

IN THE HIGH COURT OF JUDICATURE AT OF ANDHRA PRADESH.  
:: AT AMARAVATI.

C.C. No. of 2024

against  
W.P.(PIL) No.50 of 2023.

RUNNING INDEX

Sl. No.	Exhibit	Description of Document	Date of Document	Date of filing of Document	Page No.
1.		Petition & Affidavit in CC	24-01-2024	29-01-2024	1-6
2.		Copy of order passed in WP(PIL) No.50 of 2023	23-08-2023	-do-	7-17
3.		Copy of writ petition & affidavit in WP(PIL) No.50 of 2023	21-03-2023	-do-	18-58
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Dt: 24-01-2024,  
Amaravati.

*Priyanka*  
Counsel for Petitioner/s

MEMORANDUM OF CONTEMPT CASE  
(Under Sections 10 to 12 of Contempt of Courts Act)  
IN THE HIGH COURT OF JUDICATURE AT OF ANDHRA PRADESH  
:: AT AMARAVATI.

C.C. No.                      of 2024

against  
W.P.(PIL) No.50 of 2023

Between:

Gaggara Krishna Rao S/o. Late Pedda Anjaiah,  
Age: 63 years, Occ: Social Service,  
R/o.#57-13-15/3, New Postal Colony,  
Padamata, Vijayawada-10, Krishna District,  
Andhra Pradesh-520010.

... Petitioner/Petitioner


and

Mr. S. Satyanarayana,  
Commissioner of Endowments,  
Government of Andhra Pradesh, Gollapudi,  
Vijayawada Rural Mandal, Krishna District,  
Andhra Pradesh.

... Respondent/Respondent

For the reasons stated in the accompanying affidavit, it is therefore prayed that this Hon'ble court may be pleased to summon and punish the respondents for their willful and deliberate disobedience in implementing the interim order dt.23-08-2023 passed by this Hon'ble Court in WP(PIL) No.50 of 2023 U/Secs.10 to 12 of the Contempt of Courts Act and pass such other order or orders as this Hon'ble Court may deem fit and proper in the interest of justice and circumstances of the case.

Amaravati,  
Dt.24-01-2024.

  
Counsel for the Petitioner/s

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IN THE HIGH COURT OF JUDICATURE AT OF ANDHRA PRADESH  
:: AT AMARAVATI.

C.C. No. of 2024

against  
W.P.(PIL) No.50 of 2023

Between:

Gaggara Krishna Rao S/o. Late Pedda Anjaiah,  
Age: 63 years, Occ: Social Service,  
R/o.#57-13-15/3, New Postal Colony,  
Padamata, Vijayawada-10, Krishna District,  
Andhra Pradesh-520010.

... Petitioner/Petitioner

and

Mr. S. Satyanarayana,  
Commissioner of Endowments,  
Government of Andhra Pradesh, Gollapudi,  
Vijayawada Rural Mandal, Krishna District,  
Andhra Pradesh.

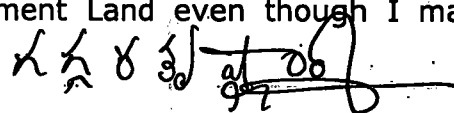
... Respondent/Respondent

AFFIDAVIT

I, Gaggara Krishna Rao S/o. Late Pedda Anjaiah, Age: 63 years, Occ:  
Social Service, R/o.#57-13-15/3, New Postal Colony, Padamata, Vijayawada-10,  
Krishna District, Andhra Pradesh-520010, do hereby solemnly affirm and  
sincerely state, on oath, as follows -

1. I am the petitioner herein and also in main writ petition; as such, I am well acquainted with the facts of the case.
2. I state that the main WP(PIL) was filed aggrieved by the action of the respondents in not taking any action to stop the illegal construction of brick kilns by the encroachers on land in Sy.No.300 to an extent of Acs.17.00 to Acs.20.00 out of total extent of Ac.29.01 cents owned by Sri Santhana Venugopala Swamy Temple and Sri Anjaneya Devasthanam situated at Kavuluru Village, G.Konduru Mandal, Krishna District which is an Endowment Land even though I made





representation dt.26-12-2022 made through SPANDANA vide Application No.NTR202212261538 and 24-01-2023 to the 2<sup>nd</sup> respondent and on 24-01-2023 to the 12<sup>th</sup> respondent requesting them to take action as illegal, arbitrary, discriminative, mala fide, unjust, colorable exercise of powers besides violative of the Arts.14 & 21 of the Constitution of India upon calling the records relating to land particulars in survey numbers mentioned in representation, dt.07-09-2021 and legal notice dt.25-09-2021.

3. When the matter came up for admission, on 23-08-2023, this Hon'ble Court was pleased to grant the order as follows -

"The present Public Interest Litigation has been filed seeking the issuance of a writ of Mandamus for directing the official respondents to stop the illegal construction of Brick kilns by encroachers on the land bearing Sy.No.300 to the extent of Ac.17.00 cents to Ac.20.00 cents, which is stated to be owned by Sri Santhana Venugopala Swamy Temple and Sri Anjaneya Devasthanam situate at Kavuluru village in Krishna District.

2. It is stated that the aforementioned parcel of land is an endowment land.

3. Response has been filed by the respondents including respondent No.7, i.e., the Commissioner, Endowments Department, wherein it is stated that the subject matter of the present PIL is in fact notified in the list under Section 22-A(1)(c) of the Registration Act as a prohibited property and belongs to the Temple. It is further averred that steps are being taken to evict the encroachers from the land in question.

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4. In that view of the matter, we dispose of this WP (PIL) with liberty to respondent No.7 to protect the land in question by taking such steps as are otherwise permissible in law. The unofficial respondents shall be given an opportunity of being heard before taking any such action. No order as to costs. Pending miscellaneous applications, if any, shall stand closed."

4. After granting of said order by this Hon'ble Court, orally, I brought the same to the kind notice of respondent and requested him to protect the Temple Land (Sri Santhana Venugopala Swamy Temple and Sri Anjaneya Devasthanam situate at Kavuluru village in Krishna District) as per this Hon'ble Court's order but, in vain.

5. The same is nothing but, deliberant and willful violation of the order of this Hon'ble Court. The respondent is the custodian of Temple property but, he himself had hands in gloves with said encroachers; as such, he kept quite as silent spectator by allowing illegal encroachers to construct Brick Kilns in lands of Sri Santhana Venugopala Swamy Temple and Sri Anjaneya Devasthanam situate at Kavuluru village in Krishna District admeasuring to an extent of Ac.17.00 Cents to Ac.20.99 Cents respectively situated in Sy. No.300.

6. As stated in writ affidavit the respondents have hands in gloves with said encroachers. Every month the respondent has been getting bribes from the said illegal encroachers. The respondent can initiate all possible steps against the respondent including initiating civil and criminal

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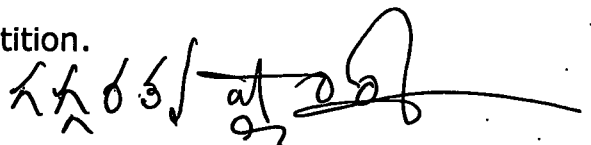
proceedings against the responsible but, he is not doing the same only for the reason that the said encroachers have been influencing the respondent besides revenue and police department by offering them bribes. But, till date, the respondent did not initiate action against the real culprit; as such, having no other option, I am forced to instant contempt proceedings against the respondent.

7. The action of the respondent in not adhering to the above stated order passed by this Hon'ble Court is nothing but, deliberate violation of interim orders of this Hon'ble Court; hence, the respondent is liable to be prosecuted and punished under the provisions of Contempt of Courts Act.

8. From the above facts, it is clear that the respondent is showing intentional and deliberate disobedience towards the order passed by this Hon'ble Court for which he is liable to be prosecuted and punished under the provisions of the Contempt of Courts Act. In view of the facts and circumstances stated above, I have no other effective alternative to see to implement the order of this Hon'ble Court except to initiate contempt proceedings.

9. I crave leave of this Hon'ble Court to refer the pleadings taken in the affidavit filed in support of the above Public Interest Litigation i.e., WP(PIL) No.50 of 2023 and the material filed therein as part and parcel of this contempt proceedings to avoid repetition.

22/06/23



For the reasons stated above, it is therefore prayed that this Hon'ble Court may be pleased to summon and punish the respondents for their willful and deliberate disobedience in implementing the interim order dt.23-08-2023 passed by this Hon'ble Court in WP(PIL) No.50 of 2023 U/Secs.10 to 12 of the Contempt of Courts Act and pass such other order or orders as this Hon'ble Court may deem fit and proper in the interest of justice and circumstances of the case.

Last page corrections

Solemnly affirmed and signed  
before me on this the 24<sup>th</sup> day of  
January, 2024 at Amaravati.

  
DEPONENT

Before me



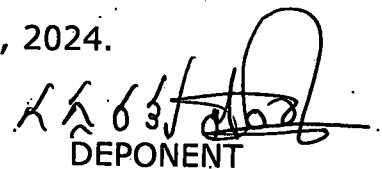
Advocate :: Amaravati.

VERIFICATION

I, Gaggara Krishna Rao S/o. Late Pedda Anjaiah, Age: 63 years, Occ: Social Service, R/o.#57-13-15/3, New Postal Colony, Padamata, Vijayawada-10, Krishna District, Andhra Pradesh-520010, being the petitioner/person acquainted with the facts do hereby verify and state that the contents of the above paras are true to my personal knowledge based on records.

Verified at Amaravati on this the 24<sup>th</sup> day of January, 2024.

  
ADVOCATE

  
DEPONENT

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P1



IN THE HIGH COURT OF ANDHRA PRADESH :: AMARAVATI  
(Special Original Jurisdiction)

WEDNESDAY, THE TWENTY THIRD DAY OF AUGUST  
TWO THOUSAND AND TWENTY THREE

PRESENT

HON'BLE MR. JUSTICE DHIRAJ SINGH THAKUR, CHIEF JUSTICE  
AND  
HON'BLE SRI JUSTICE A. V. SESA SAI

WP(PIL) NO: 50 OF 2023

Between:

Gaggara Krishna Rao S/o. Late Pedda Anjalai,  
Age: 63 years, Occ: Social Service,  
R/o.#57-13-15/3, New Postal Colony,  
Padamata, Vijayawada-10, Krishna District,  
Andhra Pradesh-520 010.  
Petitioner's Voter ID Card No.AZZ0258228  
Petitioner's Pan Card No.AJSPG9167F  
Petitioner's Aadhaar Card No.6043 5557 2626  
Petitioner's Mobile No.94410 00569

... Petitioner/s

and

1. The State of Andhra Pradesh,  
Rep. by its Principal Secretary,  
Revenue Department, A.P. Secretariat,  
Amaravati, Andhra Pradesh.
2. The District Collector,  
Krishna District, Andhra Pradesh.
3. the Joint Collector,  
Vijayawada Division, Krishna District,  
Andhra Pradesh.
4. The Sub-Collector,  
Vijayawada Division, Krishna District,  
Andhra Pradesh.
5. The Tahsildar,  
G.Konduru Mandal, Krishna District,  
Andhra Pradesh.
6. The State of Andhra Pradesh,  
Rep. by its Principal Secretary,  
Endowment Department, A.P. Secretariat,  
Amaravati, Andhra Pradesh.



7. The Endowment Commissioner,  
Gollapudi, Vijayawada Rural Mandal,  
Krishna District, Andhra Pradesh.

8. The Additional Commissioner,  
Endowment Department, Gollapudi,  
Vijayawada Rural Mandal, Krishna District,  
Andhra Pradesh.

9. The Deputy Commissioner,  
Endowment Department, Gollapudi,  
Vijayawada Rural Mandal, Krishna District,  
Andhra Pradesh.

10. The Assistant Commissioner,  
Endowment Department, Near old Bus Stand,  
Governorpet, Vijayawada, Krishna District,  
Andhra Pradesh-520 002.

11. The Executive Officer,  
Sri Santhana Venugopala and anjaneya Swamy Temple  
Kavuluru Village, G.Konduru Mandal,  
Krishna District, Andhra Pradesh.

12. The Executive Engineer,  
Pollution Control Board, Gurnanank Colony,  
Vijayawada, Krishna District, Andhra Pradesh.

... Respondents

13. Bhogineni Ravindra Rao, S/o. Raja Gopala Rao, Aged about 64 years,  
R/o. Kowlur Village, G.Kondur Mandal, Krishna District, AP

14. Bhogineni Murali Krishna, S/o. Appayya, Aged about 75 years,  
R/o. Kowlur Village, G.Kondur Mandal, Krishna District, AP

15. Bhogineni Venu, S/o. Dharma Rao, Aged about 47 years,  
R/o. Kowlur Village, G.Kondur Mandal, Krishna District, AP

16. Bhogineni Harshavardhan Rao, S/o. Surya Prakash Rao, Aged about 79 years,  
R/o. Kowlur Village, G.Kondur Mandal, Krishna District, Andhra Pradesh

17. Bhogineni Bhanu Prakash, S/o. Ravindra Rao, Aged about 38 years,  
R/o. Kowlur Village, G.Konduru Mandal, Krishna District, Andhra Pradesh

18. Bhogineni Tirupati Rao, S/o. Appayya, Aged about 82 years, Shantinagar,  
Surya High School, Kondapalli Village, Ibrahimpatnam Mandal,  
Krishna District, AP

19. Vemulapalli Ramana Rao, S/o. Krishna Murthy, Aged about 61 years,  
Near Old Telephone Exchange, Boy's High School Road, Ibrahimpatnam Mandal,  
Krishna District, AP

20. Vemulapalli Krishna Murthy, S/o. Narasaiah Kondapalli, Aged about 90 years,  
Near Old Telephone Exchange, Boy's High School Road, Ibrahim. Mandal,

21. Bhogineni Rama Krishna, S/o. Harsha Vardhan Rao, Aged about 49 years,  
R/o. Kowlur Village, G.Konduru Mandal, Krishna District, AP

Respondent Nos.13 and 21 implemented as per Court Order dated 09.08.2023  
vide I.A.No.2 of 2023 in W.P.(PIL).No.50 of 2023.

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(9)

Petition under Article 226 of the Constitution of India praying that in the circumstances stated in the affidavit filed therewith, the High Court may be pleased to issue a writ or order, orders or directions more particularly one in the nature of Writ of Certiorari, Mandamus - 1) declaring the action of the respondents in not taking any action to stop the illegal construction of brick kilns by the encroachers on land in Sy.No.300 to an extent of Acs.17.00 to Acs.20.00 out of total extent of Ac.29.01 cents owned by Sri Santhana Venugopala Swamy Temple and Sri Anjaneya Deva Sthanam situated at Kavuluru Village, G.Konduru Mandal, Krishna District which is a Endowment Land even though I made representation dt.26-12-2022 made through SPANDANA vide Application No.NTR202212261538 and 24-01-2023 to the 2nd respondent and on 24-01-2023 to the 12th respondent requesting them to take action as illegal, arbitrary, discriminative, mala fide, unjust, colorable exercise of powers besides violative of the Arts.14 and 21 of the Constitution of India upon calling the records relating to land particulars in survey numbers mentioned in representation, dt.07-09-2021 and legal notice, dt.25-09-2021 and ii) consequently, direct the respondents to resume the Temple land in Sy.No.300 to an extent of Acs.17.00 to Acs.20.00 out of total extent of Ac.29.01 cents owned by Sri Santhana Venugopala Swamy Temple and Sri Anjaneya Deva Sthanam situated at Kavuluru Village, G.Konduru Mandal, Krishna District.

**IA NO: 1 OF 2023**

Petition under Section 151 CPC praying that in the circumstances stated in the affidavit filed in support of the petition, the High Court may be pleased to direct the respondents stop the illegal construction of brick kilns by the encroachers on land in Sy.No.300 to an extent of Acs.17.00 to Acs.20.00 out of total extent of Ac.29.01 cents owned by Sri Santhana Venugopala Swamy Temple and Sri Anjaneya Deva Sthanam situated at Kavuluru Village, G.Konduru Mandal, Krishna District which is a Endowment Land and pass such other order or orders as this Hon'ble Court may deem fit and proper in the interest of justice.

**IA NO: 3 OF 2023**

Between:

1. Bhogineni Ravindra Rao S/o. Raja Gopala Rao  
Aged about 64 years, R/o. Kowlur Village  
G. Kondur Mandal, Krishna District, AP
2. Bhogineni Murali Krishna S/o. Appayya  
Aged about 75 years, R/o. Kowlur Village,  
G. Kondur Mandal, Krishna District, AP
3. Bhogineni venu S/o. Dharma Rao  
Aged about 47 years, R/o. Kowlur Village  
G. Kondur Mandal, Krishna District, AP
4. Bhogineni Harshavardhan Rao  
S/o. Surya Prakash Rao, aged about 79 years  
R/o. Kowlur Village, G. Kondur Mandal  
Krishna District, Andhra Pradesh
5. Bhogineni Bhanu Prakash  
S/o. Ravindra Rao, aged about 38 years  
R/o. Kowlur Village, G. Kondur Mandal  
Krishna District, Andhra Pradesh
6. Bhogineni Tirupati Rao S/o. Appayya  
Aged about 82 years, Shantinagar  
Sujya High School, Kondapalli Village  
Ibrahimpatnam Mandal, Krishna District, AP
7. Vemulapalli Ramana Rao S/o. Krishna Murthy  
Aged about 61 years, Near Old Telephone Exchange  
Boy's High School Road, Ibrahimpatnam Mandal  
Krishna District, AP
8. Vemulapalli Krishna Murthy  
S/o. Narasiah Kondapalli  
Aged about 90 years, Near Old Telephone Exchange  
Boy's High School Road, Ibrahimpatnam Mandal  
Krishna District, AP

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9. Bhogineni Rama Krishna S/o. Harsha Vardhan Rao  
Aged about 49 years, R/o. Kowlur Village  
G. Kondur Mandal, Krishna District, AP

Petitioners/Proposed Respondent Nos.  
13 to 21

AND

1. GAGGARA KRISHNA RAO

S/o Late Pedda Anjaiah Age 63 years  
Occ Social Service R/o 571315/3  
New Postai Colony Padamata Vijayawada 10  
Krishna District Andhra Pradesh 520 010  
Petitioners Voter ID Card No AZZ0258228  
Petitioners Pan Card No AJSPG9167F  
Petitioners Aadhaar Card No 6043 5557 2626  
Petitioners Mobile No 94410 00569

Respondent/Petitioner

2. The State of Andhra Pradesh  
Rep. by its Principal Secretary  
Revenue Department,  
A.P. Secretariat, Velagapudi, Amaravati.

3. The District Collector  
Krishna District, Andhra Pradesh

4. The Joint Collector  
Vijayawada Division, Krishna District  
Andhra Pradesh

5. The Sub. Collector  
Vijayawada Division, Krishna District  
Andhra Pradesh.

6. The Tahsildar  
G. Konduru Mandal, Krishna District  
Andhra Pradesh

7. The State of Andhra Pradesh  
Rep. by its Principal Secretary  
Endowment Department, A.P. Secretariat  
Amaravati, Andhra Pradesh.

8. The Endowments Commissioner  
Gollapudi, Vijayawada Rural Mandal  
Krishna District, Andhra Pradesh

9. The Additional Commissioner  
Endowment Department, Gollapudi  
Vijayawada Rural Mandal, Krishna District  
Andhra Pradesh

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10. The Deputy Commissioner  
Endowments Department, Gollapudi  
Vijayawada Rural Mandal, Krishna District  
Andhra Pradesh
11. The Assistant Commissioner  
Endowments Department, Near Old Bus Stand  
Governorpet, Vijayawada, Krishna District  
Andhra Pradesh - 520 002
12. The Executive Officer  
Kavuluru Village, G.Konduru Mandal  
Krishna District, Andhra Pradesh
13. The Executive Engineer  
Pollution Control Board, Gurunanak Colony  
Vijayawada, Krishna District, Andhra Pradesh

Respondents/  
Respondent Nos.1 to 12

Petition under Section 151 CPC praying that in the circumstances stated in the affidavit filed in support of the petition, the High Court may be pleased to vacate the interim order dt.18-04-2023 passed in W.P.(PIL) No.50/2023.

IA NO: 4 OF 2023

Between:

1. Bhogineni Ravindra Rao S/o.Raja Gopala Rao  
Aged about 64 years, R/o.Kowlur Village  
G.Kondur Mandal, Krishna District, AP
2. Bhogineni Murali Krishna S/o.Appayya  
Aged about 75 years, R/o.Kowlur Village,  
G.Kondur Mandal, Krishna District, AP
3. Bhogineni venu S/o.Dharma Rao  
Aged about 47 years, R/o.Kowlur Village  
G.Kondur Mandal, Krishna District, AP
4. Bhogineni Harshavardhan Rao  
S/o.Surya Prakash Rao, aged about 79 years  
R/o.Kowlur Village, G.Kondur Mandal  
Krishna District, Andhra Pradesh
5. Bhogineni Bhanu Prakash  
S/o.Ravindra Rao, aged about 38 years  
R/o.Kowlur Village, G.Kondur Mandal  
Krishna District, Andhra Pradesh
6. Bhogineni Tirupati Rao S/o.Appayya  
Aged about 82 years, Shantinagar  
Sujrya High School, Kondapalli Village  
Ibrahimpattanam Mandal, Krishna District, AP
7. Vemulapalli Ramana Rao S/o.Krishna Murthy  
Aged about 61 years, Near Old Telephone Exchange  
Boy's High School Road, Ibrahimpattanam Mandal  
Krishna District, AP
8. Vemulapalli Krishna Murthy  
S/o.Narasaiiah Kondapalli  
Aged about 90 years, Near Old Telephone Exchange  
Boy's High School Road, Ibrahimpattanam Mandal  
Krishna District, AP

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9. Bhogineni Rama Krishna S/o. Harsha Vardhan Rao  
Aged about 49 years, R/o. Kowlur Village  
G. Kondur Mandal, Krishna District, AP

Petitioners/Proposed Respondent Nos.  
13 to 21

AND

1. GAGGARA KRISHNA RAO

S/o Late Pedda Anjaiah Age 63 years  
Occ Social Service R/o 571315/3  
New Postai Colony Padamata Vijayawada 10  
Krishna District Andhra Pradesh 520 010  
Petitioners Voter ID Card No AZZ0258228  
Petitioners Pan Card No AJSPG9167F  
Petitioners Aadhaar Card No 6043 5557 2626  
Petitioners Mobile No 94410-00569

Respondent/Petitioner

2. The State of Andhra Pradesh

Rep. by its Principal Secretary  
Revenue Department,  
A.P. Secretariat, Velagapudi, Amaravati.

3. The District Collector

Krishna District, Andhra Pradesh

4. The Joint Collector

Vijayawada Division, Krishna District  
Andhra Pradesh

5. The Sub. Collector

Vijayawada Division, Krishna District  
Andhra Pradesh.

6. The Tahsildar

G. Konduru Mandal, Krishna District  
Andhra Pradesh

7. The State of Andhra Pradesh

Rep. by its Principal Secretary  
Endowment Department, A.P. Secretariat  
Amaravati, Andhra Pradesh.

8. The Endowments Commissioner

Gollapudi, Vijayawada Rural Mandal  
Krishna District, Andhra Pradesh

9. The Additional Commissioner

Endowment Department, Gollapudi  
Vijayawada Rural Mandal, Krishna District  
Andhra Pradesh

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10. The Deputy Commissioner  
Endowments Department, Gollapudi  
Vijayawada Rural Mandal, Krishna District  
Andhra Pradesh
11. The Assistant Commissioner  
Endowments Department, Near Old Bus Stand  
Governorpet, Vijayawada, Krishna District  
Andhra Pradesh - 520 002
12. The Executive Officer  
Kavuluru Village, G. Konduru Mandal  
Krishna District, Andhra Pradesh
13. The Executive Engineer  
Pollution Control Board, Gurunanak Colony  
Vijayawada, Krishna District, Andhra Pradesh

... Respondents/  
Respondent Nos. 1 to 12

Petition under Section 151 CPC praying that in the circumstances stated in the affidavit filed in support of the petition, the High Court may be pleased to permit to receive documents otherwise petitioners will suffer irreparable loss.

**Counsel for the Petitioner : M/s. PRIYANKA SONKAMBLE**

**Counsel for the Respondent Nos. 1 to 5 : GP FOR REVENUE**

**Counsel for the Respondent Nos. 6 to 10 : GP FOR ENDOWMENTS**

**Counsel for the Respondent No. 11 : SRI K. MADHAVA REDDY,  
SC FOR ENDOWMENTS**

**Counsel for the Respondent No. 11 : M/s. P. PADMAVATHI, ADVOCAT**  
**Counsel for the Respondent No. 12 : SRI V. SURENDRA REDDY, SC FOR PCB**

**Counsel for the Respondent Nos. 13 to 21 : SRI S. NAGESWARAREDDY**

**The Court made the following: ORDER**

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14

IN THE HIGH COURT OF ANDHRA PRADESH: AMARAVATI

HON'BLE MR. JUSTICE DHIRAJ SINGH THAKUR, CHIEF JUSTICE

&

HON'BLE MR. JUSTICE A. V. SESA SAI

**WRIT PETITION (PIL).No.50 of 2023**

Gaggara Krishna Rao,  
S/o.Late Pedda Anjaiah,  
Age: 63 years, Occ: Social Service,  
R/o.#57-13-15/3, New Postal Colony,  
Padamata, Vijayawada-10, Krishna District,  
Andhra Pradesh-520 010.  
Petitioner's Voter ID Card No.AZZ0258228  
Petitioner's Pan Card No.AJSPG9167F  
Petitioner's Aadhaar Card No.6043 5557 2626  
Petitioner's Mobile No.94410 00569

....  
Petitioner

Versus

The State of Andhra Pradesh,  
Rep., by its Principal Secretary,  
Revenue Department, A.P Secretariat,  
Amaravati, Andhra Pradesh and 20 others.

....  
Respondents

**Date : 23.08.2023**

**P.C:**

The present Public Interest Litigation has been filed seeking the issuance of a writ of Mandamus for directing the official respondents to stop the illegal construction of Brick kilns by encroachers on the land bearing Sy.No.300 to the extent of Ac.17.00 cents to Ac.20.00 cents, which is stated to be owned by Sri Santhana Venugopala Swamy Temple and Sri Anjaneya Devasthanam situate at Kavuluru village in Krishna District.

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2. It is stated that the aforementioned parcel of land is an endowment land.

3. Response has been filed by the respondents including respondent No.7, i.e., the Commissioner, Endowments Department, wherein it is stated that the subject matter of the present PIL is in fact notified in the list under Section 22-A(1)(c) of the Registration Act as a prohibited property and belongs to the Temple. It is further averred that steps are being taken to evict the encroachers from the land in question.

4. In that view of the matter, we dispose of this WP (PIL) with liberty to respondent No.7 to protect the land in question by taking such steps as are otherwise permissible in law. The unofficial respondents shall be given an opportunity of being heard before taking any such action. No order as to costs.

Pending miscellaneous applications, if any, shall stand closed.

Sd/- S. SRINIVASA PRASAD  
ASSISTANT REGISTRAR

//TRUE COPY//

*ca*  
SECTION OFFICER

To,

1. The Principal Secretary, Revenue Department, State of AP, A.P. Secretariat, Amāravati, Andhra Pradesh.
2. The District Collector, Krishna District, Andhra Pradesh.
3. The Joint Collector, Vijayawada Division, Krishna District, Andhra Pradesh.
4. The Sub-Collector, Vijayawada Division, Krishna District, Andhra Pradesh.
5. The Tahsildar, G.Konduru Mandal, Krishna District, Andhra Pradesh.



6. The Principal Secretary, Endowment Department, State of Andhra Pradesh, A.P. Secretariat, Amaravati, Andhra Pradesh.
7. The Endowment Commissioner, Gollapudi, Vijayawada Rural Mandal, Krishna District, Andhra Pradesh.
8. The Additional Commissioner, Endowment Department, Gollapudi, Vijayawada Rural Mandal, Krishna District, Andhra Pradesh.
9. The Deputy Commissioner, Endowment Department, Gollapudi, Vijayawada Rural Mandal, Krishna District, Andhra Pradesh.
10. The Assistant Commissioner, Endowment Department, Near old Bus Stand, Governorpeta, Vijayawada, Krishna District, Andhra Pradesh-520 002.
11. The Executive Officer, Sri Santhana Venugopala and anjaneya Swamy Temple Kavuluru Village, G.Konduru Mandal, Krishna District, Andhra Pradesh.
12. The Executive Engineer, Pollution Control Board, Gurunannak Colony, Vijayawada, Krishna District, Andhra Pradesh.
13. One CC to M/s. Priyanka Sonkamble, Advocate [OPUC]
14. Two CCs to GP for Revenue, High Court of Andhra Pradesh. [OUT]
15. Two CCs to GP for Endowments, High Court of Andhra Pradesh. [OUT]
16. One CC to Sri K. Madhava Reddy, SC for Endowments (OPUC)
17. One CC to Sri P. Padmavathi, SC for Endowments (OPUC)
18. One CC to Sri V. Suredra Reddy, SC for PCB (OPUC)
19. One CC to Sri S. Nageswarareddy, Advocate [OPUC]
20. Two C.D. Copies

Cnr

M.M. Bora

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**HIGH COURT**

**DATED:23/08/2023**

**ORDER**

**WP(PIL).No.50 of 2023**

(23)  
M.A. Bar  
31/8/23

**DISPOSING OF THE WP(PIL)  
WITHOUT COSTS**

Xerox to be  
filled  
P2 (18)

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MEMORANDUM OF WRIT PETITION  
(SPECIAL ORIGINAL JURISDICTION)  
(UNDER ART.226 OF THE CONSTITUTION OF INDIA)

IN THE HIGH COURT OF JUDICATURE OF ANDHRA PRADESH  
:: AT AMARAVATI

W.P. (PIL) No. 50 of 2023

Between:

Gaggara Krishna Rao S/o. Late Pedda Anjaiah,  
Age: 63 years, Occ: Social Service,  
R/o.#57-13-15/3, New Postal Colony,  
Padamata, Vijayawada-10, Krishna District,  
Andhra Pradesh-520 010.  
Petitioner's Voter ID Card No.AZZ0258228  
Petitioner's Pan Card No.AJSPG9167F  
Petitioner's Aadhaar Card No.6043 5557 2626  
Petitioner's Mobile No.94410 00569

and

.... Petitioner/s

1. The State of Andhra Pradesh,  
Rep. by its Principal Secretary,  
Revenue Department, A.P. Secretariat,  
Amaravati, Andhra Pradesh.
2. The District Collector,  
Krishna District, Andhra Pradesh.
3. The Joint Collector,  
Vijayawada Division, Krishna District,  
Andhra Pradesh.
4. The Sub-Collector,  
Vijayawada Division, Krishna District,  
Andhra Pradesh.
5. The Tahsildar,  
G.Konduru Mandal, Krishna District,  
Andhra Pradesh.
6. The State of Andhra Pradesh,  
Rep. by its Principal Secretary,  
Endowment Department, A.P. Secretariat,  
Amaravati, Andhra Pradesh.

7. The Endowment Commissioner,  
Gollapudi, Vijayawada Rural Mandal,  
Krishna District, Andhra Pradesh.

8. The Additional Commissioner,  
Endowment Department, Gollapudi,  
Vijayawada Rural Mandal, Krishna District,  
Andhra Pradesh.

9. The Deputy Commissioner,  
Endowment Department, Gollapudi,  
Vijayawada Rural Mandal, Krishna District,  
Andhra Pradesh.

10. The Assistant Commissioner,  
Endowment Department, Near old Bus Stand,  
Governorpetta, Vijayawada, Krishna District,  
Andhra Pradesh-520 002.

11. The Executive Officer,  
Kavuluru Village, G.Konduru Mandal,  
Krishna District, Andhra Pradesh.

12. The Executive Engineer,  
Pollution Control Board, Gurunannak Colony,  
Vijayawada, Krishna District, Andhra Pradesh.

... Respondents

The address for service on the above named Petitioners is that of their counsel Priyanka Sonkamble, Advocate, #Flat NO.115, Block-A, Poojitha's Water Front Apartments, Near YSRCP Party Office, Tadepalli, Guntur District, Andhra Pradesh.

For the reasons stated in the accompanying affidavit, it is hereby prayed that this Hon'ble Court may be pleased to issue a writ or order, orders or directions more particularly one in the nature of Writ of Certiorarified Mandamus -

- i) declaring the action of the respondents in not taking any action to stop the illegal construction of brick kilns by the encroachers on land in Sy.No.300 to an extent of Acs.17.00 to Acs.20.00 out of total extent of Ac.29.01 cents owned by Sri Santhana Venugopala Swamy Temple and Sri Anjaneya Deva

(20)

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Sthanam situated at Kavuluru Village, G.Konduru Mandal, Krishna District which is a Endowment Land even though I made representation dt.26-12-2022 made through SPANDANA vide Application No.NTR202212261538 and 24-01-2023 to the 2<sup>nd</sup> respondent and on 24-01-2023 to the 12<sup>th</sup> respondent requesting them to take action as illegal, arbitrary, discriminative, mala fide, unjust, colorable exercise of powers besides violative of the Arts.14 & 21 of the Constitution of India upon calling the records relating to land particulars in survey numbers mentioned in representation, dt.07-09-2021 and legal notice, dt.25-09-2021; and

ii) consequently, direct the respondents to resume the Temple land in Sy.No.300 to an extent of Acs.17.00 to Acs.20.00 out of total extent of Ac.29.01 cents owned by Sri Santhana Venugopala Swamy Temple and Sri Anjaneya Deva Sthanam situated at Kavuluru Village, G.Konduru Mandal, Krishna District;

and pass such other order or orders or directions as this Hon'ble Court may deem fit and proper in the circumstances of case.

Dt: 23-03-2023,  
Amaravati.

Counsel for the Petitioner/s

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Krishna District

IN THE HIGH COURT OF  
JUDICATURE OF ANDHRA PRADESH  
:: AT AMARAVATI

W.P. (PIL) No. of 2023

Between:

Gaggara Krishna Rao

... Petitioner/s

and

The State of Andhra Pradesh &  
others

... Respondent/s

WRIT PETITION (PIL)

Filed on:

Filed by:

M/s. PRIYANKA SONKAMBLE (14566)  
Advocate

Counsel for Petitioner/s

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IN THE HIGH COURT OF JUDICATURE AT OF ANDHRA PRADESH  
:: AT AMARAVATI.

W.P.(PIL). No.

of 2023

Between:

Gaggara Krishna Rao

... Petitioner

and

The State of Andhra Pradesh & others

... Respondents

LIST OF EVENTS

Annexure - I

Sl. Nos	Date	Description of the Events	Para Nos	Page Nos
1	-nil-	The petitioner states that he is a social worker who fights to safeguard the lands of temples especially the temple lands situated in Krishna District from the encroachers. He made several complaints to the concerned officers against the encroachers who encroaches endowment lands.	5.1	
2	1932	The petitioner states that the land in Sy.No.300 to an extent to Ac.29.01 cents situated at Kavuluru Village, G.Konduru Mandal, Krishna District was an Inam land allotted to the "Temple Dancing Services" for rendering services in "SRI SANATHANA VENU GOPALA SWAMY" in year 1932. As per the Resurvey Resettlement Register the land was classified as "Temple Dancing Service" at column-10 in Village No.25. No individual name was shown at the columns and it was not a personal grant. The land at column-10 is shown as "Sri Santhana Venu Gopala Swamy varu (Aata Service Nimittam)" it means the land was allotted to the persons who were rendering	5.2	

		Dancing Services in "Sri Santhana Venu Gopala Swamy Temple".		
3	1947 & 1988	The Devadasi in the temple i.e., dance in the temple is totally prohibited in the state of Madras and also in the state of Andhra Pradesh by enacting statute known as "Madras Devadasis (Prevention of Dedication) Act, 1947, which is adopted by the state of Andhra Pradesh known as Andhra Pradesh Devadasis (Prevention of Dedication) Act, 1988. Thus, rendering service of Devadasis in the temple i.e., dance in the temple is totally prohibited and it is an offence. The Service Inam is burdened with service and as long as Inamdars are rendering service they are entitled to enjoy the property.	5.3	
4	1988	When the Devadasi system itself is abolished by Act No.10 of 1988. In those circumstances the 2 <sup>nd</sup> respondent i.e., District Collector has the power to resume the land, in accordance with the procedure prescribed under Chapter-II, Part-II of the B.S.No.54 and 55.	5.4	
5	-nil-	Recently the petitioner came to know that some unknown persons are constructing brick kilns in the above stated land which belongs to "Sri Santhana Venu Gopala Swamy varu" and changing the nature of land by destroying the cultivable land. The unknown persons without possessing any right over the property and without converting the land from agricultural to non-agricultural land destroyed almost Acs.17.00 to Acs.20.00 of land by starting construction of brick kiln. At any point of time the encroachers start the process of making of bricks. If it happens the cultivable land completely become non-cultivable land and it also	5.5	



		affects the adjacent lands due to pollution arises out of making the bricks.		
6	26-08-2021 & 2018	As per G.O.Ms.No.227 dt.26-08-2021 Revenue (DA & LR) Department, notification was issued informing that amendments were made to the Andhra Pradesh Agricultural Land (Conversion for Non-Agricultural Purpose) Rules, 2018 in certain Rules	5.6	
7	2018	But, the respondent nos.2 to 5 without converting the agricultural land to non-agricultural land as per the Rules prescribed under Andhra Pradesh Agricultural Land (Conversion for Non-Agricultural Purpose) Rules, 2018 allowing the encroachers to construct the brick kiln on Sy.No.300 to an extent of Acs.17.00 to Acs.20.00 out of total extent of Ac.29.01 cents owned by Sri Santhana Venugopala Swamy Temple and Sri Anjaneya Deva Sthanam situated at Kavuluru Village, G.Konduru Mandal, Krishna District which is a Endowment Land.	5.7	
8	22-04-2010	As per G.O.Ms.No.80 dt.22-04-2010 certain guidelines were issued in respect of establishment of Brick kiln in the State of Andhra Pradesh. The Government, after careful examination of the matter, hereby issues the following guidelines for establishment of Brick Clamps in the State of Andhra Pradesh	5.8	
9	22-04-2010	The petitioner after coming to know the fact that the encroachers are constructing the Brick Kilns in the land belongs to Temple without following the guidelines issued as per G.O.Ms.No.80 dt.22-04-2010 and also the without converting the agricultural land into non-agricultural land as per the amendments in made in Rule.7 in the Andhra Pradesh Agricultural	5.9	

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		Land (Conversion for Non-Agricultural Purpose), started preparation for construction of the Brick Kilns in Sy.No.300 to an extent of Acs.17.00 to Acs.20.00 out of total extent of Ac.29.01 cents owned by Sri Santhana Venugopala Swamy Temple and Sri Anjaneya Deva Sthanam situated at Kavuluru Village, G.Konduru Mandal, Krishna District which is a Endowment Land.		
10	26-12-2022 24-01-2023 24-01-2023	Aggrieved by all the above things the petitioner a representations dt.26-12-2022 through SPANDANA vide Application No.NTR202212261538 and 24-01-2023 to the 2 <sup>nd</sup> respondent and on 24-01-2023 to the 12 <sup>th</sup> respondent requesting them to take action and remove the Brick Kiln construction immediately. But no action has been taken by the respondents till now. After making all the representations through reliable sources the petitioner came to know that prior to giving representations some people already gave complaints against the illegal construction of Brick Kilns by the encroachers in land in Sy.No.300 to an extent of Ac.17.00 to 20.00 out of total land of Ac.29.01 cents which was allotted for rendering "Dancing Services in Sri Santhana Venugopala Swamy Temple" under "Service Inam" situated at Kavuluru Village, G.Konduru Mandal, Krishna District.	5.10	
11	09-05-2022 04-12-2014	The petitioner also came to know through reliable sources that the 2 <sup>nd</sup> respondent vide R.C.E.88/2022 dt.09-05-2022 issued a request letter to the 4 <sup>th</sup> respondent seeking to conduct an enquiry as per rules in force and also for taking action against the illegal Construction of Brick Kiln in the land in Sy.No.300 to an extent of Ac.17 to 20 out of Ac.29.01 for	5.11	

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		<p>situated at Kavuluru Village, G.Konduru Mandal, Krishna District for resumption the petitioner also filing the Circular No.A3/4977/2014-4 dt.04-12-2014 which was issued by the Regional Joint Commissioner for resumption of Inam Lands as per the Inam Abolition Amendment Act, 16/2013.</p>		
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**ANNEXURE-II**

Under Article 226 of Constitution of India.  
Arts.14 & 21 of the Constitution of India.

Dt: 23-03-2023,  
Amaravati.

Counsel for the Petitioner/s

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IN THE HIGH COURT OF JUDICATURE OF ANDHRA PRADESH  
AT AMARAVATI

W.P.(PIL) No. of 2023

Between:

Gaggara Krishna Rao S/o. Late Pedda Anjaiah,  
Age: 63 years, Occ: Social Service,  
R/o.#57-13-15/3, New Postal Colony,  
Padamata, Vijayawada-10, Krishna District,  
Andhra Pradesh-520 010.

Petitioner's Voter ID Card No.AZZ0258228

Petitioner's Pan Card No.AJSPG9167F

Petitioner's Aadhaar Card No.6043 5557 2626

Petitioner's Mobile No.94410 00569

... Petitioner/s

and

1. The State of Andhra Pradesh,  
Rep. by its Principal Secretary,  
Revenue Department, A.P. Secretariat,  
Amaravati, Andhra Pradesh.

2. The District Collector,  
Krishna District, Andhra Pradesh.

3. The Joint Collector,  
Vijayawada Division, Krishna District,  
Andhra Pradesh.

4. The Sub-Collector,  
Vijayawada Division, Krishna District,  
Andhra Pradesh.

5. The Tahsildar,  
G.Konduru Mandal, Krishna District,  
Andhra Pradesh.

6. The State of Andhra Pradesh,  
Rep. by its Principal Secretary,  
Endowment Department, A.P. Secretariat,  
Amaravati, Andhra Pradesh.

7. The Endowment Commissioner,  
Gollapudi, Vijayawada Rural Mandal,  
Krishna District, Andhra Pradesh.

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8. The Additional Commissioner,  
Endowment Department, Gollapudi,  
Vijayawada Rural Mandal, Krishna District,  
Andhra Pradesh.

9. The Deputy Commissioner,  
Endowment Department, Gollapudi,  
Vijayawada Rural Mandal, Krishna District,  
Andhra Pradesh.

10. The Assistant Commissioner,  
Endowment Department, Near old Bus Stand,  
Governorpet, Vijayawada, Krishna District,  
Andhra Pradesh-520 002.

11. The Executive Officer,  
Kavuluru Village, G.Konduru Mandal,  
Krishna District, Andhra Pradesh.

12. The Executive Engineer,  
Pollution Control Board, Gurunannak Colony,  
Vijayawada, Krishna District, Andhra Pradesh.

... Respondents

**1. Particulars of the cause/order against which the petition is made:**

1.1. I submit that the above Public Interest Litigation is being filed challenging the action of the 2<sup>nd</sup> respondent in not resuming the land from the encroachers and also the action of the 1<sup>st</sup> to 12<sup>th</sup> respondents in not initiating steps to stop the construction of brick kilns by the encroachers in land in Sy.No.300 to an extent of Ac.17.00 to 20.00 out of total land of Ac.29.01 cents which was allotted for rendering "Dancing Services in Sri Santhana Venugopala Swamy Temple" under "Service Inam" situated at Kavuluru Village, G.Konduru Mandal, Krishna District which is a Endowment Land.

**2. Particulars of the Petitioner:**

2.1. I submit that I am the petitioner herein; as such, as such well acquainted with the facts of the case. I am the permanent resident of R/o.#57-13-15/3, New Postal Colony, Padamata, Vijayawada-10, Krishna District, Andhra Pradesh-520 010. I am a social activist and who fights to save the Endowment lands. I have been espousing the causes of needy in all walks of life. Besides to it, on my own, in independent capacity, I do even public service since I am a public-spirited person. Hence, I am interested in protecting the public properties.

**3. Locus standi:**

That the present petition is being filed by way of Public Interest Litigation and the petitioner has no personal interest in the matter. The petitioner is a taxpayer and a public-spirited person. As such, this Hon'ble Court has got both territorial and pecuniary jurisdiction to entertain the above Public Interest Litigation (PIL) under the Public Interest Litigation Rules, 2015, since the cause of action arose in Andhra Pradesh State, which is well within the jurisdiction of the Hon'ble Court.

3.1. I submit that I am filing this Writ Petition in the capacity of a responsible citizen of this country. I always think about prosperity of my Village, Mandal, District, State & Nation. Regarding the action of the 2<sup>nd</sup> respondent in not resuming the land from the encroachers and also the action of the 1<sup>st</sup> to 12<sup>th</sup> respondents in not initiating steps to stop the construction of brick kilns by the encroachers in land in Sy.No.300 to an extent of Ac.17.00 to 20.00 out of total land of Ac.29.01 cents which was allotted for rendering "Dancing Services in Sri Santhana Venugopala Swamy Temple" under "Service Inam" situated at Kavuluru Village, G.Konduru Mandal, Krishna District which is a Endowment Land. etc., So far, orally and through representation dt.26-12-2022 made via SPANDANA vide Application No.NTR202212261538 and 24-01-2023 to the 2<sup>nd</sup> respondent and on 24-01-2023 to the 12<sup>th</sup> respondent requesting them to stop the illegal construction of Brick Kilns and also requested to take necessary action.

**4. Declaration and understanding of the Petitioner:**

Gaggara Krishna Rao S/o. Late Pedda Anjaiah, Age: 63 years, Occ: Social Service, R/o.#57-13-15/3, New Postal Colony, Padamata, Vijayawada-10, Krishna District, Andhra Pradesh-520 010, now having temporarily come down to Amaravati, do hereby solemnly affirm and sincerely state, on oath, as follows:-

4.1. I state that this writ petition in the form of PIL is being filed in Public Interest; and I do not have any personal interest except public interest. I am approaching this Hon'ble Court with clean hands and open mind without any extraneous considerations and I have no intention to achieve any nefarious ends from this petition and clearly state that this petition is purely in the interest of the public.

4.2. The entire litigation costs, including the advocate's fee, which is very nominal, and other charges are being borne from my pocket.

4.3. I have conducted thorough research in the matter raised through this petition by obtaining available information from various sources and I also did research through internet etc., I have also gathered information from various other sources and also from those who are experts in this filed.

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4.4. To the best of my knowledge and research, the issue raised in this petition was not dealt with or yet decided by this Hon'ble court or any other court.

4.5. I have understood that in the course of hearing of this petition the Court may require any security to be furnished towards costs or any other charges and I shall comply with such requirements if it is ultimately held that the petition is frivolous or has been filed for extraneous considerations or that it lacks bona fides. I disclose the source of my information, leading to file the instant Public Interest Litigation, if and when called upon by the Court, to do so. I also undertake that in case I seek to withdraw petition or fail to attend the case by myself or through advocate, I will bear the costs incurred by the respondent and pay such amount/s of additional costs as may be imposed by this Hon'ble court by exercising its discretionary powers. If I seek to withdraw PIL after it is admitted, I shall do so by moving an application but, not by any other method, except with the leave of the Court.

**5. Particulars in brief:**

5.1. I state that I am a social worker who fights to safeguard the lands of temples especially the temple lands situated in Krishna District from the encroachers. I made several complaints to the concerned officers against the encroachers who encroaches endowment lands.

5.2. I state that the land in Sy.No.300 to an extent to Ac.29.01 cents situated at Kavuluru Village, G.Konduru Mandal, Krishna District was an Inam land allotted to the "Temple Dancing Services" for rendering services in "SRI SANATHANA VENU GOPALA SWAMY" in year 1932. As per the Resurvey Resettlement Register the land was classified as "Temple Dancing Service" at column-10 in Village No.25. No individual name was shown at the columns and it was not a personal grant. The land at column-10 is shown as "Sri Santhana Venu Gopala Swamy varu (Aata Service Nimittam)" it means the land was allotted to the persons who

were rendering Dancing Services in "Sri Santhana Venu Gopala Swamy Temple".

5.3. The Devadasi in the temple i.e., dance in the temple is totally prohibited in the state of Madras and also in the state of Andhra Pradesh by enacting statute known as "Madras Devadasis (Prevention of Dedication) Act, 1947, which is adopted by the state of Andhra Pradesh known as Andhra Pradesh Devadasis (Prevention of Dedication) Act, 1988. Thus, rendering service of Devadasis in the temple i.e., dance in the temple is totally prohibited and it is an offence. The Service Inam is burdened with service and as long as Inamdars are rendering service they are entitled to enjoy the property.

5.4. When the Devadasi system itself is abolished by Act No.10 of 1988. In those circumstances the 2<sup>nd</sup> respondent i.e., District Collector has the power to resume the land, in accordance with the procedure prescribed under Chapter-II, Part-II of the B.S.No.54 and 55.

5.5. Recently I came to know that some unknown persons are constructing brick kilns in the above stated land which belongs to "Sri Santhana Venu Gopala Swamy varu" and changing the nature of land by destroying the cultivable land. The unknown persons without possessing any right over the property and without converting the land from agricultural to non-agricultural land destroyed almost Acs.17.00 to Acs.20.00 of land by starting construction of brick kiln. At any point of time the encroachers start the process of making of bricks. If it happens



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the cultivable land completely become non-cultivable land and it also affects the adjacent lands due to pollution arises out of making the bricks.

5.6. As per G.O.Ms.No.227 dt.26-08-2021 Revenue (DA & LR) Department, notification was issued informing that amendments were made to the Andhra Pradesh Agricultural Land (Conversion for Non-Agricultural Purpose) Rules, 2018 in certain Rules. As per Rule.7, the following shall be substituted, namely -

"CONVERSION OF LAND IN REVENUE RECORDS MANDATORY: (1) In every case where the Land is converted to Non Agriculture as per sub clause (i) of Rule 3, the Revenue records shall be changed as per prescribed rules in physical records and the digitally maintained record within Thirty (30) days from the date of payment of requisite fee. (2) The Competent Authority i.e. Revenue Divisional Officer who receive ANNEXURE A shall direct the Tahsildar concerned to determine whether the conversion applied for is objectionable or not.

1. The Tahsildar shall cause full enquiry into the application, through the VRO and other Revenue officers, and the Enquiry report with the Checklist as stipulated by Chief Commissioner of Land Administration shall be submitted to the Competent Authority.

II. The Competent Authority after due verification and inspection approve/reject/dispose the application.

III. On Receipt of approval of Competent Authority, the Deputy Tahsildar in the Office of the Tahsildar of the Mandal shall make suitable changes in the digital Record (Initiator).

IV. The Tahsildar (Checker) may recommend the changes in the digitally maintained Record and forward to the Competent Authority for approval.

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V. *The Competent Authority shall approve the changes in digital record and the record-so approved can be obtained from any Meeseva Centre on payment of fee as may be prescribed from time to time.*

VI. *The Competent authority i.e., Revenue Divisional officer or any authorized officer shall issue "Certificate of Ownership", if requested for, on payment of requisite fee as may be prescribed."*

4. *For Rule 8, the following shall be substituted, namely,- "Review of use of lands converted for Agricultural purposes by District Collector :*

*(1) Every Year, in the Fasli year, the District officer designated for this purpose, Collector or any shall verify the Non Agriculture Lands in the village Record and certify that in all cases where the lands that have been converted for Non Agricultural Purpose are being used for the intended purpose and Records have been changed to non- agricultural purposes in respect of the extent converted.*

*(2) The Collector, after completion of every Fasli year, may direct the Competent Authority/RDO to furnish the List of all such Land Conversion cases to the local body concerned."*

5.7. But, the respondent nos.2 to 5 without converting the agricultural land to non-agricultural land as per the Rules prescribed under Andhra Pradesh Agricultural Land (Conversion for Non-Agricultural Purpose) Rules, 2018 allowing the encroachers to construct the brick kiln on Sy.No.300 to an extent of Acs.17.00 to Acs.20.00 out of total extent of Ac.29.01 cents owned by Sri Santhana Venugopala Swamy Temple and Sri Anjaneya Deva Sthanam situated at Kavuluru Village, G.Konduru Mandal, Krishna District which is a Endowment Land.

5.8. As per G.O.Ms.No.80 dt:22-04-2010 certain guidelines were issued in respect of establishment of Brick kiln in the State of Andhra Pradesh. The Government, after careful examination of the matter, hereby issues the following guidelines for establishment of Brick Clamps in the State of Andhra Pradesh:

1. An application for establishment of Brick Clamp made to Industries Department shall be accompanied by a no objection / license from the local body (Gram Panchayat, Zilla Parishad, Municipality or Municipal Corporation). It is open to the local body to consider the objections, if any, made to such application before grant of No objection Certificate to the applicant.

2. The edge of the Brick Clamp (batti) shall be at a radial distance of -

a. 1 Km from any human habitation, hospitals, educational or any other institutions;

b. 100 m as far as practicable; but in no case less than 50 mtrs from the neighbors' agricultural/horticulture lands. The Brick Clamp shall have the accessibility without disturbing the surrounding crops:

c. 100 mtrs from flood banks of river;

d. 200 mtrs from the National Highways/State Highways / Expressways/Ring Roads; and

e. 25 m from the village roads.

3. The General Managers, District Industries Centres shall issue acknowledgements to those Units which are complying with above guidelines duly stipulating the above mentioned guidelines as conditions.

4. Mitigative measures to control pollution;

a. To minimize generation of fugitive emissions due to movement of vehicles, the passage around the brick clamps within the premises should be paved with broken bricks;

b. Ash produced everyday shall be transported to a disposal site or reused in brick making to reduce fugitive emissions;

c. The brick clamp (Batti) shall be located/operated in such a way that it shall not affect the agricultural activity in the vicinity; and

5. The Revenue Authorities viz. Collector and District Magistrate/R.D.O./ Tahasildar shall continue to take action against defaulting units under the provisions of Cr.P Code as upheld by the Hon'ble High Court in the W.P.No.12138 /2008 and batch cases.

6. The District Collector of the concerned District shall monitor implementation of the guidelines.

5.9. The petitioner after coming to know the fact that the encroachers are constructing the Brick Kilns in the land belongs to Temple without following the guidelines issued as per G.O.Ms.No.80 dt.22-04-2010 and also the without converting the agricultural land into non-agricultural land as per the amendments in made in Rule.7 in the Andhra Pradesh Agricultural Land (Conversion for Non-Agricultural Purpose), stated preparation for construction of the Brick Kilns in Sy.No.300 to an extent of Acs.17.00 to Acs.20.00 out of total extent of Ac.29.01 cents owned by Sri Santhana Venugopala Swamy Temple and Sri Anjaneya Deva Sthanam situated at Kavuluru Village, G.Konduru Mandal, Krishna District which is a Endowment Land.

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5.10. Aggrieved by all the above things I made representations dt.26-12-2022 through SPANDANA vide Application No.NTR202212261538 and 24-01-2023 to the 2<sup>nd</sup> respondent and on 24-01-2023 to the 12<sup>th</sup> respondent requesting them to take action and remove the Brick Kiln construction immediately. But no action has been taken by the respondents till now. After making all the representations through reliable sources I came to know that prior to giving representations some people already gave complaints against the illegal construction of Brick Kilns by the encroachers in land in Sy.No.300 to an extent of Ac.17.00 to 20.00 out of total land of Ac.29.01 cents which was allotted for rendering "Dancing Services in Sri Santhana Venugopala Swamy Temple" under "Service Inam" situated at Kavuluru Village, G.Konduru Mandal, Krishna District.

5.11. I also came to know through reliable sources that the 2<sup>nd</sup> respondent vide R.C.E.88/2022 dt.09-05-2022 issued a request letter to the 4<sup>th</sup> respondent seeking to conduct an enquiry as per rules in force and also for taking action against the illegal Construction of Brick Kiln in the land in Sy.No.300 to an extent of Ac.17 to 20 out of Ac.29.01 for situated at Kavuluru Village, G.Konduru Mandal, Krishna District for resumption I am also filing the Circular No.A3/4977/2014-4 dt.04-12-2014 whcihc was issued by the Regional Joint Commissioner for resumption of Inam Lands as per the Inam Abolition Amendment Act, 16/2013.

5.12. For the reasons stated above, the action of the 2<sup>nd</sup> respondent in not resuming the land from the encroachers and also the action of the 1<sup>st</sup> to 12<sup>th</sup> respondents in not initiating steps to stop the construction of brick

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kilns by the encroachers in land in Sy.No.300 to an extent of Ac.17.00 to 20.00 out of total land of Ac.29.01 cents which was allotted for rendering "Dancing Services in Sri Santhana Venugopala Swamy Temple" under "Service Inam" situated at Kavuluru Village, G.Konduru Mandal, Krishna District which is a Endowment Land even though I made representation dt.26-12-2022 through SPANDANA vide Application No.NTR202212261538 and 24-01-2023 to the 2<sup>nd</sup> respondent and on 24-01-2023 to the 12<sup>th</sup> respondent requesting them to take action is neither sustainable in the eye of law nor facts of the case.

6. **Source of Information:**

The petitioner collected the information on his own and also through reliable sources, through internet, by interacting with academicians, experts in this filed etc.,

7. **Nature and extent of injury caused/apprehended:**

I state that this case is one of the classic examples to show how the respondents have been misusing their official position and allowing the encroachers to occupy ht eland illegally which belongs to temple by taking bribes with an intention to enrich them at the cost of the interest of the Government and public at large.

8. **Any representations made:**

So far, made orally and written representation dt.26-12-2022 through SPANDANA vide Application No.NTR202212261538 and 24-01-2023 to the 2<sup>nd</sup> respondent and on 24-01-2023 to the 12<sup>th</sup> respondent

requesting them to take action is neither sustainable in the eye of law nor facts of the case

9. **Delay if any:**

There is no delay in filing this writ petition since it is recurring cause of action.

10. **Documents relied upon:**

- 10.1. Copy of petitioners' representation, dt.26-12-2022 made through SPANDANA vide Application No.NTR202212261538 made to the 2<sup>nd</sup> respondent (**Annexure-P1**)
- 10.2. Copy of petitioners' representation, dt.24-01-2023 made to the 2<sup>nd</sup> respondent (**Annexure-P2**)
- 10.3. Copy of petitioners' representation, dt.24-01-2023 made to the 12<sup>th</sup> respondent (**Annexure-P3**)
- 10.4. Copy of R.S.R issued under Right to Information Act which shows that the land allotted to the "Temple Dancing Services" for rendering services in "SRI SANATHANA VENU GOPALA SWAMY" (**Annexure-P4**)
- 10.5. Copy of Letter issued to the Sub-Collector by the 2<sup>nd</sup> respondent for taking necessary action dt.09-05-2022 (**Annexure-P5**)
- 10.6. Copy of G.O.Ms.No.80 issued by Environment, Forests, Science & Technology (Environment) Department making certain guidelines in respect of establishment of Brick Kilns in the state of Andhra Pradesh DT.22-04-2010. (**Annexure-P6**)
- 10.7. Copy of G.O.Ms.No.227 issued by the Revenue (DA & LR) Department making some amendments to the Andhra PRADESH Agricultural Land (Conversion for non-Agricultural Purpose) Rules, 2018 dt.26-08-2021. (**Annexure-P7**)
- 10.8. Copy of the Andhra Pradesh Devadasis (Prohibition of Dedication) Act, 1988. (**Annexure-P8**)
- 10.9. Copy of the Circular issued by the Regional Joint Commissioner informing about the Inam Land Abolition (Amendment) Act, 16/2013 dt.04-12-2013. (**Annexure-P9**)

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11. Relief Prayed for:

Therefore, for the reasons stated above, it is prayed that this Hon'ble Court may be pleased to issue a writ or order, orders or directions more particularly one in the nature of Writ of Certiorarified Mandamus -

i) declaring the action of the respondents in not taking any action to stop the illegal construction of brick kilns by the encroachers on land in Sy.No.300 to an extent of Acs.17.00 to Acs.20.00 out of total extent of Ac.29.01 cents owned by Sri Santhana Venugopala Swamy Temple and Sri Anjaneya Deva Sthanam situated at Kavuluru Village, G.Konduru Mandal, Krishna District which is a Endowment Land even though I made representation dt.26-12-2022 made through SPANDANA vide Application No.NTR202212261538 and 24-01-2023 to the 2<sup>nd</sup> respondent and on 24-01-2023 to the 12<sup>th</sup> respondent requesting them to take action as illegal, arbitrary, discriminative, mala fide, unjust, colorable exercise of powers besides violative of the Arts.14 & 21 of the Constitution of India upon calling the records relating to land particulars in survey numbers mentioned in representation, dt.07-09-2021 and legal notice, dt.25-09-2021; and

ii) consequently, direct the respondents to resume the Temple land in Sy.No.300 to an extent of Acs.17.00 to Acs.20.00 out of total extent of Ac.29.01 cents owned by Sri Santhana Venugopala Swamy Temple and Sri Anjaneya Deva Sthanam situated at Kavuluru Village, G.Konduru Mandal, Krishna District;



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and pass such other order or orders or directions as this Hon'ble Court may deem fit and proper in the circumstances of case.

12. It is further prayed that, pending disposal of writ petition (PIL), this Hon'ble Court may be pleased to direct the respondents stop the illegal construction of brick kilns by the encroachers on land in Sy.No.300 to an extent of Acs.17.00 to Acs.20.00 out of total extent of Ac.29.01 cents owned by Sri Santhana Venugopala Swamy Temple and Sri Anjaneya Deva Sthanam situated at Kavuluru Village, G.Konduru Mandal, Krishna District which is a Endowment Land and pass such other order or orders as this Hon'ble Court may deem fit and proper in the interest of justice and circumstances of the case.

13. No notice has been received of lodging a caveat by the Respondents.

Last page corrections

Solemnly affirmed and signed  
before me on this the 21<sup>st</sup> day of  
March, 2023 at Amaravati.

DEPONENT

Before me

Advocate :: Amaravati.

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VERIFICATION

I, Gaggara Krishna Rao S/o. Late Pedda Anjaiah, Age: 63 years, Occ: Social Service, R/o.#57-13-15/3, New Postal Colony, Padamata, Vijayawada-10, Krishna District, Andhra Pradesh-520 010, being the petitioner/person acquainted with the facts do hereby verify and state that the contents of paras 1 to 10 & 13 of the affidavit are true to my personal knowledge based on records and those of paras 11 & 12 are based on legal advice believed to be correct.

Verified at Amaravati on this the 23<sup>rd</sup> day of March, 2023.

ADVOCATE

DEPONENT

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∴ AT AMARAVATI.

(Rule 4(e) of The High Court of Judicature at Amaravati for the States of Andhra Pradesh and Andhra Pradesh Public Interest Litigation Rules, 2015)

W.P.(PIL). No. \_\_\_\_\_ of 2023

**Between:**

Gaggara Krishna Rao S/o. Late Pedda Anjaiah,  
Age: 63 years, Occ: Social Service,  
R/o.#57-13-15/3, New Postal Colony,  
Padamata, Vijayawada-10, Krishna District,  
Andhra Pradesh-520 010.

**Petitioner's Voter ID Card No.AZZ0258228**

**Petitioner's Pan Card No.AJSPG9167F**

**Petitioner's Aadhaar Card No.6043 5557 2626**

**Petitioner's Mobile No.94410 00569**

... Petitioner/s

and

1. The State of Andhra Pradesh,  
Rep. by its Principal Secretary,  
Revenue Department, A.P. Secretariat,  
Amaravati, Andhra Pradesh.
2. The District Collector,  
Krishna District, Andhra Pradesh.
3. The Joint Collector,  
Vijayawada Division, Krishna District,  
Andhra Pradesh.
4. The Sub-Collector,  
Vijayawada Division, Krishna District,  
Andhra Pradesh.
5. The Tahsildar,  
G.Konduru Mandal, Krishna District,  
Andhra Pradesh.
6. The State of Andhra Pradesh,  
Rep. by its Principal Secretary,  
Endowment Department, A.P. Secretariat,  
Amaravati, Andhra Pradesh.
7. The Endowment Commissioner,

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Gollapudi, Vijayawada Rural Mandal,  
Krishna District, Andhra Pradesh.

8. The Additional Commissioner,  
Endowment Department, Gollapudi,  
Vijayawada Rural Mandal, Krishna District,  
Andhra Pradesh.

9. The Deputy Commissioner,  
Endowment Department, Gollapudi,  
Vijayawada Rural Mandal, Krishna District,  
Andhra Pradesh.

10. The Assistant Commissioner,  
Endowment Department, Near old Bus Stand,  
Governorpet, Vijayawada, Krishna District,  
Andhra Pradesh-520 002.

11. The Executive Officer,  
Kavuluru Village, G.Konduru Mandal,  
Krishna District, Andhra Pradesh.

12. The Executive Engineer,  
Pollution Control Board, Gurunannak Colony,  
Vijayawada, Krishna District, Andhra Pradesh.

... Respondents

AFFIDAVIT FILED UNDER RULE 5 OF PIL RULES, 2015

I, Gaggara Krishna Rao S/o. Late Pedda Anjaiah, Age: 63 years, Occu:  
Social Service, R/o.#57-13-15/3, New Postal Colony, Padamata,  
Vijayawada-10, Krishna District, Andhra Pradesh-520 010, now having  
temporarily come down to Amaravati, do hereby solemnly affirm and  
sincerely state, on oath, as follows :

1. I am the petitioner herein; as such, I am well acquainted with the  
facts of the case.

2. I state that my contact number is 94410 00569; my address is  
given in unnumbered para of instant affidavit; and the address of the

petitioner welfare association is given in cause title; besides to it, I also gave the particulars of Voter ID, PAN Card and AADHAR card are also given in cause title; and the said particulars furnished by me in the cause title are true and correct.

3. I also state that I am herewith annexing the copies of my Voter ID, PAN Card and AADHAR card and also bank statements towards my identity and address proof as required under Rule 5 (b) of the PIL Rules, 2015.

4. I further state that, previously, I did not face contempt of court proceedings under the provisions of the Contempt of Courts Act, 1971.

5. I state that I had not been ordered by this Hon'ble Court or any other court not to file Public Interest Litigation cases.

6. I also state that I am not involved either in Civil or Revenue cases having nexus with the present W.P. (PIL) case.

7. I further state that I am not a party in any pending civil cases having nexus with the subject matter of the present PIL.

Last page corrections

Solemnly affirmed and signed  
before me on this the 23<sup>rd</sup> day of  
March, 2023 at Amaravati.

DEPONENT

Before me

Advocate :: Amaravati.

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VERIFICATION

I, Gaggara Krishna Rao S/o. Late Pedda Anjaiah, Age: 63 years, Occ: Social Service, R/o.#57-13-15/3, New Postal Colony, Padamata, Vijayawada-10, Krishna District, Andhra Pradesh-520 010, being the petitioner/person acquainted with the facts do hereby verify and state that the contents of paras 1 to 7 of the affidavit are true to my personal knowledge based on records.

Verified at Amaravati on this the 23<sup>rd</sup> day of March, 2023.

ADVOCATE

DEPONENT

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ANNEXURE 6

IN THE HIGH COURT OF JUDICATURE AT OF ANDHRA PRADESH  
:: AT AMARAVATI.

(Rule 4(e) of The High Court of Judicature at Amaravati for the States of  
Andhra Pradesh and Andhra Pradesh Public Interest Litigation Rules,  
2015)

W.P.(PIL): No.

of 2023

Between:

Gaggara Krishna Rao S/o. Late Pedda Anjaiah,  
Age: 63 years, Occ: Social Service,  
R/o. #57-13-15/3, New Postal Colony,  
Padamata, Vijayawada-10, Krishna District,  
Andhra Pradesh-520 010.  
Petitioner's Voter ID Card No.AZZ0258228  
Petitioner's Pan Card No.AJSPG9167F  
Petitioner's Aadhaar Card No.6043 5557 2626  
Petitioner's Mobile No.94410 00569

... Petitioner/s

and

1. The State of Andhra Pradesh,  
Rep. by its Principal Secretary,  
Revenue Department, A.P. Secretariat,  
Amaravati, Andhra Pradesh.

2. The District Collector,  
Krishna District, Andhra Pradesh.

3. the Joint Collector,  
Vijayawada Division, Krishna District,  
Andhra Pradesh.

4. The Sub-Collector,  
Vijayawada Division, Krishna District,  
Andhra Pradesh.

5. The Tahsildar,  
G.Konduru Mandal, Krishna District,  
Andhra Pradesh.

6. The State of Andhra Pradesh,  
Rep. by its Principal Secretary,  
Endowment Department, A.P. Secretariat,  
Amaravati, Andhra Pradesh.

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7. The Endowment Commissioner,  
Gollapudi, Vijayawada Rural Mandal,  
Krishna District, Andhra Pradesh.

8. The Additional Commissioner,  
Endowment Department, Gollapudi,  
Vijayawada Rural Mandal, Krishna District,  
Andhra Pradesh.

9. The Deputy Commissioner,  
Endowment Department, Gollapudi,  
Vijayawada Rural Mandal, Krishna District,  
Andhra Pradesh.

10. The Assistant Commissioner,  
Endowment Department, Near old Bus Stand,  
Governorpetta, Vijayawada, Krishna District,  
Andhra Pradesh-520 002.

11. The Executive Officer,  
Kavuluru Village, G.Konduru Mandal,  
Krishna District, Andhra Pradesh.

12. The Executive Engineer,  
Pollution Control Board, Gurunannak Colony,  
Vijayawada, Krishna District, Andhra Pradesh.

... Respondents

DECLARATION FILED UNDER RULE 6 OF PIL RULES, 2015

I, Gaggara Krishna Rao S/o. Late Pedda Anjaiah, Age: 63 years, Occ:  
Social Service, R/o.#57-13-15/3, New Postal Colony, Padamata,  
Vijayawada-10, Krishna District, Andhra Pradesh-520 010, now having  
temporarily come down to Amaravati, do hereby solemnly affirm and  
sincerely state, on oath, and declare that the Writ Petition (PIL) is being  
instituted purely in Public Interest and not at the instance of any other  
person or organization other than the petitioner welfare association.

Amaravati,  
Dt:23-03-2023.

DECLARANT



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ANNEXURE 7A

IN THE HIGH COURT OF JUDICATURE AT OF ANDHRA PRADESH  
:: AT AMARAVATI.

(Rule 4(e) of The High Court of Judicature at Amaravati for the States of  
Andhra Pradesh and Andhra Pradesh Public Interest Litigation Rules,  
2015)

W.P.(PIL). No.

of 2023

Between:

Gaggara Krishna Rao S/o. Late Pedda Anjaiah,  
Age: 63 years, Occ: Social Service,  
R/o.#57-13-15/3, New Postal Colony,  
Padamata, Vijayawada-10, Krishna District,  
Andhra Pradesh-520 010.  
Petitioner's Voter ID Card No.AZZ0258228  
Petitioner's Pan Card No.AJSPG9167F  
Petitioner's Aadhaar Card No.6043 5557 2626  
Petitioner's Mobile No.94410 00569

... Petitioner/s

and

1. The State of Andhra Pradesh,  
Rep. by its Principal Secretary,  
Revenue Department, A.P. Secretariat,  
Amaravati, Andhra Pradesh.
2. The District Collector,  
Krishna District, Andhra Pradesh.
3. the Joint Collector,  
Vijayawada Division, Krishna District,  
Andhra Pradesh.
4. The Sub-Collector,  
Vijayawada Division, Krishna District,  
Andhra Pradesh.
5. The Tahsildar,  
G.Konduru Mandal, Krishna District,  
Andhra Pradesh.
6. The State of Andhra Pradesh,  
Rep. by its Principal Secretary,  
Endowment Department, A.P. Secretariat,  
Amaravati, Andhra Pradesh.

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7. The Endowment Commissioner,  
Gollapudi, Vijayawada Rural Mandal,  
Krishna District, Andhra Pradesh.
8. The Additional Commissioner,  
Endowment Department, Gollapudi,  
Vijayawada Rural Mandal, Krishna District,  
Andhra Pradesh.
9. The Deputy Commissioner,  
Endowment Department, Gollapudi,  
Vijayawada Rural Mandal, Krishna District,  
Andhra Pradesh.
10. The Assistant Commissioner,  
Endowment Department, Near old Bus Stand,  
Governorpeta, Vijayawada, Krishna District,  
Andhra Pradesh-520 002.
11. The Executive Officer,  
Kavuluru Village, G.Konduru Mandal,  
Krishna District, Andhra Pradesh.
12. The Executive Engineer,  
Pollution Control Board, Gurunannak Colony,  
Vijayawada, Krishna District, Andhra Pradesh.

... Respondents

AFFIDAVIT FILED UNDER RULE 7A OF WRIT PROCEEDING RULES

I, Gaggara Krishna Rao S/o. Late Pedda Anjaiah, Age: 63 years, Occ:  
Social Service, R/o.#57-13-15/3, New Postal Colony, Padamata,  
Vijayawada-10, Krishna District, Andhra Pradesh-520 010, now having  
temporarily come down to Amaravati, do hereby solemnly affirm and  
sincerely state, on oath, as follows :

1. I state that I have no personal interest in the subject matter of this  
~~PIL. I am hereby undertaking to pay exemplary costs and/or~~  
compensatory damages as directed by this Hon'ble Court in the event of a

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- 34 - (50)  
contrary finding upon adjudication that this writ petition is filed for  
extraneous/personal considerations or with an oblique motive.

VERIFICATION

"I hereby affirm and state on oath that I have no personal interest in  
the subject matter of this petition. The petitioner hereby undertake(s) to  
pay exemplary costs and/or compensatory damages as directed by this  
Court in the event of a contrary finding upon adjudication by the Court  
that the writ petition is filed for extraneous/personal considerations or  
with an oblique motive."

Verified in my presence at Amaravati on this the 23<sup>rd</sup> day of March, 2023.

ADVOCATE

DEPONENT

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1. I state that I have done complete research into the legality of the material papers in the above writ petition before filing of the above Writ Petition in the form of PIL.

2. I also state that the facts enumerated under paragraphs and its sub-paragraphs are true and correct to the best of my information, knowledge and research conducted by me with the help of experts in the field. The legal grounds raised therein are as per the advice of our counsel that I believe it to be true.

3. I further state that all the relevant documents have been obtained by me from various sources viz., official websites, offices of the official respondents, news papers etc., as such, I believe them to be true.

For the reasons stated above, it is therefore prayed that this Hon'ble Court be pleased to take the writ petition on its file and pass orders in terms of the prayer made therein, in the interests of justice.

Last page corrections

Solemnly affirmed and signed  
before me on this the 23<sup>rd</sup> day of  
March, 2023 at Amaravati.

DEPONENT

Before me

Advocate :: Amaravati.

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VERIFICATION

I, Gaggara Krishna Rao S/o. Late Pedda Anjaiah, Age: 63 years, Occ: Social Service, R/o.#57-13-15/3, New Postal Colony, Padamata, Vijayawada-10, Krishna District, Andhra Pradesh-520 010, being the petitioner/person acquainted with the facts do hereby verify and state that the contents of above paras of the affidavit are true to my personal knowledge based on records.

Verified at Amaravati on this the 23<sup>rd</sup> day of March, 2023.

ADVOCATE

DEPONENT

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ANNEXURE 8

IN THE HIGH COURT OF JUDICATURE AT OF ANDHRA PRADESH  
:: AT AMARAVATI.  
(Rule 4(e) of The High Court of Judicature at Amaravati for the States of  
Andhra Pradesh and Andhra Pradesh Public Interest Litigation Rules,  
2015)

W.P.(PIL). No.

of 2023

Between:

Gaggara Krishna Rao S/o. Late Pedda Anjaiah,  
Age: 63 years, Occ: Social Service,  
R/o.#57-13-15/3, New Postal Colony,  
Padamata, Vijayawada 10, Krishna District,  
Andhra Pradesh-520 010.  
Petitioner's Voter ID Card No.AZZ0258228  
Petitioner's Pan Card No.AJSPG9167F  
Petitioner's Aadhaar Card No.6043 5557 2626  
Petitioner's Mobile No.94410 00569

... Petitioner/s

and

1. The State of Andhra Pradesh,  
Rep. by its Principal Secretary,  
Revenue Department, A.P. Secretariat,  
Amaravati, Andhra Pradesh.

2. The District Collector,  
Krishna District, Andhra Pradesh.

3. the Joint Collector,  
Vijayawada Division, Krishna District,  
Andhra Pradesh.

4. The Sub-Collector,  
Vijayawada Division, Krishna District,  
Andhra Pradesh.

5. The Tahsildar,  
G.Konduru Mandal, Krishna District,  
Andhra Pradesh.

6. The State of Andhra Pradesh,  
Rep. by its Principal Secretary,  
Endowment Department, A.P. Secretariat,  
Amaravati, Andhra Pradesh.

7. The Endowment Commissioner,  
Gollapudi, Vijayawada Rural Mandal,  
Krishna District, Andhra Pradesh.
8. The Additional Commissioner,  
Endowment Department, Gollapudi,  
Vijayawada Rural Mandal, Krishna District,  
Andhra Pradesh.
9. The Deputy Commissioner,  
Endowment Department, Gollapudi,  
Vijayawada Rural Mandal, Krishna District,  
Andhra Pradesh.
10. The Assistant Commissioner,  
Endowment Department, Near old Bus Stand,  
Governorpeta, Vijayawada, Krishna District,  
Andhra Pradesh-520 002.
11. The Executive Officer,  
Kavuluru Village, G.Konduru Mandal,  
Krishna District, Andhra Pradesh.
12. The Executive Engineer,  
Pollution Control Board, Gurunannak Colony,  
Vijayawada, Krishna District, Andhra Pradesh.

... Respondents

DECLARATION FILED UNDER RULE 8 OF PIL RULES, 2015

I, Gaggara Krishna Rao S/o. Late Pedda Anjaiah, Age: 63 years, Occ: Social Service, R/o.#57-13-15/3, New Postal Colony, Padamata, Vijayawada-10, Krishna District, Andhra Pradesh-520 010, now having temporarily come down to Amaravati, do hereby solemnly affirm and sincerely state, on oath, and also declare that the questions raised in the Writ Petition(PIL) had not been raised earlier and that there are no other case/s or petition/s filed or that are in pending before this Hon'ble Court or any other forum or court to the best of my knowledge, research and belief.

Amaravati,  
Dt:23-03-2023.

DECLARANT

Y

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ANNEXURE 10

IN THE HIGH COURT OF JUDICATURE AT OF ANDHRA PRADESH  
:: AT AMARAVATI.  
(Rule 4(e) of The High Court of Judicature at Amaravati for the States of  
Andhra Pradesh and Andhra Pradesh Public Interest Litigation Rules,  
2015)

W.P.(PIL). No.

of 2023

Between:

Gaggara Krishna Rao S/o. Late Pedda Anjalaiah,  
Age: 63 years, Occ: Social Service,  
R/o.#57-13-15/3, New Postal Colony,  
Padamata, Vijayawada-10, Krishna District,  
Andhra Pradesh-520 010.  
Petitioner's Voter ID Card No.AZZ0258228  
Petitioner's Pan Card No.AJSPG9167F  
Petitioner's Aadhaar Card No.6043 5557 2626  
Petitioner's Mobile No.94410 00569

... Petitioner/s

and

1. The State of Andhra Pradesh,  
Rep. by its Principal Secretary,  
Revenue Department, A.P. Secretariat,  
Amaravati, Andhra Pradesh.
2. The District Collector,  
Krishna District, Andhra Pradesh.
3. the Joint Collector,  
Vijayawada Division, Krishna District,  
Andhra Pradesh.
4. The Sub-Collector,  
Vijayawada Division, Krishna District,  
Andhra Pradesh.
5. The Tahsildar,  
G.Konduru Mandal, Krishna District,  
Andhra Pradesh.
6. The State of Andhra Pradesh,  
Rep. by its Principal Secretary,  
Endowment Department, A.P. Secretariat,  
Amaravati, Andhra Pradesh.



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7. The Endowment Commissioner,  
Gollapudi, Vijayawada Rural Mandal,  
Krishna District, Andhra Pradesh.
8. The Additional Commissioner,  
Endowment Department, Gollapudi,  
Vijayawada Rural Mandal, Krishna District,  
Andhra Pradesh.
9. The Deputy Commissioner,  
Endowment Department, Gollapudi,  
Vijayawada Rural Mandal, Krishna District,  
Andhra Pradesh.
10. The Assistant Commissioner,  
Endowment Department, Near old Bus Stand,  
Governorpetta, Vijayawada, Krishna District,  
Andhra Pradesh-520 002.
11. The Executive Officer,  
Kavuluru Village, G.Konduru Mandal,  
Krishna District, Andhra Pradesh.
12. The Executive Engineer,  
Pollution Control Board, Gurunannak Colony,  
Vijayawada, Krishna District, Andhra Pradesh.

... Respondents

AFFIDAVIT FILED UNDER RULE 10 OF PIL RULES, 2015

I, Gaggara Krishna Rao S/o. Late Pedda Anjaiah, Age: 63 years, Occ:  
Social Service, R/o.#57-13-15/3, New Postal Colony, Padamata,  
Vijayawada-10, Krishna District, Andhra Pradesh-520 010, now having  
temporarily come down to Amaravati, do hereby solemnly affirm and  
sincerely state, on oath, as follows :

1. I state that I have no any personal gain or private motive or oblique  
reason in filing the above writ petition/PIL.

2. I hereby undertake that I shall pay costs as may be ordered by this Hon'ble Court, in the event that this Hon'ble court comes to a conclusion that the writ petition is frivolous or that it has been filed for extraneous considerations or that it lacks *bona fides*.

3. I also state that all the information based on which the writ petition has been filed has been gathered from the information furnished by on the basis of my personal knowledge and as per the records. I have also gathered information from various other sources and also from those who are experts in this filed. I undertake to furnish any additional information as may be directed by this Hon'ble Court.

4. I undertake that if I seek permission to withdraw the above writ petition or if I do not attend the hearing of the case either by myself or through petitioner advocate, I shall bear the costs incurred by the respondents and any such additional costs as may be imposed in the discretion of this Hon'ble Court.

5. I undertake that in the event of wishing to withdraw the above writ petition by me, after the same is admitted, I shall do so only by filing an appropriate petition and not by any other method, except with the leave of this Hon'ble Court.

Last page corrections

Solemnly affirmed and signed  
before me on this the 23<sup>rd</sup> day of  
March, 2023 at Amaravati.

DEPONENT

Before me

Advocate :: Amaravati.

17

- 42 -

(58)

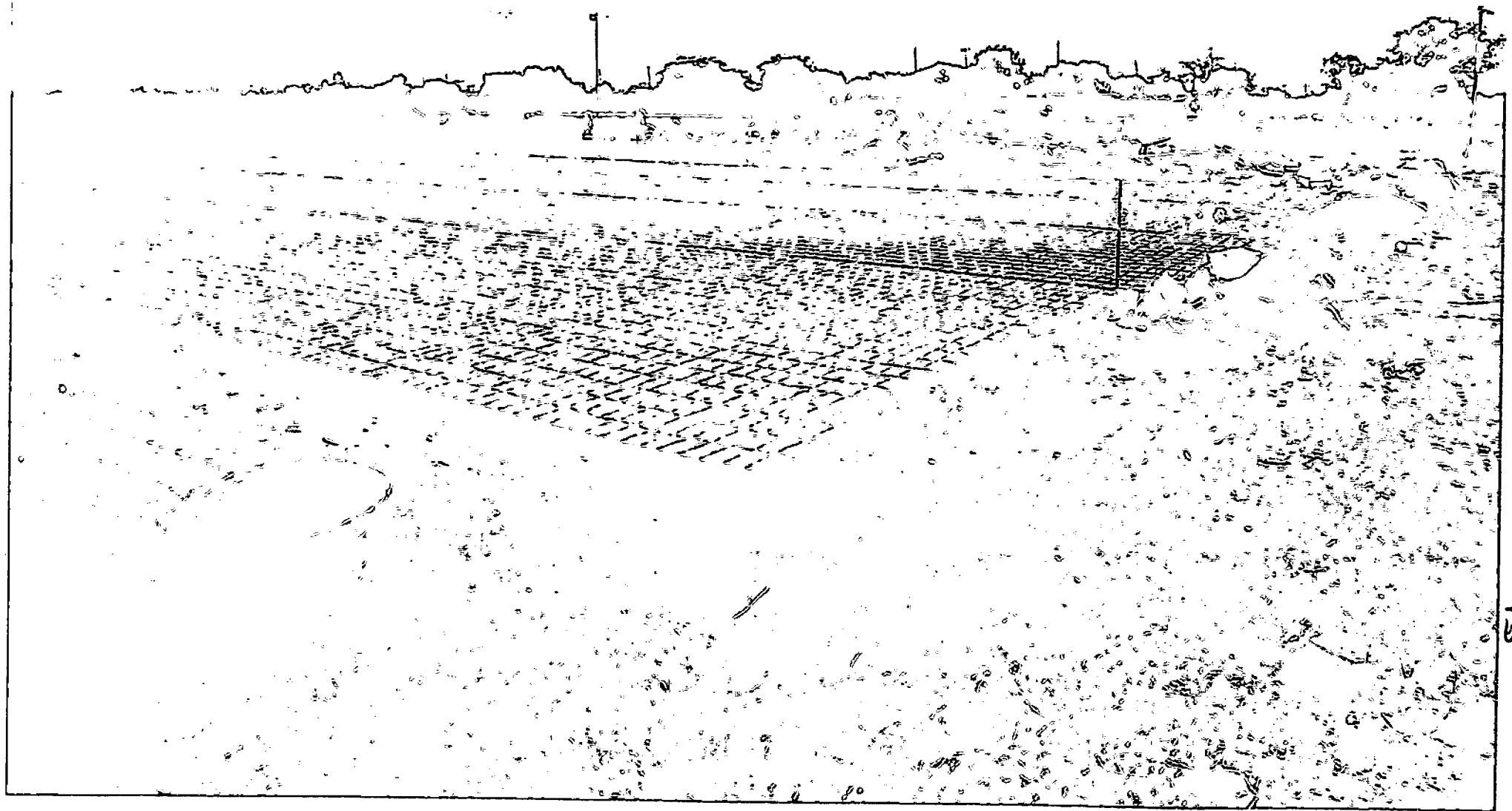
VERIFICATION

I, Gaggara Krishna Rao S/o. Late Pedda Anjaiah, Age: 63 years, Occ: Social Service, R/o.#57-13-15/3, New Postal Colony, Padamata, Vijayawada-10, Krishna District, Andhra Pradesh-520 010, being the petitioner/person acquainted with the facts do hereby verify and state that the contents of above paras of the affidavit are true to my personal knowledge based on records.

Verified at Amaravati on this the 23<sup>rd</sup> day of March, 2023.

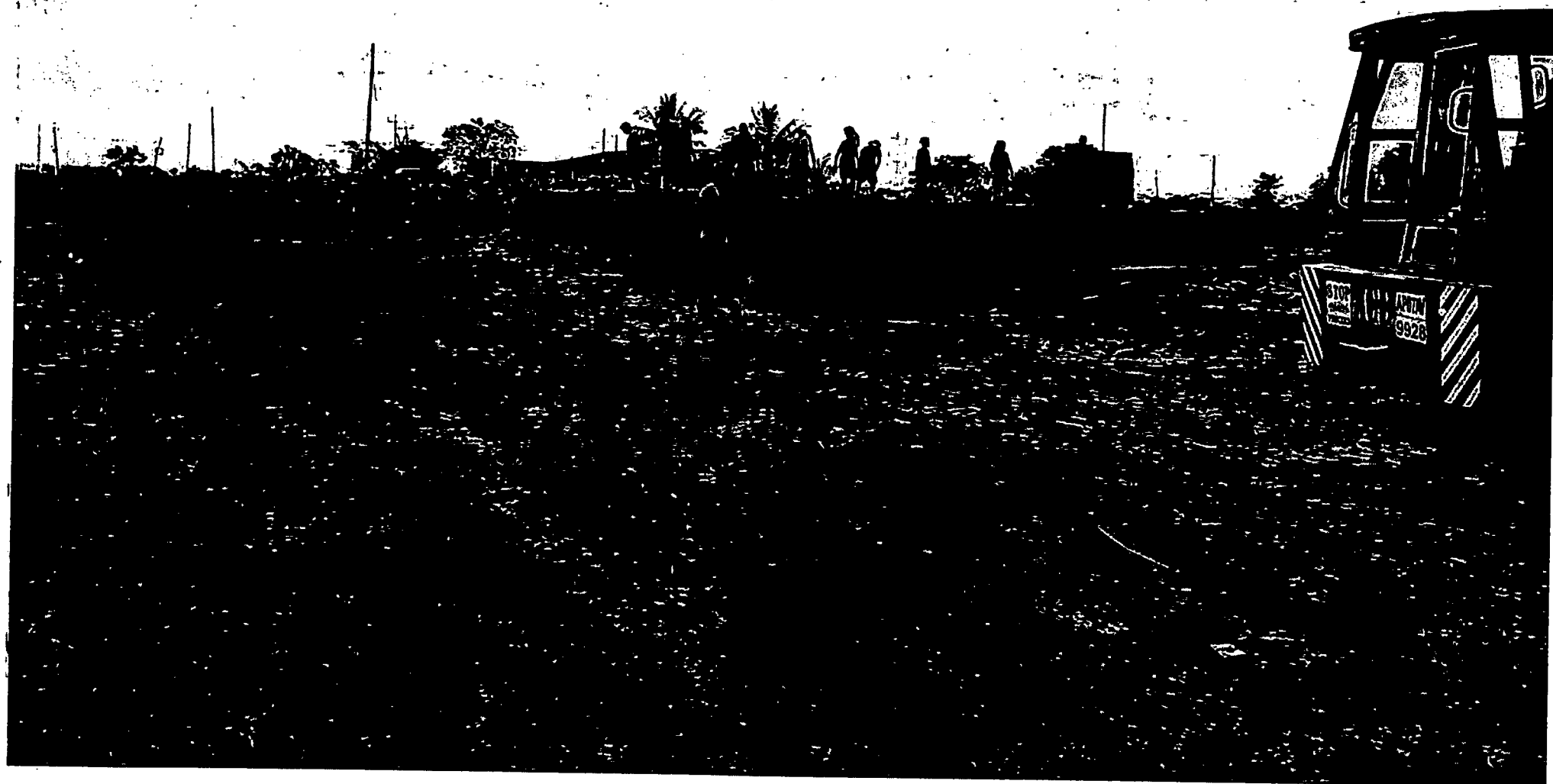
ADVOCATE

DEPONENT



69

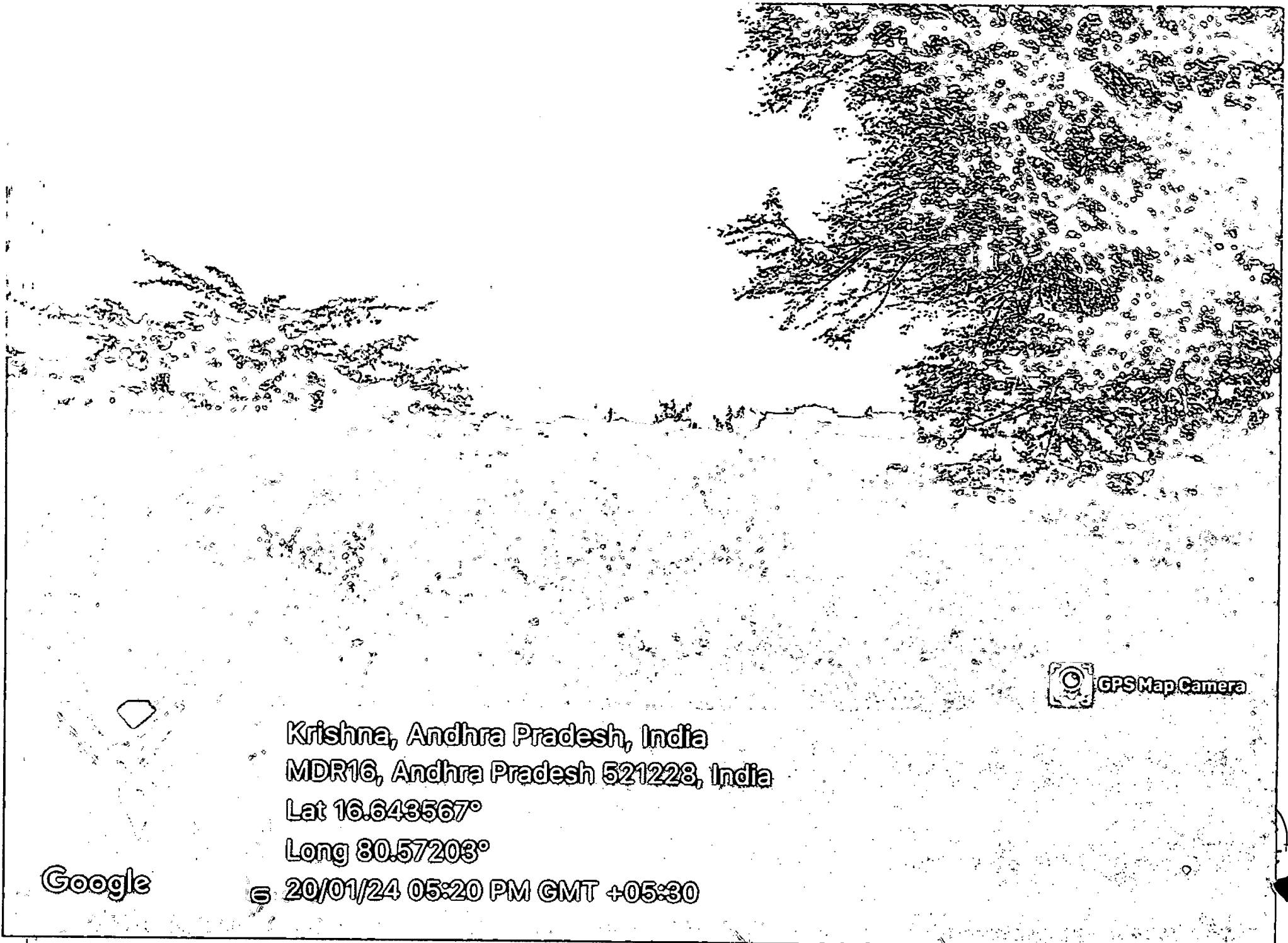












Krishna, Andhra Pradesh, India  
MDR16, Andhra Pradesh 521228, India  
Lat 16.643567°  
Long 80.57203°

Google

20/01/24 05:20 PM GMT +05:30

Google

20/01/24 05:20 PM GMT +05:30

Long 80.57203°

Lat 16.643567°

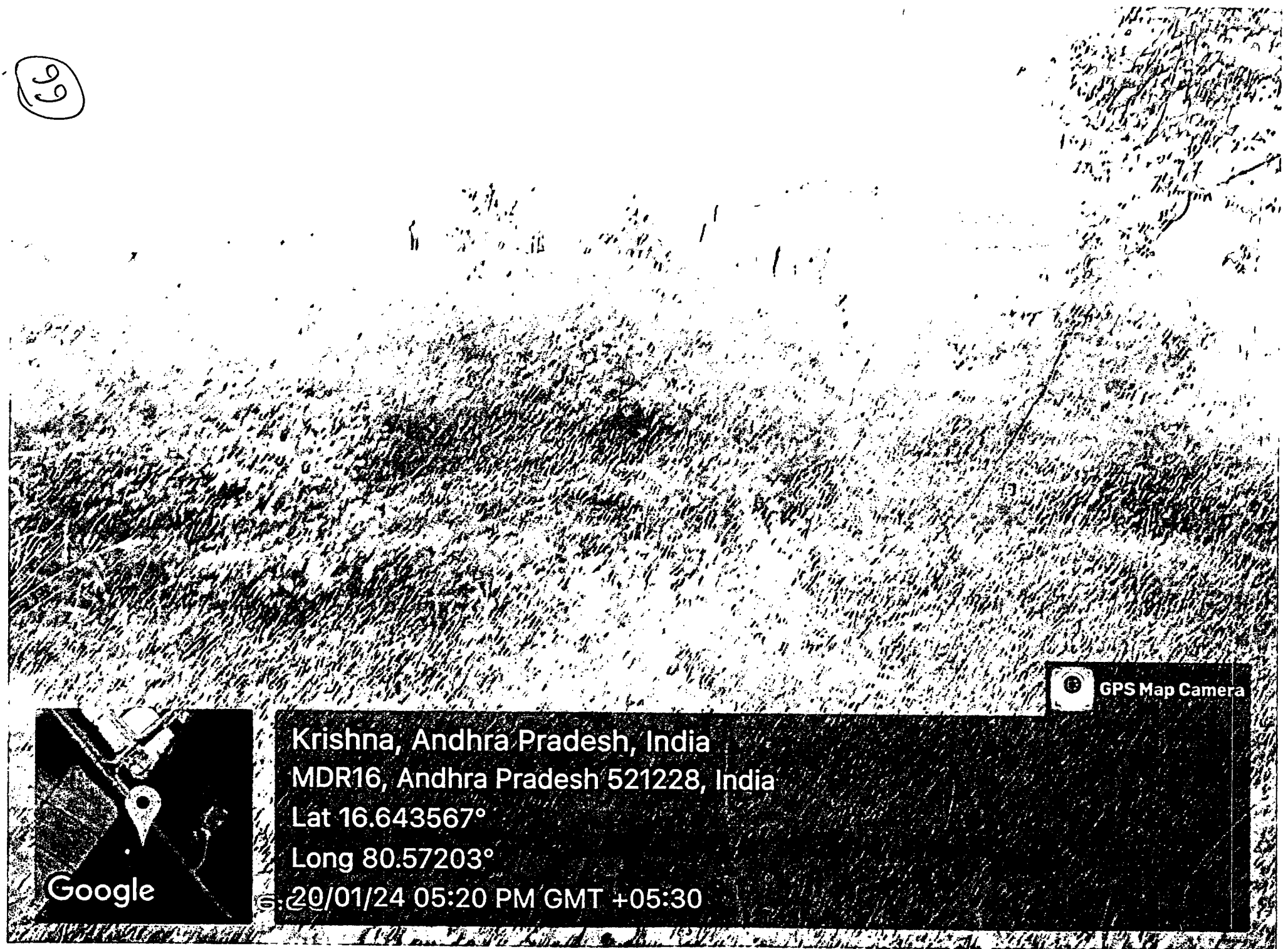
MDR16, Andhra Pradesh 521228, India

Krishna, Andhra Pradesh, India

GPS Map Camera

15

69



Krishna, Andhra Pradesh, India  
MDR16, Andhra Pradesh 521228, India  
Lat 16.643567°  
Long 80.57203°  
20/01/24 05:20 PM GMT +05:30



GPS Map Camera

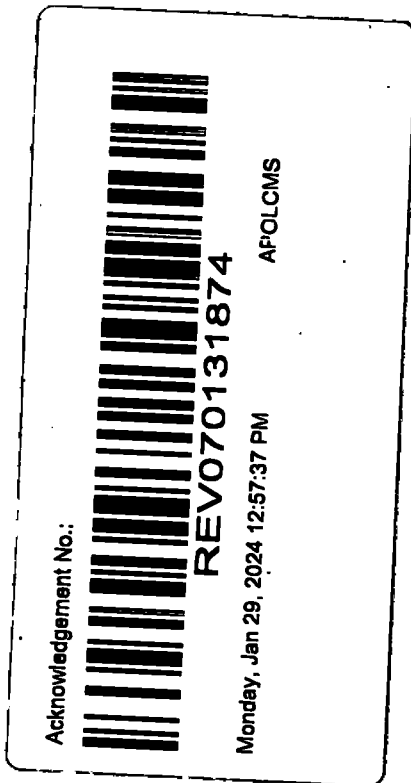
GP  
KRISHNA DISTRICT  
HIGH COURT :: AT AMARAVATI

C.C. No.                      of 2024

against  
W.P.(PIL) No.50 of 2023

*Endow*

CONTEMPT PETITION



Filed on:

Filed by:

M/S. PRIYANKA SONKAMBLE (14566)  
Counsel for the petitioner/s

88 92927686