

To,
Mr. Anup Kumre,
Superintendent of Prison,
Nagpur Central Jail,
Nagpur
NAGPURCP-MH@GOV.IN

I write to you to bring your continuous omissions and commissions, on records as under;

1. That today, I myself on instructions of my client and on humanitarian consideration came with following articles so as to hand it over to your staff for providing the same after thorough security checks to inmate Prof. G N Saibaba, who you know is differentliabled person, and wheelchair bound with multiple progressive diseases.
2. That today on 24th December 2020 at about 1 PM, I came alongwith all the listed material alongwith duly drawn list of the same, and attempted to hand over it through the gate, as per practice.
3. That it has been a practice implemented by you to make concerned person provide such material on the gate through the gate keeper and later on same are taken over for being supplied to that particular inmate. This time, despite having provided everything alongwith the catalogue, on your command, your staff has refused to accept materials which are neither security threat nor pose any danger of contacting or transmitting COVID-19.
4. On demanding reasons for the same, your officials chose not to give any written reasons but offered to tick mark the item on copy of my list, thereby indicating which of the items will be taken and later on given to my client.
5. The items that your officers have rejected form essential medical necessities, stationary for writing and material required for intellectual pursuits.
6. Of the three books that were supplied, one is a treatise on the Constitution of India, published by Harper Collins authored by Gautam Bhatia. Another one is an English translation of Tamil

bestseller titled as AMMA, which as even name suggests is about a woman who toiled hard in her life to raise her children, published by M/s Westland. The third book is by Mirza Wahid published by M/s Westland. This book is a novel, wherein a doctor composes his thoughts to write in letter to his daughter, wherein he aims to “*Tell Her Everything*”.

7. You for no conceivable reasons even refused to accept blank white seal-packed 200 pages, notepad, Edition of India Today magazine all of which in wildest of imagination can be used at best for writing and worst for littering or making paper planes. Here in this case, my client being a scholar and noted intellectual, am sure would have used the same for taking notes or writing letters which you meticulously scan and sensor when necessary, before they go out. In any case they posed no security threat.
8. Of the medical necessities, although they have accepted small bag containing all medical supplies, your officers have tick marked only those which will be given to my client. However, some of the items from list which are not tick marked have not been returned to me, which has left me guessing its meaning. Of all, I am more concerned about the wrist weight cuff/medical hand weight of 1Kg which he needs as part of his physiotherapy mandate.
9. You are aware that he has progressive degeneration of the nerves because of which he was advised regular assisted physiotherapy in order to ensure that he will not lose control over his only functional arm. While you have got medical experts to put him on self exercise as against assisted exercise, denying this instrument will only add into his misery. I hope sense will prevail over you on this count and you will allow him to use the equipment.
10. At the same time your officer has put a cross tick against shampoo bottle, and returned the same. My client had insisted shampoo bottle on urgent basis citing unbearable heavy dandruff and itchy hair. I must remind you, that my client obtains your prior approval before putting his demands to me. He draws two handwritten copies of the list, places one before you, seeks your permission and only after you show your readiness to accept the material, he sends me the second

copy. On last occasion when I had come, your officer was concerned as to why I did not bring shampoo, when it was part of the list submitted by Prof G N Saibaba. And when I brought it this time on his repeated demand, you chose to return it for no reason.

11. Of the essentials, you have even refused to accept woolen cap/monkey cap, Napkin, handkerchief, towel, and white T- shirt, while you accepted underwear and loincloth only. Given the bone chilling cold that whole of Nagpur is facing at the moment, I fail to understand how else do you expect my client to save himself from cold.
12. I have been trying to assist you in ensuring safe keep of my client and see to it that his health does not deteriorate any further. I, in no manner, am bound or required to render such “currier” services. However absolutely out of human feeling and realizing the inability of the family of Mr G N Saibaba which is situated in other States, I have been as such, performing it. Even during pandemic, risking my own health I have taken every effort to arrange for his requirements and provide you the same.
13. However now I feel it is high time that I should resist my humanitarian feelings and leave you to do your job of taking proper care of inmate lodged in your institution, all by your own means. On previous occasions your attitude to deprive my client of his basic necessities had drawn him to extreme stage of sitting on hunger strike. It was his grievance that while material reaches your office, you withhold some of it and do not pass it on to my client. He quit his agitation when you promised to give him his essentials and reading material. Be that as it may, I hope you will take all such steps as would be necessary to keep him alive, if not active.
14. I am not just aghast but demoralized by your all over conduct. Keeping me waiting for hours and then refuse to accept material shows your rudeness, disregards and complete insensitivity. Forget respect there is not even a bench or shadow where one can wait, while your officers take their time and finally shout out my name. Today, it was only an hour long waiting, for rest of the time it has always been more than two hours on an average, desperately waiting to hear ones name called out from a peep hole.

ADVOCATE

AAKASH K. SORDE,

Email Add: AAKASHSORDE@GMAIL.COM

Contact No: +91-9096007646

15. Yours and your officers conduct has also not been worthy of respect to an officer of the court. Time and again I have been reminded that this work is of families and not that of lawyers. May be it is not of a lawyer, but is it not of a human? Are lawyers only supposed to handle brief, charge fees and not show concerns for a person like that of my client?
16. To this day, I kept on religiously bringing and giving you necessities for a 90% paralyzed inmate, ignoring the treatment meted out to me. However I now call it quits. The humiliation is unbearable, your conduct incorrigible, illogical and inhuman.
17. I however put you to notice on instruction of the wife of Prof. G N Saibaba, that shall my client suffer any health hazard or deterioration or denial of any fundamental requirement, you in person shall be held responsible for damages and sued in appropriate court of law for appropriate action, consequences whereof, shall be your own did.

Take the notice, and act in best interest

Dated this 24.12.2020

Place: Nagpur

CC to:

1. Prof G N Saibaba, C9556, Anda Cell, Central Jail, Nagpur
2. Secretary, Bar Council of Maharashtra and Goa.
3. Secretary, Ministry of Home Department

ENCL: copy of list, bearing tick marks against the items

From,
Aakash K Sorde, Advocate
o/a 10, next to IIT Point,
2nd floor, Sanskrutik Sankul,
Jhansi Rani Square, Sitabuldi,
Nagpur, Maharashtra 440012
Email Add: AAKASHSORDE@GMAIL.COM
Contact No: +91-9096007646


Aakash Sorde, Adv

- ① Black Woolen Cap
- ② Napkins - 2
- ③ Handkerchief - 2
- ④ Towel - 1
- ⑤ Underwear - 2 ✓
- ⑥ White t-shirt
- ⑦ White lungi - 1 ✓

Stationery

- ① White sheet - 200 pages.
 - ② Notepad - 1 ✓
 - ③ India today magazine - 2 ✓
 - ④ Notebook - 1 ✓
 - ⑤ Book Name - Amma
 - ⑥ Tell her everything - Mirza Waheed.
 - ⑦ The Transpactive Constitution.
- } Books.

Medicines

- ① Gavlthria - 1
- ② Diclofenac Gel IP ✓
- ③ Wel Tears ✓
- ④ Atorvastatin tablets - 30 (10mg)
- ⑤ Atorva skin tablets - 30 (20mg) ✓

- 5) Thiamine Hydrochloride tablets - 10 ✓
- 6) Ofloxacin tablets - 10 ✓
- 7) Cipron - 250 ✓
- 8) ~~Metoprolol~~ Metoprolol Succinate - 1450mg
- 9) Metoprolol Succinate - 14-25mg
- 10) IFA WIFS - 20
- 11) Alphadol - 20
- 12) Pantoprazole - 20
- 13) Multivitamin tablets - 30 ✓
- 14) Paracetamol - 10 ✓
- 15) Meconeuron - 15 ✓
- 16) Cholecalciferol Granules - 5 ✓
- 17) Medical Handweight - 1kg - (Tynan)
- 18) Protein X ✓
- 19) Loreal shampoo ✗

- 20) Milk powder - 5
- 21) Milk powder - 5
- 22) Milk powder - 5 ✓
- 23) Milk powder - 5
- 24) Milk powder - 5
- 25) Milk powder - 5
- 26) Milk powder - 5