

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. Md. Jahangir Kamal, S/O, Late A. H.

M. Shohidullah, of Omda Miya Hill, P.O.

Rangamati, Thana: Kotwali, District-
Rangamati.

2. Mr. Abdur Rashid, S/O: Late Abdul
Mujid of Omda Miya Hill, P.O. Rangamati,
Thana: Kotwali, District: Rangamati.

.....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, Prime Minister's
Secretariate, 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
Affairs, Bangladesh Secretariat, P.S.
Shahbag, District: Dhaka.

7. The Secretary, Ministry of Land,
Bangladesh Secretariat, P.S. Shahbag,
District: Dhaka.

8. The Secretary, Ministry of Chittagong
Hill Tracts Affairs, Bangladesh Secretariat,
P.S. Shahbag, District: Dhaka.

9. The Director General (D.G.), Land
Record and Survey Directorate, Tejgoan,
Dhaka.

10. The Divisional Commissioner,
Chittagong Division, District-Chittagong.

11. The Deputy Inspector General of
Police (D.I.G.), Chittagong Division, Post &
District Chittagong.

12. The Deputy Commissioner (D.C.),
Khagrachori, Post & District Khagrachori.

13. The Deputy Commissioner (D.C.),
Bandorban, Post & District Bandorban.

14. The Deputy Commissioner (D.C.),
Rangamati, Post & District Rangamati.

...Respondents.

AND

IN THE MATTER OF:

Failure of the respondents to perform land
survey in Chittagong Hill Tracts as per the
decision of the Chittagonj Hill Tracts Land
Dispute Resolution Commission and The
implementation of the Chittagong Hill

Tracts Peace Agreement of 1997 and to perform the land survey in Hill Tracts in order to solve the land dispute in hill Tracts as part of the object of Chittagong Hill Tracts Land Dispute Resolution Commission Act. 2001.

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 petitioner no. 1 is an educated and law abiding citizen, by profession he is a businessman. Moreover he is the secretary general

of the Chittagong Hill Tracts Equal Rights Movement. The petitioner no. 2 is a law abiding citizen and respected businessman. Moreover he is a member of Chittagong Hill Tracts Equal Rights Movement. The petitioners are concern residents of Chittagong hill Tracts and actively participate in the welfare of the people of the hill Tracts and rights of them. As a conscious citizen, the petitioners sought to enforce the provisions of the Chittagong Hill Tracts Land Dispute Commission Act. 2001 by the Public Interest Litigation as the matter concern directly affect the mass people of Hill Tracts.

2. The petitioners being conscious citizen and respectable member of “Chittagong Hill Tracts Equal Rights Movement” is applying to execute the land survey in Chittagong Hill Tracts as per the recommendation of the Chittagong Hill Tracts Land Commission as devoid of which the dispute of land in Hill Tracts can not be resolved thus the Peace Treaty of 1997 can not be enforced. 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 Secretariat, 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 respondent no. 6 is The Secretary, Ministry of Home Affairs, Bangladesh Secretariat, P.S. Shahbag, District: Dhaka. The

respondent no. 7 is The Secretary, Ministry of Land, Bangladesh Secretariat, P.S. Shah Bag, District: Dhaka. The respondent no. 8 is The Secretary, Ministry of Chittagong Hill Tract's Affairs, Bangladesh Secretariat, P.S. Shah Bag, District: Dhaka. The respondent no. 9 is Director General, Land Record and Survey Directorate, Tejgoan, Dhaka. The respondent no. 10 is The Divisional Commissioner, Chittagong Division, Chittagong. The respondent no. 11 is Deputy Inspector General of Police (D.I.G.), Chittagong Division, Post & District Chittagong. The respondent no. 12 is Deputy Commissioner (D.C.), Khagrachori, Post & District Khagrachori. The respondent no. 13 is Deputy Commissioner (D.C.), Bandorban, Post & District Bandorban. The respondent no. 14 is Deputy Commissioner (D.C.), Rangamati, Post & District Rangamati. 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 it is stated that in the instant writ petition, the petitioners purports to implement the decision of Chittagong Hill Tracts Land Dispute Resolution Commission and for which, they want the Land survey requires to be done as soon as possible, as it is vital and without which the dispute of land in Hill Tracts is not possible to be resolved. The solution to the dispute of land in Hill Tracts was the part of the agreement of 1997, so in proper to implement the agreement the solution of the land dispute is necessary.

5. That it is stated here that the disagreement with the tribal people of Chittagong Hill Tracts and new settler was going on for a long time. In 2nd December 1997, a peace treaty was signed among the National Committee on the Chittagong Hill Tracts and Chittagong Hill Tracts Jonoshonghoti Samity. One of the most important aims of the treaty is to resolve the long going land dispute on the Chittagong Hill Tracts Area. In chapter D Article 4 of the treaty, requires to create

a “land commission” to resolve the land dispute on the Chittagong Hill Tracts. The Article 2 of Chapter D of the Treaty, state that after signing the treaty between government and Jonoshonghoti Samity; rehabilitation of the tribal people will begin and the government will conduct a land survey as soon as possible with appropriate estimate resolving the dispute of lands which will settle the land ownership of tribal people and ensure their right to land. Article 4 states that, to resolve the dispute of the lands a commission will be formed in chairmanship of a retired Judge of the Supreme Court. The commission will have authority to resolve the land disputed of rehabilitant refuge rapidly and till now which land’s and hill’s ownership has been illegally settled and the owner lost their ownership. It was also provided that the commission will be the supreme authority to determine the ownership. No appeal can be made against the decision of the commission and the decision of the commission will be count as final as to the matter.

A photocopy of the peace treaty dated 02.12.97 is annexed herewith and marked as "ANNEXURE - A".

6. That it is stated here that in 17th July 2001 to resolve the dispute and implement the treaty of the Chittagong Hill Tracts Land Dispute Resolution Commission Act. 2001 was passed and thereafter a commission was formed in accordance with the provision of the Act. Under section 6 of the Act, the function of the commission is to resolve the various dispute of land. Under section 17(1) of the Act, even if the decision of the commission contradict with any other law, the decision of the commission will be amounted as the Decree of Civil Court and in appropriate circumstances as an order the commission can implement its decisions and if necessary then it can implement its decision through other Government Authority. Subsection 2 states that, for the implementation of the subsection 1 all

authorities are bound to follow the order of the commission. The section 19 state that, the commission will be amounted as a Civil Court as per the Section 220 of Penal Code, 1860 (Act XXV of 1860) and section 480 of Code of Criminal Procedure, 1898 (Act V of 1898) and accordingly the commission can take action against any person who is a contemnor.

A photocopy of the Act dated 17.07.2001 is annexed herewith and marked as

“ANNEXURE - B”.

7. That it is stated here that the commission was long being ineffective after its creation in absence of logistic support. On 19.07.2009, by a notification. Mr. Justice Khademul Islam Chowdhury was appointed as the Chairman of the commission and he

joined on 19.07.2009, in view to make the commission effective and serve its purpose.

A photocopy of the joining later dated 19.07.2009 is annexed herewith and marked as "**ANNEXURE – C**".

8. That it is stated here that the first meeting of the commission was held on 3rd August 2009. The meeting was chaired by the Chairman and other members present were, Mr. Md. Nurul Islam, Additional Divisional Commissioner; Mr. Ruithy Karbari, Chairman Hill Tracts Khagrachuri District Porishod and Mr. Shachin Pru Chowdhury, Mong King. In that meeting it was decided that in collaboration of Ministry of Chittagong Hill Tracts and Ministry of Land the land survey will be performed within two months and the Director General of Land Records, Dhaka, will take the initiative of that. In decision no.

3 it was decided that request for application in order to resolve the past dispute regarding land, there has to be massive advertisement.

The second meeting of the commission was held on 4th August 2009, the Chairman stated the working plane of the commission as follows;

- i. Commission will insist on the rehabilitation of the refuge.
- ii. Commission will identify the original owner of the lands.
- iii. A list of illegal settler will be created.
- iv. The applicant will ask to submit adequate papers to the commission to support their claim. It will follow a working plan to resolve the every land dispute in short time.
- v. In order to resolve the dispute within a fixed time there will be land survey in every District. From which one permitted master plane can be granted.

After that the Chakma Circle Chief Debashis Roy gave his opinion as follows;

- i. In that conference the chairman of Hill Tracts District Porishod himself and one member of regional representative was absent.
- ii. There are many views about the land survey. But only after resolve the dispute of land the land survey is possible.
- iii. An offer was sent to the Land Ministry to amend some law of the land commission by the Chittagong hill Tracts Regional Porishod.
- iv. The activity of the commission could be transferred from the Land Ministry to the Ministry of Chittagong Hill Tracts Affairs.

The 3rd meeting of the committee was held on 05.08.09, the commission discussed on appointing people on the commission and requested Establishment Ministry to appoint a secretary and required employees to run the office of the Hill Track areas to resolve of land dispute. Later they discussed about the land survey and decided to resolve the dispute instantly. Along with the Chairman, Additional District Commissioner, representative of the Bomag King,

representative of Hill Tracts District Porishod and Chairman of Bandorban Hill Tracts District Porishod were present on the meeting.

The fourth meeting was held on 7th September 2009, the commission took decision (decision no. 2) to start the land survey in 15th October 2009 and complete it within 6 months and if not fulfilled within the time period then if commission will extent the time for another six month. The District administration will help the survey.

On fifth meeting of the Commission held on 8th September 2009 in which it was decided that the land survey will be started within six months and will complete, if cannot be done then the Commission can allow further six month time to fulfill the survey.

Photocopies of the minutes of the Commission dated 03.08.2009, 04.08.2009; 05.08.2009, 07.09.2009 and 08.09.2009 are

annexed herewith and marked as

“ANNEXURE – D, D-1, D-2, D-3 and D-

4”.

9. That it is stated here that on 21.06.2010 the Commission sent a letter to the Secretary, Ministry of Land, the Secretary of Chittagong Hill Tracts, the Divisional Commissioner, Chittagong and the Director General of Land Record and Survey Directorate, stating that the concerned offices are under duty to perform the decision taken by the commission, however without any reason they failed to carry on the decision of the Commission. So the concerned offices must take steps to perform the land survey in Chittagong Hill Tracts at once, unless it will be amounted as contempt of court and appropriate steps will be taken against them. However even till now the concern offices are still inactive as carry on the decision of the commission; this may be seen as deliberate contempt of court.

A photocopy of the letter dated 21.06.2010 is
annexed herewith and marked as
“ANNEXURE - E”.

10. That it is stated here that the commission has sent a report, observation and recommendation to the Hon'ble Prime Minister where it was stated that the commission has taken all the necessary steps to fulfill their lawful duty, but even after taking the decision on the commission meeting and communicating the order to them the concerned offices of the government is not cooperating with the commission in relation to land survey of the Hill Tracts area. The commission also mentioned some obstacle to resolve the dispute of land; as some of the powerful government officer helping people to work against the commission as they wants the long going dispute to go on. Despite of repeated request, informing them about the decision of commission, the Ministry of land, Ministry of Chittagong Hill

Tracts, Director General of Land Record and Survey and Divisional commissioner are not co-operating to complete the survey. The argument of a Chairman of Regional Porishad is unjustified that the dispute first required being resolved, then only survey is possible. The Commission also made some recommendations to the Hon'ble Prime Minister as follows-;

- i. At once to give an order to initiate the land survey of Hill Tracts Area.
- ii. To give a direction to the Chairman of regional Porishad/their representative's also to relevant District Parishad Chairman, relevant Circle Chief, to be regularly attending in the meeting of the commission.
- iii. To give an order to create proposed vigilant team in Land ministry to implement the decision of the commission.

iv. To give a direction to the Ministry of Land to appoint driver, swiper and night guard, or unless give the commission a temporary power to appoint on those post.

v. To give a direction to make the allotted office to the commission useable as soon as possible as hand over it to the commission.

A photocopy of the report and recommendation dated 08.07.2010 is annexed herewith and marked as

“ANNEXURE - F”.

11. That it is stated here that on 14th March, 2010 and 13th May, 2010 the commission circulated two general advertisements to invite the suffered people to make application to the commission in order to resolve the land dispute.

Copies of the General Advertisements dated 14.03.2010 and 13.05.2010 are annexed herewith and marked as **“ANNEXURE – G and G-1”**.

12. It is stated here that a demand justice notice has been served to the respondents to take steps to perform the land survey in District Khagrachori, Bandorbon, and Rangamati in order to ensure the right to property of the citizens who are living there. They have been requested to start the land survey within 10 days and take similar steps. But nothing was communicated.

A copy of the demand justice notice is annexed herewith and marked as **“ANNEXURE - H”**.

13. That it is submitted that in the other parts of the Bangladesh the land survey has been done several times, but never done in Chittagong Hill Tracts ever. It is a clear discrimination toward the people of Hill Tracts as they are as citizens of Bangladesh as others. So not demarking the land by a land survey, which is required for enjoyment of their owned property, is violation of their right to property guaranteed by Article 42 of the Constitution of Bangladesh, which provides that subject to any restriction imposed by law, every citizen shall have the right to acquire, hold, transfer or otherwise dispose of property. So deprivation of the right to property by omission of land survey is a violation of the right guaranteed in the Constitution of Bangladesh and that is why this discriminatory attitude towards the people of Hill Tracts is unlawful.

14. That it is submitted that in the year of 1986 the then government has started the land survey in Chittagong Hill Tracts area and

continued until 1988 and thereafter it was abandoned without any valid reason. It is stated here that the land survey is imperative for implementation of the terms of the peace treaty.

15. That it is submitted that under section 6 of the Chittagong Hill Tracts Land Dispute Resolution Commission Act, 2001, the function of the commission is to resolve the various dispute of land; and Under section 17(1) of the Act, even if the decision of the commission contradict with any other law, the decision of the commission will be amounted as the Decree of Civil Court and in appropriate circumstances as an order the commission can implement its decisions and if necessary then it can implement its decision through other Government Authority. Almost in all meeting of the commission it has been decided that to resolve the dispute firstly the land survey has to be done. In that relation directions have been sent to the

respondents but they remain ineffective regarding the survey, which is illegal as it violate the section 17.

16. That it is submitted that Section 17 (2) states that, for the implementation of the sub-section 1 all authorities are bound to follow the order of the commission. The Commission is the ultimate authority, made by the Act, to resolve the dispute of the land in Hill Tracts provided that the decision of the Committee is final and the other government authorities are bound by the decision of the committee. Despite of the repeated direction the respondents have failed to carry out the decision and direction, for which they are bound by the law and this is illegal.

16. It is respectfully submitted that the section 19 of the Act. state that, the commission will be amounted as a Court as per the Section 20 of Penal Code, 1860 (Act XXV of 1860) and section 480 of Code

of Criminal Procedure, 1898 (Act V of 1898) and accordingly the commission can take action against any person who is in contemnor.

It is likely that the respondents will be liable for contempt as they are disobeying the decree of the commission.

17. That it is submitted that unless the land survey is performed, the dispute cannot be resolved as the owners cannot distinctly identify their lands. As it is part of Bangladesh, so it will be discrimination if the lands are not identified whereas in other places it is. Also the law requires the disputes to be resolved and the disputes cannot be resolved unless the lands are identified, so the inaction on performing the land survey is illegal.

18. That it is submitted that the Constitution of Bangladesh has provided right to property to its citizens under Article 42, so as the owners of the lands in Hill Tracks can not enjoy their right to property

unless their lands are properly identified. So failure to perform the survey curtailed the rights to property of the citizens of that particular area and this is illegal.

19. That it is submitted that the duty and responsibility vested upon the respondents to serve the people and initiate lawful steps and the respondents are also duty bound to obey the provisions of law. But the respondents have failed to perform the duties and responsibility as vested upon them and also failed to perform the above mentioned land survey, which is illegal.

20. That being aggrieved by and dissatisfied with the inaction to implement the decision and direction of the commission for land survey 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 in the other parts of the Bangladesh the land survey has been done several times, but never done in Chittagong Hill Tracts ever. It is a clear discrimination toward the people of Hill Tracts as they are as citizens of Bangladesh as others. So not demarking the land by a land survey, which is required for enjoyment of their owned property, is violation of their right to property guaranteed by Article 42 of the Constitution of Bangladesh, which provides that subject to any restriction imposed by law, every citizen shall have the right to acquire, hold, transfer or otherwise dispose of property. So deprivation of the right to property by omission of land survey is a violation of the right guaranteed in the Constitution of Bangladesh and that is why this discriminatory attitude towards the people of Hill Tracts is unlawful.

II. For that under section 6 of the Act, the function of the commission is to resolve the various dispute of land; and Under section 17(1) of the Act, even if the decision of the commission contradict with any other law, the decision of the commission will be amounted as the Decree of Civil Court and in appropriate circumstances as an order the commission can implement its decisions and if necessary then it can implement its decision through other Government Authority. Almost in all resolution of the commission it has been decided that to resolve the dispute firstly the land survey has to be done. In that relation directions have been sent to the respondents but they remain ineffective regarding the survey, which is illegal to disobey the decision of the committee as it violate the section 17.

III. For that Section 17 (2) states that, for the implementation of the subsection 1 all authorities are bound to follow the order of the

commission. The Commission is the ultimate authority, made by the Act, to resolve the dispute of the land in Hill Tracts provided that the decision of the Committee is final and the other government authorities are bound by the decision of the committee. Despite of the repeated direction the respondents have failed to carry out the decision and direction, for which they are bound by the law and this is illegal.

IV. For that the Constitution of Bangladesh has provided right to property to its citizens under Article 42, so as the owners of the lands in Hill Tracts can not enjoy their right to property unless their lands are properly identified. So failure to perform the survey curtailed the rights to property of the citizens of that particular area and this is illegal.

V. For that the duty and responsibility vested upon the respondents to serve the people and initiate lawful steps and the respondents are

also duty bound to obey the provisions of law. But the respondents have failed to perform the duties and responsibility as vested upon them and also failed to perform the above mentioned land survey, which is illegal.

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 a direction should not be given upon the respondents to perform the land survey in Chittagong Hill Tracts area according to the decision/resolution dated 03.08.2009 and 07.09.2009 of the Chittagong Hill

Tracts Land Dispute Resolution

Commission.

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.

AFFIDAVIT

I, Md. Jahangir Kamal, S/O, Late A. H. M. Shohidullah, of Omda Miya Hill, P.O. Rangamati, Thana: Kotwali, District- Rangamati aged about --- years by faith Muslim by occupation businessman 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
.....:2011 AT..... AM/PM

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

A F F I D A V I T

I, Mr. Abdur Rashid, S/O: Late Abdul Mujid, Address: Omda Miya Hill, P.O. Rangamati, Thana: Kotwali, District: Rangamati. aged about --- years by faith Muslim by occupation businessman 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.

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

WRIT PETITION NO. OF 2011.

IN THE MATTER OF:

Md. Jahangir Kamal 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:

1. Md. Jahangir Kamal 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.	A photocopy of the peace treaty dated 02.12.97 is annexed herewith and marked as " <u>ANNEXURE - A</u> ".	02.12.97	
4.	A photocopy of the Act dated 17.07.2001 are annexed herewith and marked as " <u>ANNEXURE - B</u> ".	17.07.2001	
5.	A photocopy of the joining later dated 18.10.2009 are annexed herewith and marked as " <u>ANNEXURE - C</u> ".	19.07.2009	
6.	Photocopies of the conference dated 03.08.2009, 04.08.2009; 05.08.2009, 07.09.2009 and 08.09.2009 are annexed herewith and marked as " <u>ANNEXURE - D, D-1, D-2, D-3 and D-4</u> ".	03.08.2009 04.08.2009 05.08.2009 07.09.2009 08.09.2009	
7.	A photocopy of the later of order dated 21.06.2010 is annexed herewith and marked as " <u>ANNEXURE - E</u> ".	21.06.2010	
8.	A photocopy of the report and recommendation dated 08.07.2010 are annexed herewith and marked as " <u>ANNEXURE - F</u> ".	08.07.2010	
9.	Copies of the General Advertisements dated 14.03.2010 and 13.05.2010 are annexed herewith and marked as	14.03.2010 13.05.2010	

	<u>“ANNEXURE – G and G-1”.</u>		
10.	An office copy of the demand justice notice dated 08.01.11 is annexed herewith and marked as <u>“ANNEXURE-H”.</u>	08.01.11	
11.	Back Page		

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:

Md. Jahangir Kamal 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