

ANIL KUMAR

Advocate

Date: 06.04.2026

TO,

1. **The Commissioner of Police,
Govt. Hostel, Jaipur, Rajasthan.**

~~2.~~ **The Deputy Commissioner of Police (Traffic),
Yadgar Building, Near Albert Hall, Ajmeri Gate, MI
Road, Jaipur - 302001.**

Subject: Representation seeking strict compliance of the Order dated 08.09.2018 and the Judgment dated 08.03.2019 passed by the Hon'ble Rajasthan High Court, Bench at Jaipur in D.B. Civil Writs No. 20323/2018 – Regarding prevention of proposed Dharna/Demonstration/Rally at Shahid Smarak, Govt. Hostel Chauraha, Jaipur, scheduled on 07.04.2026 – Causing severe disruption to traffic on M.I. Road and connected arteries – Urgent intervention sought.

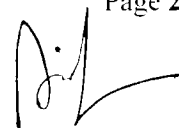
Reference: Judgment dated 08.03.2019 in D.B. Civil Writs No. 20323/2018 – Suo Motu vs. State of Rajasthan & Ors and instructions issued time to time by your good office.

Respected Sir/Madam,

The above-captioned representation is being submitted on behalf of the concerned citizens and residents of Jaipur to bring to your immediate and urgent attention the proposed Dharna/Demonstration/Rally being organized by a group identified as "XPO Victims" at **Shahid Smarak, Govt. Hostel Chauraha, Jaipur, Rajasthan** on **07th April, 2026. at 10:00 A.M.**, and to seek strict compliance of the binding orders of the Hon'ble High Court of Rajasthan as well as the directions of the Commissioner of Police, Jaipur.



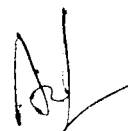
1. That the Hon'ble High Court of Judicature for Rajasthan, Bench at Jaipur, took suo motu cognizance of serious traffic disruption caused by a public meeting held at Amrudon Ka Bagh, Janpath, near the High Court, on 05th September, 2018. The Members of the Bar, court staff, government employees, and even the Hon'ble Judges were unable to reach the Court for over one hour. Distressingly, ambulances enroute to SMS Hospital and Santokba Durlabhji Memorial Hospital were also stuck in the gridlock – a matter of grave concern to public health and safety.
2. The Hon'ble High Court passed detailed orders on 05.09.2018 and 29.09.2018 in the said suo motu writ petition. The relevant directions included:
 - (a) A categorical direction to the State Government **not to permit any meeting/function/rally/mela/sammelan etc.** at Amrudon Ka Bagh or any ground nearby Ambedkar Circle, Jaipur during peak office hours.
 - (b) A direction that traffic should not be stopped, blocked, or even diverted from the main roads connecting Ambedkar Circle or nearby area, which is the lifeline to connect major hospitals and government offices including the Secretariat and the State Assembly.
 - (c) The area in question was confirmed to be a Silence Zone under the Notification issued by the State Government under the Noise Pollution (Regulation and Control) Rules, 2000, and thus additionally protected from meetings, rallies, and events involving loudspeakers and amplifiers.
3. That pursuant to the orders of the Hon'ble High Court, the Commissioner of Police, Jaipur passed an Order dated 08.09.2018, which specifically directed:



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- i. No permission shall be granted for any **meeting/programme/rally/mela/sammelan** or similar events at Amrason Ka Bagh Maidan and any ground near Ambedkar Circle during office hours.
 - ii. Traffic on main roads connecting Ambedkar Circle to major hospitals and government offices shall **neither be stopped nor diverted.**
 - iii. Any person or organisation attempting to organise a programme at the said locations shall be informed of the High Court orders and bound to comply; and **immediate legal action shall be taken** in case of violation.
4. That after hearing all parties, the Hon'ble High Court by its final Judgment dated 08.03.2019 in D.B. Civil Writs No. 20323/2018 disposed of the petition with the following binding directions:
- a) The Order dated 08.09.2018 of the Commissioner of Police, Jaipur was **upheld and made absolute.**
 - b) The said restrictions were directed to be **replicated in all areas declared as Silence Zones** across Jaipur, particularly near hospitals and educational institutions.
 - c) The Government was directed to **affix signboards in all Silence Zone areas.**
 - d) The Court affirmed that the Government has the right to exercise discretion and **deny permission for events in the interest of public**, and such discretion need not be exercised in favour of any applicant.
5. It has come to the notice of the representationist that a public demonstration/dharna/rally under the banner "**Mahadharna – XPO Ke Khilaf**" is being widely publicized and promoted through social media and WhatsApp for organization at **Shahid Smarak, Govt. Hostel Chauraha, Jaipur, Rajasthan, on 07.04.2026 at 10:00 A.M.** A publicity poster



circulating widely makes it evident that large crowds are being mobilized with considerable intensity and public messaging of an agitational nature, which will inevitably result in significant disruption.

6. That based on information available and widely circulated publicity material, the following persons have been identified as the organizers and key mobilizers of the proposed Dharna scheduled for 07.04.2026 at Shahid Smarak, Govt. Hostel Chauraha, Jaipur. It is respectfully submitted that the concerned authorities may take note of the identity and contact details of these persons for the purpose of serving appropriate notices, ensuring compliance with law, and preventing any unlawful assembly or traffic disruption:

Sr. No.	Name of the person	Contact details
1.	Mr. Vikram Unity	+91 84420 50363
2.	Mr. Vikram Singh Rathore	+91 98288 38883
3.	Mr. Mahendra Singh	+91 88239 63943
4.	Mr. Rohit Shekhawat	+91 88290 41494
5.	Mr. Sher Singh Rajput	+91 63676 86843
6.	Mr. Ashok Kumwat	+91 93146 31342
7.	Mr. Rahul Gujral	+91 81009 90999
8.	Mr. S.S. Shekhawat	+91 89492 30685
9.	Mr. Madhav Ram (Ronu)	+91 88239 63943
10.	Mr. Lalit Kaura	+91 98555 94839

7. The authorities are respectfully urged to immediately serve notices upon the above-mentioned organizers regarding the binding orders of the Hon'ble High Court of Rajasthan and the Order of the Commissioner of Police, Jaipur dated 08.09.2018, and to take such preventive action as may be necessary to ensure compliance with law.
8. It is most respectfully submitted that the location of the proposed Dharna, namely the area of **Shahid Smarak, Govt. Hostel Chauraha**, is an extremely sensitive and critical traffic junction of Jaipur City. The following aspects highlight its significance:
 - i. **Direct Connection to M.I. Road – The Lifeline of Jaipur:** Govt. Hostel Chauraha directly connects to M.I. Road (Mirza Ismail Road), which is undeniably the most important arterial road of Jaipur City. M.I. Road serves as the principal commercial and transit spine of Jaipur, connecting the old walled city, major markets, bus stands, railway stations, and numerous government offices. Any disruption at Govt. Hostel Chauraha invariably causes cascading traffic paralysis on M.I. Road and all roads feeding into or exiting from it.
 - ii. **Proximity to Vital Government Institutions:** The said chauraha is in the vicinity of several key government and public institutions including the Government Hostel, Rajasthan Secretariat, Shahid Smarak, and various other important offices. Disruption in this area directly impairs access to these institutions.
 - iii. **Proximity to Hospitals and Emergency Services:** The area connects to and feeds roads leading to major hospitals. Any blockage of traffic in this zone will endanger patients



- requiring emergency medical services, preventing ambulances from navigating the city centre.
- iv. **Dense Residential and Commercial Footfall:** The area surrounding Govt. Hostel Chauraha has dense residential localities, commercial establishments, educational institutions, and daily commuter routes. A large demonstration at this location will bring the entire adjacent area to a standstill, causing immense hardship to ordinary citizens, shopkeepers, students, and office-goers.
- v. **Peak Hours Disruption:** The proposed Dharna is scheduled to commence at 10:00 A.M. – squarely within peak office hours – when traffic density in the city centre is at its maximum. The timing makes the potential for chaos and disruption especially severe.
- vi. **Compounded Burden Due to Ongoing Festive Gathering at Amrapur Dham – A Critical Aggravating Factor:** It is most pertinently brought to the notice of the authorities that at the present time, there is already an **exceptionally heavy and unusual burden on M.I. Road and its connecting roads on account of the ongoing large-scale festive/religious gathering at Amrapur Dham.** Thousands of devotees and pilgrims are currently converging upon Amrapur Dham via M.I. Road and adjacent arteries of Jaipur City, resulting in a significant and perceptible increase in traffic volume, pedestrian movement, and overall congestion across the city centre during this festive period. The roads in and around M.I. Road, Govt. Hostel Chauraha, and their connecting lanes are already operating at or near maximum capacity owing to this ongoing religious event. In these circumstances, the proposed Dharna on 07.04.2026 will not merely add to the



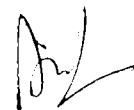
existing traffic load – it will **catastrophically worsen** an already strained situation, creating an unprecedented gridlock across the heart of Jaipur. The combined effect of the festive gathering at Amrapur Dham and a large agitational demonstration at Govt. Hostel Chauraha will render M.I. Road completely impassable, with devastating consequences for ordinary commuters, businesses, patients requiring emergency medical care, and the general public at large. This constitutes a compelling additional and independent ground for denying permission for the proposed demonstration at this particular location and at this particular point in time.

9. It is respectfully submitted that the final Judgment of the Hon'ble High Court dated 08.03.2019 is not limited in its application only to Amrudon Ka Bagh or the immediate vicinity of Ambedkar Circle. The Court expressly directed that the restrictions be **replicated for all areas declared as Silence Zones**, particularly areas near hospitals and public institutions. Govt. Hostel Chauraha falls well within the spirit and ambit of this direction given its proximity to critical public infrastructure and its role as a traffic lifeline.

Furthermore, the principles laid down by the Hon'ble High Court are equally applicable to this location: that the right to hold a meeting or public demonstration cannot override the fundamental right of the general public to use public roads and access emergency services without obstruction. The Hon'ble Court specifically held that the Government has the discretion to deny permissions to protect public interest.

10. **Grounds for the present representation are as under:**

- i. **Violation of Binding High Court Order:** Permitting the proposed Dharna at Govt. Hostel Chauraha during peak office hours would be a direct violation of the binding judgment dated 08.03.2019 of the Hon'ble High Court of Rajasthan, which made the Order dated 08.09.2018 of the Commissioner of Police absolute and further directed its replication for all Silence Zones and sensitive public areas.
- ii. **Violation of Silence Zone Notifications:** The area falls within or in close proximity to Silence Zones declared under the Rajasthan Noise Control Act, 1963 and the Noise Pollution (Regulation and Control) Rules, 2000. The proposed demonstration, which will inevitably involve the use of loudspeakers, amplifiers, sloganeering, and sound systems as evident from the mobilization posters, will be in direct violation of these statutory provisions.
- iii. **Clear and Present Danger to Public Safety:** The location of Govt. Hostel Chauraha and its connection to M.I. Road makes it a particularly dangerous location for large demonstrations. Any obstruction or diversion of traffic at this point will create a domino effect of traffic gridlock across the heart of Jaipur, imperiling emergency vehicles including ambulances, fire brigades, and police response teams.
- iv. **Right of General Public v. Right to Protest:** While the right to peaceful assembly and protest is a fundamental right under Article 19(1)(b) of the Constitution of India, the same is subject to reasonable restrictions in the interest of public order, decency, and the rights of others under Article 19(3). The Hon'ble High Court has already balanced these competing rights and held that the right of the public to access roads, hospitals, and government



offices prevails over the convenience of the organizers of demonstrations at sensitive traffic junctions.

- v. **M.I. Road – Inviolable Lifeline of Jaipur:** M.I. Road is the commercial and civic lifeline of Jaipur. It connects the Jaipur Railway Station, major bus routes, commercial markets including Johari Bazaar, M.I. Road market, government offices, courts, and key residential zones. Disruption of Govt. Hostel Chauraha will effectively blockade M.I. Road, causing incalculable inconvenience to lakhs of citizens, tourists, patients, students, and businesspersons on a working weekday.
- vi. **Past Precedent of Disruption:** The Hon'ble High Court, while passing the judgment dated 08.03.2019, specifically noted the pattern of large gatherings causing traffic paralysis in the central Jaipur area and observed that such disruptions should not be permitted to recur. Permitting the present demonstration would be contrary to the spirit and letter of this judicial precedent.

PRAYERS AND SPECIFIC REQUESTS

11. **In light of the above, it is most respectfully prayed and requested that:**
 - i. Necessary action be taken to ensure **strict compliance of the Order dated 08.09.2018** passed by the Commissioner of Police, Jaipur and the binding Judgment dated 08.03.2019 of the Hon'ble High Court of Rajasthan in D.B. Civil Writs No. 20323/2018.
 - ii. **No permission be granted** to the organizers of the proposed Dharna/Demonstration/Rally scheduled for 07.04.2026 at Shahid Smarak, Govt. Hostel Chauraha, Jaipur, particularly in view of the peak hour timing of

- 10:00 A.M. and the critically sensitive nature of the location.
- iii. In the event permission has already been granted, the same may be **immediately reviewed and revoked** in compliance with the High Court's orders and in the public interest.
 - iv. The organizers of the proposed demonstration be served with a formal notice intimating them of the binding orders of the Hon'ble High Court and the Order of the Commissioner of Police and be **directed to shift their demonstration to an alternative venue** not falling within a Silence Zone or sensitive traffic junction, and away from M.I. Road and its connecting arteries.
 - v. **Adequate police deployment** be ensured on 07.04.2026 in the Govt. Hostel Chauraha, M.I. Road and surrounding areas to prevent any unauthorized gathering or disruption to public order and traffic flow.
 - vi. If despite these representations and police actions, the demonstration proceeds in violation of the High Court orders, the organisers be subject to **immediate legal action** as mandated by paragraph 3 of the Order dated 08.09.2018 of the Commissioner of Police.
 - vii. A general directive be issued for **strict enforcement of Silence Zone regulations** in all areas declared as Silence Zones in Jaipur City in compliance with the final direction of the Hon'ble High Court in the judgment dated 08.03.2019.

The Hon'ble High Court of Rajasthan, while passing the judgment in question, aptly observed that the right of the public at large to commute freely, access hospitals, and reach government offices cannot be sacrificed for organized demonstrations at sensitive traffic junctions. The Government has been vested with the authority and duty to



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protect public interest by declining permission for such events. The proposed Dharna at Govt. Hostel Chauraha – located at the very heart of Jaipur and at the gateway to M.I. Road – presents precisely such a scenario.

It is therefore respectfully urged that the authorities act swiftly, in the letter and spirit of the binding judicial orders, to prevent the proposed demonstration from causing disruption to the precious lifelines of Jaipur City and to protect the rights of the general citizenry of Jaipur.

This representation is submitted in the public interest and with full confidence in the commitment of the Jaipur Police Administration to uphold the rule of law and the binding orders of the Hon'ble High Court.

Thanking you,

Yours faithfully,



(Anil Kumar)

Advocate

Chamber No.311, E-Block,

Rajasthan High Court, Jaipur-302001.

Place: Jaipur, Rajasthan

ENCLOSURES:

1. Copy of the Judgment dated 08.03.2019 in D.B. Civil Writ No. 20323/2018 passed by the Hon'ble High Court of Rajasthan, Bench at Jaipur
2. Copy/Screenshot of the publicity material/poster of the proposed Dharna at Shahid Smarak, Govt. Hostel Chauraha, Jaipur, dated 07.04.2026.