

**BEFORE THE HON'BLE HIGH COURT OF MADHYA  
PRADESH BENCH AT INDORE**

**Petitioner:** Kuldeep Tiwari & Anr.

**Versus**

**Respondents:** Union Of India & Ors.

**Interlocutory Application for Allowing the petitioner to remain  
present during the Survey being conducted by Respondent  
Number 2 ASI as per order dated 11/03/2024 of This Hon'ble  
Court**

The Petitioner most humbly submits as follows:

1. That, the petitioner has filed the present petition seeking directions against respondent number 2 ASI to conduct a survey by taking photographs of all inscriptions, artefacts and images available in Bhojshala complex and to preserve and protect them, among other reliefs.
2. That, the hon'ble Court has been pleased to order the ASI to conduct a detailed scientific survey by order dated 11/03/2024 in the connected matter WP/10497/2022, whereby the Hon'ble Court was pleased to allow two representatives of petitioner and respondent number 8 therein to remain present during the said survey.
3. That, the petitioner in this IA is seeking the approval of this Hon'ble Court to allow two representatives of the petitioner also to remain present during the said survey as the outcome of the



survey affects the rights of the petitioner and the out come of the petition.

4. That in view of the facts mentioned herein above as well as the averments made in the Petition it is necessary and expedient in the interest of justice that the Hon'ble Court may allow two representatives of the petitioner to remain present during the survey.

**Prayer**

The petitioner most humbly prays that the Hon'ble Court may allow two representatives of the petitioner to remain present during the survey conducted by respondent number 2 ASI as per order dated 11/03/2024 of this Hon'ble High Court.

Date:

Counsel for petitioner

Place:

Adv. Manish Gupta

Email- [maneesh041@gmail.com](mailto:maneesh041@gmail.com)

Mob.No. 9993796594

MP/1550/2019