

**IN THE SUPREME COURT OF BANGLADESH**

**HIGH COURT DIVISION**

**(SPECIAL ORIGINAL JURISDICTION)**

**WRIT PETITION NO. 2932 OF 2010**

**IN THE MATTER OF**

An application under Article  
102(1), 102(2)(a)(i) and  
102(2)(a)(ii) of the Constitution of  
Peoples Republic of Bangladesh

AND

**IN THE MATTER OF**

1. Shapan Chowkider, son of Md.  
Nurul Islam Chowkider, of

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Village: South Chakdh, Post:  
Chakdh Bazar, Police Station  
Naroia, District Shariatpur

2. Ain O Salish Kendra (ASK),  
represented by its Executive  
Director, of 7/17, Block B,  
Lalmatia, Police Station  
Mohammadpur, District Dhaka

3. Bangladesh Legal Aid and  
Services Trust (BLAST),  
represented by its Executive  
Director, of YMCA Building, 1/1  
Pioneer Road, Police Station  
Ramna, District Dhaka

4. Action for Disability and  
Development (ADD),  
represented by its Country

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Director, of House No.56, Road  
No.11, Banani, Police Station  
Gulshan, District Dhaka

... .. Petitioners

**VERSUS**

1. Bangladesh, Represented by  
the Secretary, Ministry of  
Establishment, Bangladesh  
Secretariat, Police Station-  
Ramna, District Dhaka
2. Bangladesh, Represented by  
the Secretary, Ministry of Law,  
Justice and Parliamentary  
Affairs, Bangladesh Secretariat,  
Police Station Ramna, District  
Dhaka

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3. Bangladesh, Represented by  
the Secretary, Ministry of Social  
Welfare, Bangladesh  
Secretariat, Police Station  
Ramna, District Dhaka

4. Bangladesh, represented by  
the Secretary, Ministry of  
Health and Family Planning,  
Bangladesh Secretariat, Police  
Station Ramna, District Dhaka.

5. Bangladesh Public Service  
Commission, Represented by  
its Chairman, Old Airport  
Building, P.S. Tejgaon, Dhaka

1215

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6. The Chairman, Bangladesh  
Public Service Commission,  
Old Airport Building, P.S.  
Tejgaon, Dhaka 1215

7. The Secretary, Bangladesh  
Public Service Commission,  
Old Airport Building, P.S.  
Tejgaon, Dhaka 1215

8. The Controller of Examinations  
(Cadre), Bangladesh Public  
Service Commission, Old  
Airport Building, P.S. Tejgaon,  
Dhaka 1215

9. Director General, Directorate of  
Health, Mohakhali, P.S.  
Gulshan, Dhaka

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10. National Disability Welfare

Coordination Committee,

Represented by its Chairman,

Ministry of Social Welfare,

Bangladesh Secretariat, P. S.

Ramna, Dhaka

11. The Chairman, National

Disability Welfare Coordination

Committee, Ministry of Social

Welfare, Bangladesh

Secretariat, P. S. Ramna,

Dhaka

12. The Secretary, National

Disability Welfare Coordination

Committee, Ministry of Social

Welfare, Bangladesh

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Secretariat, P. S. Ramna,

Dhaka

... .. Respondents

AND

**IN THE MATTER OF**

Persistently depriving Bangladeshi  
citizens with disabilities from the  
opportunity of appearing in the  
Bangladesh Civil Services (BCS)  
Examinations and not allowing  
them to join any cadre as may be  
determined by the Bangladesh  
Public Service Commission

AND

**IN THE MATTER OF**

Publishing a supplementary notice

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expressly specifying that there is no bar to persons with disabilities from applying for 30<sup>th</sup> BCS Examination – 2010, in addition to the Notification, bearing File No. 80.200.046.00.00.001.2010-360, dated 08.3.2010, published by the Respondent No.8

AND

**IN THE MATTER OF**

Applying discretionary powers and performing duties of the respondents for ensuring the accommodation of persons with disabilities in the appropriate cadre posts of Bangladesh civil



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service in compliance with Section  
6(2) of the Disability Welfare Act,  
2001 (Act XII of 2001) read with  
Schedule 'Cha' of the said Act

AND

**IN THE MATTER OF**

Declaring the application of  
Schedule III of Bangladesh Civil  
Service (Age, Qualification and  
Examination for Direct  
Recruitment) Rules, 1982, being  
No. S.R.O. 142-  
L/82/ED/Recruitment/1-15/80,  
dated 11.5.1982, in general and  
without considering the  
fundamental rights of the citizens

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with disabilities, to that extend to  
be, inconsistent with the Part III of  
the Constitution of the People's  
Republic of Bangladesh and as  
such void

AND

**IN THE MATTER OF**

Enforcement of fundamental rights  
guaranteed under Article 26, 40  
and 27 of the Constitution of the  
Peoples Republic of Bangladesh.

To,

Mr. Justice Mohammed Fazlul Karim, Hon'ble Chief Justice of  
Bangladesh and his companion justices of the said Hon'ble  
Court

The humble petition on behalf

of the petitioner above

named respectfully

SHEWETH:

1. That the petitioner No.1 Shwapan Chowkidar is a visually impaired person. By profession he is an Advocate. He obtained degrees in LL B (Hons) and LL M from Dhaka University in the years 2008 and 2009 respectively. He was enrolled as an Advocate by appearing in the written and viva voce examinations before the Bangladesh Bar Council. He also attempted to apply for the 28<sup>th</sup> BCS Examination but was refused an admit card on the purported ground of his visual impairment and by reference to the BCS Rules. He brought this matter to the concern of the Prime Minister vide his letter, dated 29.3.2009, and requested her to grant quotas in favour of persons with disability. Mr. Shapan continued his efforts by sending reminder letters, dated 04.10.2009, 11.10.2009 and 18.3.2010, to the Prime Minister but has received no response

to date. Under the said notice issued by the respondent No.6, Mr. Shapan will not be able to attend the 30<sup>th</sup> BCS Examination as no accommodation for persons with disability is provided under the said notice.

Photocopies of LL B (Hons), LL M, Bar Council Enrolment certificates of the petitioner No.1 is annexed herewith and marked as

ANNEXURE A

2. That the petitioner Nos. 2 and 3 are well-reputed human rights and legal aid organisations, Ain O Shalish Kendra (ASK) and Bangladesh Legal Aid and Services Trust (BLAST). Both the organisations are actively engaged in advocacy against violations of fundamental rights of the citizens. Since their inception the organisations are providing legal aid and support to the victims of fundamental rights violations through its staff and panel of lawyers, who regularly take up fundamental rights

matters before the High Court Division. The petitioner organisations ASK and BLAST also undertake activities aimed at the promotion and protection of human rights at the national and international level. ASK and BLAST are well known for their investigation, monitoring and documentation of violations of rights of persons with disabilities. They are also known for their campaigning for law reform and public interest litigation to secure rights of persons with disabilities.

3. That the petitioner No.4, Action for Disability and Development (ADD), is an UK-based disability rights organisation, duly registered in Bangladesh under NGO Bureau.

4. That the respondent No. 1 is the Secretary of Establishment, who is responsible for framing rules for employment in Bangladesh Civil Service. The Respondent No.2 is the Secretary, Ministry of Law, Justice and Parliamentary Affairs, who is responsible for ensuring the promulgation of

laws in accordance with the provisions of the Constitution of the People's Republic of Bangladesh. The Respondent No.3 is the Secretary, Ministry of Social Welfare, who is responsible for the affairs related to the persons with disabilities. The Respondent No.4 is the Secretary, Ministry of Health, who is responsible for the conduct of his subordinates, specifically the Director General, Directorate of Health. Respondents Nos. 5, 6 and 7 are Bangladesh Public Service Commission, Chairman of the said Commission and Secretary of the said Commission respectively. Respondents Nos. 5, 6 and 7 are responsible for conducting Bangladesh Civil Service Examinations and appointing deserving candidates in appropriate posts of appropriate cadres. The Respondent No.8 is the Controller of Examinations (Cadre), Bangladesh Public Service Commission, who issued the notification for employment under 30<sup>th</sup> BCS Examination, bearing file No. 80.200.046.00.00.001.2010-360, dated 08.3.2010. The Respondent No.9 is the Director General,

Directorate of Health, who is responsible for ensuring the standard of health of candidates for Bangladesh Civil Service examinations as prescribed under the provisions of Schedule III of Bangladesh Civil Service (Age, Qualification and Examination for Direct Recruitment) Rules, 1982, being No. S.R.O. 142-L/82/ED/Recruitment/1-15/80. Respondent Nos. 10, 11 and 12 are National Disability Welfare Coordination Committee, the Chairman of the said committee and the Secretary of the said committee. Respondent Nos. 10, 11 and 12 are responsible for (i) taking necessary steps to create opportunities for persons with disabilities to be employed in specific working arena; (ii) creating equal employment opportunities for persons with disabilities in appropriate services in the public sector, statutory corporations and in local government authorities; (iii) adopting measures for relaxing the age limit for persons with disabilities in the services in the public sector, statutory corporations and in local government

authorities; (iv) adopting measures for reserving appropriate quotas for persons with disabilities in the services of public sector, statutory corporations and in local government authorities, according to Section 6(2) of the Disability Welfare Act, 2001 (Act XII of 2001) read with Schedule 'Cha' of the said Act.

5. That the addresses of the petitioners and the respondents given in the cause title of this petition are correct and genuine for the purpose of service upon them of summons, notices, affidavits and other allied matters.

6. That an employment notice has been issued by the Respondent No.8, bearing File No. 80.200.046.00.00.001.2010-360, dated 08.3.2010, in the *Dainik Janakantha* on 10.3.2010, for an employment of 2572 officers in 15 general cadres, 12 professional and technical cadres of Bangladesh Civil Service and 56 lecturers in Teachers Training Colleges.

A copy of the said notice, bearing File



No. 80.200.046.00.00.001.2010-360,  
dated 08.3.2010, is annexed herewith  
and marked as ANNEXURE B

7. That general cadres for which the employment notice has been passed include administration, police, audit and accounts, ansar, customs and excise, cooperative, food, family planning, post, railway transportation and commercial, tax, trade, economic and information. Professional and technical cadres include agriculture, fisheries, food, health, information, roads and highways, railway engineering, public health engineering, public works, statistics, livestock and general education.
8. That in clause 21 of the said notification it has been stated that candidates for police and ansar cadres must have a physical competence of 5' 4" height for male candidates and 5' height for female candidates. For the rest of the cadres a height

of 5' for male candidates and 4'10" for female candidates has been specified. Furthermore candidates for police and ansar cadres must have a physical competence of 120 lb weight for male candidates and 100 lb weight for female candidates. For the rest of the cadres 99.11 lb for male candidates and 88.10 lb for female candidates would be the standard of physical competence. In addition to that candidates must have eyesight according to the rules. It has been stated that other information regarding physical competence would be informed at an appropriate time, by implicit reference to the standard of physical competence as set out in Schedule III of Bangladesh Civil Service (Age, Qualification and Examination for Direct Recruitment) Rules, 1982, being No. S.R.O. 142-L/82/ED/Recruitment/1-15/80.

A photocopy of the S.R.O. 142-L/82/ED/Recruitment/1-15/80, dated 11.5.1982 is annexed

herewith and marked as

ANNEXURE C

9. That in the Schedule III of the said Rules contains a detailed description about the physical competence of a candidate for a cadre post. This includes the standard of height, weight, chest measurement in normal position and in full expiration, eye sight, urine test and additional points including hearing capacity, speech capacity, that teeth, formation of chest, limbs, hands and feet are to be well formed and developed and with free and perfect motion of all joints, no congenial malformation or defect etc. It may be noted that these Rules were framed during a martial law administration but nevertheless remain enforceable to date.

10. That ten per cent of the total population of Bangladesh is living with different forms of disabilities, many due to natural and man made causes. Natural disaster, high rate of road

accident, social and family violence, mal-nutrition, unavailability of vaccination, congenital malformation cause disabilities amongst other reasons. However, persons with disabilities have been able to complete their post graduation in competitive subjects from the best universities of the country and have entered various professional arena.

11. That the Petitioner No.1 is a visual impaired person. He obtained degrees in LL B (Hons) and LL M from Dhaka University in the years 2008 and 2009 respectively. He was enrolled as an Advocate by appearing in the written and viva voce examinations before the Bangladesh Bar Council. At present he is pursuing his profession as a lawyer. Petitioner No.1 also attempted to apply for the 28<sup>th</sup> BCS Examination but was refused an admit card on the purported ground of his visual impairment and by reference to the BCS Rules. He brought this matter to the concern of the Honourable Prime Minister vide his letter, dated 29.3.2009, and requested her to grant quotas in

favour of persons with disability. Mr. Shapan continued his efforts by sending reminder letters, dated 04.10.2009, 11.10.2009 and 18.3.2010, to the Prime Minister but has received no response to date. Under the said notice issued by the respondent No.6, Mr. Shapan will not be able to attend the 30<sup>th</sup> BCS Examination as no accommodation for persons with disability is provided under the said notice.

Letters, dated 04.10.2009, 11.10.2009 and 18.3.2010, sent by the Petitioner No.1 to the Prime Minister are attached herewith and marked as ANNEXURE D, D1, and D2

12. That the Prime Minister of the People's Republic of Bangladesh made a declaration of reserving quotas of ten percent in third class and fourth class employment and one percent in first class employment in public sector, on

19.10.2009. The Prime Minister made a repeatation of the said declaration on the National Disability Day, 2010, which was celebrated on 02.4.2010. Instead of repeated declaration made by the Prime Minister the respondents kept on ignoring the issue in case of employment in Bangladesh Civil Service.

Press-clipping, dated 03.4.2010, containing the news of the declaration made by the Prime Minister is annexed herewith and marked as ANNEXURE E

13. That the petitioners through their lawyer served a registered Notice demanding justice on 01.4.2010 to the respondents calling upon them to ensure compliance with the provisions of the section 6(2) 6(2) of the Disability Welfare Act, 2001 (Act XII of 2001) read with Schedule 'Cha' of the said Act and to publish a supplementary notice allowing the persons with disabilities in 30<sup>th</sup> BCS Examination but no information of

compliance has been received till now and as such it is clear that justice has been denied to the petitioners.

A copy of the Demand for Justice Notice, dated 01.4.2010 is annexed herewith and marked as

ANNEXURE F

14. That it is respectfully submitted that the right of persons with disabilities to not to be discriminated on the basis of disability with regard to all matters concerning all forms of employment has been persistently violated by the enactments of the legislature and other instruments, which have enforcement as a law. Amongst others the Schedule III of Bangladesh Civil Service (Age, Qualification and Examination for Direct Recruitment) Rules, 1982, being No. S.R.O. 142-L/82/ED/Recruitment/1-15/80 sets the standard for physical fitness of the eligible candidates for appointment to a cadre post. According to the said provisions of law, a candidate may

be rejected for appointment, even after passing different stages of examinations, namely preliminary test, written examination, IQ test and Viva-voce, only if she or he is found to have a particular form of disability even though such disability may not be an impediment in performing the duties and responsibilities of the concerned cadre post.

15. That it is submitted that under Section 6(2) of the Disability Welfare Act, 2001 (Act XII of 2001) the Respondent No.11 is made responsible to direct or request the ministries or departments of the government for (i) taking necessary steps for identifying appropriate working arena and to create opportunities for disable people in such working arena; (ii) creating equal employment opportunities for competent persons with disabilities in appropriate services in the public sector, statutory corporations and in local government authorities; (iii) adopting measures for relaxing the age limit for persons with disabilities in the services of public sector, statutory



corporations and in local government authorities; (iv) adopting measures for reserving appropriate quotas for persons with disabilities in the services of public sector, statutory corporations and in local government authorities as described in Schedule '*Cha*' of the said Act.

16. That it is further submitted that the fundamental right to freedom of profession or occupation has been recognised in Article 40 under Part III of the Constitution of the People's Republic of Bangladesh. It has been stated in the said Article "Subject to any restrictions imposed by law every citizen possessing such qualifications, if any, as may be prescribed by law in relation to his profession, occupation, trade or business shall have the right to enter upon any lawful profession or occupation, and to conduct any lawful trade or business." At present persons with disabilities like the petitioner No.1 are deprived of being employed in the public sector in spite of possessing such qualifications as required to be employed as a

BCS cadre officer.

17. That it is again submitted that in Article 27 it has been declared that all citizens are equal before law and are entitled to equal protection of law. But citizens of Bangladesh, who are with disabilities, are deprived of getting the opportunity for appearing in Bangladesh Civil Service Examination.

18. That it is again submitted that in Article 15 under Part II of the Constitution it has been recognised that it is a fundamental responsibility of the state to attain a constant increase of productive forces and a steady improvement in the material and cultural standard of living of the people with a view to securing the right to work to citizens of Bangladesh. In the present case without securing the right to work to citizens the respondents are persistently violating the fundamental rights of the citizens with disabilities to get the equal opportunity for appearing in the BCS examination and to be employed accordingly.

19. It is respectfully submitted that under Article 19(2) the

State has been endowed with a duty to adopt effective measures to remove social and economic inequality between man and man and to ensure the equitable distribution of wealth among citizens, and of opportunities in order to attain a uniform level of economic development throughout the Republic.

20. That it is further submitted that under Article 20 work has been recognised as a right, a duty and a matter of honour for every citizen, who is capable of working and the State has been endowed with a duty to create conditions in which human labour in every form, intellectual and physical, shall become a fuller expression of creative endeavour and of the human personality. The existing legal regime regarding public employment creates hindrance on the way for creating conditions for human labour, intellectual and physical, to be recognised as the expression of creative endeavour and human personality.

21. That it is again submitted that Bangladesh has ratified the

UN Convention on the Rights of Persons with Disabilities (CRPD) on 30.11.2007. According to Article 27 of the Convention, Bangladesh has undertaken to safeguard and promote the realization of the right to work by taking appropriate steps, including through legislation, to prohibit discrimination on the basis of disability with regard to all matters concerning all forms of employment, including conditions of recruitment, hiring and employment, continuance of employment, career advancement and safe and healthy working conditions.

22. That it is further submitted that although the Honourable Prime Minister has declared one percent quota for citizens with disabilities in first class posts in public sector the respondents did not take any attempt to comply with the declaration of the Honourable Prime Minister.

23. That there is no other equally efficacious remedy or forum available to your petitioner except by way of this

application.

24. That your petitioners file this application *bona fide* in public interest.

25. That it is respectfully stated that annexure A, A1 and A2 are academic and professional certificates of Petitioner No.1, annexure C is the S.R.O. 142-L/82/ED/Recruitment/1-15/80, dated 11.5.1982, a copy of the same is not available in BG Press, annexure D, D1 and D2 are letters sent by the petitioner No.1 to the Honourable Prime Minister and the Petitioner No.1 does not have the original copies in his custody and as such the petitioners crave permission to swear affidavits with photocopies of those documents as annexures.

26. That in the premises set forth above the petitioners beg to file this petition and to move before Your Lordships, in the Public Interest, on the following amongst other -

**G R O U N D S**

- I. For that persistent deprivation of Bangladeshi citizens with disabilities from the opportunity of appearing in the Bangladesh Civil Services (BCS) Examinations and not allowing them to join any cadre as may be determined by the Bangladesh Public Service Commission is without lawful authority and is of no legal effect.
  
- II. For that the application of Schedule III of Bangladesh Civil Service (Age, Qualification and Examination for Direct Recruitment) Rules, 1982, being No. S.R.O. 142-L/82/ED/Recruitment/1-15/80 setting the standard for physical fitness of the eligible candidates for appointment to a cadre post of Bangladesh Civil Service, without considering the eligibility of citizens with disabilities to serve in such posts, is inconsistent with the provisions of Part III of Constitution of the People's Republic of Bangladesh. As such the S.R.O. 142-

L/82/ED/Recruitment/1-15/80 is liable to be declared void to the extent of non considering the eligibility of citizens with disabilities to serve in appropriate posts of Bangladesh Civil Service.

III. For that the respondent No.11 did not comply with the duties and obligations as conferred upon him under Section 6(2) of the Disability Welfare Act, 2001 (Act XII of 2001) Schedule 'Cha' of the said Act. Hence the Respondent No.11 is liable to be directed to perform his functions in connection with the affairs of the Republic which he is required by the Disability Welfare Act, 2001 (Act XII of 2001).

IV. For that depriving of persons with disabilities like Petitioner No.1 from appearing in the BCS examinations and from being employed in the appropriate cadres of Bangladesh Civil Service in spite of possessing such

qualifications as required to be employed as a BCS cadre officer is a violation of Article 40 of the Constitution of the People's Republic of Bangladesh. As such the respondents are liable to be directed for allowing citizens with disabilities to appear in the 30<sup>th</sup> BCS Examination and for applying their discretion to accommodate citizens with disabilities in appropriate posts in appropriate cadres.

- V. For that citizens of Bangladesh, who are with disabilities, are deprived of getting the opportunity for appearing in Bangladesh Civil Service Examination in violation of fundamental rights as described in Article 27 of the Constitution. And as such the respondents are liable to be directed for allowing citizens with disabilities to appear in the 30<sup>th</sup> BCS Examination and for applying their discretion to accommodate citizens with disabilities in appropriate posts in appropriate cadres.



- VI. For that the respondents are persistently ignoring the liabilities and duties as conferred upon them under Articles 15, 19(2) and 20, as described in Part II of the Constitution, by not allowing the citizens with disabilities to appear in the 30<sup>th</sup> BCS Examination. And as such the respondents are liable to be directed for allowing citizens with disabilities to appear in the 30<sup>th</sup> BCS Examination and for applying their discretion to accommodate citizens with disabilities in appropriate posts in appropriate cadres.
- VII. For that Bangladesh has ratified the UN Convention on the Rights of Persons with Disabilities (CRPD) on 30.11.2007. According to Article 27 of the Convention, Bangladesh is under an obligation to safeguard and promote the realization of the right to work by taking appropriate steps, including through legislation, to prohibit discrimination on the basis of disability with regard to all

matters concerning all forms of employment, including public services. And as such the respondents are liable to be directed for allowing citizens with disabilities to appear in the 30<sup>th</sup> BCS Examination and for applying their discretion to accommodate citizens with disabilities in appropriate posts in appropriate cadres.

- VIII. For that in spite of repeated declaration of the Honourable Prime Minister for reserving one percent quota for citizens with disabilities in first class posts in public sector the respondents did not take any attempt to comply with the declaration of the Honourable Prime Minister in respect of Bangladesh Civil Service employment. And as such the respondents are liable to be directed for allowing citizens with disabilities to appear in the 30<sup>th</sup> BCS Examination and for applying their discretion to accommodate citizens with disabilities in appropriate posts in appropriate cadres.

IX. For that the petitioners have no speedy, expedient and equally efficacious remedy other than the remedy herein prayed for and it makes this application bona fide in public interest.

Wherefore it is prayed that your

Lordship would be pleased to:-

(A) To issue a Rule Nisi calling upon the respondents to show cause as to why an order will not be passed directing the respondents for publishing a supplementary notice expressly specifying that there is no bar to citizens with disabilities from applying for 30<sup>th</sup> BCS Examination

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– 2010, in addition to the Notification, bearing File No. 80.200.046.00.00.001.2010-360, dated 08.3.2010, published by the Respondent No.8;

(B) To issue a Rule Nisi calling upon the respondents to show cause as to why an order will not be passed directing the respondents for applying discretionary powers and performing duties of the respondents for ensuring the accommodation of citizens with disabilities in the appropriate

cadre posts of Bangladesh civil service in compliance with Section 6(2) of the Disability Welfare Act, 2001 (Act XII of 2001) read with Schedule 'Cha' of the said Act;

(C) To issue a Rule Nisi calling upon the respondents to show cause as to why an order will not be passed declaring the application of Schedule III of Bangladesh Civil Service (Age, Qualification and Examination for Direct Recruitment) Rules, 1982, being No. S.R.O. 142-L/82/ED/Recruitment/1-15/80,

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dated 11.5.1982, in general and without considering the fundamental rights of the citizens with disabilities, to that extend to be, inconsistent with the Part III of the Constitution of the People's Republic of Banglaesh and as such void;

(D) Pending disposal of the Rule

(i) To direct the respondents to stay the operation of the Notification, bearing File No. 80.200.046.00.00.001.2010-360, dated 08.3.2010, published by the Respondent No.8, until the

publication of a supplementary notice, expressly specifying that there is no bar to persons with disabilities from applying for 30<sup>th</sup> BCS Examination – 2010;

(ii) To direct the respondents to submit a list within two weeks detailing the posts of appropriate cadres, under Bangladesh Civil Service, in which persons with disabilities can be accommodated;

(E) After hearing the parties make the rule absolute;

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(F) To award costs of the petition  
to the petitioner;

(G) To pass such other or further  
order or orders as to your  
Lordships may deem fit and  
proper;

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

### **AFFIDAVIT**

I, Shapan Chowkider, son of Md. Nurul Islam Chowkider, of  
Village: South Chakdh, Post: Chakdh Bazzar, Police Station-  
Naroia, District - Shariatpur, by profession advocate, aged  
about ... years, by nationality Bangladeshi by birth do hereby  
solemnly affirm and say as follows:



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

2. That the statements made above are true to the best of my knowledge and belief.

Prepared in my office  
Advocate

\_\_\_\_\_  
Deponent

The deponent is known to me and identified by me.

\_\_\_\_\_  
Advocate

Solemnly affirmed before me  
by the said deponent this  
the . . . . day of April 2010 at. . . .

COMMISSIONER OF AFFIDAVIT  
SUPREME COURT OF BANGLADESH  
HIGH COURT DIVISION, DHAKA

**AFFIDAVIT**

I, Sultana Kamal wife of Supriyo Chakravorty, Executive Director of Ain o Salish Kendra, (ASK) of 26/3, Purana Paltan Line, Police Station- Motijheel, District- Dhaka, by profession advocate and social worker, aged about 54 years, by nationality Bangladeshi by birth do hereby solemnly affirm and say as follows:

1. That I am the Executive Director of the Petitioner organization No.2 and conversant with the facts and circumstances of this case and competent to swear this affidavit.
2. That the statements made above are true to the best of my knowledge and belief.

Prepared in my office  
Advocate

\_\_\_\_\_  
Deponent

The deponent is known to  
me and identified by me.

\_\_\_\_\_  
Advocate

Solemnly affirmed before me  
by the said deponent this  
the . . . . day of April 2010 at. . . .

COMMISSIONER OF AFFIDAVIT  
SUPREME COURT OF BANGLADESH  
HIGH COURT DIVISION, DHAKA

**AFFIDAVIT**

I, Ambassador (Retd.) Mohsin Ali Khan, son of ... .. ,  
Executive Director of Bangladesh Legal Aid and Services Trust  
(BLAST) of 1/1, pioneer Road (3<sup>rd</sup> floor), YMCA Bhaban,  
Kakrail, Dhaka, Police Station- Ramna, District- Dhaka, by  
profession social worker, aged about ... years, by nationality

Bangladeshi by birth do hereby solemnly affirm and say as follows:

1. That I am the Executive Director of the Petitioner organization No.3 and conversant with the facts and circumstances of this case and competent to swear this affidavit.
2. That the statements made above are true to the best of my knowledge and belief.

Prepared in my office  
Advocate

---

Deponent

The deponent is known to me and identified by me.

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Advocate

Solemnly affirmed before me  
by the said deponent this  
the . . . . day of April 2010 at. . . .

COMMISSIONER OF AFFIDAVIT  
SUPREME COURT OF BANGLADESH  
HIGH COURT DIVISION, DHAKA

**AFFIDAVIT**

I, Md. Mosharraf Hossain, son of ... .., Country  
Representative of Action for Disability and Development (ADD),

of ... .. , Police Station- Gulshan, District- Dhaka, by profession social worker, aged about ... years, by nationality Bangladeshi by birth do hereby solemnly affirm and say as follows:

1. That I am the Country Representative of the Petitioner organization No.4 and conversant with the facts and circumstances of this case and competent to swear this affidavit.
2. That the statements made above are true to the best of my knowledge and belief.

Prepared in my office  
Advocate

\_\_\_\_\_  
Deponent

The deponent is known to me and identified by me.

\_\_\_\_\_  
Advocate

Solemnly affirmed before me  
by the said deponent this  
the . . . . day of April 2010 at. . . .

COMMISSIONER OF AFFIDAVIT  
SUPREME COURT OF BANGLADESH  
HIGH COURT DIVISION, DHAKA