

Precedent No. 19

AFFIDAVIT: IN A WRIT PETITION - WRIT OF *CERTIORARI*

BEFORE THE HON'BLE HIGH COURT OF

Original Petition No ... of 20

IN THE MATTER OF:

A.B.

....PETITIONER

VERSUS

B.C

.....RESPONDENT

AFFIDAVIT

I....., W/o....., aged about.....years, presently residing in
.....

The abovenamed deponent hereby solemnly affirms and states on oath as under:

1. That the deponent herein is the petitioner in the Original Petition referred to above and also in the Civil Miscellaneous Petition NoThe deponent is well conversant with the facts and circumstances of the case and stands fully competent to swear to this affidavit.
2. That the Original Petition referred to above is filed seeking the issuance of, *inter alia*, a writ of *Certiorari*, direction or order quashing Ex. P. 12 order passed by the respondent cancelling the passport of the deponent herein.
3. That it is submitted that all the statements of facts contained in the aforesaid petition are true and correct to the best of my knowledge, and all the statements of law contained therein are believed to be true and correct belief as per information received by me from experts. The exhibits produced alongwith the Original Petition are true copies of the Originals they purport to represent.
4. That it is further submitted that, the impugned order in the aforesaid petition stands vitiated by very serious errors apparent on the face of the record.
5. That, it may be mentioned here that, the 1st respondent completely disregarded the objections filed by the deponent herein to the show-cause notice issued by the 1st

respondent to the deponent. Therefore, there has been a clear and gross violation of the principles of natural justice by the said respondent.

6. That the aforementioned facts and circumstances lay bare the arbitrariness exercised by the 1st respondent in cancelling the passport of the deponent herein and there has been absolutely no application of mind on the part of the said respondent in passing the impugned order.
7. That in view of the abovementioned facts and circumstances, it is in the interest of justice, equity and conscience, that this Hon'ble Court may be pleased to quash the aforesaid order passed by the 1st respondent.

Sd./

Deponent.

VERIFICATION

Verified at on this the day of 20....., that the contents of the above affidavit are true and correct to the best of my knowledge, belief and information and nothing material has been concealed therefrom.

Sd./

Deponent.

Solemnly affirmed and signed before me by the deponent, who is personally known to me, on this the day of , 20.....

Sd./

Counsel for the deponent.

Note: Affidavit to be attested by the appropriate authority prescribed under law.