

IN THE SUPREME COURT OF BANGLADESH
HIGH COURT DIVISION
(SPECIAL ORIGINAL JURISDICTION)

WRIT PETITION NO. OF 2011.

IN THE MATTER OF:

An application under Article 102 of the
Constitution of the People's Republic of
Bangladesh.

AND

IN THE MATTER OF:

Public Interest Litigation (PIL)

AND

IN THE MATTER OF:

1. Human Rights and Peace for
Bangladesh (HRPB) Represented by it's

Secretary Advocate Asaduzzaman Siddique,
Hall No. 2, Supreme Court Bar Association
Bhaban, Dhaka, Bangladesh.

2. Advocate Sarwar Ahad Chowdhury,
Organizing Secretary, Human Rights and
Peace for Bangladesh (HRPB) of 3/14
Bashbari Bosila Road, Mohammadpur, P.S.:
Mohammadpur, Dhaka.

3. Advocate Md. Aklas Uddin Bhuiyan
Publicity Secretary of Hall No. 2, Supreme
Court Bar Association Bhaban, Dhaka and 33
Abdul Hadi Lane, Police Station Kotwali,
District- Dhaka, Bangladesh.

.....Petitioners.

-V E R S U S-

1. Bangladesh represented by the Cabinet

Secretary, Cabinet Division, Bangladesh

Secretariat, P.S.: Ramna, District: Dhaka.

2. The Secretary, President Secretariat,

Bangabhaban, P.S.: Ramna, District: Dhaka.

3. The Secretary, Secretariat of the Prime

Minister's Office, Tejgaon, P.S.: Tejgaon,

District: Dhaka.

4. The Secretary, Ministry of Law, Justice

and Parliamentary Affairs, Bangladesh

Secretariat P.S.: Ramna, District: Dhaka.

5. The Secretary, Bangladesh Jatiya
Sangsad Secretariat, Bangladesh Secretariat,
P.S.: Ramna, District: Dhaka.

6. The Secretary, Ministry of Home
Affaires, Bangladesh Secretariate, P.S.
Shahbag, District: Dhaka.

....Respondents.

AND

IN THE MATTER OF:

The Amendment of Column 7 of Schedule
II, Act V of 1898 by The Code of Criminal
Procedure (2nd Amendment) Ordinance,
1985 (Ordinance No. XLIX of 1985) and
amendment of section 304B , Act XLV of

1860 by the Penal Code (Second Amendment) Ordinance, 1985 (Ordinance no. XLVIII of 1985), inserting the words “3 years” substituting the words “7 years”.

To,

Mr. Justice A. B. M. Khairul Haque, the Hon’ble Chief Justice of Bangladesh and the companion Judges of the said Hon’ble Court.

The humble Petition of the Petitioners above named most respectfully;-

S H E W E T H:

1. That the organization Human Rights And Peace For Bangladesh (HRPB) is a non profitable registered organization and the objects of the organization are to uphold the human rights of the citizen, to

establish rule of law, to work for the poor people, to give legal support to the helpless people, and to build up awareness amongst the people about their rights etc. That the petitioners are the members of the organization and engaged in promoting and defending human rights, working to establish rule of law and supporting the victims of human rights violations.

2. The petitioners being conscious citizen and respectable member of the Bar is challenging amendment of column 7 of schedule II in relation of section 304B of the Code of criminal Procedure, 1898 (Act V of 1898) by the Code of Criminal Procedure (Second Amendment), 1985 (Ordinance No. XLIX of 1985) and the amendment of section 304B of the Penal Code, 1860 (Act XLV of 1860) by the Penal Code (Second Amendment) Ordinance, 1985 (Ordinance no. XLVIII of 1985) inserting the words “three years” substituting the words “seven years”. The petitioners seek to bring this application by

invoking Article 102 of the Constitution as public interest litigation in order to establish rule of law.

3. That the respondent no. 1 is the Bangladesh, represented by the Cabinet Secretary, Cabinet Division, Bangladesh Secretariat, P.S.: Ramna, District: Dhaka. The respondent no.2 is the Secretary, President Secretariat, Bangabhaban, P.S.: Ramna, District: Dhaka. The respondent no.3 is the Secretary, Secretariat of the Prime Minister's Office, Tejgaon, P.S.: Tejgaon, District: Dhaka. The respondent no.4 is the Secretary, Ministry of Law, Justice and Parliamentary Affairs, Bangladesh Secretariat P.S.: Ramna, District: Dhaka. The respondent no. 5 is the Secretary, Bangladesh Jatiya Sangsad Secretariat, Bangladesh Secretariat, P.S.: Ramna, District: Dhaka. The addresses of the petitioner and respondents given in the cause title are correct for the purpose of services of notice upon them.

4. That in the instant writ petition, the petitioners purports to challenge the impugned amendment of column 7 of schedule II in relation of section 304B of the Code of criminal Procedure, 1898 (Act V of 1898) by the Code of Criminal Procedure (Second Amendment), 1985 (Ordinance No. XLIX of 1985) and the amendment of section 304B of the Penal Code, 1860 (Act XLV of 1860) by the Penal Code (Second Amendment) Ordinance, 1985 (Ordinance no. XLVIII of 1985) published in the Bangladesh Gazette, Extraordinary, dated 10th October, 1985 inserting the words “three years” substituting the words “seven years” being ultra vires, disproportionate, unreasonable, and illegal as it is in violation of fundamental right of “right to life” guaranteed by constitution.

Copies of the amendment of the Criminal
Procedure Code and the Penal Code are
annexed herewith and marked as

“ANNEXURE”A and A-1”. (here is referred to as the **Impugned amendment**.)

5. That it is stated here that earlier it was provided in law that if any person cause death to another by rash driving then he shall be liable for imprisonment not exceeding “seven years” or fine or both, however, by the impugned amendment, the terms of “seven years” has been reduce to “three years”. The amendment is impugning here as the penalty for such serious crime, which violate others right to life, is not adequate to prevent the offence thus it’s unreasonable and the amendment of a law which violate the fundament rights is ultra vires to the constitution and illegal.

6. That it is stated here that the reduction of the penalty has made the drivers more careless or reckless as to driving in recent years, so the death due to careless and reckless driving increased in such

amount that it becoming a threat to the life of the citizen and now roads are so unsafe that “right to life” of people are being affected. So the impugned amendment in a view that a higher punishment will bring adequate justice to the victims and victim’s family and the adequate punishment of the offender will be a lesson to other drivers and they will be more careful as to driving.

7. That it is stated here that almost every day we can find reports on serious accidents and death result from that.

i. in 18th July 2008 it was reported with photograph on Daily Jugantor that, there has been a serious coalition between Bus and a Covered Van in Dhaka – Chittagong Highway near Sitakundo which resulted death of 8 people including 2 women and 1 children and more 40 passenger were injured.

ii. on 23rd June 2008 in Daily Jugantor a coalition between one Micro bus and Green line Volvo bus was reported with the photograph of the

coalition on Dhaka – Chittagong Highway near Chakoria where the driver along with 10 passenger of the Micro Bus had died and 20 passenger of Volvo Bus were injured.

iii. on 16th June 2008 in Daily Jugantor it was reported that one woman died while cursed under the Bus and due to this people fired the bus due to which there has been serious traffic jam on Fulbaria, Savar.

iv. On 8th July 2008 in Daily Jugantor the coalition between two bus has reported which resulted death of 23 passenger and 30 was injured, the report include a photograph show the accident effected bus and the dead bodies of the dead passengers.

v. On 18th August 2008 in Daily Jugantor the death of three children was reported, they died while playing with rickshaw and a truck run them in high speed.

vi. on 14 June 2008 in Daily Jugantor a death of 4 family members in an accident while traveling on an ambulance toward the Bardem

Hospital for treatment is reported with pictures of the death. It is especially stated that the responsible of the accident the driver of the ambulance flee after the accident and never brought to justice.

vii. on 10th May 2008 in Daily Jugantor a report was publish that a student of Tejgaon Polytechnic Institute died while getting down from the bus. A picture of the report shows that the fellow students protest on this by blocking the road, setting fire on vehicles and attacking on police and fire fighters. Due to this protest for several hours the road was blocked and no vehicles were allowed to pass, and due to this there was huge traffic jam on that rout.

viii. on 20 April 2008 in Daily Jugantor it was reported that in Dhaka-Jomuna Bridge highway a bus carrying 70 workers, after crossing the Jomuna Bridge the driver lost control of the bus and collide 25/30 feet distance of the highways resulting death of 18 workers and injured 50 workers. Two photograph of aftermath of the accident of Kalihati.

ix. on 4th May 2008 in Daily Jugantor it was reported that in Fotullah on Microbus run a traffic police. While trying to stop the microbus on suspicion the microbus run the constable and resulted death of the constable.

x. on 22 March 2009 in Daily Prothom Alo that in Dhaka-Sirajgonge highway it was reported a coalition of a truck and bus, resulted death of 10 people. The Sub-Inspector Sobur of Bhagga Highway said that the accident resulted due to reckless driving.

xi. on 21 March 2009 in Daily Prothom Alo that in Progoti Soroni of Dhaka 2 motorcycle rider died on a coalition with a car and the police captured the car but the driver managed to run away.

xii. On 20 April 2009 in Daily Shongbad it was reported that in different road accident 10 people died and 62 were injured. In Rupgong along with 3 persons of same family 5 persons died. In Norail in a coalition of a motorcycle and Nosimon husband-wife and another person were injured. In Shibchor of Madaripur a bus rotated

and causes 2 death and 40 injure. In Manikgong a Joboleauge leader died when run by a truck. In several road accidents in Kolapara 7 persons were injured.

xiii. on 10th April 2009 in Daily Prothom Alo it was reported that two busses collide in Chaderhat Khulna-Mauya Highway and 11 people died and another 40 were injured. After the accident the highjway was closed for 45 minutes.

Copies of the newspaper clippings are annexed herewith and marked as

“ANNEXURE” B series”.

8. That it is stated here that in all accident motioned above one important point ought to be noticed that in all the accident the responsible drivers were never been arrested and bought to justice.

This way the drivers are getting more careless and reckless day by

day. Also the reduction of the penalty for homicide by reckless driving made the drivers more reckless as to driving. Three years imprisonment can not be an adequate punishment for one's negligence or recklessness which curtailed another's right to life, so impugned amendments as reducing the penalty of such severe crime and is disproportionate and unreasonable and as the offence in concern curtailed the citizen's right to life guaranteed by the Constitution of Bangladesh so it is ultra vires to the Constitution and illegal.

9. That it is stated here that in Daily Prothom Alo a news was published stating that The Hon'ble President states, "The law in matter of road accident need to amend". President Jilur Rahman insisted that law regarding road traffic ought to change and the punishment has to be insured. Moreover he requested the Minister of Communication to take steps on this. The President was giving speech in Dhaka University on a seminar arranged by the families of the victims of

road accidents where they demand that the law of road accident as to bail able must be changed and justice must be insured by punish the drivers. In the same seminar Communication Minister Abul Hossain said that they have set a goal to reduce the road 50% by 2021 and to reduce it by 20% they are going to enforce Strategic Road Safety Action Plane. The Chairman of National Human Rights Commission States that “according to government statistics last year almost 958 people died in road accident. And every day on average eight persons are dieing. In last five years there has been 637 accidents occurred. But none has been properly investigated.” The Vice Chancellor of Dhaka University, A. A, S. M. Arefin Siddiq said, the Accident Prevention Laws must be amended in such a way that punishment of the offender is insured. Member of Parliament Tarana Halim insisted the drivers must have a different outfit or uniform.

2010 is annexed herewith and marked as

“ANNEXURE” C”.

10. That in view of the above, the instant writ petition is filed by the petitioners challenging the proportionality, reasonableness, ultra vires and challenging the legality of the impugned amendments. The amendments, is against the principle of proportionality and wednesbury unreasonableness and also it violate the right guaranteed to the citizen's under the constitution of People Republic of Bangladesh, so it is ultra vires and illegal.

11. That it is stated here that as per impugned amendment where a person cause death to other while driving recklessly will be imprisoned not more then 3 years or fine or both, however before the amendment the term of imprisonment was seven years. Reducing penalty of such a sever crime which result death to other is

disproportionate and unreasonable. Moreover by reducing the term of imprisonment of the offence the government indirectly inducing people to be more careless by which the government violating the “right to life” of the citizens guaranteed by the constitution under fundamental rights, which is ultra vires and illegal.

12. That it is stated here that Human Rights And Peace For Bangladesh (HRPB) is an organization working on different issues and many public interest litigations have been filed by them. In many cases the Hon’ble High Court Division has passed judgment such as i) VAT collection from the patient declared illegal, ii) directed to constitute civil vacation court during civil vacation in every December in subordinate court, iii) directed not to set up any cattle hat on the street in Dhaka City during Eid-UI-Azha and removing all slaughtering materials within 24 hours with a hygienic manner, iv) directed to form an inquiry commission about murder/rape

/persecution/torture committed immediate after parliament election of 2001 upon the then opposition supporter and minorities, v) directed to set up food court in every city in order to prevent food adulteration, vi) directed to form an “Earthquake Preparedness And Awareness Committee” and collected the necessary earthquake rescue equipments as per their recommendation, vii) directed to protect river Buriganga, Balu, Turag and Shitallakha and to stop encroachment in the rivers as well as directed to remove all the structure from inside the rivers and etc. Many others cases are pending before the Hon’ble High Court Division. The organization is always bearing all the cost of the cases by it’s own fund which is raised by the donation of the members. The organization received no fund from abroad or from any citizen of the country except the lawyer members. Due to present high volume of cases it is not possible to bear the cost of the cases filed before the Hon’ble High Court Division as public interest litigation. Under these circumstances it is necessary to exempt the cost of the

cases filed by the organization as public interest litigation. Hence a direction may be given to the office to register the application as a writ petition and also notices may be served at the cost of office.

13. That it is submitted that by amending the provisions of the impugned sections, the offenders are being subject to a punishment which is not proportionate to the seriousness of the offence. The government has no reasonable ground to reduce the penalty of the offence where death is related so it is unreasonable. By way of this amendment the right to life of the citizen guaranteed by the constitution has been seriously affected thus it is ultra vires and illegal.

14. That it is submitted that despite the fact that respondents amended the column 7 of schedule II in relation of section 304B of the Code of criminal Procedure, 1898 (Act V of 1898) by the Code of

Criminal Procedure (Second Amendment), 1985 (Ordinance No. XLIX of 1985) and the amendment of section 304B of the Penal Code, 1860 (Act XLV of 1860) by the Penal Code (Second Amendment) Ordinance, 1985 (Ordinance no. XLVIII of 1985). The petitioners with no option but to challenge the vires and legality of the impugned amendment by which inserting the words “three years” substituting the words “seven years”.

15. That it is submitted that Article 32 of the Constitution of People Republic of Bangladesh provides the citizens of Bangladesh a fundamental right, “protection of right to life and personal liberty”. Even though according to the judgment of Field J, in *Munn v. People of Illinois* 94 US 113 the meaning of life in “right life” is more than mere animal existence. But for the purpose of our issue in hand, the literal meaning of the fundamental right protected by the constitution

is violated by the impugned amendment, thus it is ultra vires and illegal.

16. That it is submitted that the government has no reasonable ground to reduce the penalty of this sever offence thus the amendment of the column 7 of schedule II in relation of section 304B of the Code of criminal Procedure, 1898 (Act V of 1898) by the Code of Criminal Procedure (Second Amendment), 1985 (Ordinance No. XLIX of 1985) and the amendment of section 304B of the Penal Code, 1860 (Act XLV of 1860) by the Penal Code (Second Amendment) Ordinance, 1985 (Ordinance no. XLVIII of 1985), was an unreasonable act by the government. As in the *Wednesbury* case any act or decision of the public body which no other reasonable public body would take is amounted to be an unreasonable act or decision.

17. It is respectfully submitted that the penalty provided in impugned amendment is not proportionate to any offence related to homicide.

Thus the amendment is disproportionate.

18. That on 26.12.2010 a demand justice notice was sent to the Respondents to withdraw or cancel the aforesaid amendment but the Respondents did not take any steps. In thus way the Respondents have failed to do justice upon the Petitioners.

A office copy of the demand justice notice dated 26.12.2010 is Annexed herewith and marked as **“ANNEXURE-D”**.

19. That being aggrieved by and dissatisfied with the ultra vires amendment of the Criminal Procedure Code and having no other

alternative, efficacious remedy begs to move this application before your Lordships on the following amongst other-

GROUND S

I. For that by amending the provisions of the impugned sections, the offenders are being subject to a punishment which is not proportionate to the seriousness of the offence. The government has no reasonable ground to reduce the penalty of the offence where death is related so it is unreasonable. By way of this amendment the right to life of the citizen guaranteed by the constitution has been seriously affected thus it is ultra vires and illegal.

II. For that despite the fact that respondents amended the column 7 of schedule II in relation of section 304B of the Code of criminal Procedure, 1898 (Act V of 1898) by the Code of Criminal Procedure (Second Amendment), 1985 (Ordinance No. XLIX of 1985) and the

amendment of section 304B of the Penal Code, 1860 (Act XLV of 1860) by the Penal Code (Second Amendment) Ordinance, 1985 (Ordinance no. XLVIII of 1985). The petitioners with no option but to challenge the vires and legality of the impugned amendment by which inserting the words “three years” substituting the words “seven years”.

III. For that Article 32 of the Constitution of People Republic of Bangladesh provides the citizens of Bangladesh a fundamental right, “protection of right to life and personal liberty”. Even though according to the judgment of Field J, in *Munn v. People of Illinois* 94 US 113 the meaning of life in “right life” is more than mere animal existence. But for the purpose of our issue in hand, the literal meaning of the fundamental right protected by the constitution is violated by the impugned amendment, thus it is ultra vires and illegal.

IV. For that the government has no reasonable ground to reduce the penalty of this sever offence thus the amendment of the column 7 of schedule II in relation of section 304B of the Code of criminal Procedure, 1898 (Act V of 1898) by the Code of Criminal Procedure (Second Amendment), 1985 (Ordinance No. XLIX of 1985) and the amendment of section 304B of the Penal Code, 1860 (Act XLV of 1860) by the Penal Code (Second Amendment) Ordinance, 1985 (Ordinance no. XLVIII of 1985), was an unreasonable act by the government. As in the *Wednesbury* case any act or decision of the public body which no other reasonable public body would take is amounted to be an unreasonable act or decision.

V. For that the penalty provided in impugned amendment is not proportionate to any offence related to homicide. Thus the amendment is disproportionate, hence liable to be declared illegal and void.

VI. For that the reason for increasing the death by negligent and rash driving is minimum punishment for the offence. Though the right to live of the citizen is guaranteed by the Constitution of Bangladesh but due to minimum punishment under section 304B of the Penal Code fundamental rights of the citizen has been violated. So the amendment made under the ordinance no. XLVIII and XLIX are inconsistent with the constitution and violative of the provisions of the constitution of Bangladesh. So it is liable to be declared illegal and void.

Wherefore it is most humbly prayed that
your Lordships would graciously be pleased
to -

a) Issue a Rule Nisi calling upon the
Respondents to show cause as to why
Amendment of Column 7 of Schedule II,

Act V of 1898, by The Code of Criminal Procedure (2nd Amendment) Ordinance, 1985 (Ordinance No. XLIX of 1985) and amendment of section 304B, Act XLV of 1860 by the Penal Code (Second Amendment) Ordinance, 1985 (Ordinance no. XLVIII of 1985), inserting the words “3 years” substituting the words “7 years”, published in the official gazette on 10.10.1985, should not be declared to be void and ultra vires to the constitution as being violative of the fundamental rights of the citizen.

b) After hearing the parties make the Rule absolute.

c) Pass such other and further order and/or orders as your Lordships may deem fit and proper.

And for this act of kindness your Petitioners as in duty bound shall ever pray.

A F F I D A V I T

I, Advocate Asaduzzaman Siddique, of 169/2, Malibagh Bazar Road, Dhaka-1217, District- Dhaka aged about 42 years by faith Muslim by occupation Lawyer by Nationality Bangladeshi by birth do hereby solemnly affirm and say as follows:-

1. That I am the Petitioner No. 1 in this case and acquainted with the facts and circumstances of this application and am competent to swear this affidavit.

2. That the statement made hereinabove in this application are true
to the best of my knowledge and belief.

Prepared in my office.

Manzill Murshid
মনজিল মোরসেদ
Advocate

(DEPONENT)

THE DEPONENT IS KNOWN
TO ME
AND IDENTIFIED BY ME

Manzill Murshid
মনজিল মোরসেদ
Advocate

SOLEMNLY AFFIRMED BEFORE
ME THIS THEDAY OF
.....:2010 AT..... AM/PM

COMMISSIONER OF AFFIDAVITS
SUPREME COURT OF BANGLADESH
HIGH COURT DIVISION, DHAKA.

AFFIDAVIT

I, Advocate Md. Sarwar Ahad Choudhury, Hall No.2, supreme Court Of Bangladesh and of 3/14 Bashbari Bosila Road, Mohammadpur, P.S.: Mohammadpur, Dhaka, aged aboutyears by faith- Muslim by occupation- Lawyer by Nationality- Bangladeshi by birth do hereby solemnly affirm and say as follows:-

1. That I am the Petitioner No. 2 in this case and acquainted with the facts and circumstances of this application and am competent to swear this affidavit.
2. That the statement made hereinabove in this application are true to the best of my knowledge and belief.

Prepared in my office.

Manzill Murshid
মনজিল মোরসেদ
Advocate

(DEPONENT)
THE DEPONENT IS KNOWN
TO ME
AND IDENTIFIED BY ME

Manzill Murshid
মনজিল মোরসেদ
Advocate

SOLEMNLY AFFIRMED BEFORE
ME THIS THEDAY OF
.....:2011 AT..... AM/PM

COMMISSIONER OF AFFIDAVITS
SUPREME COURT OF BANGLADESH
HIGH COURT DIVISION, DHAKA.

AFFIDAVIT

I, Advocate Md. Aklas Uddin Bhuiyan, Hall No.2, supreme Court Of Bangladesh and 33 Abdul Hadi Lane, P.S. Kotwali, Dhaka, District Dhaka aged about years by faith- Muslim by occupation- Lawyer by Nationality- Bangladeshi by birth do hereby solemnly affirm and say as follows:-

1. That I am the Petitioner No. 3 in this case and acquainted with the facts and circumstances of this application and am competent to swear this affidavit.
2. That the statement made hereinabove in this application are true to the best of my knowledge and belief.

Prepared in my office.

Manzill Murshid
মনজিল মোরসেদ
Advocate

(DEPONENT)

THE DEPONENT IS KNOWN
TO ME
AND IDENTIFIED BY ME

Manzill Murshid
মনজিল মোরসেদ
Advocate

SOLEMNLY AFFIRMED BEFORE
ME THIS THEDAY OF
.....:2011 AT..... AM/PM

COMMISSIONER OF AFFIDAVITS
SUPREME COURT OF BANGLADESH
HIGH COURT DIVISION, DHAKA.

IN THE SUPREME COURT OF BANGLADESH
HIGH COURT DIVISION
(SPECIAL ORIGINAL JURISDICTION)

WRIT PETITION NO. OF 2011.

IN THE MATTER OF:

Human Rights And Peace For Bangladesh,
represented by it's Secretary Advocate
Asaduzzaman Siddique and others.

.....Petitioners.

-V E R S U S-

1. Bangladesh and others.

.....Respondents.

Manzill Murshid
মনজিল মোরসেদ
Advocate
For the Petitioners.

IN THE SUPREME COURT OF BANGLADESH
HIGH COURT DIVISION
(SPECIAL ORIGINAL JURISDICTION)

WRIT PETITION NO.OF 2011.

IN THE MATTER OF:

Adv. Asaduzzaman Siddique and others

.....Petitioners.

-V E R S U S-

1. Bangladesh and others.

.....Respondents.

INDEX

SL	Description of the paper or document	Date	Page
1	Power		
2	Writ Petition		
3.	Copies of the amendment of the Criminal Procedure Code and the Penal Code are annexed herewith and marked as " <u>ANNEXURE" A and A-1"</u> . (here is referred to as the Impugned amendment .)	10.10.1985	
4.	Copies of the newspaper clippings are annexed herewith and marked as " <u>ANNEXURE" B series"</u> ."		
5.	Copy of the newspaper dated 13 th December 2010 is annexed herewith and marked as " <u>ANNEXURE" C"</u> ."		
6.	A office copy of the demand justice notice dated 26.12.2010 is Annexed herewith and marked as " <u>ANNEXURE-D"</u> ."	26.12.2010	
7.	BACK SHEET		

Manzill Murshid,
Advocate
For the Petitioners.

IN THE SUPREME COURT OF BANGLADESH
HIGH COURT DIVISION
(SPECIAL ORIGINAL JURISDICTION)

WRIT PETITION NO..... OF 2011.

IN THE MATTER OF:

Human Rights And Pecaes For Bangladesh,
represented by Advocate Asaduzzamn
Siddique and others.

.....Petitioner.

-V E R S U S-

Bangladesh and others.

.....Respondents.

To,
The Learned Attorney General
The Peoples Republic of Bangladesh.

Dear Sir,

Please take notice that an application under Article 102 of the
Constitution of Bangladesh will be filed and moved before this Court,
a copy of which is enclosed herewith for your kind information.

Regards-

Manzill Murshid
মনজিল মোরসেদ
Advocate
Supreme Court of Bangladesh