

IN THE HIGH COURT OF DELHI AT NEW DELHI
(ORDINARY ORIGINAL CIVIL JURISDICTION)

I.A. No. _____ of 2026
IN
C.S. (OS) No. 335 of 2026

IN THE MATTER OF:

MR. SATISH SANPAL
(Through POA)

...PLAINTIFF

VERSUS

JAGRAN PRAKASHAN LTD. & ORS. ...DEFENDANTS

INDEX

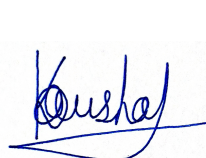
S.No.	PARTICULARS	PAGES
1.	Notice of Motion.	1
2.	Urgent Application.	2
3.	Application on behalf of the Plaintiff under Order XI Rule 1(10) and Rule 1(12) read with Section 151 of the Code of Civil Procedure, 1908, for filing additional documents along with affidavit in support.	3-11
4.	Proof of Service along with affidavit of service.	12-14

NOTE: All the Defendants have been duly served through their respective e-mail addresses, in compliance with the applicable rules and practice directions.

NOTE: Documents are filed separately vide Diary No. E-


PLAINTIFF/APPLICANT
THROUGH ITS POA

Filed by:




D/9755/22

Kaushal Jeet Kait / Parimal Bhatia
(D/1985/2020) (D/9755/2022)

For Lex Bellator
Advocates & Solicitors
B-21, 1st Floor, Nizamuddin East
New Delhi - 110013
M-9013908391, 9818451476
E-mail: advkaushal.kait@gmail.com

Dated: 29.04.2026

Place: New Delhi

IN THE HIGH COURT OF DELHI AT NEW DELHI
(ORDINARY ORIGINAL CIVIL JURISDICTION)

I.A. No. _____ of 2026
IN
C.S. (OS) No. 335 of 2026

IN THE MATTER OF:

MR. SATISH SANPAL
(Through POA)

...PLAINTIFF

VERSUS

JAGRAN PRAKASHAN LTD. & ORS. ...DEFENDANTS


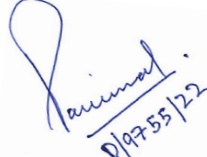
NOTICE OF MOTION

Sir,

Please find enclosed an application under Order XI Rule 1(10) and Rule 1(12) read with Section 151 of the Code of Civil Procedure, 1908, that is being filed on behalf of the Plaintiff for placing on record additional documents pursuant to the directions issued by this Hon'ble Court. The application is likely to be listed on **06.05.2026**. Please take notice accordingly.


PLAINTIFF/APPLICANT
THROUGH ITS POA

Filed by:

 
D/1985/2020 D/9755/22

Kaushal Jeet Kait / Parimal Bhatia
(D/1985/2020) (D/9755/2022)

For Lex Bellator

Advocates & Solicitors

B-21, 1st Floor, Nizamuddin East
New Delhi - 110013

M-9013908391, 9818451476

E-mail: advkaushal.kait@gmail.com

Dated: 29.04.2026

Place: New Delhi

IN THE HIGH COURT OF DELHI AT NEW DELHI
(ORDINARY ORIGINAL CIVIL JURISDICTION)

I.A. No. _____ of 2026
IN
C.S. (OS) No. 335 of 2026

IN THE MATTER OF:

MR. SATISH SANPAL
(Through POA)

...PLAINTIFF

VERSUS

JAGRAN PRAKASHAN LTD. & ORS. ...DEFENDANTS

URGENT APPLICATION

To
The Registrar,
Delhi High Court,
New Delhi.

Sir,

Kindly treat the accompanying application as an urgent one in accordance with the High Court Rules and Orders. The grounds of urgency are:

"Urgent directions as being prayed for in compliance with the directions of this Hon'ble Court."


PLAINTIFF/APPLICANT
THROUGH ITS POA

Filed by:

 
D/9755/22

Kaushal Jeet Kait / Parimal Bhatia
(D/1985/2020) (D/9755/2022)

For Lex Bellator

Advocates & Solicitors

B-21, 1st Floor, Nizamuddin East
New Delhi - 110013

M-9013908391, 9818451476

E-mail: advkaushal.kait@gmail.com

Dated: 29.04.2026

Place: New Delhi

2. That the present suit has been filed by the Plaintiff seeking, inter alia, a decree of permanent injunction, mandatory injunction, and damages of Rs. 50,00,00,000/- (Rupees Fifty Crores only) against the Defendants on account of the publication, dissemination, broadcast, and continued hosting of patently false, misleading, and defamatory content branding the Plaintiff as, inter alia, a "bookie", "hawala operator", "satoria", "fugitive", and "absconding criminal", in complete absence of any judicial determination of guilt.
3. That during the course of proceedings, this Hon'ble Court was pleased to direct the Plaintiff to place on record the copies of the FIRs that have been referenced and relied upon by the Defendants in the impugned articles/publications, for the purposes of enabling this Hon'ble Court to appreciate the true and complete factual matrix of the matter, including the precise nature of the allegations contained in the said FIRs, the offences ascribed therein, and the present status of the said proceedings.
4. That in due compliance with the said directions of this Hon'ble Court, the Plaintiff seeks leave to place on record the copies of the following three (03) FIRs as additional documents:
 - i. FIR No. **271/2022** registered on **28.05.2022** at **OMTI Police Station, Jabalpur, Madhya Pradesh**, under Sections **120-B of the Indian Penal Code, 1860**, and **Section 4A of the Public Gambling Act, 1867**. The said FIR has been referenced and relied upon by the Defendants in the impugned publications, which form

part of the present suit. The present status of the said proceedings is that the Plaintiff has been **granted bail by the competent court vide order dated 10.12.2025**, and the Plaintiff has not been declared a proclaimed offender by any court of competent jurisdiction.

- ii. FIR No. **170/2022** registered on **23.04.2022** at **Madan Mahal Police Station, Jabalpur, Madhya Pradesh**, under Sections **109, 112, 114 and 120-B of the Indian Penal Code, 1860, and Section 4A of the Public Gambling Act, 1867**. The said FIR has been referenced and relied upon by the Defendants in the impugned publications, which form part of the present suit. The present status of the said proceedings is that the Plaintiff has been **granted bail by the competent court vide order dated 05.01.2026**, and the Plaintiff has not been declared a proclaimed offender by any court of competent jurisdiction.
- iii. FIR No. **356/2022** dated **10.06.2022**, registered at **P.S. Lordganj, Jabalpur, Madhya Pradesh**, under Section **420 of the Indian Penal Code, 1860**. The said FIR has been referenced and relied upon by the Defendants in the impugned publications, which form part of the present suit. The present status of the said proceedings is that the Plaintiff has been **granted bail by the competent court vide order dated 21.01.2026**, and the Plaintiff has not been declared a proclaimed offender by any court of competent jurisdiction.

5. That the aforesaid documents are essential and necessary for the just and proper adjudication of the issues arising in the present suit. The Plaintiff respectfully submits that the said FIRs assume direct relevance for the following reasons:

- i. **To Demonstrate Compliance with the Court's Directions:** The proposed documents are placed on record in due and direct compliance with the express directions of this Hon'ble Court, and the Plaintiff is bound to assist this Hon'ble Court in the manner so directed.
- ii. **To Establish the Factual Foundation of the Defamatory Publications:** The said FIRs constitute the very basis upon which the Defendants have purported to author and publish the impugned articles. Their production on record will enable this Hon'ble Court to appreciate the precise contents of the FIRs vis-à-vis the manner of reportage adopted by the Defendants.
- iii. **To Demonstrate the Distinction Between Allegation and Adjudication:** The FIRs reflect mere allegations and do not constitute any judicial determination of guilt. The production of the said FIRs is therefore necessary to demonstrate that the Defendants have impermissibly conflated unproven allegations with established guilt and have publicly branded the Plaintiff as a confirmed criminal in violation of the settled norms of journalistic conduct.
- iv. **To Place the Present Status on Record:** The Plaintiff has been granted bail in the proceedings

arising out of the said FIRs and has not been declared a proclaimed offender by any court of competent jurisdiction. The said documents will assist this Hon'ble Court in appreciating the falsity of the Defendants' characterisation of the Plaintiff as an "absconding", "farar", or "fugitive" criminal.

6. That the Plaintiff could not have placed the aforesaid documents on record at the time of institution of the suit inasmuch as the necessity for the said documents has specifically arisen pursuant to the directions issued by this Hon'ble Court for the purposes of proper adjudication of the matter. The Plaintiff submits that the filing of the said additional documents at this stage is just, equitable, and in consonance with the principles of natural justice.
7. That no prejudice whatsoever shall be caused to the Defendants if the Plaintiff is permitted to place on record the aforesaid additional documents. On the contrary, the inclusion of these documents is critical to enable this Hon'ble Court to appreciate the complete factual matrix of the matter and to ensure a fair and expeditious resolution of the suit on its merits.
8. That the present application is not an attempt to delay the proceedings or to introduce any irrelevant material on record. Rather, it is a bona fide effort, in due compliance with the directions of this Hon'ble Court, to ensure that all relevant facts and documents are made available for the just adjudication of the suit.

9. That the balance of convenience lies in favour of the Plaintiff and against the Defendants, and the grant of leave as prayed for shall serve the ends of justice.

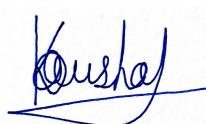
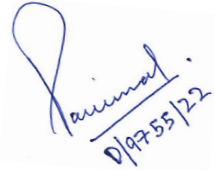
PRAYER

In view of the facts and circumstances stated hereinabove, it is most respectfully prayed that this Hon'ble Court may be pleased to:

- a. Grant leave to the Plaintiff to place on record the additional documents, namely the certified copies of the three (03) FIRs detailed in Paragraph 4 hereinabove, under Order XI Rule 1(10) and Rule 1(12) read with Section 151 of the Code of Civil Procedure, 1908;
- b. Direct that the said additional documents be taken on record and read as part of the Plaintiff's pleadings and documents in the present suit, for the purposes of just and proper adjudication of the issues arising therein;
- c. Pass any such further or other order(s) as this Hon'ble Court may deem fit and proper in the facts and circumstances of the present case, in the interest of justice.


**PLAINTIFF/APPLICANT
THROUGH ITS POA**

Filed by:

 
Kaushal Jeet Kait / Parimal Bhatia
(D/1985/2020) (D/9755/2022)
For Lex Bellator

Advocates & Solicitors

B-21, 1st Floor, Nizamuddin East

New Delhi - 110013

M-9013908391, 9818451476

E-mail: advkaushal.kait@gmail.com**Dated: 29.04.2026****Place: New Delhi**

IN THE HIGH COURT OF DELHI AT NEW DELHI
(ORDINARY ORIGINAL CIVIL JURISDICTION)

I.A. NO. _____ of 2026
IN
C.S. (OS) NO. 335 of 2026

IN THE MATTER OF:

MR. SATISH SANPAL

...PLAINTIFF

(Through POA – Shri Yogesh Sharma)

VERSUS

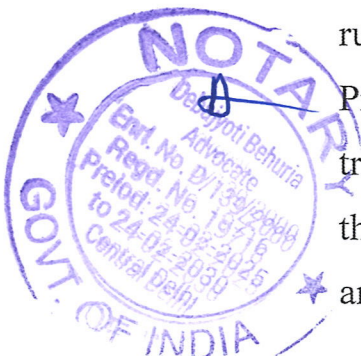
JAGRAN PRAKASHAN LTD. & ORS.

...DEFENDANTS

AFFIDAVIT

I, YOGESH SHARMA, S/o Late Sh. M.L. Sharma, R/o B-1/12, Safdarjung Enclave, New Delhi – 110029, the duly constituted Power of Attorney Holder of the Plaintiff, Mr. Satish Sanpal, do hereby solemnly affirm and state on oath as under:

1. That I am the Power of Attorney Holder of the Plaintiff, Mr. Satish Sanpal, and am well conversant with the facts and circumstances of the present case. I am competent to swear this Affidavit on behalf of the Plaintiff.
2. That I have read and understood the contents of the accompanying Application under order XI rule 1(10) And rule 1(12) read with section 151 of the Code Of Civil Procedure, 1908. The contents of the said Application are true and correct to my knowledge, and are stated to be so on the basis of the records and documents available with me, and I believe the same to be true.



[Handwritten signature]

DEPONENT

VERIFICATION

29 APR 2026

Verified at New Delhi on this ___ day of April 2026 that the contents of the above Affidavit are true and correct to the best of my knowledge and belief and nothing material has been concealed therefrom.

[Handwritten signature: Koushal]

I Identified the deponent who has signed in my presence

[Handwritten signature]

DEPONENT



CERTIFIED THAT THE DEPONENT
Shri/Smt./Km. *Mahesh Sharma*
S/o, W/o R/o *Shri. M.L. Sharma*
Identified by Shri/Smt. *Kaushal Jitendra A/W*
Has solemnly affirmed before me
Delhi on..... as S/ No. *(70)*
That the contents of the affidavit which
have been read & explained to him/h
& is true & correct to his/her knowledge

29 APR 2026