

**IN THE HIGH COURT OF JUDICATURE FOR \_\_\_\_\_ AT  
\_\_\_\_\_ BENCH, \_\_\_\_\_**

**\*\*\***

**S.B. CIVIL WRIT PETITION NO. \_\_\_\_\_ /2021**

**\*\*\***

MR. ABC SINGH S/O SH. XYZ, AGED ABOUT 23 YEARS,  
RESIDENT OF 1, CIVIL LINES, \_\_\_\_\_.

**(Petitioner)**

**Versus**

1. STATE OF \_\_\_\_\_ THROUGH THE PRINCIPAL  
SECRETARY, DEPARTMENT OF HEALTH AND FAMILY  
WELFARE, \_\_\_\_\_.

**(Respondents)**

**\*\*\***

**S.B. CIVIL WRIT PETITION UNDER  
ARTICLE 226 OF THE CONSTITUTION  
OF INDIA**

**AND**

**IN THE MATTER OF IMPUGNED  
ARBITRARY AND UNLAWFUL ACTION  
OF THE RESPONDENTS \_\_\_\_\_**

**AND**

**IN THE MATTER OF PRINCIPLES OF  
NATURAL JUSTICE, EQUITY AND GOOD  
CONSCIENCE.**

\*\*\*\*\*

To,

THE HON'BLE CHIEF JUSTICE AND HIS OTHER  
COMPANION JUDGES OF THE HIGH COURT OF  
JUDICATURE FOR \_\_\_\_\_ AT \_\_\_\_\_ BENCH,  
\_\_\_\_\_.

MAY IT PLEASE THIS HON'BLE COURT

The humble Petitioner, above named, most respectfully  
begs to submit as under:-

1. That the petitioner is a citizen of India who is being aggrieved of the arbitrary and unlawful action of the respondents wherein the services of the petitioner has been dispensed with in a wholly arbitrary and unlawful manner in utter violation of the principles of natural justice. The petitioner being aggrieved of the impugned action is competent to invoke the extraordinary jurisdiction of this Hon'ble Court in order to seek redressal of his grievances by preferring the instant writ petition under article 226 of the constitution of India.

2. That all the respondents are state and its

functionaries who are duly covered under the ambit of 'State' as enshrined under article 12 of the constitution of India. Hence, they are amenable to the writ jurisdiction of this Hon'ble Court.

#### BRIEF FACTS OF THE CASE

3. That the brief facts leading to the filing of the instant writ petition are that the .....
4. That the petitioner being aggrieved of the arbitrary action of the respondents in dispensing the services of the petitioner in an wholly arbitrary and unlawful manner vide order dated \_\_\_\_\_, prefers this present writ petition on following grounds:-

#### **GROUND**

- A.
- B. BECAUSE the petitioner craves the liberty to raise other grounds which would be submitted at the time of final arguments.
32. That the petitioner has not previously filed any such writ petition in the matter under Article 226 of the Constitution of India either before this Hon'ble Court or before the Supreme Court of India.
33. That the petitioner is left with no other equally efficacious alternative remedy and speedy remedy available except to approach this Hon'ble Court by

way of filing this writ petition.

**PRAYER**

It is, therefore, humbly prayed that Your Lordships may graciously be pleased to call for entire record of this case and after examining the same, admit and allow this writ petition by issuing an appropriate writ order or directions:-

- i. To quash and set aside \_\_\_\_\_ (the major relief should be prayed here).
- ii. To direct the respondents to give relaxation to the petitioner for the period \_\_\_\_\_ .
- iii. Any other relief which this Hon'ble Court may deem fit and proper in the facts and circumstances of the case may also kindly be passed in favour of the petitioner.
- iv. Cost of the litigation may kindly be passed in favour of the petitioner.

Humble Petitioner  
Through Counsel

Place:  
Dated:

Advocate

NOTES:

1. That the process fees, notices and extra sets of the writ petition shall be filed within 3 days after admission of the writ petition
2. That this is a S.B.Civil Writ Petition and no vires of any Act or Rules made thereunder, has been challenged in this writ petition.
3. It has been typed by my private Steno who is not an employee of this Hon'ble Court.
4. As pie papers are not readily available, it has been typed on stout papers.
5. That the jurisdiction lies in the High Court of Judicature for \_\_\_\_\_.

**IN THE HIGH COURT OF JUDICATURE FOR \_\_\_\_\_ AT  
\_\_\_\_\_ BENCH \_\_\_\_\_**

**S.B.CIVIL WRIT PETITION NO.                    /2021**

MR. ABC SINGH

VERSUS

STATE OF \_\_\_\_\_ & ORS.

**AFFIDAVIT IN SUPPORT OF WRIT PETITION**

I, Abc Singh son of Sh. Xyz, Aged About 23 Years,  
Resident Of 1, Civil Lines, \_\_\_\_\_, do hereby take oath  
and state as under:-

1.That I am the petitioner in the present writ petition and  
as such am well conversant with the facts and  
circumstances of the case.

2.That the annexed writ petition has been drafted under  
my instructions by my counsel. I admit that the content  
mentioned therein are true and correct to my personal  
knowledge.

3.That the contents of paras 1 to 30 and 33 of the  
annexed writ petitions are true and correct to my  
personal knowledge, while the submissions made in  
grounds are believed to be true and correct on the basis of  
legal advice given to me by my counsel.

**DEPONENT**

**VERIFICATION:**

I, the above named deponent do hereby verify on oath

that the contents of paras 1 to 3 of my above stated affidavits are true and correct to my personal knowledge. Nothing material has been concealed in it and no part of it is false. So help me God.

DEPONENT

**IN THE HIGH COURT OF JUDICATURE FOR \_\_\_\_\_ AT**

**\_\_\_\_\_ BENCH \_\_\_\_\_**

**S.B.CIVIL WRIT PETITION NO.                    /2021**

MR ABC SINGH

VERSUS

STATE OF \_\_\_\_\_ AND OTHERS

**AFFIDAVIT IN SUPPORT OF DOCUMENTS**

I, Abc Singh son of Sh. Xyz, Aged About 23 Years,  
Resident Of 1, Civil Lines, \_\_\_\_\_, do hereby take oath  
and state as under:-

1. That I am the petitioner in the present writ petition  
and as such am well conversant with the facts and  
circumstances of the case.
2. That the annexed documents being Annexures 1 to  
17 with the writ petition are true and correct  
photostat/downloaded copies of the original  
documents.

DEPONENT

**VERIFICATION:**

I, the above named deponent do hereby verify on oath that  
the contents of paras 1 and 2 of my above stated affidavits are  
true and correct to my personal knowledge. Nothing material  
has been concealed in it and no part of it is false. So help me  
God.

DEPONENT