V. K. Wasi

ADVOCATE HIGH COURT

Chamber: M-'Dev-Prayag' Gr. Floor, Ravi Compound,

Bhakti Mandir Road, Thane (W) - 400 602.

E- mail : advocatewasnik@gmail.com Tel. : 2536 93 43

Cell: 9820145302

To,

Date :- 27/03/2018

Mr. Fahad Ahmed, 1. General Secretary of Students' Union,

- Ms. Shefali Saini 2.
- Mr. Ajmal Khan 3.
- Mr. Yashwant Bapurao Zagade, 4.
- Mr. Joy Praful Lakra 5.
- Mr. Imran Gandhi 6. Tata Institute of Social Science, V.N.Purav Marg, Deonar, Mumbai 400 088

Gentlemen,

Please take notice that on behalf of our client M/s. TISS we have instituted a Suit being No. (L) 4506 of 2018 before the Bombay City Civil Court Mumbai.

Please take further notice that in the said suit, we shall also be making motion to seek same urgent relief. The said suit and the Motion shall come up before the Hon'ble Judge Agarwal, Court Room No. 3 on 28/3/2018 at 3.00 p.m.

Copy of suit and motion is enclosed herewith as and by way of service upon you.

You may remain present if you so desire.

Yours faithfully,

Advocate for TISS

Jusnil

Encl :- As above

IN THE BOMBAY CITY CIVIL COURT AT MUMBAI

SUIT NO.

OF 2018

Tata Institute of Social Sciences, Through its Registrar, V N Purav Marg, Deonar, Mumbai 400 088.

Plaintiff

Versus

Mr.Fahad Ahmed General Secretary of Students' Union & Ors

Defendants

INDEX

Sr.	<u>Particulars</u>	Ex.	Page
No.			No.
1	Roznama		A - C
2	Plaint		1 - 19
3	Vakalatnama		20 - 21
4	Memorandum of Address		22
5	List of Documents		23
6	Notices displayed dated 26th February and 3rd March 2018.		24 - 26
7	Grievance letter from the residents residing at TISS quarters situated in the Campus.		27 - 40
8	Newspaper cuttings dated 23.02.2018, 24.02.2018, 28.02.2018 and 01.03.2018 of Maharashtra Times and 05.03.2018 of Hindustan Times.		41 - 47
9	Affidavit in Support		48 – 49

 Advocate for the Plaintiff

IN THE BOMBAY CITY CIVIL COURT AT MUMBAI

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Plaintiff

Versus

Mr.Fahad Ahmed General Secretary of Students' Union & Ors

Defendants

Advocates

Office Notes, office Memorandum of Coram, Appearance, or direction and Court's or Judge's Order.

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IN THE BOMBAY CITY CIVIL COURT AT MUMBAI

SUIT NO.

OF 2018

Tata Institute of Social Sciences, Through its Registrar, V N Purav Marg, Deonar, Mumbai 400 088.

Plaintiff

Versus

- 1. Mr. Fahad Ahmed,
 General Secretary of Students' Union
 Having its office at the campus of
 Tata Institute of Social Sciences,
 V N Purav Marg, Deonar,
 Mumbai 400 088.
- 2. Ms. Shefali Saini,
- 3. Mr. Ajmal Khan,
- 4. Mr. Yashwant Bapurao Zagade,
- 5. Mr. Joy Praful Lakra,
- 6. Mr Imran Khan,

Address for service for all At the Students' Union's Office Tata Institute of Social Sciences, V N Purav Marg, Deonar, Mumbai 400 088.

... Defendants

MOST RESPECTFULLY SHEWETH:

The Plaintiff above named states as under:

The present suit is filed by the Tata Institute of Social Sciences through its Registrar who is competent to institute the suit on behalf of the Institute.

1. The Plaintiff state that the Tata Institute of Social Sciences is an Institute engaged in imparting higher education in the field of social sciences and other disciplines is conducting courses such as Bachelors (in its off-campuses), Masters, and doctorate programmes such as M Phil and PhD.

- 2. The Institute has a long history of 81 years and it was declared to as a Deemed to be University' under section 3 of the University Grant Commission Act 1956. The courses are as approved by the University Grant Commission, Government of India.
- 3. The Plaintiff states that the Institute is funded by the University Grant Commission and Ministry of Human Resources Development, Government of India and follows all the regulations notified by the University Grants Commission.
- 4. The Plaintiff states that by virtue of the above, the Institute follows the Government of India guidelines in the matter of reservation in admission to various classes of students including the students belonging to Scheduled Castes, Scheduled Tribes, OBC, PWD, Armed forces and other classes as recognized by the Government of India. The Government of India, however, has put some specific rules and guidelines on some scholarship grants, concessions, relaxations available to the SC/ST/OBC (non creamy layer) community students in which the Institute has no role except certifying their bonafide.
- 5. The Plaintiff states that the Institute has a campus at the present address at V N Purav Marg, Deonar, Mumbai 400088 which is also the registered office and the

principal seat of the Institute from where all administrative control is exercised through the Director, Registrar of the Institute and other officers and authorities. The Institute also has campuses at Tuljapur in Maharashtra, Guwahati in Assam and Hyderabad in Telangana.

- 6. The Plaintiff states that as stated earlier, the Institute has been observing the norms of reservation in admission, etc and the students are admitted according to the said norms of Govt. of India/UGC. The scholarships, so also other facilities such as hostel, mess are regulated by the rules, regulations of the Institute as per the guidelines issued by the UGC from time to time.
- 7. The Plaintiff state that the Defendant No.1 is the General Secretary of the presently elected Students' Union and is spearheading the agitations currently going on. The Defendant No.2 to 6 are the students who are actively participating /instigating the students to hold demonstrations and strike. The Plaintiff states that the Students' Union is organized by the students and the students are following the directions given by the Union from time to time in the matter of any subject and issues facing the students.
- 8. The Plaintiff states that all the Defendants No. 1 to 6 are the students who along with their supporters, activists are

engaged in various forms of illegal activities and are actively instigating, inciting the students within the campus and also at other campuses to strike and agitate in various forms.

- 9. The Plaintiff states that the Plaintiff being a Deemed to be University under section 3 of the UGC Act 1956, all scholarships, concessions available to the students of SC/ST/OBC (Non-creamy Layer) is regulated by the Government of India, State governments and the University Grant Commission under whose control/direction the Plaintiff are working.
- 10. The Plaintiff states that the Government of India and the State Governments are the apex bodies for extension of concession to the students ensuing higher education in the form of Gol_post-matric scholarships (Gol-PMS).
- 11. The Plaintiff states that all admission process/fees payable by SC/ST, GoI-PMS students was also notified at the admission stage itself and that upfront payment of tuition fees, dining hall charges and hostel charges are required to be paid at the time of admission stage itself.
- 12. The Plaintiff states that the Institute, being an entity registered under the Public Trust Act and have no resources of its own income, and therefore, was compelled to issue such notification for upfront payment of tuition

- fees, dining charges and hostel charges at the time of admission stage itself.
- 13. The Plaintiff states that the said notification was issued after several consultations in various bodies including the students union, although it was not required in law and only in order to maintain cordial relations between the student community and the Institute's Management. The Plaintiff states that although the said notification was issued, the students were assured that no student would be barred from the above facilities even if they are unable to pay the same upfront at the time of admission.
- 14. The Plaintiff states that even the students and its GoI-PMS working group met the authorities like the Honourabl Minister of Social Justice for addressing their grievances. However, the same is not within the jurisdiction/scope of the Institute. The Plaintiff states that on 18.02.2018 the student Union gave a Charter of Demands to the Acting Director, with various demands and including roll back of the said notification.
- 15. The Plaintiff states that in order to have cordial relations with the students, the Institute has called upon a meeting with the Students Union on 20.02.2018 and after considering the various aspects, it was prevailed upon the students to pay the dining hall charges since it was an actual recurring expenses incurred for providing food to

- the students. The Students' Union assured the Management that they would go back to the group and communicate their stand.
- 16. The Plaintiff states that the Defendants, their members, followers, however, in spite of reporting back, have started protesting within the campus and have insisted for total withdrawal of the notification, which has serious financial implications for the Institute. The protest of the students started on 20.02.2018, continued unabated and the same is being intensified by forcing other students to observe total bandh and the working of the Institute had come to stand still.
- 17. The Plaintiff states that on 21.02.2018 the Institute tried its best to convince the students, but the efforts of the Management including the Acting Director did not bear any fruit. Instead, the protesting students intensified their agitation within the campus and started obstructing movement of men, material, including not allowing even the persons with disability or senior citizens from moving in or out of the campus. It is a matter of record that even the exit of the Acting Director to move out from the main gate was blocked and she was forcibly prevented from going home by making a human blockade. The human blockade was enforced with threats of complaints under atrocities act and in the case of male staff with threat of complaints of sexual harassment.

- 18. On the subsequent dates i.e. on 22.02.2018 the agitation was further intensified in spite of the efforts of the Management to consider the issues. However, the agitation continued and intensified and that all activities came to stand still and blockages, obstructions, slogans and high decibel loud speaker and shouting went on.
- 19. The Plaintiff states that on subsequent dates also the agitation was intensified to the extent that many of the officers, residents including senior citizens were kept captive for days by blocking the main gate and there are also instances that the senior lady officers, staff of the Institute were not allowed to attend their nature's call and denied against all norms of human rights and civilized behaviour. Following days, they disrupted the classroom teaching, functioning of offices and also confined the Acting Director, Deputy Director, Faculty members in their respective offices.
- 20. The Plaintiff states that thus the agitation, bandh continued unabated in spite of several appeals of the Management and the same agitation is also going on in other campuses. The subject matter of the agitation/bandh of the students is a matter of everyday's media news. It is not understood at whose instances such news items are published. The Plaintiff shall rely on the notices displayed on various dates, so also the news items which had appeared in prominent newspapers.

The Plaintiff state that the Institute has always taken a lead for resolving the issues in an amicable manner and in spite of several illegal activities that are going on and finally have tried to resolve the issue on 02.03.2018 through an Empowered faculty committee where the President of the Students' Union with others were also Appreciating the efforts of the students, the Acting Director has issued a notice to that effect on 03.03.2018. However, no sooner such Minutes were signed, the students union withdrew the strike. However, the dissenting members led by the first respondent went back and continued their strike and other illegal activities unabated. The Plaintiff states that in the premises of the Institute, CCTV cameras are installed in specific places and most of the actions and activities of the students are recorded and captured in the said CCTV cameras and other cameras that it is prayed that this Hon'ble Court be pleased to allow the Plaintiff to show the said CCTV footage and to ascertain the extent of activities caused by the students and to take action in accordance with law.

21.

22. The Plaintiff states that faced with such continued strike and illegal activities, bringing a total stoppage of activities, movement of men, material including women, residents, senior citizens, the Plaintiff has finally called upon the students on the very same day i.e. on

03.03.2018 to desist from committing their unlawful activities.

- 23. The Plaintiff state that the efforts of the Management in explaining the situation to the students by holding dialogues with the students and their delegates appeared, not to have taken a positive note and that an Institute bandh situation coupled with instances of stoppage of even suppliers of essential commodities / holding even senior citizens at the gate continued.
- 24. The Plaintiff state that it was also brought to the notice that the campus houses not only students' classrooms, but several other facilities including residential premises for a number of offices, authorities, executives, officers and staff who stay within the campus with their families consisting of senior citizens, people with health issues, infants and school going children, etc. and due to the said "TISS BANDH" agitation and consequential acts of stoppage of peaceful movement, paralyzed the normal functioning of the office, life of residents and others within the campus. The Plaintiff states that serious complaints were received by the Institute from the family members of the residents and faculty for obstructing, misbehaving, blocking the ingress and egress of men, material and there was a total fear psychosis in the mind of the residents,

occupants, staff, faculty, executives and even the students within the campus.

The Plaintiff craves leave to refer and rely on the complaints received from the residents which are self-explanatory.

The Institute's Management continued to dialogue with the protesting students and had even detailed a Plan of Action on 10th March 2018 to address the issues raised by the students, subject however to the agitation being called off. Despite the best efforts, this group continues to obstruct the main gate with posters and notice boards causing hindrance to the movement of people and material. They continue to call outsiders for lectures at the main gate and inflammatory and anti institute slogans are raised at high decibels and the movement of the people and materials are restricted.

25. On March 21, 2018, around 5.10 p.m. a string of nooses were hung in front of the gate creating an atmosphere that could have an adverse psychological impact on other vulnerable students/ residents in the campus. A very disturbing scene was created by the protesting students purportedly in the name of discussing a particular sensitive incident, that could be potentially dangerous and could be an inducement for some one to cause self-harm.

The Plaintiff states that the situation had become bad to 26. worse, in so much so that the students have en-mass entered the office of the Registrar on 23.03.2018 and started picketing, shouting slogans, beating drums, singing using megaphones in high decibels and giving slogans and creating law and order situation. Plaintiff further states that the students entered en-mass and have also started accessing the files and documents, have also used all the facilities and even did not allow the Security to enter the chamber of the Registrar to safeguard the Institutes record and property. The students did not stop there, but went on to disconnect CCTV camera and unauthorizedly accessed, tampered with and might have illegally copied, carried away or destroyed documents. They have illegally occupied the Chamber of the Registrar, defaced the premises by putting up large size flex posters and went on shouting slogans, sleeping on the floor and sitting on the official chair of the Registrar. The administrative block of the Institute was also blocked on Saturday, 24.03.2018, as a result the staff numbering around 50 attending office for important official purpose could not enter the premises by barricading the entrance of administrative wing with furniture and physically occupying the place and preventing entry of staff. The Plaintiff state that the Institute caters to thousands of students and that the office staff is required to maintain records including accounts etc due to the end of financial and academic year. Due to the above obstruction of the students, the administrative work of the Institute had come to stand still.

- 27. The Plaintiff state that the Registrar is the custodian of the official records of the Institute and very valuable, important and confidential records are maintained by his office. In view of the above actions of the students, the Plaintiff strongly apprehends that many of the vital records/documents/ files might have been tampered, copied, carried away or destroyed and that the incidence is also reported to the Police on 24.03.2018.
- 28. The Plaintiff apprehends that in view of the above situation and in view of the voluminous record maintained in the office of the Registrar, the students who encroached and unlawfully intruded into the office will be solely responsible for any loss, destruction of documents, records, files etc. Attempts to secure the documents by the officers and security staff were thwarted by the students.
- 29. The Plaintiff states that the agitation/demonstration being held by the students are captured in the CCTV camera to the extent available and the same shall be produced before this Hon'ble Court in order to show the impact of agitation which cannot be expressed.

In continuation of our various notices, calling upon the students to refrain from continuing their agitation and holding out very high decibel demonstrations involving stoppage of peaceful movements, regular office functioning, blockades, obstructions, creating scene within the campus of the Institute, it is regretfully observed that the students, agitators, demonstrators have totally ignored the appeal of the Management and their illegal actions are continued unabated.

- 30. The Plaintiff re-iterates that the agitators, demonstrators on 23.03.2018 have en-mass entered the office of the Registrar and started picketing, shouting slogans, drumming in front of the Registrar's office and giving slogans by using objectionable un-parliamentary words. The situation is, thus, being deteriorated and that the striking students are going to the extent of indulging in coercive activities in spite of the appeals of the Institute.
- 31. The Plaintiff states that the students are finally called upon to refrain from indulging in their unlawful acts and maintain normalcy, failing which the individual students shall be responsible for the consequences arising out of their illegal agitation. The Plaintiff crave leave to produce the same.
- 32. The Plaintiff state that by notices/appeals, the Institute called upon the students, activists not to take law in their

hands and not to obstruct men, women, vehicles, material coming in or going out or otherwise obstruct the free movement of men, women, vehicles, material and regular functioning of office. The Plaintiff have reliable information that even lot of outsiders are entering and have free access within the campus and therefore normal life of the occupants have been under tremendous pressure.

33. The Plaintiff apprehends that looking to the illegal conduct of the Defendants and their members, supporters, the Plaintiff states and submit that it is just, lawful and necessary for the protection of the occupants and also in the larger interest of the students that the Defendants, their members and supporters be restrained by an order to call off their illegal strike and grant injunction by way of interlocutory order restraining the Defendants, their supports in any manner, directly or indirectly stopping the normal functioning of office, the suppliers of essential commodities / holding even senior citizens at the gate of the campus, intruding, barging in and forcibly occupying as also from physically obstructing the office spaces faculty, officers and staff who stay within the campus with their families consisting of senior citizens, school going children, etc.

- 38. The Plaintiff have not filed any other Suit, application, petition before any other court or before the High Court of Bombay or before the Supreme Court of India touching the subject matter of the present Suit.
- 39. Cause of action of the Suit is not barred by law of limitations.
- 40. The Suit is filed for declaration and injunction as such it is not susceptible to valuation. Hence the stamp duty of Rs. applicable to injunction suit is paid.
- 41. The Plaintiff craves leave to add, delete, alter, modify any of the above as may be required.
- 42. The Plaintiff, in the circumstances, prays that this Hon'ble

 Court be pleased to grant the following reliefs
 - a) That this Hon'ble Court by an order declare that the strike /boycott, agitation by the students in the name of TISS Bandh' commenced and continued by the students from 20.02.2018 is illegal in law, unjustified and improper.
 - b) That this Hon'ble Court by an order declare that the agitations and actions of the students submitted hereinabove are ultra-virus, illegal, unlawful, unwarranted, unconstitutional.
 - c) That this Hon'ble Court by an order declare that the acts of omissions and commissions complained hereinabove are in contravention of the rule of law and against the public order.

- d) Pending hearing and final disposal of the suit, this Hon'ble Court be pleased to direct the students to call off their agitation in the interest of the student community.
- e) Pending hearing and final disposal of the suit, this Hon'ble Court be pleased to restrain by an order of injunction to restore normalcy.
- Pending hearing and final disposal of the suit, f) this Hon'ble Court, by an order of injunction, be pleased to restrain the Defendants/students, their supporters, followers from demonstrating, illegal occupation, unlawful accession of official documents and records, agitating, shouting slogans, obstructing office functios, material ingress or egress into the offices and in any way obstructing free movements of men, women, vehicles, material or visitors or suppliers of essential commodities/vendors, etc. within the campus or at the gate of the Tata Institute of Social Sciences at V N Purav Marg Deonar, Mumbai 400 088.
- g) Pending hearing and final disposal of the suit, this Hon'ble Court, by an order of injunction, be pleased to restrain the Defendants/students, their sympathizers, followers from conducting any sort of dharna, strike, gheraos, hartal, within 500 meters of the campus or at the gate of the Tata Institute of Social Sciences at V N Purav Marg, Deonar, Mumbai 400 088 and other campuses of the Institute.
- h) Pending hearing and final disposal of the suit, this Hon'ble Court, by an order of injunction, be pleased to restrain the Defendants/students,

their sympathizers, followers from holding/ organizing meetings or from shouting slogans within the campus and offices and residential spaces of the Tata Institute of Social Sciences at V N Purav Marg, Deonar, Mumbai 400 088 and other campuses of the Institute.

- i) Pending hearing and final disposal of the suit, this Hon'ble Court, by an order of injunction, be pleased to restrain the Defendants/students, their sympathizers, followers from displaying any sort of banners, flags, illegal temporary structures, posters and defacement of heritage structures within the campus or at the gate or at the compound walls of the Tata Institute of Social Sciences at V N Purav Marg, Deonar, Mumbai 400 088 and other campuses of the Institute.
- j) Pending hearing and final disposal of the suit, this Hon'ble Court, by an order of injunction, be pleased to direct the Defendants/students, their sympathizers, followers to maintain peace and discipline within the campus of the Institute.
- k) Pending hearing and final disposal of the suit, this Hon'ble Court, by an order of injunction, be pleased to direct the Police authorities to investigate the matter based on CCTV Camera and book the law-breakers as per the provisions of law.
- l) For such other and further reliefs as the nature and circumstances of the case may require.
- m) Ad-interim reliefs in terms of prayers 'd' to 'k'.

VERIFICATION

I, C P Mohan Kumar, Registrar of Tata Institute of Social Sciences, V N Purav Marg, Deonar, Mumbai 400 088 do hereby state and declare that the particulars given hereinabove are true, correct to the best of my knowledge and information which I believe to be correct.

Verified at Mumbai on this & Day of March, 2018.

C P Mohan Kumar Registrar – TISS Plaintiff

IN THE BOMBAY CITY CIVIL COURT AT MUMBAI

SUIT NO. OF 2018

Tata Institute of Social Sciences, Through its Registrar, V N Purav Marg, Deonar, Mumbai 400 088.

Plaintiff

Versus

Mr Fahad Ahmed General Secretary of Students' Union & Ors... Defendants

MEMORANDUM OF ADDRESS

Tata Institute of Social Sciences, V N Purav Marg, Deonar, Mumbai 400 088.

Phone: 91-22-2552500

Mumbai 26.03.2018

ςJ For Plaintiff SUIT NO.

OF 2018

Tata Institute of Social Sciences,

...Plaintiff

Versus

Mr Farad Ahmed, Gen. Secretary of Students' Union & others

... Defendants

<u>List of Documents</u>

May It Please this Hon'ble Court:

Plaintiff beg to file the following documents. The same may please be allowed to place on record.

Sr.No	Particulars	Exh.	Page No.
1	Notices displayed dated 26th February and 3rd March 2018.		24 - 26
2	Grievance letter from the residents residing at TISS quarters situated in the Campus.		27 - 40
3	Newspaper cuttings dated 23.02.2018, 24.02.2018, 28.02.2018 and 01.03.2018 of Maharashtra Times and 05.03.2018 of Hindustan Times.		41 - 47

Mumbai 26.03.2018

Advocate for the Plaintiff

24

टाटा सामाजिक विज्ञान संस्थान Tata Institute of Social Sciences



NOTICE

February 26, 2018

A section of the students who are agitating since the last four days have blocked the main gate of the Institute from 21st February onwards.

The said agitation adopted by the students as "TISS BANDH" in connection with the alleged stoppage of scholarships and related matters. Now, the scholarship is directly transferred to student's bank account by the Social Welfare Department/Tribal Department of the respective State Government on receipt of the application submitted by the eligible students. The Tata Institute of Social Sciences (TISS) has no role either in the sanction or disbursement of the scholarships.

TISS is following all the guidelines of the Government of India and the course fee for the eligible GOI Post Matric reserved category students are still exempted. The students are only required to pay dining hall charges and hostel fees on actual basis, which is the norm in all universities.

The Institute's authorities are in continuous dialogue with the students since 21st February 2018. In the night of 21st February, the Acting Director heard all the protesting students in the open on their insistence and received their charter of demands. She requested the protesting students to form a delegation and meet the administration team next day (February 22nd). On 22nd February 2018, the administration team met a group of 20 students' representatives for three hours to discuss their charter of demands.

The students were informed that the TISS Administration has no role in the sanction and disbursement of GOI-PMS which is purely a Government decision and that the students should not obstruct movement of any person (Staff, students, faculty, campus residents, visitors), vehicles, materials including suppliers of essential commodities.

The TISS Administration fully supports the concerns of the students. However, certain instances occurred in the last few days that have become a cause of serious concern to the Institute.

The efforts of the Administration in explaining the situation to the students by holding dialogues with the elected Students' Union representatives and student delegates, do not appear to have satisfied them. An institute bandh situation coupled with instances of stoppage of all the residents, even supplies of essential commodities / holding even senior citizens at the gate, continued.

The campus houses not only students' classrooms, hostels and dining halls, but also several other facilities such as day care centres, residences of faculty members, officers and staff, many of whom live with their families consisting of senior citizens, infants, school going children, etc.

डाक पेटी क्रमांक 8313 देवनार, मुम्बई 400 088 Post Box No 8313 Deonar, Mumbai 400 088

दूरभाष Telephone: 022 2552 5000 फैक्स्स Fax: 91 22 2552 5050 वेबसाइट Website: www.tiss.edu

A Govc, of India funded, Multi Campus, Deemed University under Section 3 of the USC Act, 1956



: 2:

Due to the students' agitation and blocking of the main gate, consequential acts of stoppage of normal movement has paralyzed life of the residents and others within the campus. TISS authorities have received a written grievance from the residents about the serious inconvenience caused by blocking the main gate of the Institute and the noise generated by the protesters.

By this notice, the Institute once again calls upon the students not to take law into their hands and not to obstruct persons, material coming in or going out or otherwise obstruct the free movement of persons and material.

Failure to adhere immediately to the request of opening the gate and removing the blockade to maintain normalcy within the campus shall compel the Institute to take recourse to action as per rules, however reluctantly, which may please be noted.

For TISS

Copies to:

- All Notice Boards
- 2. All Campuses
- Security Officer
- 4. The Secretary, Ministry of HRD
- 5. The Secretary, UGC
- 6. The Secretary, Ministry of Education, State of Maharashtra
- 7. The Commissioner of Police
- 8. The Senior Inspector of Police, Trombay



टाटा सामाजिक विज्ञान संस्थान Tata Institute of Social Sciences

NOTICE



March 3, 2018

Attention is drawn of all sections of students, staff and faculty to the notification dated March 3, 2018, issued by the Acting Director informing the Students' Union's decision to call off the students' strike with effect from the night of March 2, 2018. It is noted that despite this notification a section of students are organizing group activities at the main gate creating innumerable hardships to residents and employees in the main campus.

In continuation of the various appeals from the Institute, the Students' Union vide its mail letter dated 01.03.2018 had declared the main gate open and made free for movement of all kinds. Despite this welcome announcement, a section of students appear to have ignored the appeals and have from time to time continued activities at the main gate disturbing free movement through the gate. At 6 pm yesterday a section of students had again created obstruction by holding a lecture by a faculty and thus blocking the main gate, including ingress and egress of persons, vehicles and material. It is learnt from various sources that today also unauthorized persons were brought into the campus and lectures conducted, without prior permission, at the main gate.

The students gathering at the main gate have been informed time and again that the campus houses not only the students from all sections, but provides several other facilities within the campus. In addition, the students are aware that there are staff working in the campus, besides it has residential accommodation for a number of officers and staff, who are staying within the campus with their families having senior clitizens, school going children, etc. The use of microphones and creating loud noise, particularly after the 10 pm time limit set by the Honourable Courts, is violation of the law besides causing severe problems to the residents who include the aged, infants and students preparing for examinations.

The Institute regrets that its good intentions and sincere appeals to prevent such unlawful activities are being ignored by a section of students.

The Institute, by this notice, once again calls upon the students gathered at the gate to refrain from organizing lectures and other organized activities at the main gate leading to blockade and obstruction of movement.

Through this notice, these students are finally called upon to help maintain normalcy within the campus and not to obstruct free movement through the main gate, inconvenience people within the campus, material ingress and egress and otherwise, and to generally not include in any act amounting to unlawful activities in the smooth functioning of the Institute.

Resultantly, if normalcy is not restored and if the instances of obstructions, stoppage of movements of persons, material or such other illegal acts in any form/method are continued, the Institute shall have no option, but to safeguard the interest of all concerned by taking recourse to law in order to ensure law and order situation.

The Institute hopes that a wiser counsel shall prevail upon the protesting students and that they will not compel the Institute to take recourse to law.

By order of the Acting Director.

Copies to:

1. The Secretary, Ministry of HRD.

The Secretary, UGC.

The Secretary, Ministry of Education, State of Maharashtra.

4. The Commissioner of Police.

The Sr. Inspector of Police, Deonar, Mumbai.

6. Security Officer, TISS

सक्त पेटी क्रमांक 8313 देवनार, मृम्बई 400 088 Post Box No 8313 Deonar, Mumbal 400 088

दूरभाव Telephone: 022 2552 5000 फैक्स Pax: 91 22 2552 5050 वेबसाइट Website: www.tiss.edu

A Deemed University established under Section 3 of the USC Act, 1956, vide Notification No. F11—22/62—U2, dated 29th April, 1964, of the Government of From

The Residents TISS Quarters Main Campus

То

The Registrar
Tata Institute of Social Sciences
Mumbai

Sub: Grievances from the residents for the past four days-reg.

Respected Sir,

We, the residents who stay within the TISS Housing Quarters wish to bring to your attention on the series of instances that has been causing serious inconvenience to us since 20th Feb 2018.

20th February 2018

Students of TISS declared a strike on the 20th Feb 2018 night and they issued a notice around 11 p.m. which mentioned about the 21st Feb Strike. To issue this notice, they rang the calling bell of the residences from 11 p.m onwards. Also they made loud slogans till the midnight while they are well aware that the household have infants, children and senior citizens who have health concerns and children appearing for the 12th board exams in the next day. They were also flouting the 10pm ban on noise.

21st February 2018

On the 21st Feb, without any notification to the campus residents, the protesting students blocked the main gate with human barricade. Unaware of this incident, many of the residents' children and spouses who came back after work were stranded on the road, too confused absolutely, they cannot enter their own residence, for hours. This created a sudden panic to among of us. We witnessed parents waiting to pick up their children and members returning from work tired after the whole day's work, who did not know where to park the vehicles, and waited on the road of the main gate for hours. The entry was blocked for all including children and senior citizens. Some requested and some reacted to the students seeking entry, but the students kept saying that they need support for their protest and thus we need to use the rear gate. The rear gate is a facility that can be used for people to walk though but not for vehicle to pass through. Some of the residents were not even aware of their cause, as they are not connected to TISS except for the fact that one family member works in TISS.

The same day, there were many testimonies from the campus residents, that how they were blocked without any prior intimation. Visit to Tulsi Medicals, which is adjacent to the main door had to be accessed through rear gate that involved 15-20 minutes of walk, and some of us were not in a capacity to do that because of our

health conditions and age. Residents who are not working in the institute were also not permitted to use the main gate.

22nd February 2018

Now, while we bore this as a one day incident, we woke up at 2am with the slogans again. Our children who were going to write their board exams, were blocked from going out through the main gate. This has created mental agony for children as they had not planned extra time to walk through rear gate. Some of us personally wanted to go and drop our children in the exam hall, but then students blocked the parents and asked the children to go alone, they also commented looking at the children that 'you are young and tall enough to go alone'. All these incidences gave our children mental strain and they could not perform well in the examination. We never expected these kind of insensitive comments from students of our institute. They stopped the milk vehicle, pav and food items, and the laundry person has not been allowed since day 1, the housemaids were not allowed and many have taken leave citing this as a cause. This has caused so much tension and change in our day to day routine.

One of the minor girl child who came back after giving her board exam was not allowed to enter with her mother and when she argued she was pushed by a male student.

The students were aggressive. We would have even accepted and tolerated whatever had happened. But they demanded in arrogant ways and passed unnecessary remarks.

23rd February 2018

The status remained same, they made few modification for some selected faculty to take their vehicles, but no change for us-the campus residents. They have taken us as hostage, asking us only to use the rear gate, which has physical (walk a long distance), economical (40 rs extra per day) and health consequences (we are unable to access the medical shop adjacent).

In the meanwhile, we also noticed that there is a bias in whom they are allowing and not. We observed that they are allowing selected faculty and staff to pass through the main gate and no residents are allowed to use the main gate. Thus there is an increasing anger amongst the residents of campus, which has resulted in minor altercations. In some instances protesting students are making human barricade with girls when men are trying to enter or go out and then fabricating stories and complaining that they were physically assaulted. Instead of requesting, they are bullying, and this has affected us. We have been living here for more than decades and have never experienced this much insults from anyone. Even to enter our own home, we had to plead and be in the mercy of the protesting students. When demanding our rights to free entry and exit, they brought few faculty to negotiate with us, and they were explaining why it is important for us to support. We are tired of this and seek immediate redressal of this. To quote some instances

- A campus resident and a senior citizen was made to wait for 5 hours from 11pm to 4am. He refused to take the students instructions to use the rear gate. Rather than requesting they behaved very rough and they continued the same behavior on the second day. There were instances where parents who came to collect their children from DCC, were blocked and they were asked to walk 1.5 km.
- 2. School students were blocked from going to the school in the morning, however after repetitive requests and plea, they are doing a favour of allowing only the children. However they have caused damage to the children who were writing the board examinations the previous day. They have not allowed the students to go out even after showing the hall ticket.
- 3. They are not allowing any vehicle to come in or go out even in emergency situations and even senior citizens who are physically fragile also were asked to walk through back gate.
- 4. The parents cannot accompany small children to their bus stops in between their office hours which was easy as they could use the main gate which is now blocked.
- 5. Because of the fear and commotion, the parents coming with their children to the daycare centre are using the back gate.
- 6. Often students make loud sloganeering, drumming, and singing even in the late hours of the night, some days upto 2am.

We have patiently waited for things to settle, but it does not look like settling. We have to go to work, take public transport and reach our office on time. The students can take their fight with TISS employees, we do not have a problem, but they cannot heap the problems. They do not have any right to harass and humiliate us. We do not want to listen to any more excuse.

All the above incidences have created lots of inconveniences to our family members physically, mentally and the feeling that we are controlled, being held hostage and punished for no reason. This is increasing our anger. We, as residents, met the students leaders and requested to allow us to use the main gate but they are giving false promises and continue to do the same. They allow few, and then they stop. They along with the faculty told that they will write a mail, which we have not received. All these incidents have physically and mentally affected the residents of the main campus.

We hereby appeal to you as campus residents to free the main gate from protesting students for all purpose, coming in and going out -walking, cycling, and on car and bike-as always, and enjoy our freedom and mobility. Specifying all the means of mobility, is because the students have been treating us bad and during our negotiation, they said that they will only allow us by foot. Who gave them this

power to rule over us? They have all the right to protest, but not at the cost of others rights.

Please find attached testimonies of residents on their experiences in the past four days.

Residents TISS, Main Campus power to rule over us? They have all the right to protest, but not at the cost of others rights.

Please find attached testimonies of residents on their experiences in the past four days.

On behalf all the selections of their experiences in the past four selections.

Residents
TISS, Main Campus

And Andrew Panthal

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L(D. s. kale)

23/2/18

Ildey A Salvi. Lervice cepantment 501.

We all Compus revoidant we request to students. who are secting on strike

We have Suffering very mach problem. to go out & come in compas. belouse we are Stay in Compas consung times are have to go out & every time to time we don't want argu with Student we don't have probleme with there strike only our humbher haguest to Student P1. alous us to go out of compas & get in compas.

T. L. Woghele

- Thanking you

LIA Salvi

Ranjit Patel

Sorvice Aportment 101.

We come fired after the long and firing hows at own work place and that time we don't have a bit of energy left for travelling another distance to steach I home. In the morning while the school as we are not allowed to tresposs from the main gate. Please allow us to pass in and out from the main gate. Thank you !

R.K. Shelan

Mr. Mirma Momin - R. No. D4 Staff Quarker.

My dayster, Mr. Musikaan Monin appearing for 12th boards

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मेरि अडकि कार Mcom कार परिशा हर हिंद रहानी है। अनित अधिकार पिछले ती में अप अहत सपार कार रहत है। उसार के अ121-6म समार हारवाले मारे बहुत सपार कार रहे हैं।

The students of TISS allowed me to go out and told me whenever you go edges you should not allow me, afterwall my 6 years old daughter came and cried. Then they allowed me insicle

4) MR. R.K. Gamre

The students union aira is not allowing to go not fin which we feel not correct. They can Room No. 02

We have feel many problems to go outside the tiss & they are not allowing to go & come inside. They told to us to went from back gate & that is not Sufe for a girl to go alone, for small thing we have to go from the back gate for medical & all this thing. We can are come from the willage & jobs, we are titled & we have to after howing long day & tired fors. In the wilager & the offices the energy level of burs is not sufficient to covered abother long distance. ever when we go for the marketo we are not capable to hold on the stoops clong with our as they may investigate lot more.

M. Jowatker, 19930720593

Do. Anil Kum P. No. 1, Blog No. 2, Faculty Qto Mrs. Hentahn Anil Rumer in norking in Don Bosco Reseau Centre, Mahupa, Fliring I ama suffery from Right Eye Vision publican which in very low. So I cannot travel few me buck gets whereby 9 have a gran walk from the gate and difficult cross roads.

DN SUGUMAR B-3, faculty Qtm.
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My son is going for 12th Exam today but in main gate grow of 15 student Des avare with 41 and soning that your son can go from Maingate & Ichrolla go prom Lack side gate. Secondly language of some studing are very rudely my Dayshow gow to school at 6 40 ay.

Harry P.

Parag Panchal - D:1

Both my Son and daughter go to school. Yesterday, when I wanted to pirt my daughter from the school the shidents Stopped me from proceedity from the main gate & intern asked me to use the rear gate from the backside. It was already late do pick my daughter, as I was busy with my office Schedule. Today also the same thing happened. Also we reside in the office campus, My wife is a nurse who has shift duttes, Which means her timings are not fixed. She was also stopped twice from entering the campus. Now, I am also Norting and ocsiding in campus, but every time when Iwand-te go out of the campus, I have to beg in front of the Shutents to leave me from the front gate. When we are paying HRA Why our rights are stopped. And pray Panched Danner G. Bholens

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H HEA HRAISBR TISS Staff Quart R.No.402 में रहलां हूं में दुसास मेरा दूस फुमीली की मेल जेर सुक्क पर प्रोटेस्ट भारत चालु है। इसी छारण वहा पर मे स्ट्राज्य प्रोटेस्ट मान्ये पर केंग्रे दे। अरो मेरे फंमीकी की गेर के बाहन मानेश मना कर रहे हैं। र्सा नहीं होना याहीए.

M.G. Morwadaga Head Security Guarp

Mr Rahil Phodke, P.No. 207 R. No. 402 They are not albring my children to be dropped to school.

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not peritted to me.

Mr. Smil brankhedy R. No. D6 IM then.
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> C. N. Parman: C.N. Parman: -24/2/118.

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5700. Dayhter. Finding it digitalt to go to School. Pick up & deoppout has to be done everyday. As well as Opice hours. disturbed "Sue to Brech. Situation."

> 1/05it fremae Til Du/2/118.

Mr Laxman Changy Kamble Staff quatras RoomNo.301

Me & my family members are facing problem to go outside from tiss compus from the main gate. Due to protest of Tiss students. It is very time consuming to go from back gate of Tiss campus. At night deener form road is not safe for kids who come from their classes. Specially for girls.

Alkanille

Dilip S. Kali. D. 2 Staff Ross.

Joseph different experience in last two days. Then students ceno are on strice they behave roughly to they one got allowing resident to go outset the empso or cornein the caupus or cornein on child al School. There were medical encouragemy twice in last two hays. These shedered didn't allow me do go outside 4 have medicine Joan chomist/medical store.

D.S. Kale D-2 stapp for Main Compus.

नीस्थाहिवास्ति। किस्मित्या विद्याश्वित्य । भूतिलान्



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सिनीजक विज्ञान संस्थेच्या (स्रि) कंट्रसम्प्रके गुरुवारी उसरले संस्थारच्या या निर्णायाना विध्यास्य कंप्रणासाठी विधाय्याना कुधवारी स्रोयासून केलिज बंद्र आंद्रोलन स्रिक्शान विद्यास्यास्य स्थितिक सिक्शान्याना केल् इंड्रमा नामानिक विद्यास्याना केल्ला इंड्रमा नामास्ययाचित्र विद्यास्याना केल्ला हिंद्री

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डि।जान्। गुणकिही ाम

म. टा. प्रतिनिधी, मुंबई

मागासवर्गीय विद्यार्थ्यांना दिली जाणारी शिष्यवृत्ती केंद्र सरकारने बंद केल्याच्या निषेधार्य मुंबईत टाटा सामाजिक विज्ञान संस्थेच्या (टिस) कॅम्पस येथे दोन दिवसांपासून सुरू असलेले कॉलेन बंद आंदोलन शुक्रवारीही कायम राहिले. या आंदोलनाला इतर संघटनानी पाठिंबा जाहीर केला आहे.

केंद्र सरकारतर्फे देशभरातील मागासवर्गीय विद्यास्मीपैकी उरावीक उत्पादन मर्यादा असलेल्या विद्यार्थीना दरवर्षी शिष्यवृती देण्यात येते. ही शिष्मवृत्ती बंद करण्याचा निर्णय केंद्र सरकारने घेतला असून या निर्णयाविरोधात देशभरात विविध ठिकाणी आंदोलन होत आहे. बुधवारपासून चेंबूर येथील टाटा सामाजिक विज्ञान संस्थेतही विद्यार्थ्यांनी कॉलेज बंद आंदोलन पुकारले आहे. टिसच्या कम्पसमधील विद्यार्थ्यांनी लेक्चरवर बहिष्कार टाकून कॉलेज बंद आंदोलत पुकारले त्राम् अतेक विद्यार्थानी फ़िल्डवर्ककुडेही पाठ फिरवली आहे.



भ भ पूर्ण आंदोलनाबहल दिस प्रशासनाने शुक्रवारी भूमिका आहीर केली. ही शिष्ण्ती केंद्र सरकारने बंद केली आहे. त्यात प्रशासनाचा काहीही संबंध नाही. प्रशासनाने आधितार केली आहे. त्यात प्रशासनाचा काहीही संबंध नाही. प्रशासनाने आधितार हैंदर भेजूबारी रोजीही प्रशासनाने रहे विद्याद्यांचा समावेश असलेल्या शिष्टमंडळाशी भेट धेऊच अहिंद्रांच्यांची समावेश असलेल्या शिष्टमंडळाशी भेट धेऊच अहिंद्रांच्यांची समावेश प्रयान केला असल्याचे प्रशासनाने सारितले. आंदोलन सुरू असले तरी जाती उत्पापन आलेल्या प्रशासनाने सारितले. आंदोलन सुरू असले तरी जाती उत्पापन आलेल्या प्रशासनाने सारितले. आंदोलन सुरू असले तरी जाहीर करण्यात आलेल्या परीक्षेच्या वेळापत्रकात बदल करण्यात आला नसल्याची विद्यार्थीनी नोंद ध्यावी, असे टिसने म्हटले आहे.

छात्रभारती या विद्यार्थी संघटनेने पूर्ववत करावा, अशो आमची भूमिका जाहीर केला आहे. या प्रकरणाचा आम्ही निषेध करीत आहोत. बंद केलेला निधी केले.

दिसम्मा आदोलनाला शुक्रवारी पाठिंबा असल्याचे छात्रभारतीचे मुंबई अध्यक्ष 'सचिन बनसोड यांनी मटाकडे स्पष्ट

'टिस' आंदोलन अधिक तीव्र?

म. टा. प्रतिनिधी, मुंबई

H. CT . 28 219

टाटा सामाजिक विज्ञान संस्थेत (टिस) गेल्या बुधवारपासून सुरू असलेले विद्यार्थी आंदोलन आता अधिक तीव्र करण्याचा निर्धार मंगळवारी विद्यार्थी संघटनांनी व्यक्त केला. विद्यार्थी संघटनांनी पुकारलेले चक्का जाम आंदोलन स्थानिकांच्या तक्रारीनंतर मागे घेण्यात आले खरे; मात्र, याच दरम्यान प्रशासनाने विद्याच्यांच्या मागणीसंदर्भात दिलेला प्रस्ताव नाकारल्याने येत्या काळात हे आंदोलन चिधळण्याची शक्यता वर्तविण्यात येत आहे.

केंद्र सरकारतर्फे शिष्यवृत्तीपोटी देण्यात येणारा निधी बंद करण्यात आल्याने गेल्या बुधवारपासून विद्यार्थ्यांनी 'टिस'च्या चेंबूर कॅम्पस येथे आंदोलन सुरू केले होते. मंगळवारी, विद्यार्थ्यांनी कॅम्पसच्या प्रवेशद्वारासमोर चक्का जाम करण्याचा इशारा दिला होता. या आंदोलनामुळे स्थानिकांना आत बाहेर ये-जा करण्यास अडथळे निर्माण झाल्याने रहिवाशांनी थेट 'टिस' प्रशासनाकडे तक्कार केली. याची दखल घेत प्रशासनाने कारवाईचा इशारा दिल्याने विद्यार्थ्यांनी चक्का जाम आंदोलन मागे घेतले. पण 'टिस'च्या कर्मचाऱ्यांना प्रवेश रोखण्याचा आक्रमक पवित्रा विद्यार्थ्यांनी घेतल्याने स्थिती तणावपूर्ण झाली होती.

नंतर 'टिस' प्रशासनाने विद्यार्थ्यंच्या मागण्यासंदर्भात एकर्पस्ताव विद्यार्थ्यांपुढे मांडला. मात्र, त्याने विद्यार्थ्यांपुढे मांडला. मात्र, त्याने विद्यार्थ्यांपुढे मांडला. मात्र, त्याने विद्यार्थ्यांपुढे मांडला. मात्र, त्याने विद्यार्थ्यांचे सम्प्रधानं आर्थिकदृष्ट्या दुर्बल विद्यार्थ्यांना शुल्क प्रलंबित असतानाही परिश्रेला बंसण्याचा पर्याय् व निकालपत्र देण्याची तयारी प्रशासनामे दर्शवली. सीबतव संबंधित विद्यार्थ्यांना वसतीगृह शुल्कातृन मुक्त करण्याचे आश्वासन देण्यात आल्याचे समजते. येथील उपहारगृहातील शुल्कही नोकरी लागल्यानंतर किंवा शिष्यवृत्ती मिळाल्यानंतर देण्याचा पर्याय प्रशासनाने सुचविला होता.

'टिस'च्या आंदोलनाला आयआयटीय न्सचा म. टा. प्रतिनिधी, मुंबई । 3 । 8 बंद आंदीलन

गेल्या आठवड्याभरापासून चेंबूर येथील टाटा सामाजिक विज्ञान संस्थेत सुरू असलेल्या आंदोलनाबाबत अद्याप तोडमा निघालेला नाही. त्यामुळे टिसच्या कॅम्पसमघले वातावरण आता अधिक तंग झाले आहे. बुधवारी टिसच्या आंदोलनालाः आयआयटी मुंबईच्या विद्यार्थ्यानी पाठिबा दर्शवित पवई येथील कॅम्पसमध्ये त्यासाठी निदर्शनेही केली.

केंद्र सरकारकडून शिष्यवृत्तीपोटी देण्यात येणारा निधी बंद केल्टाच्या निषेधार्थं बुधवारापासून टाटा सामाजिक विज्ञान संस्थेच्या विद्यार्थ्यांनी कॉलेज

बंद आंदोलन पुकारले असून बुधवारी झालेल्या प्रशासनाबरोबर झालेल्या बैठकीतही या मुद्यावर तोडगा निघालेला नाही. त्यातच विद्यार्थ्यांनी कॅन्टीनची फी द्यायलाही नकार दिल्याने अखेर टिसने २०१२ पासून शिष्यवृत्तीच्या बंदीमुळे विद्यार्थ्यांकडून २० कोर्टीची देय बाकी असल्याचे जाहीर केल्याची माहिती विद्यार्थीनी दिली. या थकब की मुळे टिस आर्थिक संकटात असल्याचे दिसकडून जाहीर करण्यात आले आहे. बुधवारी विविध विद्यार्थी संघटनांनी टिसञ्चाः विद्यार्थना पाठिंबा दर्शवार्थसहि देवनारच्या संकुलात सांस्कृतिक कार्यक्रम

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TISS strike: 1 faction calls off protest, other continues

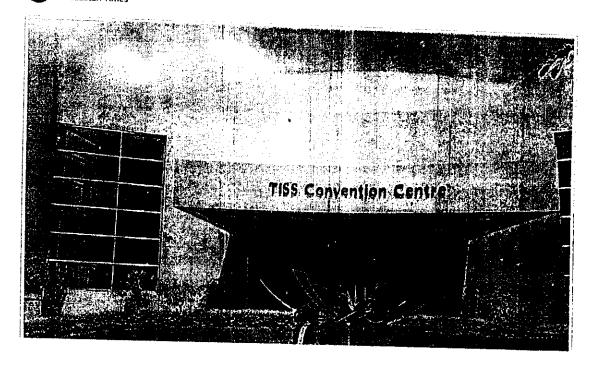
In a statement, five members of the union said that they withdrew the strike as most of the core demands of the union were accepted by the administration.

MUMBAI (HTTPS://WWW.HINDUSTANTIMES.COM/MUMBAI-NEWS/)

Updated: (Mar 05, 2018 00:42 IST

Musab Qazi

Hindustan Times





Core demands included dining hall and hostel fee waiver for SC and ST students. (HT FILE)

A faction of Tata Institute of Social Sciences (TISS) students' union on Sunday called off their strike over cuts in scholarships, even as several students led by another faction continued their protest.

In a statement, five members of the union, including its president Archana Soreng, said that they withdrew the strike as most of the core demands of the union, including dining hall and hostel fee waiver for scheduled caste (SC) and scheduled tribe (ST) students from 2016-18 and 2017-19 batches, were accepted by the administration.

The statement adds that for the upcoming batches, a Joint Scholarship Committee is being formed, comprising representatives from the administration, students and faculty to work towards finding sustainable solutions for students' scholarship woes.

However, another faction, led by general secretary Fahad Ahmed, and students' councils at Guwhati, Tuljapur and Hyderabad TISS' campuses vowed to continue the strike.

"The proposal read out by the administration partially fulfilled the first demand only. The administration rolled back the hostel and dining hall fee waiver for only M.A. students of 2016-18 and 2017-19. Whereas did not even address about MPhil and PhD students of these Batches. The administration's proposal did not offer anything for 2018-20, the up-coming batch.

The students who withdrew their protest said that it was affecting the academic health of the campus and the on-going placements. 'Students' Union has the responsibility of safeguarding rights of the individual students who are not participating in the protests," read their statement.

The other group defended their method of protest. "We must reiterate that the call for bandhs, blockades issued from the union have resulted from the severity of the issues at hand and theinsensitivity of the administration towards our concerns since

a very long time now," it said.

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IN THE BOMBAY CITY CIVIL COURT AT MUMBAI SUIT NO. OF 2018

Tata Institute of Social Sciences,

Plaintiff

Versus

Mr. Fahad Ahmed,

General Secretary of Students' Union and ors. ... Defendants

Affidavit in support of the Plaint

- I, Mr C. P. Mohan Kumar, Indian inhabitant, aged 57 years, resident of Mumbai and the Registrar of the Tata Institute of Social Sciences do hereby state on solemn affirmation as under:-
- 1. I say that I am working as the Registrar of the Institute and by virtue of the powers vested in me by the Memorandum of Association Governing Board of the Institute, I am authorized to file the present affidavit being the custodian of the Institute.
- 2. I say that I am well conversant with the facts and circumstances of the case. The above said suit is filed against the Defendant for declaration and grant of interim/ad-interim reliefs as prayed therein.
- 3. I repeat, reiterate and reaffirm all the statements, averments, and submissions made in the Plaint and pray that the same be treated as if set out herein verbatim and

forming part of this affidavit. I crave leave of this Hon'ble Court to refer to and rely upon the Plaint ad Exhibits enclosed therein.

4. Under the circumstances, I pray that this Hon'ble Court be pleased to pass necessary order prayed for in the Plaint.

Solemnly affirmed at Mumbai on this 26th Day of March, 2018.

Deponent

C. P. Mohan Kumar

Identified by me.

V K Wasnik

Advocate for Plaintiff