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IN THE COURT OF THE HON'BLE CIVIL JUDGE
(SENIOR DIVISION), NAGPUR

SPECIAL CIVIL SUIT No. 4/7...../2023

PLAINTIFF : Shri Prakash S/o Gopalrao Pohare
Aged about 60 yrs, Occ. Editor in
Chief, Dainik Deshonnati,
R/o Nishant Tower, 3rd Floor, M.G.
Road, Akola.

VERSUS

DEFENDANTS : 1) Serum Institute of India Pvt. Ltd.
2) Shri Adar Poonawalla,
Aged about 42 yrs,
Occ. CEO, Serum Institute of India.
3) Shri Vivek Pradhan,
Aged about – Major, Occ. Service
(Authorised Signatory of Serum
Institute of India Pvt. Ltd.)

Address of Defendants Nos. 1 to 3 -
212/2, Soli Poonawalla Road, JJC
Colony, Suryalok Nagri, Hadapsar,
Pune, Maharashtra 411028.

SUIT FOR DECLARATION, PERPETUAL
INJUNCTION, DAMAGES AND COMPENSATION

[Valued at Rs. 10,000 Crores for the purposes of Court
Fees and jurisdiction and Court Fees of Rs. 3,00,000/-
paid thereon]

The plaintiff named above most humbly and respectfully submits,as under :

- 1) That, the plaintiff Shri Prakash Pohare is a renowned Farmer Leader, Human Rights Activist and Editor-in-Chief of renowned Marathi daily newspaper 'Dainik Deshonnati'.
- 2) That, the plaintiff is a member of renowned NGO Awaken India Movement (in short 'AIM').
- 3) That, the plaintiff individually and as a member of the Awaken India Movement has been performing constitutional duties towards nation as enshrined under Article 51(A) of the Constitution of India and awakening people about death causing and other serious side effects of vaccines.
- 4) That, the awareness campaign is based on authentic data, research made by government authorities and honest domain experts and doctors.
- 5) That, the defendants are the manufacturers, sellers and suppliers of Covishield (Astrazeneca) Vaccine. The

defendants Nos. 1 to 3 are involved in a process of suppressing the truth and silencing the voice of citizens, activists and victims by adopting unlawful means and running false narratives.

6) That, the Government of India in the investigation report done through the committee called as Adverse Event Following Immunization (AEFI) had confirmed that the deaths of one Dr. Snehal Lunawat and many other citizens were due to side effects of covishield vaccine. The said Covishield (Astrazeneca) vaccine is manufactured by the defendant No. 1 company.

7) That, though as stated supra the deaths of the abovesaid citizens were due to side effects of covishield vaccine, however, since beginning the defendants Nos. 1 to 3 have been denying the very fact that the said vaccine is having deaths causing side effects. The e-mails sent on 9.2.2021 and thereafter to the family members of said Dr. Snehal Lunawat are sufficient proofs of the aforesaid fact.

8) That, since March 2021 around 21 European Countries have banned the Covishield (Astrazeneca) vaccine manufactured by the defendant No. 1. The reason for ban was the death of 'Youth of Norway' due to side effects of vaccine which is manufactured by the defendant No. 1 company. The relevant news articles are available at following link :

Link : <https://www.aljazeera.com/news/2021/3/15/which-countries-have-halted-use-of-astrazenecas-covid-vaccine>

9) Needless to mention here that the warnings about dangers of Covishield (Astrazeneca) vaccine have been issued by the Governments of different Countries and World Health Organisation (in short 'WHO') against Covishield (Astrazeneca) are as under :

(i) On 9th November, 2021 Canada's Health Department also warned about side effects on Covishield :

Link : <https://globalnews.ca/news/8362363/astrazeneca-covid-vaccine-autoimmune-disorder-health-canada-update>

“Health Canada adds autoimmune disorder warning to AstraZeneca, J&J COVID-19 vaccines

Health Canada is updating the labels for the AstraZeneca and Johnson & Johnson COVID-19 vaccines to add immune thrombocytopenia (ITP), an autoimmune condition, as a potential side effect.”

(ii) WHO on 26th July, 2021 also warned people about type of paralysis called Guillain-Barre syndrome (GBS) caused due to Covishield.

Link : <https://www.who.int/news/item/26.07.2021-statement-of-the-who-gacvs-covid-19-subcommittee-on-gbs>

10) That, the abovesaid facts and circumstances go to show that the said vaccine is having death causing and other serious side effects i.e. lifetime disabilities. In view of that it was the duty of the defendants Nos. 1 to 3 to have called back the said product and saved future deaths, vaccine injuries and should have helped the victim families.

11) That, however, the defendants Nos. 1 to 3 had chosen to go ahead for profits and given precedence to profit over the lives of not only citizens of India but also entire humanity. Furthermore, the defendants Nos. 1 to 3 are falsely denying the side effects and trying to silence the people who are making the public aware of the said truth.

12) That, various High Court & Hon'ble Supreme Court had taken the note of deaths of citizen due to Covishield vaccines and passed the orders as under :

Sr. No	Party Name & Case Nos.	Name of the Court	Detail brief of prayers	Status and Date of Order
1.	Rachana Gangu Vs. Union of India (Writ Petition (C) No. 1220 of 2021)	Supreme Court	Action against guilty and compensation	Supreme Court issued notice (Citation) Rachana Gangu Vs. Union of India, 2022 SCC OnLine SC 1125
2.	Dilip Lunawat Vs. Serum Institute of India (P) Ltd. (Writ Petition (C) No. 2739/2022)	Bombay High Court	Action against guilty and compensation and interim compensation of Rs. 1000 Crores from Serum Institute, Institute,	Notice issued to : 1. Bill Gates 2. Adar Poonawalla 3. Randeep Guleria 4. Dr. V.G. Somani

			Adar Poonawala Bill Gates	5. Union of India 6. State of Maharashtra 7. Drug Controller General of India [Citation] Dilip Lunawat Vs. Serum Institute of India (P) Ltd., 2022 SCC OnLine Bom 1773
3.	Jean George & Anr Vs. Serum Institute of India & ors. (Writ Petition (C) No. 13573/2022)	Kerala High Court	Action against guilty and compensation and interim compensation of Rs. 10 Crores from Serum Institute, Institute, Adar Poonawala Bill Gates	Court asked UOI to file reply. Title : Vaccination : Kerala High Court Seeks Centre's Response on Parents' Plea Link : https://www.livelaw.in/news-updates/18-year-old-dies-post-covishield-vaccination-kerala-high-court-seeks-centres-response-on-parents-plea-196742?from-login=672554

4.	Sayeeda Vs. Union of India (WP (C) No. 17628 of 2022)	Kerala High Court	Compensation to widow of a person died due to vaccine.	<p>Court issued directions to the Central Government to immediately formulate guidelines for giving compensation to the victims of deaths or other side effects of vaccines.</p> <p>Citations :</p> <p>(i) Sayeeda K.A. Vs. Union of India, 2022 SCC OnLine Ker 4531</p> <p>(ii) Sayeeda K.A. Vs. Union of India, 2022 SCC OnLine Ker 4514</p>
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13) It is of relevance to mention here that the Kerala High Court issued notice to the defendant No. 1. The details of which are available on the link mentioned as under :

“Kerala High Court issues notice to Serum Institute, Centre on plea for Rs. 10 Cr. compensation alleging paralysis after Covishield vaccination.”

Link : <https://www.barandbench.com/news/kerala-high-court-issues-notice-serum-institute-centre-plea-1ocr-compensation-alleging-paralysis-covishield-vaccination>

- 14) That, all the abovesaid facts are widely published in mainstream media and therefore are well within the knowledge of the defendants.
- 15) That, on 1.10.2022 members and various volunteers of AIM had come to Pune to deliver the court-summons (Humdast) issued by the Division Bench of Hon'ble Bombay High Court in W.P. (C) No. 5767/2021 in the matter between Dilip Lunawat Vs. Serum Institute of India & others.
- 16) That, on 1.10.2022 a programme was organized by AIM in lawful manner by following requisite procedure, forms and rules framed by the relevant statute.
- 17) That, the members of AIM and the plaintiff had performed all the legal formalities and had given a letter to the Officer In-charge of concerned Police Station and also the Commissioner of Police, Pune.

18) That, however, the defendants Nos. 1 to 3 hatched a conspiracy in connivance and active participation and support of other directors and employees of the defendant No. 1 and in furtherance of said conspiracy the defendant No. 3 on 1.10.2022 gave a letter to Senior Inspector of the Hadapsar Police Station, Pune and Commissioner of Police, Pune.

19) That, in the said letter dated 1.10.2022 the defendant No. 3 on behalf of the defendants Nos. 1 & 2 had made false and highly defamatory allegations against NGO AIM of which the plaintiff is a member. The said letter dated 1.10.2022 reads thus :

"1. A group namely Awaken India Movement (hereinafter referred to as the 'said Group') has organized a march from Kanyadan Mangal Karyalaya Hall, Hadapsar to Serum Institute. Hadapsar on 1 Oct. 2022 to handover Hamdast to Adar Poonawala issued by Hon'ble Bombay High Court. The said Group has sent WahtsApp messages as well as made tweets on Twitter making an appeal to

large number of people to join the march to give Hamdast to Adar Poonawala

2. The said Group has organized buses from Kolambali, Mumbai to Kanyadaan Mangal Karyala Hall, Hadapsar and thereafter they are planning to march towards Serum Institute. The WhatsApp messages contain the name and mobile numbers of following members for assistance for bus booking –

*1. Ajinkya, Mobile Number 9321234861, 2. Chetan, Mobile Number 8879592924, 3. Hemant, Mobile Number 8830398392, 4. Yusuf, Mobile Number 9321232620, Pune
Contacts : 1. Suyash, Mobile Number 9923454589, 2. Aditya, Mobile Number 9922919377.*

3. The said march is completely illegal and unauthorized and completely frustrates the purpose of serving Hamdast issued by the Hon'ble Bombay High Court. The said march is planned with an intention and motive to create a law and order situation at the venue i.e. Serum Institute of India, Hadapsar Pune. The said march is organized with an intention and motive to cause unlawful

restraint to the directors and the employees of the Serum Institute of India. Through Whatsapp messages the said group is instigating and promoting enmity against Serum Institute of India by sending false and defamatory messages. There is a possibility that the people involved in the said march may damage and destroy the property of Serum Institute of India. A law and order situation will be created if the said march is allowed to be held on 1.10.2022. The said march will also cause inconvenience, nuisance and annoyance to people staying in and around that area. This is nothing but a planned and organized act done with an intention and oblique motive to damage the image of Serum Institute of India and its directors worldwide.

5. On behalf of Serum Institute of India, I Vivek Pradhan, Authorised Signatory, hereby request you to take all precautionary measures by issuing notices u/S. 149 of Cr.P.C. to Ajinkya, Mobile Number 9321234861, Chetan, Mobile Number 8879592924, Hemant, Mobile Number 8830398392, Yusuf, Mobile Number 9321232620 as well as Mr. Yohan Tengra, Mobile Number 8097333845 or arrest them u/S. 151 of Cr.P.C. to prevent them from committing cognizable offence u/S. 143 Punishment for unlawful assembly, 147 – Punishment for rioting, 149- Offence committed with Common Object, 341-Punishment for Wrongful Restraint, 425-Mischief, 426-Punishment

for Mischief, 441-Criminal Trespass, 447-Punishment for Criminal Trespass, 499-Defamation, 500-Punishment for Defamation, 506-Punishment for Criminal Intimidation of Indian Penal Code for organizing the march as well as sending false and defamatory messages. Hence, thereby request you to to take all the precautionary measures and provide adequate security to Serum Institute of India and register offence against the abovementioned persons as per the provisions of law in order to avoid outbreak of law and order situation or any unwanted situation.”

20) That, all the above allegations made by the defendants Nos. 1 to 3 against members of AIM are ex-facie false and defamatory and deliberately made with an ulterior motive to defame AIM and ultimately to defame the plaintiff also in the eyes of public and government officials.

21) It is a matter of record that after enquiry by the police, they did not accept the abovesaid version in the letter dated 1.10.2022 and no action was initiated against the plaintiff and the members of AIM as the allegations made by the defendants Nos. 1 to 3 were found extremely false and bogus.

22) That, when various victims and activist citizens went to Pune for serving the High Court's 'Hamdast' that time they had followed all the legal procedure and had made application to the police seeking their permission.

23) That, the first letter dated 28.9.2022 which was given to Pune Police reads thus :

(a)

To,

1. *Shivaji Nagar Police Station*
Near Shivaji Nagar, Court Complex,
Pune, India.
2. *Hadapsar Police Station*
Pune, India.

Subject : *Issue of Bombay High Court Hamdast to Mr. Adar C. Poonawalla, CEO, Serum Institute of India Pvt. Ltd., Pune.*

Reference : *Bombay High Court order dt. August 26, 2022 in the case of Dilip Lunawat Vs. Serum Institute of India Pvt Ltd and othersk, writ petition No. 5767 of 2022. The copy of the petition can be downloaded form [https drive.google.com/file/d/lloiYAbwIcTPe_OJ2zAUynVEipggrM140/view](https://drive.google.com/file/d/lloiYAbwIcTPe_OJ2zAUynVEipggrM140/view).*

Dear Senior Officer,

This is to inform you that on 26 Aug 2022, Bombay High Court issued order Hamdast to be served to the respondents.

The Hamdast copy of Mr Adar C Poonawalla is with us and we are going to serve him the same on 1st Oct 2022. AIM members will come to Shivaji Nagar Court to handover the court documents to the District Court and accompany the Bailiff to Serum Institute, Hadapsar to deliver the same.

(b) That, the second letter reads thus :

“Subject : Peaceful gathering at Saras Baug.

This letter is to intimate you that around 50 volunteers of Awaken India Movement will be meeting at Saras Baug on 1st Octoberr 4 pm to discuss the Bombay High Court case that we have filed against pharma mafia head Bill Gates. Covid vaccines are killing people and leading to increased heart attacks all over the country and we are doing our constitutional duty under Article 51(A) of the Constitution of India to spread awareness among the

Indian people and save the lives of our fellow brothers and sisters. Yohan Tengra – 8097333895, Feroze Mithiborwala – 9029277751 and Ambar Koiri – 9920903825.

24) That, the record shows that all the member of Awaken India Movement are law abiding citizen and they have acted within the four corners of law. In fact they were performing their constitutional duty under Article 51(A) by informing the public at large that the covishield vaccine is having death causing and other serious side effects which may cause life time disabilities.

25) That, all the above statements made by the members of AIM are based on the sound proofs and data from Government office and authentic research papers.

26) That, however, the defendants Nos. 1 to 3 misled the police and everyone by portraying that the AIM activists are making false claims and defaming the defendants Nos. 1 to 3 on the basis of incorrect facts. The defendants Nos. 1 to 3 had made complaint on 1.10.2022 asking the police to

arrest the plaintiff and the other members and volunteers of AIM under Section 151 of Cr.P.C. and/or to take the action of prevention against them.

27) That, the persistent stand of the defendants Nos. 1 to 3 is that there is no connection between the death of Dr. Snehal Lunawat and covishield vaccine. The second version of the defendants Nos. 1 to 3 is that the said vaccine is completely safe and does not have death causing or other serious side effects.

28) That, the said version of the defendants Nos. 1 to 3 about safety of covishield vaccine and the version that there is no connection between death of Dr. Snehal Lunawat and covishield vaccine are falsified from the investigation report of the Govt. of India's Committee for Adverse Events Following Immunization (AEFIs).

29) That, all the above versions made by the defendants Nos. 1 to 3 are ex-facie false and misleading, because already the committee of Government of India called Adverse Event Following Immunization (AEFI) had

conducted a thorough enquiry and had given its conclusion that the death of Dr. Snehal Lunawat was due to side effects of covishield vaccine.

30) It is further submitted that the Ministry of Health and Family Welfare of Central Government had in their Frequently Asked Question had specifically warned the citizen that the covishield vaccine is having side effects of Thrombosis which is the cause of death of Dr. Snehal Lunawat.

Link : <https://www.mohfw.gov.in/pdf/FAQsCOVID19vaccinesvaccinationprogramWebsiteupload27Sep.pdf>

31) Needless to mention here that the Union of India in its affidavit dated 23.11.2022 affirmed by Dr. Veena Dhawan Add. Commissioner (Immunization) Ministry of Health & Family Welfare, which is filed before Hon'ble Supreme Court in the case between **Rachna Gangu Vs. Union of India, Writ Petition (C) No. 1220 of 2021**, had mentioned that they have informed the public about death causing side effects of covishield vaccines.

32) That, during the enquiry by police of the said complaints made by the defendants Nos. 1 to 3 in the light of records and documents available with them, the police did not find any substance in the allegations made by the defendants Nos. 1 to 3. The police therefore did not arrest the plaintiff and other activists of AIM. The plan made by the defendants Nos. 1 to 3 to get the plaintiff arrested got failed as the said complaint found to be malafide and bogus. This proved the malicious and malafide conduct of defendants Nos. 1 to 3. The defendants Nos. 1 to 3 for the said acts are liable to be prosecuted and punished under Section 109, 220, 211, 499, 500, 471, 474, 469, 120(B) and 34 etc. of I.P.C.

33) That, despite the exposure of the falsity of the defendants Nos. 1 to 3 before the police, the defendants Nos. 1 to 3 repeated the said allegations many a times using the said letter dated 1.10.2022 everywhere including the court proceedings.

34) That, due to abovesaid unlawful activities of the defendants Nos. 1 to 3 the plaintiff defamed in the eyes of common public and has suffered much hardship including mental torture, annoyance, inconvenience and harassment. The plaintiff has suffered loss of many future business prospects and also suffered monetary losses. This being so the defendants Nos. 1 to 3 are liable to compensate the plaintiff.

35) It is of relevance to mention here that many people are continuously asking the plaintiff and the plaintiff has to answer everyone about the false complaint made to the police by the defendants Nos. 1 to 3 against the said NGO Awaken India Movement.

36) In view of above the defendants Nos. 1 to 3 are required to stop from defaming the plaintiff. Similarly, the defendants Nos. 1 to 3 are required to compensate the plaintiff by paying an amount of Rs. 10,000 Crores in the form of damages and compensation.

37) That, the said wild, concocted, false and frivolous allegations made by the defendants Nos. 1 to 3 against the plaintiff and the members of AIM are defamatory, scandalous and unparliamentary. Needless to mention here that the abovesaid allegations have maligned the very image of the plaintiff and the Awaken India Movement. The said allegations made by the defendants are given wide publicity by the defendant themselves. The publication of the said allegations made maligned the very image of the plaintiff and also the image of the Awaken India Movement.

38) At the cost of repetition it is submitted that the abovesaid defamatory, scandalous, false, frivolous, reckless statement made by the defendants Nos. 1 to 3 and the news items circulated and read by public at large have lowered the very reputation, dignity of the plaintiff and the AIM in the eyes of the public. The names of the witnesses are as under : (1) Adv. S.R. Narnaware, (2) Shri Ravindra Bhuyar and (3) Shri Purushottam Thakre etc.

39) Needless to mention here that the said scandalous, fabricated, defamatory, false, frivolous, reckless allegations have been deliberately made by the defendants Nos. 1 to 3 with ulterior motives and wrongful intent to malign and tarnish the image of the plaintiff and the Awaken India Movement.

40) That, on account of abovesaid illegal acts on the part of the defendants Nos. 1 to 3, they are liable to pay the plaintiff general and special damages on account of mental, physical torture, agony, apathy, financial loss, injury inflicted to the reputation of the plaintiff and AIM due to the abovesaid illegal acts including the false complaint and publication of news in various newspapers. The general and special damages/compensation are mentioned hereunder :

General & Special Damages/Compensation

- (a) Injury/loss to business, reputation and future prospects Rs. 50,90,00,00,000/-.
- (b) Mental and physical torture and agony Rs. 31,00,00,00,000/-.

- (c) Loss in family honour Rs. 18,00,00,00,000/-.
- (d) Legal assistant and general charges Rs. 10,00,00,000/-.

41) That, the defendants are liable to pay the said damages and compensation to the plaintiff as they have tarnished the very image of the plaintiff and AIM deliberately as mentioned in the aforesaid paras.

42) That, the said illegal acts, allegations and publication thereof happened within the territorial jurisdiction of this Hon'ble Court. This being so this Hon'ble Court has territorial and pecuniary jurisdiction to entertain and try the instant suit.

43) That, the cause of action firstly arose when the defendants made several false statements against the plaintiff and Awaken India Movement. The cause of action further arose on 1.10.2022 when a false complaint was made to the Senior Inspector of Hadapsar Police Station, Pune and the Commissioner of Police, Pune by the defendants Nos. 1 to 3. The cause of action thereafter

continuous one and shall last till the instant suit is disposed of by this Hon'ble Court.

44) That, the reliefs claimed in instant suit are valued at Rs. 10,000 Crores. The plaintiff has paid maximum court fees of Rs. 3,00,000/- as per the provisions of the Bombay Court Fees Act.

45) That, the plaintiff has filed several documents on record and craves leave to file more subsequently.

Hence this suit.

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

- (i) pass a decree and thereby declare that the defendants Nos. 1 to 3 have no authority to justify vaccination of Covishield Vaccine posing the same to be safe for lives of the people;

- (ii) pass a decree of perpetual injunction and thereby permanently restrain the defendants Nos. 1 to 3, their agents, henchmen, representatives and any other person acting for or under them from selling covishield vaccine, vaccinating people using covishield vaccine, justifying the same to be safe for lives of the people;
- (iii) pass a decree and thereby direct the defendants Nos. 1 to 3 to pay sum of Rs. 10,000 Crores to the plaintiff in the form of damages and compensation as quantified in the instant suit and also direct the defendants Nos. 1 to 3 to pay the plaintiff cost of instant litigation;
- (iv) saddle the costs on the defendants;

- (v) grant any other relief which this Hon'ble Court deems fit and proper in the facts and circumstances of the case.

Nagpur
3rd April, 2023


PLAINTIFF



COUNSEL FOR PLAINTIFF

SOLEMN AFFIRMATION

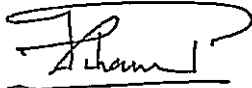
I, Prakash S/o ~~Govardhan~~ Pohare, Aged about 60 yrs, Occ. Editor in Chief, Dainik Deshonnati, R/o Nishant Tower, 3rd Floor, M.G. Road, Akola, presently at Nagpur, do hereby take oath and declare on solemn affirmation that the contents stated in paras 1 to 45 are true and correct to the best of my personal knowledge and belief and drafted by my counsel as per my instructions given to him and the contents therein are explained to me in vernacular and are found to be true and correct. The legal contentions

received by me from my advocate are believed to be true by me.

Hence, verified and signed this 3RD day of April, 2023 at Nagpur.

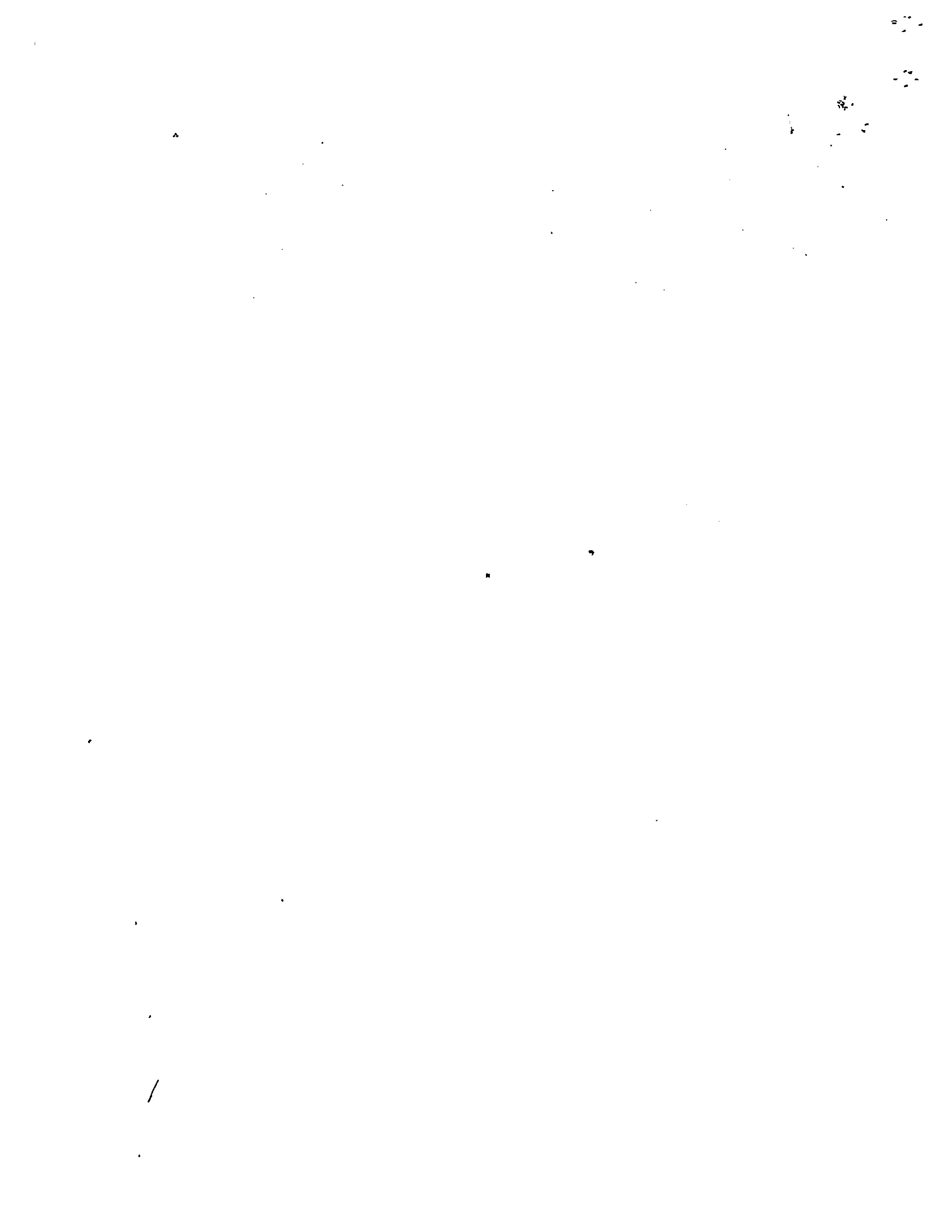

DEPONENT

I know & identify the deponent.



Advocate

C. D. Rohankar



IN THE COURT OF THE HON'BLE CIVIL JUDGE
(SENIOR DIVISION), NAGPUR

SPECIAL CIVIL SUIT No./2023

APPLICANT : Shri Prakash S/o Gopalrao Pohare
PLAINTIFF Aged about 60 yrs, Occ. Editor in
Chief, Dainik Deshonnati,
R/o Nishant Tower, 3rd Floor, M.G.
Road, Akola.

VERSUS

NON-APPLICANTS: 1) Serum Institute of India Pvt. Ltd.
DEFENDANTS

2) Shri Adar Poonawalla,
Aged about 42 yrs,
Occ. CEO, Serum Institute of India.

3) Shri Vivek Pradhan,
Aged about – Major, Occ. Service
(Authorised Signatory of Serum
Institute of India Pvt. Ltd.)

Address of Defendants Nos. 1 to 3 -
212/2, Soli Poonawalla Road, JJC
Colony, Suryalok Nagri, Hadapsar,
Pune, Maharashtra 411028.

APPLICATION FOR GRANT OF TEMPORARY
INJUNCTION UNDER ORDER 39 RULES 1 & 2
R/W SECTION 151 OF THE CODE OF CIVIL
PROCEDURE

The applicant/plaintiff above named most respectfully submits as under

- 1) That, the applicant/plaintiff has filed the instant suit for declaration, perpetual injunction, damages and compensation. The applicant/plaintiff has demonstrated an excellent case on merits in the plaint.
- 2) That, in order to avoid repetition the applicant/plaintiff relies on the contents of the plaint in extenso. The contents of the plaint are therefore need to be taken into consideration as part and parcel of this application.
- 3) That, in the plaint the applicant/plaintiff has demonstrated as to how the Covishield Vaccine caused deaths of Dr. Snehal Lunawat and many other citizens. The plaintiff has also cited many instances and the decisions of the Hon'ble High Courts and Supreme Court of India in that regard.
- 4) That, the facts stated in the plaint are more than sufficient to demonstrate that the Covishield Vaccine is

totally unsafe for the lives of people. It is also crystal clear that the vaccination of covishield not only caused deaths of Dr. Snehal Lunawat but also various citizens and therefore it is necessary to restrain the defendants etc. from vaccinating the covishield vaccine and from justifying the same posing it to be safe for lives of people.

5) That, in the plaint the applicant/plaintiff has elaborately stated as to how the defendants Nos. 1 to 3/non-applicants Nos. 1 to 3 have defamed the plaintiff and Awaken India Movement, if the defendants Nos. 1 to 3 are not restrained the defendants shall defame and injure the applicant/plaintiff and AIM in future by making similar allegations even in press, electronic media, social media or any other medium of communication.

6) That, as demonstrated in the plaint the applicant/plaintiff has an excellent prima facie case in his favour. The balance of convenience leans in favour of the applicant/plaintiff.

- 7) That, if the defendants Nos. 1 to 3/non-applicants Nos. 1 to 3 are not restrained from making false, frivolous, defamatory and derogatory accusations and allegations against the applicant/plaintiff by way of and in the form of letters, complaints, representations, emails and any other medium of communication, the applicant/plaintiff shall suffer immensely and irreparably and a great loss shall be caused to the applicant/plaintiff.
- 8) That, similarly, if defendants are not restrained from justifying and vaccinating people by using covishield vaccine the plaintiff, AIM and the people at large shall suffer immensely and irreparably and a great prejudice shall be caused to them.
- 9) Needless to mention here that the loss and injury, which will cause to the applicant/plaintiff cannot be accurately assessed in terms of damages, even if the applicant/plaintiff were to later seek damages for loss of reputation and defamation.

10) That, the applicant/plaintiff has requested the defendants Nos. 1 to 3 not to defame the plaintiff and AIM but, the defendants Nos. 1 to 3 have been continuously making false, frivolous, defamatory and derogatory accusations and allegations against the applicant/plaintiff, Awaken India Movement, by various means. In addition to that the defendants Nos. 1 to 3 have been posing the covishield vaccine to be safe for lives of the people. The defendants are therefore required to be restrained from doing so.

11) In the abovesaid facts and circumstances of the case there is every possibility, real and substantial danger that the defendant shall make in future similar allegations even in press or electronic media or social media or any other medium of communication. In such event, the reputation of applicant/plaintiff is likely to suffer substantial detriment and lead to loss of life also. Such loss cannot be accurately assessed in terms of damages even if the applicant/plaintiff were to later seek damages for loss of reputation or defamation.

12) That, if the defendants are not restrained from vaccinating the people using covishield vaccine justifying the same to be safe for lives of people, the people shall suffer immensely and irreparably and the plaintiff and AIM shall also suffer an immense and irreparable loss as their movement for the welfare and safety of people shall be frustrated.

13) That, at the cost of repetition it is submitted that if the reliefs prayed for in terms of prayer clause are not granted the applicant/plaintiff shall suffer immensely and irreparably and a great prejudice shall be caused to him.

14) That, in panorama of abovesaid facts and circumstances the applicant/plaintiff is all the way entitled for the relief of temporary injunction as prayed for in terms of the prayer clause.

Hence this application.

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


- (i) restrain the defendants Nos. 1 to 3/non-applicants Nos. 1 to 3, their agents, henchmen, representatives and any other person acting for or under them from making false, frivolous, defamatory and derogatory accusations and allegations against the plaintiff and Awaken India Movement by way of and in the form of letters, complaints, representations, emails and any other medium of communication by way of an ex-parte ad-interim injunction;
- (ii) restrain the defendants Nos. 1 to 3/non-applicants Nos. 1 to 3, their agents, henchmen, representatives and any other person acting for or under them from selling covishield vaccine, vaccinating people using covishield vaccine justifying the same to be safe for lives of the people by way of an ex-parte ad-interim injunction;
- (iii) confirm the ex-parte order of injunction in terms of above prayer

clauses (i) & (ii) after hearing both the parties;

- (iv) grant any other relief which this Hon'ble Court deems fit and proper in the facts and circumstances of the instant case in the interests of justice.

Nagpur

3rd April, 2023


APPLICANT/PLAINTIFF



COUNSEL FOR APPLICANT/PLAINTIFF

SOLEMN AFFIRMATION

I, Prakash S/o Pohare, Aged about 60 yrs, Occ. Editor in Chief, Dainik Deshonnati, R/o Nishant Tower, 3rd Floor, M.G. Road, Akola, presently at Nagpur, do hereby take oath and declare on solemn affirmation that the contents stated in paras 1 to 14 are true and correct to the best of my personal knowledge and belief and drafted by my counsel as per my instructions given to him and the contents therein are explained to me in vernacular and are found to be true and correct. The legal contentions

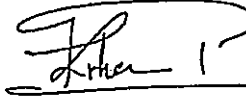
received by me from my advocate are believed to be true by me.

Hence, verified and signed this 3RD day of April, 2023 at Nagpur.



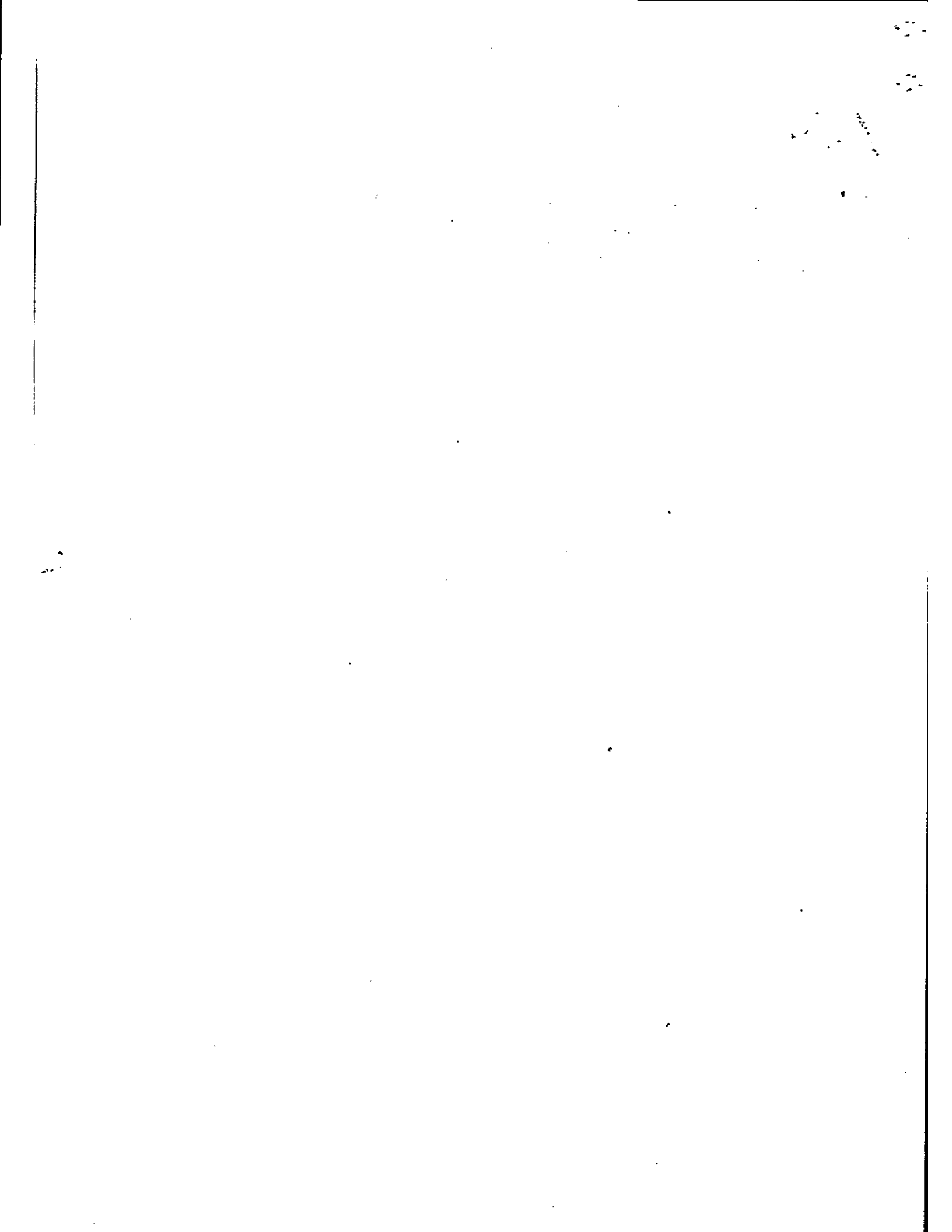
DEPONENT

I know & identify the deponent.



Advocate

C.D. Rohankar



IN THE COURT OF THE HON'BLE CIVIL JUDGE
(SENIOR DIVISION), NAGPUR

SPECIAL CIVIL SUIT No./2023

PLAINTIFF : Shri Prakash S/o Gopalrao Pohare

VERSUS

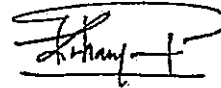
DEFENDANTS : Serum Institute of India Pvt. Ltd.
and two others

LIST OF DOCUMENTS FILED BY
THE PLAINTIFF

Doc. No.	Particulars	Date	Original/ True Copy
1	A copy of the notice by Adv. Snehal Surve on behalf of plaintiff to the defendants	02.01.2023	True Copy
2	A copy of the e-mail receipt	02.01.2023	True Copy
3	A copy of the report to the Senior Inspector, Hadapsar Police Station	01.10.2022	True Copy
4	A copy of the representation/report to the Commissioner of Police, Pune	01.10.2022	True Copy

Nagpur

3rd April, 2023



COUNSEL FOR PLAINTIFF

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DOENO I



ADV. SNEHAL SURVE

Office: 2 & 3, Floor, Kothari House, 5/7 Oak Lane, A. R. Allana Marg, Near Burma
Burma Restaurant, Fort, Mumbai - 400 023.

Contact No.: 022 4971 7796

Email: advsnehalsurve@gmail.com

2nd January, 2023

Notice Regarding A.D.

To,

1. Serum Institute of India Pvt. Ltd.
2. Shri. Adar Poonawalla CEO, Serum Institute of India.
3. Shri Vivek Pradhan, authorized signatory
of Serum Institute of India Pvt. Ltd.

Office address at :-

212/2 Soli Poonawalla Road, JJC Colony,
Suryalok Nagri, Hadapsar,
Pune, Maharashtra 411 028.

Sub:- Notice for compensation of Rs. 10,000 Crores to my
client for his deliberate defamation done by you.

Sir,

Under the authorization and instructions of my client Shri. Prakash Pohare, R/o, Nishant Tower, 3rd Floor M.G. Road, Akola. I, the undersigned, serve you the legal notice as under;

1. That my client Shri. Prakash Pohare is a renowned Farmer Leader, Human Rights Activist and Editor-in-Chief of renowned marathi daily newspaper 'Dainik Deshonnati'.
2. That my client is a member of renowned NGO Awaken India Movement (AIM).

3. That my client individually and as a member of Awaken India Movement (AIM) is performing his constitutional duty towards nation as enshrined under Article 51(A) of the Constitution of India and awakening people about death causing and other serious side effects of vaccines.

4. That the awareness campaign is based on authentic data, research given by government authorities and honest domain experts and doctors.

5. That you noticee are involved in a process of suppressing the truth and silencing the voice of citizen, activists and victims by adopting unlawful means and running false narratives.

6. That Government of India in their investigation report done through the committee called as Adverse Event Following Immunization (AEFI), had confirmed that the death of Dr. Snehal Lunawat and many other citizen was due to side effects of covishield vaccine. Said Covishield (Astrazeneca) vaccine is being manufactured by you noticee no. 1.

7. However since beginning, you were denying the very fact that your vaccines are having death causing side effects.

Your emails sent on 9th February 2021 and thereafter to family members of Dr. Snehal Lunawat are sufficient proof of it.

8. That since March 2021 around 21 European countries have banned the Covishield (Astrazeneca) vaccine manufactured by you noticee no. 1.

The reason was the death of 'Youth of Norway' due to side effects of vaccine which is manufactured by you.

The relevant news articles are available at following link:-

(i) Link:-

<https://www.aljazeera.com/news/2021/3/15/which-countries-have-halted-use-of-astrazenecas-covid-vaccine>

9. Other warnings about dangers of Covishield (Astrazeneca) vaccine, issued by the Governments of different countries & WHO against Covishield (Astrazeneca) are given below.

9.1 That on 9th November, 2021 Canada's Health Department also warned about side effects on Covishield:

Link:-

<https://globalnews.ca/news/8362363/astrazeneca-covid-vaccine-autoimmune-disorder-health-canada-update/>

"Health Canada adds autoimmune disorder warning to AstraZeneca, I&J COVID-19 vaccines

Health Canada is updating the labels for the AstraZeneca and Johnson & Johnson COVID-19 vaccines to add immune thrombocytopenia (ITP), an autoimmune condition, as a potential side effect."

9.2 That WHO on 26th July, 2021 also warned people about type of paralysis called Guillain-Barré syndrome (GBS) caused due to Covishield.

Link:- <https://www.who.int/news/item/26-07-2021-statement-of-the-who-gacvs-covid-19-subcommittee-on-gbs>

10. That, when it is crystal clear that the vaccines are having death causing and other serious side effects causing lifetime disabilities, then it was the duty of you noticee to have called back your product and saved future deaths and vaccine injuries and should have helped the victim families.

11. But you had chosen to go ahead for profits and given precedence to profit over the life of not only citizens of India but also entire humanity. Furthermore, you are falsely denying the side effects and trying to silence the people who are making public aware of the said truth.

12. That, various High Court & Hon'ble Supreme Court had taken the note of deaths of citizen due to Covishield vaccines and passed orders.

Sr Nos	Party Name & Case Nos	Name of the Court	Detail brief of prayers	Status and Date of Order
1.	Rachana Gangu v. Union of India [Writ Petition (C) No. 1220 of 2021] Link:	Supreme Court	Action against guilty and compensation	Supreme Court Issued Notice [Citation] <u>Rachana Gangu v. Union of India, 2022 SCC OnLine SC 1125</u>
2.	Dilip Lunawat v. Serum Institute of India (P) Ltd. [Writ Petition (C) No. 2739/2022] Link:	Bombay High Court	Action against guilty and compensation and interim compensation of Rs. 1000 Crores	Notice issued to: 1. Bill Gates 2. Adar Poonawalla 3. Randeep Guleria 4. Dr. V.G. Somani 5. Union of India 6. State of Maharashtra

			from Serum Institute, Institute, Adar Poonawala Bill Gates	7. Drug Controller General of India [Citation] Dilip Lunawat v. Serum Institute of India (P) Ltd., <u>2022 SCC OnLine Bom 1773</u>
3.	Jean George & Anr v. Serum Institute Of India & Ors. [Writ Petition (C) No. 13573/2022]	Kerala High Court	Action against guilty and compensati on and interim compensati on of Rs. 10 Crores from Serum Institute, Institute, Adar Poonawala Bill Gates.	Court asked UOI to file reply. Title: Vaccination: Kerala High Court Seeks Centre's Response On Parents' Plea Link: https://www.livelaw.in/news- updates/19-year-old-dies- post-covishield-vaccination- kerala-high-court-seeks- centres-response-on-parents- plea-196742?from- login=672554
4.	Sayeeda Vs Union of India [WP (C) No. 17628 of 2022]	Kerala High Court	Compensat ion to widow of a person died	Court issued directions to the Central Government to immediately formulate guidelines for giving

			due to vaccine.	compensation to the victims of deaths or other side effects of vaccines. Citations: - (i) Sayeeda K.A. v. Union of India, 2022 SCC OnLine Ker 4531 (ii) Sayeeda K.A. v. Union of India, 2022 SCC OnLine Ker 4514
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13. Recent news in this regard is as under;

“Kerala High Court issues notice to Serum Institute, Centre on plea for ₹10cr compensation alleging paralysis after Covishield vaccination.”

Link: <https://www.barandbench.com/news/kerala-high-court-issues-notice-serum-institute-centre-plea-10cr-compensation-alleging-paralysis-covishield-vaccination>

14. All the abovesaid facts are widely published in mainstream media and are within the knowledge of accused Adar Poonawalla.

15. That on **01.10.2022** members and various volunteers of AIM had come to Pune to deliver the court-summons. (Humdast) issued by the Division Bench of Hon’ble Bombay High Court in W.P. (C) No. 5767/2021 in the matter between Dilip Lunawat Vs. Serum Institute of India & Ors.

16. That the member of AIM and my client had performed all its legal formalities and gave a letter to the Officer-In-Charge of concerned Police Station and Commissioner of Police.

17. The entire program by members of AIM was in a complete lawful manner and as per the requisite procedure, forms and rules framed by the statute.

18. However, you noticee no. 1, 2 & 3 hatched one conspiracy in connivance and active participation and support from other directors and employee of the Serum Institute of India Pvt. Ltd. and in furtherance of said conspiracy, you noticee no. 3 on 1.10.2022 gave a letter to Sr. Inspector of Hadapsar Police Station, Pune and Commissioner of Police, Pune.

19. That in the said letter dated 1.10.2022 your noticee no. 3 on behalf of noticee no. 1 & 2 had made false and highly defamatory allegations against NGO AIM of which my client is a member.

Said letter dated 1.10.2022 reads thus;

"1. A group namely Awaken India Movement (hereinafter referred to as the "said Group") has organized a march from Kanyadan Mangal Karyalaya Hall, Hadapsar to Serum Institute, Hadapsar on 1 Oct. 2022 to handover Hamdast to Adar Poonawala issued by Hon'ble Bombay High Court. The Said Group has sent WhatsApp messages as well as made tweets on Twitter making an appeal to large number of people to join the march to give Hamdast to Adar Poonawala.

2. The Said Group has organized buses from Kalambali, Mumbai to Kanyadaan Mangal Karyala Hall, Hadapsar and thereafter they are planning to march towards Serum Institute. The WhatsApp messages contain the name and mobile numbers of following members for assistance for bus booking-

1. Ajinkya, Mobile Number- 9321234861
2. Chetan, Mobile Number-8879592924
3. Hemant, Mobile Number-8830398392
4. Yusuf, Mobile Number-9321232620

Pune Contacts: -

1. Suyash, Mobile Number-9923454589
2. Aditya, Mobile Number-9922919377

3. The said march is completely illegal and unauthorized and completely frustrates the purpose of serving Hamdast issued by the Hon'ble Bombay High Court. The said march is planned with an intention and motive to create a law and order situation at the venue i.e. Serum Institute of India, Hadapsar Pune. The said march is organized with an intention and motive to cause unlawful restraint to the directors and the employees of the Serum Institute of India. Through Whatsapp messages the said group is instigating and promoting enmity against Serum Institute of India by sending false and defamatory messages. There is a possibility that the people involved in the said march may damage and destroy the property of Serum Institute of India. A law and order situation will be created if the said march is allowed to be held on 01/10/2022. The said march will also cause inconvenience, nuisance and annoyance to people staying in and around that area. This is nothing but a planned and organized act done with an intention and oblique motive to damage the image of Serum institute of India and its directors worldwide.

5. On behalf of Serum Institute of India, i Vivek Pradhan, Authorized Signatory, hereby request you to take all precautionary measures by issuing notices u/S. 149 of Cr.P.C to Ajinkya. Mobile Number- 9321234861, Chetan, Mobile Number 8879592924 Hemant. Mobile Number 8830398392, Yusuf, Mobile Number- 9321232620 as well as

Mr. Yohan Tengra, Mobile Number- 8097333845 or arrest them u/S. 151 of Cr.P.C. to prevent them from committing cognizable offence u/S. 143 Punishment for unlawful assembly, 147- Punishment for rioting,149-Offence committed with Common Object, 341- Punishment for Wrongful Restraint, 425- Mischief, 426- Punishment for Mischief, 441-Criminal Trespass, 447-Punishment for Criminal Trespass, 499- Defamation, 500-Punishment for Defamation, 506-Punishment for Criminal Intimidation of Indian Penal Code for organizing the march as well as sending false and defamatory messages Hence, thereby request you to to take all the precautionary measures and provide adequate security to Serurn Institute of India and register offence against the abovementioned persons as per the provisions of law in order to avoid outbreak of law and order situation or any unwanted situation.”

20. That all above allegations against members of AIM are ex-facie false and defamatory and deliberately made with an ulterior motive to defame AIM and ultimately my client in the eyes of public and government officials.

21. It is matter of record that after enquiry the police did not accepted the abovesaid version in your letter dated 1.10.2022 and no action was taken against my client as your allegations were extremely false and bogus.

22. When various victims and activist citizen went to Pune for serving the High Court's 'Hamdast' then they have followed all the legal procedure and made proper application to the police seeking their permission.

23. That, the first letter dated 28.09.2022 given to Pune Police reads thus;

Date 28-9-2022

To,

1. Shivaji Nagar Police station

Near Shivaji nagar court complex

Pune, India

2. Hadapsar Police Station

Pune, India

Subject - Issue of Bombay High Court Hamdast to Mr Adar C Poonawalla, CEO, Serum Institute Of India Pvt Ltd, Pune.

Reference - Bombay High Court order dt August 36,2022 in the case of

Dilip Lunawat v/s Serum Institute of India pvt ltd and othrs, writ petition

no 5767 of 2022. The copy of the petition can be downloaded from

https

drive.google.com/file/d/lloiYAbwIcTPe_0J2zAUynVEipggrMI40/view

Dear Senior Officer,

This is to inform you that on 26 Aug 2022, Bombay high court issued order Hamdast to be served to the respondents.

The Hamdast copy of Mr Adar C Poonawalla is with us and we are going to serve him the same on 1" Oct 2022.9.2022.

AIM members will come to Shivaji nagar court to handover the court documents to the district court and accompany the Bailiff to serum institute, Hadapsar to deliver the same.

24. That, the second letter reads thus;

“Subject: Peaceful gathering at Saras Baug

This letter is to intimate you that around 50 volunteers of Awaken India Movement will be meeting at Saras Baug on 1st October 4pm to discuss the Bombay High Court case that we have filed against pharma mafia head Bill Gates. Covid vaccines are killing people and leading to increased heart attacks all over the country and we are doing our constitutional duty under article 51(A) of the Constitution of India to spread awareness among the Indian people and save the lives of our fellow brothers and sisters.

Yohan Tengra-8097333895

Feroze Mithiborwala - 9029277751

Ambar Koiri - 9920903825

25. That, the record shows that, all the members of Awaken India Movement are law abiding citizen and they have acted within the four corners of law. Infact they are performing their constitutional duty under Article 51(A) by informing the public at large that the covishield vaccine is having death causing and other serious side effects which may cause life time disabilities.

26. That, all the above statements made by the members of AIM are based on the sound proofs and data from Government office and authentic research papers.

27. However, you noticee are trying to mislead the police and everyone by portraying that the AIM activists are making false claims and defaming you on the basis of incorrect facts. You made a complaint on 01.10.2022 asking the police to arrest them under section 151 of Cr. P. C. and/or to take the action of prevention against them.

28. Your persistent stand is that, there is no connection between the death of Dr. Snehal Lunawat and your covishield vaccine. Your second version is that your vaccines are completely safe and does not have death causing or other serious side effects.

29. That, your version about safety of Covishield vaccine and no connection with the death of Dr. Snehal Lunawat is falsified from the investigation report given by the Government of India's committee for Adverse Events Following Immunization (AEFIs).

30. That, all your version are ex-facie false and misleading, because already the committee of Government of India called Adverse Event Following Immunization (AEFI) had conducted a through enquiry and had given its conclusion that the death of Dr. Snehal Lunawat was due to side effects of covishield vaccine.

31. Furthermore, the Ministry of Health and Family Welfare of Central Government had in their Frequently Asked Question had specifically warned the citizen that the Covishield vaccine is having side effects of Thrombosis which is the cause of death of Dr. Snehal Lunawat.

Link:<https://www.mohfw.gov.in/pdf/FAQsCOVID19vaccinesvaccinationprogramWebsiteupload27Sep.pdf>

32. That, the Union of India in its affidavit dated 23.11.2022 affirmed by Dr. Veena Dhawan Add. Commissioner (Immunization) Ministry of Health & Family Welfare, which is filed before Hon'ble Supreme Court in the case between Rachna

Gangu Vs. Union of India Writ Petition (C) No. 1220 of 2021, had mentioned that they have informed the public about death causing side effects of Covishield vaccines.

33. That there are many cases filed in other High Courts & Orders are passed therein, which to indicate that many deaths are due to side effects of Covishield vaccine.

34. That, during the enquiry by police my clients gave the records and documents available with them and after complete enquiry the police did not found any substance in the allegations by you noticee and that's why police did not arrested my clients. Hence your malafide plan to get my clients arrested on bogus complaint got failed. This proved the malicious and malafide conduct of you noticee, for which you are liable for prosecution under section 109, 220, 211, 499, 500, 471, 474, 469, 120 (B) and 34 etc., of IPC.

35. Despite the fact that your falsity is exposed before police, you have repeated said allegations many times and using said letter dated 1.10.2022 everywhere including in court proceedings.

36. Due to your abovesaid unlawful activities my client had been defamed in the eyes of common public and he had suffered much hardship including mental torture, annoyance, inconvenience and harassment. It had impacted many future business prospects and my clients had suffered monetary losses which you are bound to compensate.

37. That many people are continuously asking my client about the said instance of your false police complaint against NGO of my client and my client has to answer everyone about the same.

38. Hence, by way of this notice you are hereby called upon to forthwith stop from defaming my client and pay a compensation of Rs. 10,000 Crores to my client by way of Demand Draft, within seven days from the date of receipt of this notice.

39. Please note that, in case of your failure to comply with the notice, my client will be compelled to initiate appropriate legal proceeding against you. Which will be at your sole risk as to cost and consequences.

40. This notice is independent of and is issued by reserving rights to initiate the prosecution under criminal law against you noticee no. 1, 2 & 3 and all the office bearers of Serum Institute of India Pvt. Ltd.

41. Needless to mention here that, in view of various cases by all the members, citizen and victims the total compensation amount claims against you are likely to go around Rupees Five Lac Crores and above, therefore you noticee should not alienate the property and preserve the property, shares worth of said amount. Any attempt to transfer, sell or alienate property should go against you and pleaded as your conduct. My client is soon going to apply to the Hon'ble Court under Order 21 Rule 54 of CPC for attachment of your property before judgment.

42. Under these circumstances please take the serious note of this notice and act accordingly.

43. Notice charges of Rs. 1 Crore are levied upon you and added in addition to the compensation amount to your account.

Sincerely

Snehal

Adv. Snehal Surve

41
DOC NO-2

M Gmail

Snehal Surve <advshahalsurve@gmail.com>

[IMPORTANT- LEGAL NOTICE]

1 message

Snehal Surve <advshahalsurve@gmail.com>


To: michael.vernekar@seruminstitute.com, kum@seruminstitute.com

Mon, Jan 2, 2023 at 7:00 PM

Sir,

Kindly find the copy of Legal Notice dated 2nd January, 2023.

Regards,
Adv. Snehal Surve

 Legal Notice to Serum Institute and Ors. dated 2nd January 2023...pdf
472K

T.C.
E.I.

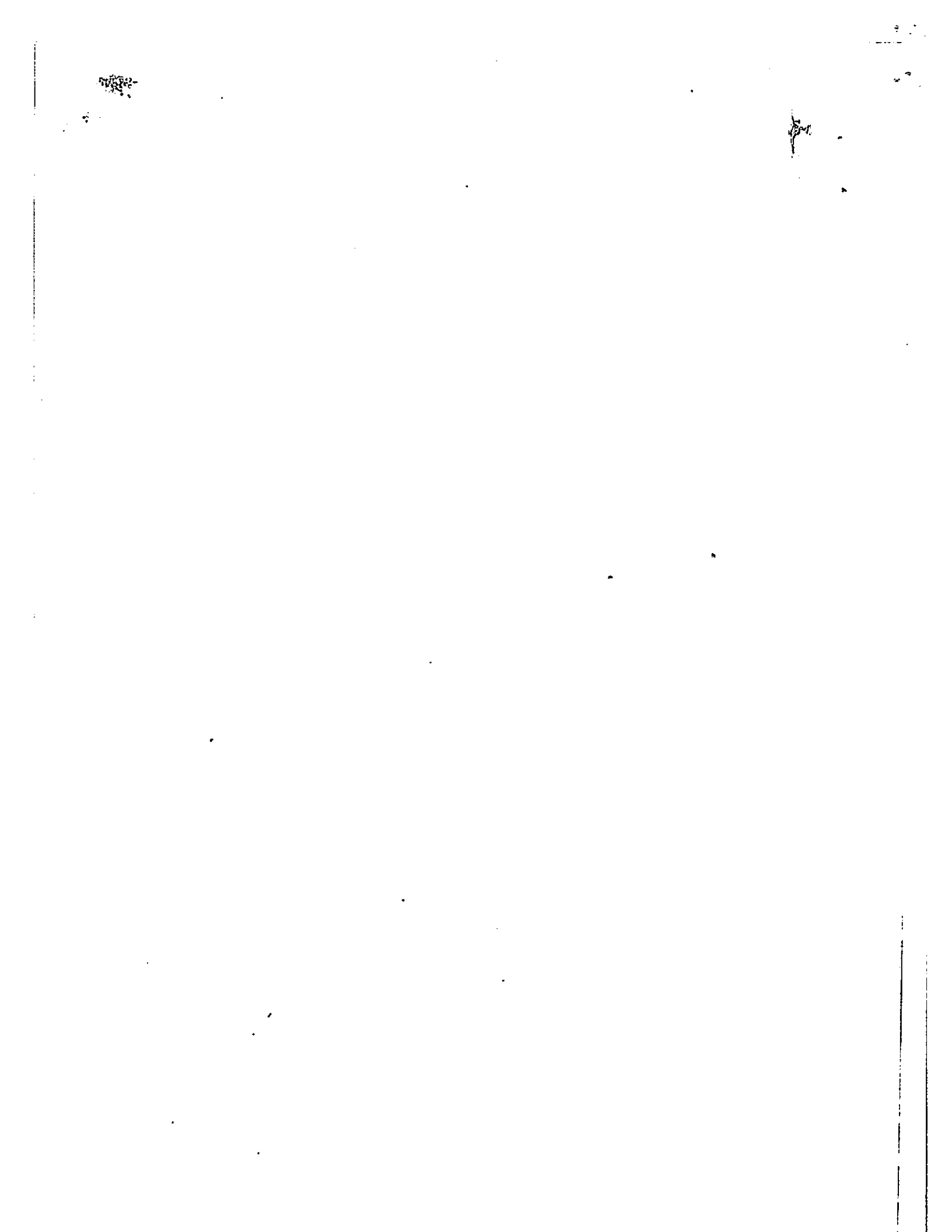


EXHIBIT - 'M'

DOC NO - 3

91



SERUM INSTITUTE OF INDIA PVT. LTD.

(FORMERLY KNOWN AS SERUM INSTITUTE OF INDIA LTD.)

Cyrus Poonawalla Group

Regd. off. : 212/2, Hadapsar, Pune - 411028. TEL. : +91-20-26993900. FAX : +91-20-26993921
www.seruminstitute.com. CIN : U80903PN1984PTC032945

From

Serum Institute of India

Authorised Signatory-

Address-

To,

Senior Inspector,

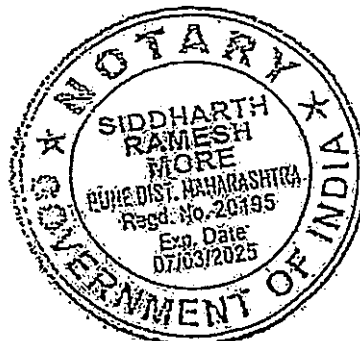
Hadapsar Police Station

Subject- To register an offence against Group called 'Awaken India Movement' and its Team members for organising an illegal march on 1st Oct. 2022 towards Serum Institute to handover Hamdast to Adar Poonawala and to take precautionary measures .

Respected Sir,

1. A group namely Awaken India Movement (hereinafter referred to as the "Said Group") has organized a march from Kanyadan Mangal Karyalaya Hall, Hadapsar to Serum Institute, Hadapsar on 1st Oct. 2022 to handover Hamdast to Adar Poonawala issued by Hon'ble Bombay High Court. The Said Group has sent WhatsApp messages as well as made tweets on Twitter making an appeal to large number of people to join the march to give Hamdast to Adar Poonawala.
2. The Said Group has organized buses from Kalamboli, Mumbai to Kanyadaan Mangal Karyala Hall, Hadapsar and thereafter they are planning to march towards Serum Institute. The WhatsApp messages contain the name and mobile numbers of following members for assistance for bus booking-

1. Ajitkya, Mobile Number- 9321234861
2. Chetan, Mobile Number- 8879592924
3. Hemant, Mobile Number- 8830398392
4. Yusuf, Mobile Number- 9321232620



R
PSD
01/10/2022
01/10/2022
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SERUM INSTITUTE OF INDIA PVT. LTD.

(FORMERLY KNOWN AS SERUM INSTITUTE OF INDIA LTD.)

Cyrus Poonawalla Group

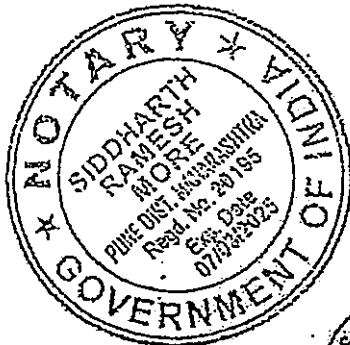
Regd. off. : 212/2, Hadapsar, Pune - 411028. TEL. : +91-20-26993900 ■ FAX : +91-20-26993921
www.seruminstitute.com ■ CIN : U80903PN1984PTC032945

Prine Contacts

1. Suyash, Mobile Number- 9923454589
2. Aditya, Mobile Number- 9922919377

3. The said march is completely illegal and unauthorized and completely frustrates the purpose of serving Hamdast issued by the Hon'ble Bombay High Court. The said march is planned with an intention and motive to create a law and order situation at the venue i.e. Serum Institute of India, Hadapsar Pune. The said march is organized with an intention and motive to cause unlawful restraint to the directors and the employees of the Serum Institute of India. Through Whatsapp messages the said group is instigating and promoting enmity against Serum Institute of India by sending false and defamatory messages. There is a possibility that the people involved in the said march may damage and destroy the property of Serum Institute of India. A law and order situation will be created if the said march is allowed to be held on 01/10/2022. The said march will also cause inconvenience, nuisance and annoyance to people staying in and around that area. This is nothing but a planned and organized act done with an intention and oblique motive to damage the image of Serum Institute of India and its directors worldwide.

5. On behalf of Serum Institute of India, I Vivek Pradhan, Authorized Signatory, hereby request you to take all precautionary measures by issuing notices u/S. 149 of Cr.P.C to Ajinkya, Mobile Number- 9321234861, Chetan, Mobile Number- 8879592924 Hemant, Mobile Number- 8830398392, Yusuf, Mobile Number- 9321232620 as well as Mr. Yohan Tengra, Mobile Number- 8097333895 or arrest them u/S. 151 of Cr.P.C. to prevent them from committing cognizable offence u/S. 143- Punishment for unlawful assembly, 147- Punishment for rioting, 149- Offence committed with Common Object, 341- Punishment for Wrongful Restraint, 425- Mischief, 426- Punishment for Mischief, 441- Criminal Trespass, 447- Punishment for Criminal Trespass, 499- Defamation, 500- Punishment for Defamation, 506- Punishment for Criminal Intimidation of Indian Penal Code for organizing the march as well as sending false and defamatory messages. Hence, I hereby request you to take all the precautionary measures and provide adequate security to Serum Institute of India and register offence against the abovementioned persons as per the provisions of law in order to avoid outbreak of law and order situation or any unwanted situation.



Yours Faithfully,

Authorized Signatory
Serum Institute of India

TRUE COPY

ASSOCIATES

EXHIBIT - 'L'

DOCNO-4

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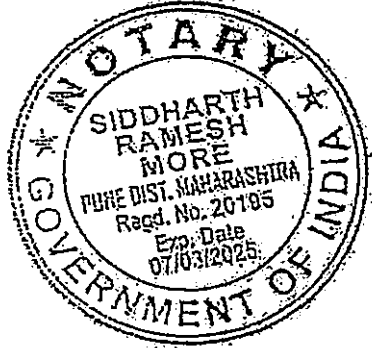


SERUM INSTITUTE OF INDIA PVT. LTD.

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Regd. off.: 212/2, Hadapsar, Pune - 411028. TEL : +91-20-26993900 ■ FAX : +91-20-26993921
www.seruminstitute.com ■ CIN : U80903PN1984FTC032945



From
Serum Institute of India
Authorised Signatory-
Address- 212/2 Hadapsar,
Off Soli Poonawalla Road,
Pune - 411028

To,
✓ Commissioner of Police
Pune.

Subject- To register an offence against Group called 'Awaken India Movement' and its Team members for organising an illegal march on 1st Oct. 2022 towards Serum Institute to handover Hamdast to Adar Poonawala and to take precautionary measures .

Respected Sir,

1. A group namely Awaken India Movement (hereinafter referred to as the "Said Group") has organized a march from Kanyadan Mangal Karyalaya Hall, Hadapsar to Serum Institute, Hadapsar on 1st Oct. 2022 to handover Hamdast to Adar Poonawala issued by Hon'ble Bombay High Court. The Said Group has sent WhatsApp messages as well as made tweets on Twitter making an appeal to large number of people to join the march to give Hamdast to Adar Poonawala.
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 1. Ajinkya, Mobile Number- 9321234861
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 3. Hemant, Mobile Number- 8830398392
 4. Yusuf, Mobile Number- 9321232620

Received

01/10/2022



SERUM INSTITUTE OF INDIA PVT. LTD.

(FORMERLY KNOWN AS SERUM INSTITUTE OF INDIA LTD.)

Cyrus Poonawalla Group

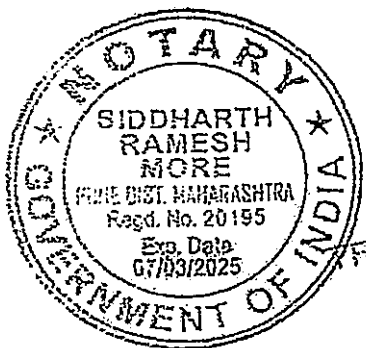
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Pune Contacts

1. Suyash, Mobile Number- 9923454589
2. Aditya, Mobile Number- 9922919377

3. The said march is completely illegal and unauthorized and completely frustrates the purpose of serving Hamdast issued by the Hon'ble Bombay High Court. The said march is planned with an Intention and motive to create a law and order situation at the venue i.e. Serum Institute of India, Hadapsar Pune. The said march is organized with an intention and motive to cause unlawful restraint to the directors and the employees of the Serum Institute of India. Through Whatsapp messages the said group is instigating and promoting enmity against Serum Institute of India by sending false and defamatory messages. There is a possibility that the people involved in the said march may damage and destroy the property of Serum Institute of India. A law and order situation will be created if the said march is allowed to be held on 01/10/2022. The said march will also cause inconvenience, nuisance and annoyance to people staying in and around that area. This is nothing but a planned and organized act done with an intention and oblique motive to damage the image of Serum Institute of India and its directors worldwide.

5. On behalf of Serum Institute of India, I Vivek Pradhan, Authorized Signatory, hereby request you to take all precautionary measures by issuing notices u/s. 149 of Cr.P.C to Ajinkya, Mobile Number- 9321234861, Chetan, Mobile Number- 8879592924 Hemant, Mobile Number- 8830398392, Yusuf, Mobile Number- 9321232620 as well as Mr. Yohan Tengra, Mobile Number- 8097333895 or arrest them u/s. 151 of Cr.P.C. to prevent them from committing cognizable offence u/s. 143- Punishment for unlawful assembly, 147- Punishment for rioting, 149- Offence committed with Common Object, 341- Punishment for Wrongful Restraint, 425- Mischief, 426- Punishment for Mischief, 441- Criminal Trespass, 447- Punishment for Criminal Trespass, 499- Defamation, 500- Punishment for Defamation, 506- Punishment for Criminal Intimidation of Indian Penal Code for organizing the march as well as sending false and defamatory messages. Hence, I hereby request you to take all the precautionary measures and provide adequate security to Serum Institute of India and register offence against the abovementioned persons as per the provisions of law in order to avoid outbreak of law and order situation or any unwanted situation.



TRUE COPY
PARINAV LAW ASSOCIATES
Attorneys For

Yours Faithfully,

Authorized Signatory
Serum Institute of India



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