



SUDHEER JONNALAGADDA

B.Sc., B.L.,

ADVOCATE

Dated . : 25-4-2018

To

1. State of Telangana
Rep. By its Principal Sectary
Municipal Administration and Urban Development
Secretariat Hyderabad.
2. Greater Hyderabad Municipal Corporation
Rep. By its Commissioner GHMC
Burgula RamakrishnaRao Bhavan, Hyderabad.
3. Mr. Pilli Edward Prasad S/o Pilli Paul Prasad
aged about 55 years Occ: Treasurer East Central Union of Seventh-Day
Adventist, Add: D.No. 5-9-184 Chappel Road Adids Hyderabad - 01
4. Pastor Ch. John Victor S/o Ch. Koteswar Rao
Aged about 60 years Occ: President East Central Union of Seventh-Day
Adventist, Add: D .No. 5-9-184 Chappel Road Adids Hyderabad. Q1
5. M/s Devendra Builders,
Rep. By its V. Shankar Rao, Aged about 55 years
D. No. 8-3-309, Sri Nilaya 4th floor Yousufguda, Hyderabad.

Sir,

Sub : Writ petition No. 13092/2018

That the above writ petition has been taken up today and the Hon'ble *high* Court posted the matter to 4-6-2018. The counsel for petitioner is permitted to take out personal notice. The matter will be taken up on 4-6-2018. Hence, take notice.


ADVOCATE

Encl : writ petition 13092/18 with material papers.

OTC

IN THE HIGH COURT OF JUDICATURE AT HYDERABAD
(FOR THE STATE OF TELANGANA AND FOR THE STATE OF ANDHRA
PRADESH)

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HYDERABAD

COUNSEL FOR THE PETITIONER

DATED: ...-04-2018

Memorandum of Writ Petition
(Under Article 226 of the Constitution of India)

IN THE HIGH COURT OF JUDICATURE AT HYDERABAD
(FOR THE STATE OF TELANGANA AND FOR THE STATE OF ANDHRA
PRADESH)

WP. No. 13092 of 2018

Between:

1. S. Srinivas Reddy S/o Late S Bheem Reddy
Age 39, Occ: Private Employee,
H.No.6-1-128 /A , OLD CIB Quarters ,
Khairatabad , Hyderabad -500004.
2. M Victor M S/o Late M Premandam
Age about 61, Occ: Rtd. Govt. Employee
1-1—27/11 ,Prakashnagar , Begumpet, Hyderabad -500016.
3. Mr K Balaji S/o Late K JayramBalaji
Age about 70, Occ: Business
Tirumala Pearls Residency , D.no 16-2-146/18/102 ,
Akbar Bagh , New Malakpet Hyderabad -500036
4. Mrs. Rajini Prasad W/o Mr V Varaprasad
Age about 58, Occ: House wife
Flat No 101 , KalyanHema Residency ,
Road No 4 , Banjara Hills , Hyderabad -500034
5. Mr Allan Harris S/o Mr. G. Harris
Age about 70 Occ: Rtd. Employee
Pragathinagar , Plot No 99 , Kukatpally - Hyderabad
6. Mr Ezra Paul S/o C. Thanraj
age about 43 Occ: Private Employee
Flat No 104 ,BalajiEncalve ,
Patelnagar, Nampally , Hyderabad -500001
7. Johnny Thiagaraj S/o Pastor D.Thiagaraj
Age about 35 years Occ: Private Employee
Flat No 404 ,BalajiEncalve ,
Patelnagar, Nampally , Hyderabad -500001
8. Mr. S Surya Rao S/O S Dharma Rao
aged about 35 years Occ: Private Employee
Padmaraonagar , Near Park , Hyderabad.
9. Mr. Micheal Reddy S/o Israel Reddy
Aged about 55years Occ: Private Employee
Block No 27 , Flat No 2c,
Vijaynagar Colony , Hyderabad - 500057

10. Dr Henna Rajsekhar W/o Mr Rajsekhar
Aged about 55 years Occ: Doctor
Flat No 501 ,Sripada Residency ,
Shanthinagar , Hyderabad .

.... PETITIONERS

AND

1. State of Telangana
Rep. By its Principal Secretary
Municipal Administration and Urban Development
Secretariat Hyderabad.
2. Greater Hyderabad Municipal Corporation
Rep. By its Commissioner GHMC
Burgula RamakrishnaRao Bhavan, Hyderabad.
3. Mr. Pilli Edward Prasad S/o Pilli Paul Prasad
aged about 55 years Occ: Treasurer East Central Union of Seventh-Day
Adventist, Add: D.No. 5-9-184 Chappel Road Adids Hyderabad - 01
4. Pastor Ch. John Victor S/o Ch. Koteswar Rao
Aged about 60 years Occ: President East Central Union of Seventh-Day
Adventist, Add: D .No. 5-9-184 Chappel Road Adids Hyderabad. 01
5. M/s Devendra Builders,
Rep. By its V. Shankar Rao, Aged about 55 years
D. No. 8-3-309, Sri Nilaya 4th floor Yousufguda, Hyderabad.

... RESPONDENTS

The Address for services of Summons, Processes and Notices etc., on the Petitioner is that of his Counsel: J. SUDHEER, SATISH DESHPANDE, L. SRIPAL REDDY, N. PREM JOY, NITIN & Ms. HEPHZIBAH, Advocates, Flat No. 402, Aziz Tower, St. Paul School Lane, Hyderguda, Hyderabad.

For the reasons stated in the accompanying Affidavit, it is humbly prayed that this Hon'ble Court in the interest of justice, may be pleased to

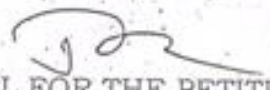
- a) call for the records pertaining to Sanction of building permission by GHMC vide permit No. 53299/HO/C2/Cir-8/2016 in File No. 105309/23/11/2016/HO dated 24-7-2017 and set it aside as bad, illegal, arbitrary, discriminatory and unconstitutional

b) by holding the action of the 2nd respondent in entertaining the application of the 3rd respondent for construction of multi storied commercial complex and residential complex who is an unauthorized person/ entity and awarding permit/permission to the 3rd respondent to demolish the existing church without insisting for necessary requirements for such permission leading to interfering with the existing church and the school and also interfering with the interests of the church members and causing traffic congestion in view of reducing the parking space area as bad, illegal, arbitrary, discriminatory and unconstitutional

c) by issuance of Writ of Mandamus

d) and to Pass such other orders as this Hon'ble Court may deem fit and proper in the circumstances of the case.

HYDERABAD
DATED: 13-04-2018


COUNSEL FOR THE PETITIONER

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IN THE HIGH COURT OF JUDICATURE AT HYDERABAD
(FOR THE STATE OF TELANGANA AND FOR THE STATE OF ANDHRA
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D. No. 8-3-309, Sri Nilaya 4th floor Yousufguda, Hyderabad.

... RESPONDNETS

AFFIDAVIT OF THE PETITIONER

I, S. Srinivas Reddy S/o Late S Bheem Reddy, Age 39, Occ: Private Employee,
H.No.6-1-128/A, OLD CIB Quarters, Khairatabad , Hyderabad, do hereby
sincerely state on solemn affirmation of oath as follows.

1. I am the deponent/Petitioner No. 1 herein and as such I am well
acquainted with the facts of the case. I am deposing this Affidavit on my
behalf and on behalf of the other petitioners as well, as I am authorized to
do so.

S. Srinivas Reddy

2. That the above writ petition is being preferred by the petitioners, aggrieved by the action of the respondents, more particularly the 2nd respondent in granting permission to 3rd respondent for construction of multi storied commercial and residential complex by demolishing the church building and sacrificing the parking area which is meant for church and the school, contrary to the interests of the church members/petitioners and students and public as well, as bad, illegal and unconstitutional. The facts of the case are as follows :

3. It is respectfully submitted that the petitioner 1 to 10 are members of the church of Seventh day Adventist situated at chapel Road. More than 500 members visit the church to attend prayers and also conduct prayer meetings, ceremonial functions like Baptism, Child dedication, marriages, festive occasions etc., It is further submitted that the offering contributed by the church members goes to the head office situated at Hosur in Tamil Nadu. The offering contributed by the church members is used for functioning and development activities i.e. to run schools, hospitals, colleges, churches and for payment of salaries to the pastors and other staff. It is further submitted that more than Ten Thousand Churches are located in India having its registered office at Hosur in Tamil Nadu.

4. It is respectfully submitted that Dr. Dan Harris who is a native of America had purchased 8007 Sq. Yrds. On 22-03-1956 along with double storied building comprising of ground and first floor in the name and style of Seventh day Adventist church. The building located in the said plot was being used for the purpose of running the church activities. It is further submitted that, as more members had joined and as the existing building could not cater to the needs of the members of the church, a new church

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was constructed in the year 1979. The old building is being used for congregational worship in Telugu, new church which was constructed in the year 1979 was being used to run English congregation for worship.

5. It is respectfully submitted that the school was also constructed in the church compound on the western end in the name and style as Seventh day Adventist High School and the school is catering to the needs of more than 800 students. It is further submitted that within the church compound residential units are located for some the officers and staff.

6. It is respectfully submitted that the General Conference of Seventh-day Adventist is the World Head Quarters situated at 12501 Old Columbia Pike, Silver Spring, MD 20904. USA having 13 divisions, across the world and including Southern Asia Division Post Box 2 HCF Housr - 635110 TN. INDIA. It is further divided into Ten(10) Unions, including East Central India Union located at D. No. 5-9-184, Chapel Road, Hyderabad- 500001, Telangana and the East Central India Union is further divided into 13 sections including Hyderabad Metro Section located at D. No. 5-9-184, Chapel Road, Hyderabad - 500001. Under the Hyderabad Metro Section several local churches which are located with in Hyderabad Metro are existing and controlled by Hyderabad Metro Section including Seventh - Day Adventist Church located at chapel Road Hyderabad. It is further submitted that union offices of East Central India Union (ECIU) and their offices and their quarters are located at Seventh-day Adventist Church Chapel Road Hyderabad. It is further submitted that the principal of the seventh -day Adventist school who is also director of ECIU is residing in the quarters which are located in the church campus of Seventh-day Adventist Church Chapel Road.

7. It is respectfully submitted that when the plot was purchased in the year 1956 along with building comprising ground and first floor, the said building was being utilized for running the church. As more members grew the said building could not cater to the needs for running the church and as stated above new church was constructed in the year 1979. It is further submitted that municipal taxes etc. were paid to the municipal authorities, water and electricity charges were also paid to the concerned authorities. Subsequently the school was also constructed and more than 800 students are attending the school which is located in the church compound. It is further submitted that the old building which is being presently used for Telugu congregation is roughly about 5000 sq. feet comprising of ground plus first floor. The old building located roughly occupied about 400 sq. yards.

8. It is respectfully submitted that the total area of the church compound is 8007 Sq. Yrds. Out of which 1711 Sq. Yrds is being used by Litter Flower High School as a play ground and balance of area of 6296 Sq. Yrds. is available as on today. The schedule of the property is as follows:

North:	Chapel Road
South:	Little Flower High School
East:	Slate High School and SBI Bank
West:	Residential Areas

9. It is respectfully submitted that the Seventh-day Adventist High School which is located at the Western side of the old Church Compound has a separate gate for the school. At the North-eastern side there is gate

leading to the new church and old church. There is a passage between old church and church compound with a space of 14 ft' leading to the school. Behind the back of the old church there is an open space which is used by the school and also by the church members for conducting church activities like weddings, Christmas celebrations and prayer meetings. Behind the new church there is an open space which is indented to be used by the church for the extension of the church as the numbers of church are increasing. The space in the church is becoming insufficient and the church members have decided to extend the church into the open space which is located behind the new church. It is further submitted that the space behind the new church was earmarked for the extension of the church which is amicably agreed between the church members, section and union and even foundation stone is laid for extension of the church.

10. It is respectfully submitted that India Financial Association of Seventh Day Adventists, initially was registered in state of Bengal in the year 1908, and it was transferred to Bombay on 28.5.1940. Further it was transferred to Hosur Tamil Nadu with the permission of Hon'ble High Court Judicature at Bombay in C.P 21 of 1974. It is further submitted that as per the MEMORANDUM OF ASSOCIATION OF THE INDIA FINANCIAL ASSOCIATION OF SEVENTH-DAY ADVENTISTS (as per the article 3) the object of the association is to establish and to safeguard the property of the churches of the Seventh-Day Adventist churches in India, Burma, Silone etc.,

11. It is respectfully submitted that before any building project is launched or any financial commitment is entered into, estimate of cost with plans and specifications and full statement as to how the project shall be

financed shall be submitted to the Union Committee. It is further submitted that where the building cost exceeds 1000000/- (Ten Lakhs) ULC (Unit Local Currency), matter shall be referred to Division Building Committee for its approval and if the cost of the project exceeds \$500000/- (Five Lakhs US Dollars) it shall be referred to be General Conference for its approval.

12. It is respectfully submitted that Mr. Cherkuri Samuel Paul S/o Cherkuri Paul who is the Executive secretary of ECIU with an intention to construct commercial complex, and two blocks of residential complexes without the knowledge of the members of the church had sought report for soil testing for feasible report for such construction of the commercial complex and residential building complexes and the report was submitted by M.V.K Associates in the year 2015. It is further submitted that sewerage and water connection for the commercial complex and residential buildings were obtained on 19.07.2016.

13. It is respectfully submitted that Mr. Pilli Edward Prasad who is the Treasurer M/s. East Central Union of Seventh - day Adventist, D.No. 5-9-184, Chapel Road, Abids, Hyderabad had obtained the municipal permission and the second respondent had accorded the building permit order on 24.7.2017 Permit No : 53299/HO/CZ/Cir-8/2016 for construction of commercial and residential building complexes.

14. It is respectfully submitted that as per the Indian Financial Association of Seventh-day Adventist, for construction of any building, the building plan and site plan by an engineer has to be approved by the local board after approval by the local board and it should be placed before the

Reddy

section or union for its approval and after its approval it should be placed before the Division approval.

15. It is respectfully submitted that the Mr. Pilli Edward Prasad who is the Treasurer of East Central India Union had not placed site plan and building plans for its approval before the local body for its approval, and it was not placed before the section/union for its approval and not placed before the division for its approval and he has acted contrary to the bylaws of the Indian Financial Association of Seventh-Day Adventist and in violation of Indian Financial Association of Seventh-day Adventist. He acted illegally, arbitrarily, unilaterally and in violation of its bylaws and acted contrary to Indian Financial Association. It is further submitted that the 3rd respondent had applied for municipal permission in the year 2016, and the permission was granted by the 2nd respondent on 24.7.2017 Permit No: 53299/HO/CZ/Cir-8/2016. It is further submitted that as per the Indian Financial Association of Seventh-Day Adventist, the building guidelines were framed that there must be approval form the local body and it should be placed before the union/ section and it should be placed before the Division. These guidelines were not followed and the 3rd respondent acted unilaterally and in violation of bylaws and IFA regulations by applying municipal permission in the year 2016 and permission was given by the second respondent in the year 2017. The secretary for IFA of SEVENTH-DAY ADVENTIST Mr. Gompa Devadas gave authorization on 5.4.2017 to the 3rd respondent in gross violation of IFA REGULATIONS. Such authorization was also for residential purpose only but not for commercial purpose.

16. It is respectfully submitted that the 2nd respondent had granted building permit order vide permit No.53299/HO/CZ/Cir-8/2016 dated

24.07.2017 for construction of commercial - cum residential buildings, staff quarters with an area 5803.55 and 2555.30 total into 8358.85 with cellar, stilt and 5 floors. The permit order says commercial cum residential, but in sanction plan permission was granted for construction of separate commercial building and two residential buildings. The permit order reflects one thing and sanction plan shows something. The action of the 2nd respondent is illegal, arbitrary and without application of mind and for a person who is not authorized.

17. It is respectfully submitted that when the schedule property was purchased in the year 1956 along with the premises consisting of ground and first floor which is being used for church and prayers right from the purchase of the schedule property. It is further submitted that when the church is in existence, the 2nd respondent had accorded permission in the place of said church for construction of commercial complex. The second respondent accorded permission which is illegal, arbitrary devoid of merits and violation of article 14, 21 and 25 of Indian constitution. It is further submitted that when the church is in existence, the 2nd respondent ought not to have accorded permission for construction of commercial complex. It is further submitted that being a treasurer of East Central India Union of Seventh-Day Adventist Church and knowing pretty well that the church is in existence, for his vested interest he had applied for construction of commercial complex. Demolition of the church is contrary to the faith of Christianity and his actions are injurious to the sentiments of the members coming to the church.

18. It is respectfully submitted that the 3rd respondent acted contrary to bylaws of Southern Asia Division, Constitution, Bylaws and Working Policy,

and also violated the regulation of Indian Financial Association of SEVENTH - DAY ADVENTIST. It is further submitted that the 3rd respondent had not taken approval of IFA of Seventh - day Adventist and applied permission without their consent and approval and even the church members were kept in dark. It is further submitted that the secretary of IFA of Seventh - day Adventist had accorded approval for construction of residential building and head quarters building for East Central Indian Union. The approval granted by the secretary of IFA is contrary to their regulation prescribed under IFA Seventh-Day Adventist. It is respectfully submitted that as per the minutes of executive committee of East Central India Union held at Hyderabad on 12.09.2015, approval was given for construction of residential staff quarter and building and East Central India staff office building. But the 3rd respondent acted contrary to the minutes of the executive committee of East Central India Union by getting permission from the 2nd respondent for construction of commercial complex and two residential blocks. The 3rd respondent therefore, acted contrary to the minutes of the East Central India Union dated 12.9.2016.

19. It is respectfully submitted that when application was made initially by the 3rd respondent to the 2nd respondent, the 2nd respondent had rejected the application on the ground that it was placed before the building committee meeting held 3.5.2017 and the building committee had decided to return the case with the following reasons:

- (i) The required play found to be provided for school in the open area duly deleting the rear side office block proposed.
- (ii) 2. Separate parking layout for church building to be shown.

20. It is respectfully submitted that the 2nd respondent had rejected the application submitted by the 3rd respondent through letter dated 5.5.2017 but strangely within 3 months the 2nd respondent had accorded permission dated 24.7.2017 for construction of commercial complex and two residential blocks. The 2nd respondent on one hand rejected the application through letter date 5.5.2017 but accorded permission vide Permit No: 53299/HO/CZ/Cir-8/2016 dated 24.7.2017. The 3rd respondent used illegal means to pressurize the 2nd respondent. While permission was accorded by the 2nd respondent, he acted illegally arbitrary without application of mind and in violation of Article 21 and 25 of Constitution of India.

21. It is respectfully submitted that there is open space behind the old church and new church which is constructed in the year 1979. The open space is utilized by the Seventh-Day Adventist High School as a playground for the children. It is further submitted that as per the education Act and rules there under, there must be a play ground for the children. If two residential blocks come up in the play area there would be no playground for the children and as such GHMC had rightly rejected the application initially. It is further submitted that strangely permission was granted for construction of commercial and two residential blocks within a period of 3 months which shows how the 3rd respondent greased the palms of the official of the 2nd respondent.

22. It is further submitted that the open spaces behind the old church and existing church are being used by the church members for conducting religious ceremonies, functions like Marriage function and Christmas celebrations. If two residential blocks are constructed on open spaces there

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would be no play ground for the children and no ground for conducting prayer and other functions by the church members. It is further submitted that as existing church is not sufficient for conducting prayer by the church members, proposal was suggested by the church members for the extension of the church and the same was amicably settled before the committee and foundation stone was also laid by the church member and office members.

23. It is respectfully submitted that when the church is in existence and being used for Telugu congregation, the 2nd respondent ought not to have granted permission for construction of the commercial complexes in place of existence church. The action of the 2nd respondent in granting permission to the 3rd respondent is illegal arbitrary and capricious and violated the fundamental rights like article 21 and 25 of the Indian constitution. It is further submitted that by demolition of the church, if commercial complex is built, it would cause hindrance to the members going to the church and also hindrance and nuisance to the school. Any commercial activity in the commercial building will create nuisance and disturbance to the church goers and the school community.

24. It is respectfully submitted that when the 3rd respondent made application for the construction of commercial complex and residential building, the 2nd respondent rejected the application through letter dated 5.5.2017, but after the rejection of the application the 3rd respondent approached the M/s Devendra Builders represented by Sri V. Shankara Rao, and the 2nd respondent accorded permission vide permit No.53299/HO/CZ/Cir-8/2016 dated 24.07.2017.

Parashakti

25. It is respectfully submitted that the 3rd respondent had given church property which is more fully described in the schedule hereto to the builder if it is personal property. The church property is the property of the God being misused by the 3rd respondent who is acting according to his whims and fancies for his personal and pecuniary benefits. The action of the 3rd respondent is illegal, arbitrary and he acted against the interest of the church member and other office bearers and he did not take their opinion nor consulted them.

26. It is respectfully submitted that the office bearers, staff and workers salaries are being paid by the donations/offerings/contribution by the church member. The 3rd respondent ignoring all these aspects wants to make a fast buck and accordingly colluded with the builder for his personal and pecuniary gain and he acted against the interest of church members.

Violation committed by the Greater Hyderabad Municipal Corporation:

a) GHMC ought not have entertained an application for building permission by an unauthorised person Mr Pilli Edward Prasad, who claimed that he was representing M/S East Central India Union Seventh-day Adventist (SAD). He was not an authorised person at the time of application. Therefore while rejecting the request of Mr P Edward Prasad, by proceeding Dt:05.05.2017, GHMC ought to have raised the objection that the very application for building permission is no maintainable.

Not authorized

b) Though Mr P. Edward Prasad obtained authorisation by Letter Dt : 05/04/2017 , the same was not given retrospectively. Therefore the

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application filed by Mr P Edward Prasad 23/11/2016 was without authorisation.

- c) The 3rd respondent who claims to be an authorised person of the church, seems to have entrusted the project of construction to M/s Devendra Builders rep by Mr V Shankara Rao and builder seems to have applied / pursued the matter with GHMC, and GHMC gave permission to the 3rd respondent on 24/07/2017. Therefore GHMC treated the church property as individual property.
- d) GHMC chose not to insist for the conditions imposed earlier while rejecting the request of the 3rd respondent on 05/05/2017. It is not understandable as to how GHMC ignored the earlier conditions.
- e) GHMC failed to take interest of church members and the interest of School
- f) GHMC failed to take note of requirement of playground and parking space for the school.
- g) GHMC failed to see the requirement of parking area for the church and church activities.
- h) GHMC ought to have realised that if huge commercial / residential complex come up in the parking area / place and also in the place of heritage church building, it will lead to traffic congestion in as much as on working days, the parking area provided for the complex cannot cater to the residents/outsidars and also the school.

- i) GHMC failed to realise that there would be traffic congestion on Sabbath Day (Worship Day) as well, in as much as the parking space would not be sufficient for residents / outsiders / church members.
- j) GHMC ought to have realised that giving building permission that to by demolishing existing church would not only lead to interfering with sentiments of the church members , but also may lead to law and order problem.
- k) GHMC ought not have dealt with this issue like regular / normal application for a building permission by an individual owner over his property and ought to have dealt with , with more circumspect and sensitivity.
- l) GHMC ought to have noticed that in view of introduction of builder for the construction of complex the builder obviously would be taking a share about 50% of the constructed area who in turn would obviously either renting / selling to a outsiders be whoever is paying more and possibility of private establishments / offices and even a Bar could be opened contrary to the interests of church / school.
- m) GHMC ought to have seen that the serenity of Church/School will be lost forever, if the permitted complex come up
- n) GHMC would not have given and till now have not given such building permission, in the premises of any religious / worship place.

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- o) GHMC being a public authority is expected to act within the bounds of Law / constitution.
- p) GHMC gave no such permission for Temples and Mosques which may lead to demolition of Temple / Mosque and therefore, giving permission for the church for construction of commercial complex in and around such worship place would amount to violation of Article 14, 21 , and 25 of Constitution of India .
- q) That GHMC beside following rules and regulations is expected to follow constitutional mandate.

26. In the said circumstances, it has become necessary for the petitioners to approach this Hon'ble Court for justice.

27. I respectfully submit that we have no other alternative and efficacious remedy except to approach this Hon'ble Court for redressal of our grievances through the present Writ Petition and invoke the Special Original jurisdiction of this Hon'ble Court under Article 226 of the Constitution of India.

28. That the Petitioners have not filed any other Petition or application before any Court of law or Authority for the relief claimed in the present Writ Petition and hence, this Writ Petition.

Hence, it is humbly prayed that this Hon'ble Court in the interest of the Justice be pleased to

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- a) call for the records pertaining to Sanction of building permission by GHMC vide permit No. 53299/HO/C2/Cir-8/2016 in File No. 105309/23/11/2016/HO dated 24-7-2017 and set it aside as bad, illegal, arbitrary, discriminatory and unconstitutional
- b) by holding the action of the 2nd respondent in entertaining the application of the 3rd respondent for construction of multi-storied commercial complex and residential complex who is an unauthorized person/ entity and awarding permit/permission to the 3rd respondent to demolish the existing church without insisting for necessary requirements for such permission leading to interfering with the existing church and the school and also interfering with the interests of the church members and causing traffic congestion in view of reducing the parking space area as bad, illegal, arbitrary, discriminatory and unconstitutional.
- c) by issuance of Writ of Mandamus
- d) and to Pass such other orders as this Hon'ble Court may deem fit and proper in the circumstances of the case.

Pending disposal of the Writ Petition, it is humbly prayed that the Hon'ble Court in the interest of justice may be pleased to suspend the Sanction of building permission by GHMC vide permit No. 53299/HO/C2/Cir-8/2016 in File No. 105309/23/11/2016/HO dated 24-7-2017 and to pass such other orders as this Hon'ble Court may deem fit and proper in the circumstances of the case.

Sworn and signed before me on this the 11th day of April 2018 at Hyderabad.

Before me
ADVOCATE: HYDERABAD