

**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 for Amendment of Prayer**

**WITH**

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

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

**Filed on: 25.01.2022**

**ADVOCATE FOR THE PETITIONER: SATYA MITRA**

**INDEX**

Sl.No.	Particulars	Page No.
1.	Application seeking Permission for Amendment of Prayer on behalf of Petitioners with Affidavit	1- 10
2.	Application for Exemption from filing Notarized Affidavit	11-12

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**Application seeking Permission for Amendment of Prayer**

To

Hon'ble. The Chief Justice of India and

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

**Most respectfully Showeth:**

1.        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. It is humbly submitted that the Petition had been filed by the Petitioners in the exigency of the matter praying for the reliefs prayed therein. However, considering the present circumstances and recent developments in the vaccination program, it would be apposite to amend the prayer, and as such the Petitioners humbly seek the permission of this Hon'ble Court to amend the Prayer as following:
- a. *Issue a writ of mandamus or any other writ, order or direction to the Union of India and all the State Governments to conduct active monitoring and surveillance, by an agency independent of the government and the vaccine manufacturers, of all women administered the vaccine for at least 30 days in accordance with the 2020 WHO Covid 19 Vaccines: Safety Surveillance Manual and the AEFI: Surveillance and Response Operational Guidelines 2015, annexed as Annexure P-1 and Annexure P-2 in additional documents filed on 25.01.2022.*
  - b. *Issue a direction, order or writ, directing the Union of India and all state governments to have Asha workers, Anganwadi workers and auxiliary nurse midwives throughout every state, follow up on a daily basis with the vaccinated women and promptly report any adverse event;*
  - c. *Issue a direction, order or writ, directing the Union of India and all state governments to maintain accessible and transparent records of all adverse events affecting pregnant women and lactating mothers after inoculation.*
  - d. *Issue a direction, order or writ, directing the Union of India and all State Governments to prominently put up on the Cowin website all the possible side effects of the vaccines and also to*

*have printed handouts at all the vaccination stations to be handed out to all pregnant and lactating women.*

- e. Issue a direction, order or writ, directing the Union of India and all the state governments to immediately thoroughly investigate all deaths happening within the 30 day period and to make those records available to a Committee of Experts who are independent of governments and the vaccine manufacturers.*
  - f. Issue a direction, order or writ, directing the Union of India and all state governments to upload on the CoWin website the fact sheets of the manufacturers of the vaccine regarding the taking of vaccines as set out from para 9 onward of the Petition.*
  - g. Issue any other direction or order which this Hon'ble Court may deem fit and proper in the facts and circumstances of the present case and in the interest of justice.*
3. It is respectfully submitted that the present Application is *bonafide* and being filed in the interest of justice.

### **PRAYER**

It is most humbly prayed, therefore, that this Hon'ble Court may kindly be pleased to:

- i. Allow the present Application granting permission to Amend the Prayer of the Petition;
- ii. Pass any other or further order(s) deemed fit and proper.

And for this act of kindness, the Petitioners as in duty bound shall ever pray.

Drawn by: Varsha Gumashta

Place: Delhi

Date: 25.01.2022



Satya Mitra

Advocate of Petitioner

satyamitra2003@yahoo.co.in

Ph. 9811768848

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**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 seeking Permission for Amendment of Prayer from pages 1 to 4 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 25<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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**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 seeking Permission for Amendment of Prayer from pages 1 to 4 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.



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**AFFIDAVIT**

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

[REDACTED]

[REDACTED], 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 seeking Permission for Amendment of Prayer from pages 1 to 4 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**

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*Suman Chauhan*

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**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: 25.01.2022



Satya Mitra  
Advocate of Petitioner  
satyamitra2003@yahoo.co.in  
Ph. 9811768848

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