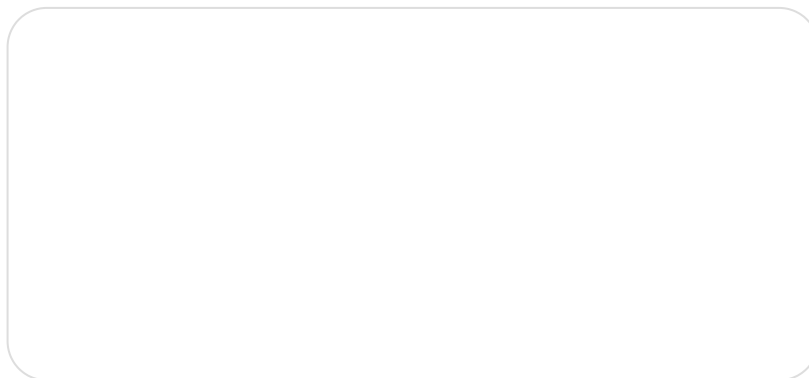
Manjula Yamanurappa Meti (25) is a dead woman. The first dose of the vaccine was given to 70 people, including 14 other pregnant women, in the village of Hulagera on Thursday. The woman who had been healthy before had come home and had bleeding at night.

He was immediately rushed to a private hospital in Ilakkal but doctors there recommended that he be taken to a government hospital. Doctors at the public hospital here at night gave one unit of blood. However, as the woman was in a state of dysfunction without bleeding, doctors had recommended her to be taken to Koppal District Hospital for emergency treatment. The woman died in the middle of the road leading to Koppal.

**Outrage:** A woman has died after a Kovid vaccine was reported by an upset family member. A complaint has been lodged with the

A medical post mortem examination by Koppal Medical College (Forensic) has been carried out post-mortem on the complaint that the incident was caused by the Kovid vaccine.

“Other pregnant women have been vaccinated with the same batch. No other health problems have been reported. However, this is a special case and the post-mortem examination has been carried out by forensic experts, said Dr. Ananda Gottoor, a talisman.





## Essakkimuthu

DailyThanthi : 3-4 minutes : 7/10/2021

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The death of a 6-month-old baby in the womb of a pregnant woman who was vaccinated against corona at Theni Government Medical College Hospital has caused a stir.

Posted: July 10, 2021 22:04 PM

Theni:

The death of a 6-month-old baby in the womb of a pregnant woman who was vaccinated against corona at Theni Government Medical College Hospital has caused a stir.

### Corona vaccine

Jagan hails from Bhadrakalipuram near Bodi in Theni district. He is working as a laborer in an auto repair shop in Dombucherry. His wife is the heartthrob Sylvia (age 23). The two fell in love and got married last year.

In this case, the heartthrob Sylvia became pregnant. She registered her pregnancy at the Dombucherry Government Primary Health Center and was treated there. The day before yesterday, Jagan took his wife to the Dombucherry Government Primary Health Center for a pregnancy test. The medical team there recommended that pregnant women go to Theni Government Medical College Hospital for vaccination as corona vaccination is currently underway.

### Infant death

Accordingly, Jagan took his wife to Theni Government Medical College Hospital yesterday. There he was vaccinated for the first installment of Covshield. After being vaccinated, Sylvia, a cardiologist, performed a scan at a private scan center in Theni. There he got the test results and went to the Dombucherry Government Primary Health Center.

After seeing the results of the examination, the doctor said that the child did not have a heartbeat and the child was sent to Theni Government Medical College Hospital for further treatment as he was in a stable condition. He was admitted to Theni Government Medical College Hospital the night before yesterday. Doctors who examined her there said the 6-month-old baby in her womb had died. His family was shocked to hear this.

### Before vaccination ...

Following this, Sylvia was given medication to treat labor pains. When asked about this, a medical officer said, "The scan showed that the baby in the womb had died a day or two earlier. There was no connection between the vaccination and the death of the baby. None of the other pregnant women who were vaccinated on the same day were harmed. The

baby is being treated to be taken out. The true cause of death will be known only after the delivery. "

The incident has caused a stir in Theni Government Medical College Hospital area.

[www.newindianexpress.com /nation/2021/nov/24/pregnant-woman-dies-after-covid-19-jab-in-jharkh...](http://www.newindianexpress.com/nation/2021/nov/24/pregnant-woman-dies-after-covid-19-jab-in-jharkh...)

## Pregnant woman dies after Covid-19 jab in Jharkhand; probe underway

By Mukesh Ranjan : 2-2 minutes



Image used for representation (File Photo)

Express News Service

RANCHI: A Nine months pregnant woman allegedly died within 24 hours of being administered first dose of COVID-19 vaccine at Shikaripara in Dumka. According to the complaint lodged by her husband, Jatin Murmu, she was forcefully administered the jab while she had gone to withdraw money from Shikaripara on November 17 and died the very next day.

The complaint has been lodged with Shikaripara Block Development Officer (BDO) demanding action against the health workers who administered the jab and compensation for him. Interestingly, the man was given referral slip by the CHC in charge suggesting that the woman was admitted with the complaints of side effects of the first dose of the vaccine.

The husband further added that within hours at around 12 in the midnight, she complained of uneasiness following which she was taken to the nearest Health and Wellness Center at Kolaiwari on the next morning where they referred her to Shikaripara CHC.

“Following her deteriorating health condition, she was referred further to the Phulo Jhano Medical College and Hospital in Dumka at 4.00 pm, where she along with the child in her womb passed away around 7.00 pm,” said the husband.

Taking cognizance into the matter, State Health Minister Banna Gupta said, “I have sought a report on under what circumstances the pregnant women was vaccinated forcefully.”

They cannot get away just by saying that she died as she was anaemic, he said.

[www.puthiyathalaimurai.com /newsview/117307/A-pregnant-woman-who-took-2nd-dose-covid-vacc...](http://www.puthiyathalaimurai.com/newsview/117307/A-pregnant-woman-who-took-2nd-dose-covid-vacc...)

## Thiruvallur : 9 months pregnant lady who took the 2nd dose died with sudden breathing difficulties

yoursguna : 2-3 minutes



**A 9-month-pregnant woman who was injected with the 2nd dose of the corona vaccine near Tiruvallur has died due to suffocation. Relatives have besieged the district revenue office, saying they will not buy the body until the real cause of the pregnant woman's death has been determined.**

Nandakumar lives in the Puthur Medu Colony area next to Thiruthani in Tiruvallur district. His wife Lavanya (age 25). Both of them worked as laborers in a private company in Sriperumbudur. The two fell in love and got married last year. Lavanya was 9 months pregnant. Seemandham show was organized tomorrow (30.09.2021) for Lavanya who was pregnant.

Lavanya was vaccinated at the Corona Vaccine Special Camp in Puthur village last evening. He went home after being vaccinated and suddenly had shortness of breath last night. Relatives immediately rushed him to the nearby Pattaraperumbudur Primary Health Center for first aid.



Lavanya, a pregnant woman, was given another injection by the primary health center and then told to take her home. Lavanya, who has returned home, has been suffering from shortness of breath again for some time. Frightened by this, Lavanya was taken to the Butterfly Perumbudur Primary Health Center. During the interrogation, he was taken to the Tiruvallur Chief Government Hospital. Lavanya was immediately taken there as well. Doctors who examined him there said, 'Lavanya died on the way home.'

Lavanya's father Vijayakumar Kanagammassathram has lodged a complaint with the police stating that Lavanya, who was 9 months pregnant, died due to the second round of corona vaccination and that Lavanya's death is suspected. As the District Revenue Officer inquired into the matter, her relatives besieged the District Revenue Office, saying, "We will not buy the body unless there is a real response to Lavanya's death." Thus there seems to be excitement.

**COVID-19 AstraZeneca Vaccine Analysis Print**

Report Run Date: 10-Feb-2022  
Data Lock Date: 09-Feb-2022 18:30:05

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All UK spontaneous reports received between 04/01/21 and 02/02/22 for COVID-19 vaccine Oxford University/AstraZeneca.

A report of a suspected ADR to the Yellow Card Scheme does not necessarily mean that it was caused by the vaccine, only that the reporter has a suspicion it may have. Underlying or previously undiagnosed illness unrelated to vaccination can also be factors in such reports. The relative number and nature of reports should therefore not be used to compare the safety of the different vaccines. All reports are kept under continual review in order to identify possible new risks.

## Case Series Drug Analysis Print

## Name: COVID-19 AstraZeneca Vaccine Analysis Print

Report Run Date: 10-Feb-2022

Data Lock Date: 09-Feb-2022 18:30:05

Reaction Name	Total	Fatal
<b>Pregnancy conditions</b>		
<i>Abortion related conditions and complications</i>		
Anembryonic gestation	1	0
<i>Abortions not specified as induced or spontaneous</i>		
Abortion missed	1	0
<i>Abortions spontaneous</i>		
Abortion spontaneous	229	0
<i>Foetal complications NEC</i>		
Haemorrhage foetal	1	0
<i>Foetal position and presentation abnormalities</i>		
Face presentation	1	0
<i>Gestational age and weight conditions</i>		
Low birth weight baby	1	0
Premature baby	2	0
<i>Haemorrhagic complications of pregnancy</i>		
Haemorrhage in pregnancy	1	0
Subchorionic haemorrhage	1	0
<i>High risk pregnancies</i>		
Pregnancy of unknown location	1	0
<i>Hypertension associated disorders of pregnancy</i>		
Pre-eclampsia	3	0
<i>Labour onset and length abnormalities</i>		
Precipitate labour	1	0
Premature labour	3	0
Premature rupture of membranes	3	0
Prolonged labour	1	0
<i>Maternal complications of delivery NEC</i>		
Traumatic delivery	1	0
<i>Maternal complications of labour NEC</i>		
Uterine contractions abnormal	1	0
Uterine hypertonus	1	0
<i>Maternal complications of pregnancy NEC</i>		
Biochemical pregnancy	3	0
Decidual cast	3	0
Ectopic pregnancy	8	0
Hyperemesis gravidarum	2	0
Morning sickness	1	0
Pelvic girdle pain	2	0
Preterm premature rupture of membranes	1	0
Somatic symptom disorder of pregnancy	1	0
<i>Multiple pregnancies</i>		
Twin pregnancy	2	0
<i>Normal pregnancy, labour and delivery</i>		
Delivery	1	0
Labour pain	1	0
Live birth	2	0
Pregnancy	24	0
Uterine contractions during pregnancy	1	0
<i>Placental abnormalities (excl neoplasms)</i>		
Foetal vascular malperfusion	1	0
<i>Pregnancy complicated by maternal disorders</i>		
Gestational diabetes	6	0
Peripartum cardiomyopathy	1	0
<i>Stillbirth and foetal death</i>		

## Case Series Drug Analysis Print

## Name: COVID-19 AstraZeneca Vaccine Analysis Print

Report Run Date: 10-Feb-2022

Data Lock Date: 09-Feb-2022 18:30:05

Reaction Name	Total	Fatal
<b>Pregnancy conditions</b>		
<del>Stillbirth</del>		
<del>Umbilical cord complications</del>		
<del>Umbilical cord around neck</del>		
<del>Unintended pregnancies</del>		
<del>Pregnancy after post coital contraception</del>		
<del>Pregnancy on contraceptive</del>		
<del>Pregnancy with implant contraceptive</del>		
<del>Unintended pregnancy</del>		
<b>Pregnancy conditions SOC TOTAL</b>	<b>329</b>	<b>5</b>



## Case Series Drug Analysis Print

## Name: COVID-19 AstraZeneca Vaccine Analysis Print

Report Run Date: 10-Feb-2022

Data Lock Date: 09-Feb-2022 18:30:05

Reaction Name	Total	Fatal
<b>Vascular disorders</b> Vascular disorders cont'd		
<b><i>Vascular hypertensive disorders NEC</i></b>		
Diastolic hypertension	5	0
Essential hypertension	1	0
Hypertension	1049	1
Labile hypertension	2	0
Neurogenic hypertension	1	0
Systolic hypertension	3	0
Venous hypertension	4	0
White coat hypertension	12	0
<b><i>Vascular hypotensive disorders</i></b>		
Capillary leak syndrome	17	0
Diastolic hypotension	1	0
Hypotension	562	0
Orthostatic hypotension	48	0
<b><i>Vascular malformations and acquired anomalies</i></b>		
Arteriovenous fistula	1	0
<b><i>Vasculitides NEC</i></b>		
Behcet's syndrome	3	0
Diffuse vasculitis	2	1
Granulomatosis with polyangiitis	2	0
MAGIC syndrome	3	1
Vasculitis	112	2
<b><i>Vena caval embolism and thrombosis</i></b>		
Vena cava thrombosis	8	1
<b>Vascular disorders SOC TOTAL</b>	<b>13766</b>	<b>74</b>
<b>TOTAL REACTIONS FOR DRUG</b>	<b>862394</b>	<b>126</b>
<b>TOTAL REPORTS</b>	<b>243491</b>	
<b>TOTAL FATAL OUTCOME REPORTS</b>		<b>126</b>

## ANNEXURE P-3

[www.thegatewaypundit.com /2022/01/whistleblowers-reveal-dod-medical-data-showing-military-can...](http://www.thegatewaypundit.com/2022/01/whistleblowers-reveal-dod-medical-data-showing-military-can...)

### Whistleblowers Reveal DoD Medical Data Showing Military Cancer Diagnoses HAVE TRIPLED Since The Rollout Of The Experimental Vaccines - Along With a 10x Increase in Neurological Disorders and a Near 5x increase in Female INFERTILITY - (VIDEO)

Julian Conradson : 9-11 minutes : 1/27/2022



On Monday, several world-renowned doctors and medical experts spoke during a [panel discussion](#) in Washington DC that was hosted by Senator Ron Johnson (R-WI),

The nearly five-hour-long event, which was titled “[Covid-19: A Second Opinion](#),” saw a wide range of issues discussed, including “the global pandemic response, the current state of knowledge of early and hospital treatment, vaccine efficacy, and safety, what went right, what went wrong, what should be done now, and what needs to be addressed long term,” according to its description on Sen. Johnson’s [website](#).

The esteemed medical experts sounded the alarm over several issues that they have come across over the past year, exposing even more damning information that illustrates the horrific effects of the experimental vaccines, and how the corrupt US health regime has nefariously attempted to cover its tracks since the beginning.

Unfortunately, the catastrophic effects of the vaccines may be worse than ever thought possible, especially for young people.

**TRENDING:** [MUST SEE: President Trump Releases New Video - "Justice Is Coming for Hillary"](#)

During the event, Ohio attorney Thomas Renz [presented DOD medical billing data](#) from the Defense Medical Epidemiology Database ([DMED](#)) that exposes the disturbing truth about what is happening to the health of our service members since the rollout of the jab a year ago.

According to Renz, there has been an astronomical increase in several serious illnesses and disorder diagnoses in the US military since the rushed rollout of the Covid-19 vaccine – most concerning of which – cancer, which has seen a 3x increase.

*“We have substantial data showing that we saw, for example, miscarriages increasing by 300% over the five-year average, almost. We saw almost 300% increase in cancer over the five-year average.”*

The [DMED](#) data also revealed that there has been a whopping ten times increase in neurological disorders since the vaccines were introduced, which directly impacts military readiness, especially within the US Air Force.

Not the most encouraging thing, considering the Warhawks in the DC Swamp are [pushing](#) to kick off WWII with Russia.

*“We saw — this one’s amazing — neurological. So, neurological issues which would affect our pilots, over 1000% increase. 1000,” he said.*

Completely flabbergasted by the revelation, Sen. Johnson asked Renz to clarify: “Ten times,” he said. “That’s ten times the rate?”

Renz continued:

*“82,000 per year to 863,000 in one year. Our soldiers are being experimented on, injured, and sometimes possibly killed.”*

WATCH:

Attorney Thomas Renz reveals what multiple DoD whistleblowers have provided on the safety signals they are seeing

These numbers are mind blowing! [@SenRonJohnson](#)  
[pic.twitter.com/gS4fhwF1Po](https://pic.twitter.com/gS4fhwF1Po)

— Chief Nerd (@TheChiefNerd) [January 24, 2022](#)

Senior editor [Daniel Horowitz](#) of the Blaze [spoke](#) with Renz and corroborated the information with the whistleblowers to confirm the data’s legitimacy. According to Horowitz, who personally ‘knows two of the three whistleblowers,’ the number of cancer diagnoses in the military went from a 5-year average (2016-2020) of 38,700 per year to 114,645 in the first 10 months of 2021.

Horowitz explained:

*“I know 2 of the 3 cited whistleblowers. Their credentials are impeccable. Lt. Col. Chambers is one of the only Green Beret doctors in the military. Actually I*

*got that wrong. One of the whistleblowers just told me it was through October, not November. So this is 10 months of data off the chart vs. prior 12 month years!”*

Unlike VAERS where the naysayers can suggest that anyone can submit, this is only by military doctors and quantifies every single ICD code in the military for tri care billing of Humana. This is the ultimate defined and finite population with excellent surveillance.

— Daniel Horowitz (@RMConservative) [January 25, 2022](#)

Further adding to the credibility of it all, the military whistleblowers provided their testimony under oath, which will be used in federal court by Renz.

From [The Blaze](#):

*“In a declaration under penalty of perjury that Renz plans to use in federal court, Drs. Samuel Sigoloff, Peter Chambers, and Theresa Long — three military doctors — revealed that there has been a 300% increase in DMED codes registered for miscarriages in the military in 2021 over the five-year average.*

*The five-year average was 1,499 codes for miscarriages per year. During the first 10 months of 2021, it was 4,182.*

*As Renz explained to me in an interview with TheBlaze, these doctors queried the numbers for hundreds of codes from 2016 through 2020 to establish a baseline five-year average. These codes were generally for ailments and injuries that medical literature has established as being potential adverse effects of the vaccines.”*

Renz also [provided](#) The Blaze with additional information on other severe illnesses and disorders that he did not have time to get to during the panel discussion.

The scope of the damage is absolutely shocking. In addition to the 3x of cancer and miscarriages, and the 10x of neurological disorders, there has been a near 5x spike in female infertility, among others.

*“Some other numbers he did not mention at the hearing but gave to me in the interview are the following:*

- *myocardial infarction –269% increase*
- *Bell’s palsy – 291% increase*
- *congenital malformations (for children of military personnel) – 156% increase*
- *female infertility – 471% increase*
- *pulmonary embolisms – 467% increase”*

The data comes directly from the [US military's Defense Medical Epidemiology Database \(DMED\)](#) system, which is the military's equivalent to the [US Vaccine Adverse Events Reporting System \(VAERS\)](#) – but the DMED system is only accessible by military doctors and records every single case in the military for insurance billing, which, unlike VAERS, makes it extremely accurate.

As Horowitz also [points out](#), this military-medical information is easily accessible to the federal government's alphabet agencies (FDA, CDC, DoD) that are in charge of creating the public health nightmare we are living through, which indicates they are well aware of the skyrocketing diagnoses of life-threatening reactions that are linked to the experimental vaccine – but have decided to cover up the information from the public while they continue to compel more jabs.

In short, Biden's federal government is fully aware of what's going on, but the narrative and their corruption are more important than American lives, even if they are military members.

According to Renz, the whistleblowers came forward because of what they were seeing on the job as they treated military personnel, leading them to investigate the DMED system for anomalies related to the increase they had seen in their clinical experience.

Unfortunately, their investigation confirmed what they had feared, and things have just been getting worse.

This is just “the tip of the iceberg,” claimed Renz, who says he has even more data coming.

One of the whistleblowers [explained](#) to The Blaze:

*“These doctors were motivated to explore DMED data due to the numbers of case increases they were seeing empirically,” said the whistleblower, who served in the military for many years. ‘Some physicians throughout the force (all branches) have been intimidated by commands not to perform the full spectrum of testing and adhere to the regulations, which implicitly direct full workups for EUA vaccination adverse reactions. It will require other military physicians to step forward and share experiences to fully ascertain the enormity of these allegations and engender an investigation to the fullest extent.’*

*Renz claims he has a video with two witnesses showing the entire process of downloading this data from the database and is prepared to present it in court. He also told me that this is just ‘the tip of the iceberg,’ as the codes have increased exponentially in numerous other diagnosis categories. Renz said his spreadsheet, which includes over 100 medical diagnosis categories, was shared with Senator Johnson and his staff before the Monday hearing.”*

During Monday's hearing, Renz also testified that some of the data, specifically related to myocarditis, have been manipulated since the whistleblowers pulled the data out of the DMED system, indicating that the federal government is attempting to cover its tracks.

Following Renz's bombshell revelations, Sen. Johnson warned Biden's corrupt regime that they have officially been put "on notice," and better not delete any of the data.

*"The Department of Defense, the Biden administration is on notice they must preserve these records and this must be investigated."*

If the data is accurate, and there is no indication that it isn't (especially considering the [corroborating data in VAERS](#), [countless medical studies](#) showing the [adverse effects of the vaccine](#), and the [manipulation of Covid statistics](#) that has already been exposed), Biden's federal government has committed atrocious crimes against humanity and has been working overtime to criminally conceal them from the public.

We are way past due for some major accountability.



Select Language: English

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<b>Name</b>	Rushil Tamboli
<b>Received Date</b>	23/10/2021
<b>Public Authority</b>	CENTRAL DRUGS STANDARD CONTROL ORGANISATION
<b>Status</b>	REQUEST DISPOSED OF
<b>Date of action</b>	15/11/2021
<p><b>Reply :-</b> As per information available, the firm have enrolled healthy participants in the various clinical trials of COVID-19 vaccines and as per exclusion criteria, Pregnant and lactating/ breast-feeding women were excluded. Further, the details of inclusion &amp; exclusion criteria and details of number of participants in all the clinical trials of various COVID-19 vaccines are publically available in ICMR CTRI website <a href="http://www.ctri.nic.in">www.ctri.nic.in</a>.</p> <p>The brief of interim clinical trial results containing safety, immunogenicity and efficacy results and number of participants, side-effects and adverse effects observed during the clinical trials, contraindications, precautions and instruction for use approved COVID-19 vaccines are available in Summary of Product Characteristics (SmPC) &amp; factsheet which are publically available on CDSCO website i.e. <a href="http://www.cdsco.gov.in">www.cdsco.gov.in</a>.</p>	
<b>CPIO Details :-</b>	Sushanta Sarkar Phone: 011-23216367 rti[dot]cell[at]cdsco[dot]nic[dot]in
<b>First Appellate Authority Details :-</b>	A[dot] K[dot] Pradhan Phone: 011-23216367 rti[dot]cell[at]cdsco[dot]nic[dot]in
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Recommendations of the SEC meeting to examine COVID-19 related proposal under accelerated approval process made in its 161<sup>st</sup> meeting held on 22.06.2021 at CDSCO, HQ New Delhi:

Agenda No	File Name & Drug Name, Strength	Firm Name	Recommendation
<b>New Drug Division</b>			
1.	12-01/21-DC (pt-166)  IV Artesunate  IV Infliximab  Tab Imatinib	ICMR - National AIDS Research Institutes	<p>The applicant presented their proposal before the committee.</p> <p>After detailed deliberation, the committee recommended for approval of protocol subject to the conditions that</p> <ol style="list-style-type: none"> <li>1. Artesunate arm shall not be recommended in view of non availability of data.</li> <li>2. The definition for 'Moderate' to be elaborated to include the respiratory frequency 24-30</li> <li>3. Standard of Care to be well defined and uniform across the sites.</li> <li>4. RT-PCR, and not rapid antigen testing, shall be used for diagnosis of COVID -19.</li> </ol>
2.	12-01/20-DC (pt-333)  Anti-Corona Virus Therapies	St John Research Institute	<p>In light of earlier recommendation dated 01.06.2021, the firm presented the revised clinical trial protocol for conduct of study in mild Covid patients.</p> <p>After detailed deliberation, the committee recommended for grant of permission to conduct the trial in mild COVID-19 patients with following conditions:-</p> <ol style="list-style-type: none"> <li>1. Standard of Care to be well defined and uniform across the sites.</li> <li>2. RT-PCR, and not rapid antigen testing, shall be used for diagnosis of COVID -19</li> </ol>
3.	ND/CT/20/000096  Carbohydrate derived Fulvic Acid	M/s Sphaerapharma	<p>In the light of earlier recommendation of the SEC held on 17-12-2020 &amp; 18-12-2020, the firm presented the proposal for Fulvic Acid , which is a family of many organic acids.</p> <p>The firm could not present any data on characterization of the organic acids, PK, PD, Safety efficacy data of the product.</p> <p>The product is not approved as drug even for clinical trial in any country.</p>



Agenda No	File Name & Drug Name, Strength	Firm Name	Recommendation
			Therefore, the Committee did not recommend for approval of the proposed Clinical Trial.
4.	ND/CT-21/FF/21/26235  Aviptadil Solution for inhalation 67 mcg/ml	M/s Biosphere	<p>The firm presented their proposal for approval of manufacture and marketing the drug “Aviptadil Inhalation” as Emergency use approval for moderate to severe Covid-19 treatment with waiver of CT &amp; BE trial.</p> <p>After detailed deliberation, the committee recommended that the firm should present the detailed data on PK/PD, safety, efficacy of aviptadil by inhalation route to consider the matter further.</p>
<b>Biological Division</b>			
5.	BIO/CT/21/000077  Adenoviral Vector COVID-19 Vaccine (BBV 154) (Intranasal)	M/s Bharat Biotech International Ltd., Hyderabad	<p>The firm presented interim safety &amp; immunogenicity data from Phase I clinical trial of Adenoviral Vector COVID-19 Vaccine (BBV 154) (Intranasal) along with the Phase II clinical trial protocol.</p> <p>After detailed deliberation, the committee recommended for grant of permission to conduct the Phase II clinical trial as per the proposed protocol.</p>
6.	BIO/CT/20/000159  Whole-virion Inactivated SARS-CoV-2 Vaccine BBV152	M/s Bharat Biotech International Ltd., Hyderabad	<p>In continuation to the recommendation of SEC meeting dated 23.04.2021, the firm presented updated interim safety &amp; efficacy data of Phase III clinical trial of Whole-virion Inactivated SARS-CoV-2 Vaccine (BBV152).</p> <p>The committee noted that the firm has submitted safety &amp; efficacy data till two months after the second dose along with final efficacy analysis after accrual of 130 cases of symptomatic RT-PCR positive COVID-19 as required to meet the primary endpoint. Out of 130 cases, 106 were reported in the placebo arm and 24 in the vaccine arm giving vaccine efficacy of 77.8%.</p> <p>Further, the committee noted that, currently Phase III clinical trials are ongoing</p> <p>After detailed deliberation, the committee recommended that the vaccine should be continued to be used under restricted use in</p>

Agenda No	File Name & Drug Name, Strength	Firm Name	Recommendation
			<p>emergency situation . Further, the phase III clinical trial should be continued as per the approved protocol. The firm should update the prescribing information and factsheet accordingly and submit to CDSCO for approval.</p> <p>With regards to the use of the vaccine in pregnant women, the committee recommended that the firm should submit additional safety data.</p>

Recommendations of the SEC meeting to examine COVID-19 related proposal under accelerated approval process made in its 194<sup>th</sup> meeting held on 24.11.2021 at CDSCO, HQ New Delhi:

Agenda	File Name & Drug Name, Strength	Firm Name	Recommendation
<b>Biological Division</b>			
1.	BIO/CT/21/000149 M/s Bharat Biotech International Limited	Whole-Virion Inactivated SARS-CoV-2 Vaccine (COVAXIN)	<p>The firm presented its proposal for conduct of Phase II/III clinical trial of Whole-Virion Inactivated SARS-CoV-2 Vaccine (COVAXIN) in pregnant women along with the clinical trial protocol.</p> <p>After detailed deliberation, the committee recommended that firm should submit the following information before the committee for further review:</p> <ol style="list-style-type: none"> <li>1. Safety data of pregnant women vaccinated in the immunization program</li> <li>2. Data of developmental toxicity studies in animal.</li> <li>3. The safety follow up should be increased to 6 months from the date of birth.</li> </ol>
2.	BIO/MA/21/000056 M/s Serum Institute of India Pvt. Limited	SARS-COV-2 Recombinant Spike Protein Nanoparticle Vaccine (SARS-COV-2 rS) With Matrix-M1™ Adjuvant	<p>The firm presented its proposal for grant of market authorization of SARS-COV-2 Recombinant Spike Protein Nanoparticle Vaccine (SARS-COV-2 rS) with Matrix-M1™ Adjuvant for restricted use in emergency situation in the age group of 18 years and above along with the interim safety and immunogenicity data of Phase II/III bridging clinical trial conducted in the country.</p> <p>The firm has submitted interim clinical trial data of safety and efficacy from Phase III clinical trials conducted in UK &amp; US.</p> <p>The committee noted that the vaccine is technology transfer of NOVAVAX vaccine and is not yet approved in the country of origin.</p> <p>After detailed deliberation, the committee recommended that firm should submit the following data/clarifications for further consideration:</p> <ol style="list-style-type: none"> <li>1. The correct status of the Phase-III clinical trials in USA &amp; UK along with up to date data on the safety, efficacy and</li> </ol>

Agenda No	File Name & Drug Name, Strength	Firm Name	Recommendation
			<p>immunogenicity. Further, as informed by the firm they should communicate whether the study for efficacy endpoint is continuing or is there any amendment in clinical trial protocol in country of origin.</p> <p>2. Comparative statement of immunogenicity parameters of the subjects from the USA, UK and other overseas Phase-III studies with data from phase-III study in India.</p> <p>3. Review status of the application with regulatory authorities of USA &amp; UK.</p>
3.	BIO/CT/21/000150  M/s PGIMS, Chandigarh	[Covishield, Covaxin and Sputnik-V]	<p>The institute presented its proposal for conduct of Academic clinical trial with Covishield, Covaxin and Sputnik-V]. After detailed deliberation, the committee recommended that the Institute should submit revised clinical trial protocol for further review before the committee with the following changes:</p> <p>1. Efficacy objectives should be omitted.</p> <p>2. Interchangeability should be defined</p> <p>3. The sponsor's role should be clearly defined in protocol including compensation and medical management.</p> <p>4. The immunogenicity parameters should be same as those assessed in the efficacy studies of the vaccine.</p> <p>5. Since the Sputnik V have two different components therefore its inclusion shall be reviewed.</p> <p>6. DSMB to be constituted and to be defined in the study protocol.</p>
4.	BIO/CT/21/000194  Cadila Healthcare Limited	Novel Corona Virus - 2019-nCov vaccine (ZyCovD vaccine)	<p>The firm presented amendment in Phase III efficacy trial in Novel Corona Virus 2019-nCoV vaccine for modification in number of target COVID-19 RT-PCR cases in primary objective.</p> <p>The committee noted that, the target COVID-19 cases as per approved clinical</p>

Agenda No	File Name & Drug Name, Strength	Firm Name	Recommendation
			<p>trial protocol are 158, however, till date about 105 COVID-19 cases have been reported.</p> <p>During the deliberation, the firm proposed to seek permission for undertaking of second interim analysis and present the data.</p> <p>After detailed deliberation, the committee agreed to the request of the firm for presenting the data as above.</p>
5.	BIO/CT/20/000182  M/s Gennova Biopharmaceuticals Limited	mRNA Vaccine for Injection (COVID-19)	<p>In light of the SEC meeting dated 11.10.2021, the firm has submitted revised clinical trial protocol for the discontinuation of recruitment of subjects in Phase II part of the Phase I/II clinical trial of mRNA Vaccine for Injection (COVID-19) [HGCO19].</p> <p>The firm presented amended clinical trial protocol as Phase I clinical trial.</p> <p>After detailed deliberation, the committee recommended for grant of approval for the revised protocol.</p>

**Call 01: Call to 1075 from Vadodara, Gujarat****Recording Link:**

Responder - Namaskar 104 health helpline. How may I help you?

Caller - Hello, I want to get some information regarding the pregnant women's safety concerns with regards to the covid vaccination.

Responder - Yes madam do ask.

Caller - is it safe for pregnant women to take the Covid vaccine?

Responder - Yes a pregnant mother can take the vaccine.

Caller - Any side effects?

Responder - But before getting the vaccine if you are on some medication then it is needed to take the advice of your doctor. The doctor where you go to be examined, there. One time is important to get their advice.

Caller - Yes but is there any official Material available which has information on what the possible side effects may be expected. Or of any possible harm to the baby's health and development if any. Is there any data available from the trials?

Responder - No madam. There is no such problem, nothing like that. A pregnant mother may take the vaccine. But I will have you speak to the doctor and you may get their opinion.

Caller -- ok

Responder -- What Jilla (district) are you calling from?

Caller -- Vadodara

Responder -- Are you speaking from Vadodara city?

Caller -- mmm

Responder -- Can you tell me your name?

Caller -- I am Maya Valecha

Responder -- Mayaben can you give me your full name?

Caller -- Mayaben Valecha. What doctor will you have me speak to?

Responder -- These, here there is a doctor right. With them I will have you speak. The doctor can advise you.

Caller -- hmm ok

Responder -- Can you give me your husband's or father's name madam?

Caller -- hm hm why . In this day and age you should not ask women this actually. My name is Maya Valecha, Maya Valecha (softer).

Responder -- Ok no problem madam. Stay on the line and I shall transfer your call to the doctor.

Caller -- Yes thank you.

Responder -- ji

(After about 45 seconds of waiting)

Responder -- Hello

Caller -- Hello

Responder -- Thank you for staying on the line. And are you yourself pregnant or is there another lady?

Caller -- Actually it is my friend.

Responder -- is like that. Ok ok

Caller -- yes

Responder -- I will transfer your call to the doctor. You will be able to get more information.

Caller -- ok

Responder -- ji Thank you for calling 104.

(Ringing)

Responder 2 -- Namaskar speaking from (inaudible) how may I help you?

Caller -- Yes hello. Are you the doctor speaking?

Responder 2 -- yes

Caller -- May I know your name?

Responder 2 -- Dr Priyanshi

Caller -- ok. I want to know in a pregnancy situation, that for covishield or covaxin is there some trial data that it says it's safe for the child and if anything in the future... Or which is better of the two covaxin or covishield, anything like that?

Responder 2 -- No there is nothing like that. You may take any of the two.

Caller -- And are you saying this on the basis on some trial data or are you just saying it as government....?

Responder 2 -- Gujarat government has made put out guidelines so they has to have done so on the basis of trials

Caller -- Ok. So you yourself have not seen trial or .... As you when one goes to take the vaccine they don't show any Factsheet or something. So..

Responder 2 -- yes say...

Caller -- So does the Factsheet have anything on pregnant women is what I wanted to know.

Responder 2 -- So it has been stated now in the guidelines that pregnant women can take it.

Caller -- Yes but like when the kind of paper insert available with medicines saying so and so side effect is possible...

Responder 2 -- No no. There is no such thing

Caller -- So that kind of a paper have you seen or read that. Like when we go to purchase an antibiotic, then they give .....

Responder 2 -- I got it I understood what you are saying. There is nothing like that in writing. What the Gujarat guidelines have been stated, we can tell you....that pregnant women can take it.

Caller -- So if I want to inquire further about this . I wanted to know if there is some trial data and where I can acquire it from.

Responder 2 --- that you cannot get but if you want to ask more you can ask at the vaccination centre, the doctors seated there. You may ask there for more information.

Caller -- okay

Responder 2 -- okay ?

Caller -- okay thank you.

## **Call 02: Call to 1075, Tonk Rajasthan**

### **Recording Link:**

Respondent : Namaskar! Jeevan Vahini Seva, please tell your emergency.

Caller: Sir, I want to ask few questions related to pregnancy.

R: Yes.. Tell your name, madam.

C: Akanksha.

R: Your Age?

C: 30years.

R: And tell the name of the district from where you are calling.

C: Tonk

R: Which Tehsil in Tonk District?

C : Deoli

R: Which village in Deoli Tehsil?

C: No, I am speaking from deoli city only.

R: You want to take advice na madam?

C: Yes!



R: We are transferring your call to the concerned department.. Don't cut the call and thank you for calling on Jeevan Vahini Seva.

Ringin..

C :Hello

Doctor : Yes please tell.

C : Sir I want to ask few questions. Can we take covid vaccines during pregnancy?

Doctor : No, you can't take but according to the guidelines, you can take it but it's on your own risk.

C: OK.. We can take it on our own risk but what is the risk?

Miscarriage or something?

Doctor: No no there is nothing like that.

C: Have you seen any such case?

D: No, we haven't seen any such case and there is no such problem.

C : OK.. But suppose I take it.. Is there any side effect or anything else that can happen?

Doctor : No such kind of case have happened.

C : No Adverse effects till date?

Sir can you make trial data's of vaccines available for us?

Doctor : What data's?

C : Vaccine trial data's.

Doctor : You'll get it from the hospital from where you get the vaccine.

C : OK I will get it from there only?

Doctor : yes

C: But there are few mild side effects like fever and all. Do I need to report them in case anything like that happens?

Doctor : Take medicine of cold and fever in case of any such problems and you can call on this no. Also.

C: OK so I can call on this no.?

Ok thank you

Doctor : OK madam.

**Call 03: Call to 1075 from Mumbai, Maharashtra  
Recording Link:**

Caller- I wanted to ask questions regarding vaccines

Responder-what is your name?

Caller-Nisha

Responder-Greetings

Caller-my questions are regarding vaccination of pregnant women.

Responder-yes

Caller-can you answer my questions?

Responder-yes, where are you calling from?

Caller-Mumbai.

Responder - ok, tell me.

Caller-is vaccination mandatory for pregnant women?

Responder-it is not mandatory, but the government has allowed it after testing. It is up to you to get vaccinated or not.

Caller-ok, is it safe for pregnant women to get vaccinated ?

Responder-There should be no problem you can take vaccine after child delivery.

Caller-will it affect the health of the unborn child?

Responder-Till now there have been no such issues.

Caller-Do you have vaccine clinical trial data for pregnant women for covaxin and covishield?

Responder-That trial data you will get from the Government, for which you will have to send a mail. But i could connect you to a Government Gynecologist you can ask about your quieres.

Caller - ok , please connect the call.

Responder2 - Greetings

Caller - I would like to know if covid19 vaccines are safe for pregnant women?

Responder2 - Yes, it is safe.

Caller-Is it mandatory?

Responder2-Though it is necessary, it is not mandatory, but it is advisable to take the vaccine.

Caller-will it affect the health of the unborn child?

Responder2-No , it has no affect on the health of the unborn child.

Caller-Do you have clinical trial data for vaccination of pregnanat women for covaxin and covishiled?

Responder2 - I do not have any clinical trial data, but it is understood that the results would be given after clinical trials. Since 3 July 2021 ,they have revised their instructions stating that it is safe for pregnant women to get vaccinated, for which we are arranging separate camps

Caller- So you are saying you have no clinical data to reassure me?

Responder2 - We have instructions from the Government, that vaccines can be given to pregnant women, since July 3 rd 2021.

Caller - Incase of any adverse event how should anyone report, should we call or what's the procedure for reporting?

Responder2 - Where ever you get vaccinated the doctors there will take care of the adverse events.

Caller - This means you do not have any help line number, can we call on 104?

Responder2 - No. It cannot happen over the phone, the doctors at the place of vaccination will take care of adverse events, Though adverse events do not happen immediately.

Caller - ok

Responder2 - You might get fever or headache for 2 or 3 days, that usually goes away on its own. Some people experience it, many don't.

Caller - Do you have any fact sheet or any contraindication stating who should get vaccinated, which you can share with the public?

Responder2 - We know about contraindication, if there is a major reaction to the first dose ,in such case one should not take second dose. That is the only contraindication we know of.

Caller - Thank you for the information.

Responder2 - We have vaccinated more than 150cr people in India without any issues.

Caller - But don't you think it is a matter of concern to vaccinate pregnant women?

Responder2 - I am telling you before they had instructed not to vaccinate pregnant women, but since 3 July 2021 the Government revised the data and stated that the vaccines do not affect the unborn child and it is safe to give. After that the Government guidelines were issued to go ahead with the vaccination of pregnant women. For which we are setting up separate camps.

Caller - And there is no other contraindication even in the fact sheet.

Responder2 - No

Caller - Thank you , I had called to gain some confidence on this matter, thank you again.

**Call 04: Call to 1075 from Karnataka  
Recording Link:**

Covid Customer Care : Welcome to Corona helpline how can I help you?!

Caller: Good morning mam this is Smita. I needed some information for a friend. She lives in Maharashtra. She is pregnant and she is not familiar with customer helplines and so she asked me to check for her. She said that vaccines have been made compulsory in Maharashtra so she is concerned how safe this vaccine is for pregnant women and is afraid to take it.

Covid Customer Care : I apologize for the issue you are facing. May I know from where you are calling please?

Caller: I am calling from Karnataka.

Covid Customer Care : : Ok so I'd like to inform you that it is completely safe for pregnant women to take the vaccine if she has no major issues. But if she is having any major issues if she is pregnant...

Caller: No no she is already pregnant

Covid Customer Care : ok I understand your concerns. So if she is already pregnant and if she has no major issues she can absolutely take the vaccine it is safe but if she has any kind of health issues then she needs to consult her doctor whether or not she must take the vaccine

Caller: ok ok so there is no issue otherwise??!

Covid Customer Care : No no, no issues at all if she has no major health issues

Caller: Yes hers is a normal pregnancy. Can she do regular walking exercises?

Covid Customer Care : Absolutely she can do walking there are no issues

Caller: She is concerned because she heard there are a lot of miscarriages. So she is terribly afraid and now it is her third month. She also wanted to know which month she should take the vaccine? 3rd month 6th or 9th month ?!

Covid Customer Care : See I would like to inform you that we have no information on this as we are not doctors but we can definitely inform you whether you can take the vaccine or not. She needs to consult her family doctor who is familiar with her medical history whether or not she needs to take the vaccine and when to take it.

Caller : ok ok thank you ma'am. But there will be no issues in the future right? Because we are very afraid.

Covid Customer Care : No no. See mam there are some slight side effects post the vaccine but otherwise there are no issues at all.

Caller : No no there should be no issues for the child like disability and health problems because they are making it compulsory for delivery also. They have no option or intention to take the vaccine but are forced to take it so it should not affect mother and child.

Covid Customer Care : Absolutely I understand your concerns. If there were any issues then the government would not take risks of vaccinating the people.

Caller: Yes that I know. So if the government is so confident about their product and if something happens we can rely on the government who should compensate for any loss. Is there any helpline where we can communicate if we face any issues?

Covid Customer Care : See like that there are no issues you can take the vaccine. But again if you face any problems regarding the vaccine please consult your own doctor who can guide you better whether you have to take it or not. But if there is no major issue she can take the vaccine.

Caller : See we are trusting your advice. The mother and child are safe now. But if something happens we need to know what we have to do and all.

Covid Customer Care : Mam I can share with you only what info I have. Again I want to let you know that she must consult her doctor and be sure whether she should take the vaccine or not.

Caller : Ok Thank you Mam.

Covid Customer Care : Do you need any other information?

Caller : No no thank you.

Covid Customer Care : Ok

### **Call 05: Call to 1075 from Mumbai, Maharashtra**

Cust Care : Namaste! Welcome to National Corona help desk. I am Vikas. How can I help you ?

Cust : This is Sunita singh from Mumbai. I would like to ask a few questions related to the covid vaccine. I have registered myself for the shot so I wanted to know before taking. Is it safe for pregnant women to take the vaccine?!

CC: Ok definitely pregnant women can take the vaccine but if you want you can also consult with your doctor. But yes as per the government guidelines pregnant woman can take the vaccine.

C: No I just wanted to know is it safe because I have registered myself for taking the vaccine so I just need to know how safe it is.

CC: Yes definitely you can take the vaccine.

C: But what are the side effects of the vaccine please?

Cc: Ok possible side effects are are maybe you may feel the pain at the injection side, swelling at the injection side, you can feel fever after the vaccine and you can feel headache. These are the common side effects.

C: Ok. That's it ?! So after taking will it affect my baby's health or development?

CC: No. As per government guidelines there are no effects on the baby that's why government guidelines allow pregnant women to take the vaccine and it is safe for pregnant women.

C: Ok that's good. Is there any trial data available for covid vaccine or covishield or covaxin ?!

CC: uh..for what. ?!

C: Is there any trial data available in the market or with you?!

CC: Ok, so actually after trial, after experiment, government has approved. So if government guidelines has said that it is safe for pregnant women then it is clearly the experiment's based data. Ok.

C: Oh that way ! Thankyou

CC: Ok so as you told me your name is Sunita right?

C: Yes

Cc: You are from Maharashtra State, Mumbai.

C: Yes.

Cc : Thank you. May I know your age please? how old are you?!

C: 40

CC: Thank you for the confirmation. Your mobile number is 98XXXXXX

C: Yes that's right.

CC : Thank you for the confirmation. Can you please confirm the area code Ms Sunita?!

C: 400078

CC: Thank you for the confirmation. Is there anything else that I may assist you with?

C: No, Thank you.

CC : Ok thank you for the confirmation. If you are satisfied with the information that I provided you, you can also rate this call from 1 being lowest and 5 being highest.

C : Yes as of now I am satisfied. I will think about it. Thank you . Definitely I will do that.

CC : for more information on covid-19 you can WhatsApp on

C : Ok thank you.

CC : Thank you for calling National Covid Helpdesk. Have a nice day. For more info call on 1075.

C: Thank you.

**IN THE SUPREME COURT OF INDIA**

**CIVIL ORIGINAL JURISDICTION**

**I.A. NO.            OF 2022**

**IN**

**WRIT PETITION (CIVIL) NO. 1383 OF 2021**

**(PIL UNDER ART. 32 OF THE CONSTITUTION OF INDIA)**

**IN THE MATTER OF:**

Dr. Ridhi Arora & Others

...PETITIONERS

Versus

Union of India

...RESPONDENT

**Application seeking exemption from filing notarized affidavit**

To

Hon'ble The Chief Justice of India and

His Companion Justices of the Supreme Court of India

**MOST RESPECTFULLY SHOWETH:**

1. The present Application is filed by Petitioner in the captioned Writ Petition. The contents of the Petition are not repeated herein for the sake of brevity but the same may be read as part and parcel of the instant application.
2. On account of Covid-19 the affidavit signed by the petitioner could not get attested by Notary/Oath Commissioner. Hence, the present application has been



filed by the Petitioner seeking exemption from filing attested and notarized copy of the affidavit.

3. Petitioner further submits that the attested copy of the affidavit shall be filed upon the directions of this Hon'ble Court.

PRAYER

In the above circumstances it is therefore most respectfully prayed that this Hon'ble Court may be pleased to:

- i. Grant exemption to the Petitioner from filing attested copy of the affidavit in support of the Writ Petition;
- ii. Pass any such writ/order/directions as this Hon'ble Court may deem fit and proper in the facts and circumstances of the case.

And for this act of kindness, the petitioners shall be forever grateful.

Place: New Delhi

Date: 17.02.2022



Satya Mitra

Advocate of Petitioner

satyamitra2003@yahoo.co.in

Ph. 9811768848

**IN THE SUPREME COURT OF INDIA**

**CIVIL ORIGINAL JURISDICTION**

**I.A. NO.                      OF 2022**

**IN**

**WRIT PETITION (CIVIL) NO. 1383 OF 2021**

**(PIL UNDER ART. 32 OF THE CONSTITUTION OF INDIA)**

**IN THE MATTER OF:**

Dr. Ridhi Arora & Others

...PETITIONERS

Versus

Union of India

...RESPONDENT

**AFFIDAVIT**

I, Dr. Ridhi Arora, aged about 40 years, [REDACTED]

[REDACTED], do hereby solemnly affirm and state as under:

1. That, I am the Petitioner No. 1 in the above captioned Writ Petition/PIL, and in such capacity, I am well conversant with the facts of the Petition and competent to swear this affidavit.
2. That, the contents contained in the Application for seeking exemption from filing notarized affidavit from pages   61   to   62   and Paragraph 1 to 3 are true and correct to my knowledge and belief nothing material has been concealed.

3. This Application is being filed under my instructions and the contents thereof are true to the best of my knowledge and there is no personal gain, private motive or oblique reason in filing the Application.



**DEPONENT**

**VERIFICATION:**

Verified at New Delhi on this the 17<sup>th</sup> day of February, 2022 that the contents of the above affidavit are true and correct to my knowledge, that no part of it is false and that nothing material has been concealed.



**DEPONENT**

**IN THE SUPREME COURT OF INDIA**

**CIVIL ORIGINAL JURISDICTION**

**I.A. NO.                      OF 2022**

**IN**

**WRIT PETITION (CIVIL) NO. 1383 OF 2021**

**(PIL UNDER ART. 32 OF THE CONSTITUTION OF INDIA)**

**IN THE MATTER OF:**

Dr. Ridhi Arora & Others

...PETITIONERS

Versus

Union of India & Another

...RESPONDENTS

**AFFIDAVIT**

I, Mathukutty John, aged about 64 years, [REDACTED]

[REDACTED], do hereby solemnly affirm and state as under:

1. That, I am the Petitioner No. 2 in the above captioned Writ Petition/PIL, and in such capacity, I am well conversant with the facts of the Petition and competent to swear this affidavit.
2. That the contents contained in the Application for seeking exemption from filing notarized affidavit from pages 61 to 62 and Paragraph 1 to 3 are true and correct to my knowledge and belief nothing material has been concealed.

3. This Application is being filed under my instructions and the contents thereof are true to the best of my knowledge and there is no personal gain, private motive or oblique reason in filing the Application.



**DEPONENT**

**VERIFICATION:**

Verified at New Delhi on this the 17<sup>th</sup> day of February, 2022 that the contents of the above affidavit are true and correct to my knowledge, that no part of it is false and that nothing material has been concealed.



**DEPONENT**

**IN THE SUPREME COURT OF INDIA****CIVIL ORIGINAL JURISDICTION****I.A. NO.            OF 2022****IN****WRIT PETITION (CIVIL) NO. 1383 OF 2021****(PIL UNDER ART. 32 OF THE CONSTITUTION OF INDIA)****IN THE MATTER OF:**

Dr. Ridhi Arora &amp; Others

...PETITIONERS

Versus

Union of India &amp; Another

...RESPONDENTS

**AFFIDAVIT**

I, Suman Kumari Chouhan, aged about 29 years, [REDACTED]

712102, do hereby solemnly affirm and state as under:

1. That I am the Petitioner No. 3 in the above captioned Writ Petition/PIL, and in such capacity, I am well conversant with the facts of the Petition and competent to swear this affidavit.
2. That the contents contained in the Application for seeking exemption from filing notarized affidavit from pages 61 to 62 and Paragraph 1 to 3 are true and correct to my knowledge and belief nothing material has been concealed.

3. This Application is being filed under my instructions and the contents thereof are true to the best of my knowledge and there is no personal gain, private motive or oblique reason in filing the Application.

*Suman Chauhan*

**DEPONENT**

**VERIFICATION:**

Verified at New Delhi on this the 17<sup>th</sup> day of February, 2022 that the contents of the above affidavit are true and correct to my knowledge, that no part of it is false and that nothing material has been concealed.

*Suman Chauhan*

**DEPONENT**

**IN THE SUPREME COURT OF INDIA****CIVIL ORIGINAL JURISDICTION****I.A. No.            OF 2022****IN****WRIT PETITION (CIVIL) NO. 1383 OF 2021****(PIL UNDER ART. 32 OF THE CONSTITUTION OF INDIA)****IN THE MATTER OF:**

Dr. Ridhi Arora &amp; Other

...PETITIONERS

Versus

Union of India

...RESPONDENT

**APPLICATION SEEKING EXEMPTION FROM FILING OFFICIAL  
TRANSLATED COPIES OF ANNEXURES P-1 and P-7**

To

THE HON'BLE CHIEF JUSTICE OF INDIA  
AND HIS COMPANION JUSTICES OF THE  
SUPREME COURT OF INDIA**MOST RESPECTFULLY SHOWETH:**

1. That, the above captioned Writ Petition is pending adjudication before this Hon'ble Court. The contents of the petition are not repeated herein for the sake of brevity but the same may be read as part and parcel of the instant Application.



2. That, some documents annexed herewith in the Application for additional facts along with documents are in the vernacular language, the annexure being Annexure P- 1 & P-7 and due to urgency in the matter and paucity of time, the Petitioner has got the documents translated by a person who is not an official translator but who is well conversant in both the languages and the same may be taken on record.
3. That, the Petitioners humbly seek the permission of this Hon'ble Court to accept the translated copies of *Annexure P-1, i.e. The true translated copy of social media and newspaper reports on adverse event*, which were in the languages Hindi, Kannada and Tamil and *Annexure P-7, i.e. The true typed and translated copy of the call on tollfree vaccine number*, which were in Gujarati, Hindi and Marathi.
4. It is humbly submitted that the present application is bonafide and is being filed in the interests of justice, and taking on record of these documents would not prejudice to Respondents in any manner.

### **P R A Y E R**

In the above circumstances, it is most respectfully prayed that this Hon'ble Court may graciously be pleased to:

- a) Permit the Petitioner to bring on record additional documents as Annexure P-1 to P-7,
- b) Pass any such other order and further order(s) as this Hon'ble Court may deem fit and necessary in the interest of justice.

AND FOR THIS ACT OF KINDNESS, THE PETITIONERS SHALL BE  
FOREVER GRATEFUL.



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Drawn by: Varsha Gumashta

Place: New Delhi

Date: 17.02.2022