

Re: Meeting notice dtd 27 March 2025 at 1430 hrs

From: [REDACTED]

To: fsdsec.dgca@gov.in

Cc: dgoffice@dgca.nic.in; bbhushan.dgca@nic.in; ssaxena.dgca@nic.in; jamwal.dgca@nic.in;
shwetasingh.dgca@gov.in; pavanmalviya.dgca@nic.in; shashankshekhar.dgca@gov.in;
himanshusri1958.dgca@gov.in; adhiraj.dgca@gov.in

Date: Sunday, 4 May, 2025 at 11:31 pm IST

04.05.2025

Dear All the DGCA Officials listed separately by their email address in this email and to whomsoever it may concern in the O/o DGCA,

It is with a very heart and disturbed mind that I write this communication to Yourselves.

2 At the very outset, I mention that there is whatsoever NO ENEMITY from my side against anyone or any entity; but infact it is a basic and crucial matter concerning the safety, security and lives of lakhs of passengers and crew, travelling by the much reputed Air India Ltd; and which said crucial matter needs to be dealt with squarely taking in account all facets surrounding it, beginning from the cause of action onwards.

3 This is indicated in Para 2 of the Order dated 19.12.2024, wherein The Honourable High Court of Judicature at Bombay has unequivocally stated that :

Para 2 : “We are of the view that this is not a matter of a bilateral dispute between two parties, but a matter that involves issues of a wider social impact involving flight safety and passenger safety. We take note that Respondent No.3 is fairly resolute and confident that it meets every norm applicable in this regard whereas the Petitioner is as resolute in his view that it is not so. We are not experts in the field and we believe that it would be appropriate that these issues are squarely dealt

with by the DGCA, without our views influencing the appreciation by DGCA of all facets involved in the matter.

In the afore-said Para 2, The Honourable High Court of Judicature at Bombay has unequivocally mentioned that it is **"a matter that involves issues of a wider social impact involving flight safety and passenger safety"** and would be appropriate that these issues are **"squarely dealt with by the DGCA"** comprising **"of all facets involved in the matter"**.

As per the Court Oder, You are ordained to deal with the matter on-hand thoroughly befitting any such **matter that involves issues of a wider social impact involving flight safety and passenger safety**

(a) **"squarely"**

and

(b) **"of all facets involved in the matter"**

which means for the times **NOT ONLY AFTER, BUT INFACIT EVEN BEFORE and DURING** the date of the concerned initial incident/s which led to the cause of action, i.e. the initial Complaint dated 29.10.2023. But unfortunately, instead of **"squarely"** dealing with the issues, You have contrastingly and unconscionably, vide Your communication dated 21.02.2025, chosen to circumvent Your responsibility of **"squarely"** dealing with the issues **"of all facets involved in the matter"**; by refusing to share the evidentiary documents requested by me (Applicant / Petitioner) appertaining to the period **BEFORE** the date of the concerned incident as well as the DGCA Order dated 24.01.2024, by frivolously mis-interpreting, mis-construing, mis-representing and **TWISTING** the words of the Order of The Honourable Bombay High Court dated 19.12.2024 to suit your **UNHOLY** objectives; and selectively choosing to **REFUSE** the furnishing of evidentiary documents **BEFORE** the date of the concerned incident as well as the DGCA Order dated 24.01.2024; by simply brushing off and non-chalantly stating that :

*"... as such the documents related to flight(s) of Air India prior to 24.01.2024, as sought by you vide your e-mail dated 10.01.2025 **"are not relevant"** for*

*conducting the proceedings as mandated by Hon'ble High Court and accordingly your request for providing the same **"cannot be acceded to"***

This vulgar approach of Yourselves is ABSOLUTELY UNTENABLE, ESPECIALLY SINCE THERE IS NEITHER A NEGATIVE COVENANT NOR AN EMBARGO BY THE HONOURABLE COURT RESTRICTING YOU FROM COMPLYING WITH YOUR ONUS OF FURNISHING MY REQUESTED EVIDENTIARY DOCUMENTS, BEING MUCH IN ORDER AND COMMENSURATE WITH THE REQUIREMENT OF THE CRUCIAL SUBJECT MATTER DEALING WITH THE SAFETY, SECURITY AND LIVES OF LAKHS OF PASSENGERS AND CREW, TRAVELLING BY THE MUCH REPUTED AIR INDIA LTD, AND WHICH BEING IN SYNC WITH THE REQUIREMENTS OF DEALING **"squarely" with the issues **"of all facets involved in the matter"**.**

I call upon to provide legally tenable reasons substantiating Your stand that the documents which I have requested for **"are not relevant"** and my request **"cannot be acceded to"**; especially since my request for documents is **SURROUNDING THE TIMES AND PERIODS OF THE VERY CAUSE OF ACTION ARISING OUT OF MY COMPLAINT DATED 29.10.2023 AND WHICH LED TO YOUR ORGANISATION ISSUING A 'SCN' (SHOW CAUSE NOTICE) TO AIR INDIA LTD DATED 02.11.2023 (AS REPORTED BY SAURABH SINHA (The Times of India) AND WHEREAFTER IT ENTAILED AN EXCHANGE OF SEVERAL emails, ANNEXURES, COMMUNICATIONS INCLUDING HAND DELIVERED CORRESPONDENCES, BY AND BETWEEN, YOU AND AIR INDIA LTD; AND ONLY AFTER WHICH **"DETAILED"** PROCESS OF THE TO-AND-FRO, INCLUDING SERVING A SECOND SCN (SHOW CAUSE NOTICE) TO AIR INDIA LTD DATED 30.11.2023, DID YOU CULMINATE INTO THE ISSUANCE OF AN ORDER DATED 24.01.2024; DUE TO WHICH YOU WERE EVEN BROUGHT TO THE STAGE AND EXTENT OF LEVYING A PENALTY UPON AIR INDIA LTD FOR A MEAGRE, PUISNE AND TOKEN AMOUNT OF RS.1,10,00,000/= (RUPEES ONE CRORE TEN LAKHS) FOR THAT **"SINGULAR FLIGHT ONLY"** AND WHICH SAID-PENALTY AMOUNT WAS APPEALED AGAINST BY AIR INDIA LTD AND WHICH SAID-APPEAL BY AIR INDIA LTD WAS DULY REJECTED BY YOURSELVES DUE TO THE REVELATION OF**

AIR INDIA LTD THAT THEY WERE FLYING ILLEGAL AND DANGEROUS FLIGHTS AT THE COST OF THE LIVES, SAFETY, SECURITY OF LAKHS OF PASSENGERS AND CREW, TRAVELLING BY THE MUCH REPUTED AIR INDIA LTD (THOUGH IT IS STILL A WONDER AS TO WHY HAVE YOU STOPPED THE PENALTY AMOUNT AT THAT “SINGULAR FLIGHT ONLY”, AND NOT TAKEN COGNISANCE OF THE CONTINUING VIOLATIONS AND OMISSIONS BY AIR INDIA LTD FROM THE PAST PERIODS ONWARDS TILL DATE ?)

ARE SOME PERSONS WAITING OR WANTING FOR MORE MISHAPS TO OCCUR, SO AS TO THEN CONDUCT LATE-IN-THE-DAY INQUIRIES ?

THUS AND THEREFORE, WHEN ON THE ONE HAND, FOR YOUR SIDE OF THE PURPOSES, YOU WENT INTO THE WHOLE GAMUT OF STEPS OF ISSUING ‘SCN’ AFTER ‘SCN’ TO EXCHANGING SEVERAL emails, ANNEXURES, COMMUNICATIONS INCLUDING HAND DELIVERED CORRESPONDENCES, BY AND BETWEEN, YOU AND AIR INDIA LTD; AND ONLY AFTER WHICH DETAILED PROCESS OF A TO-AND-FRO, DID YOU CULMINATE INTO TAKING A DECISION WHICHEVER WAY; THEN HOW COME YOU ARE UNFAIRLY TURNING DOWN MY LEGITIMATE REQUEST FOR THOSE DOCUMENTS WHICH ARE RELEVANT, AND NOT PROVIDING ME WITH THE EQUAL OPPORTUNITY TO GO THROUGH THE GAMUT OF STEPS AS PER THE PRINCIPLES OF NATURAL JUSTICE, WHICH ARE, ONLY AND SIMPLY, REQUIRED TO SERVE THE HONEST PURPOSE OF DELVING INTO THE SUBJECT MATTER IN THE RIGHT PERSPECTIVE WITH THE DESERVING QUOTIENT OF TRANSPARENCY AS WITH ANY INVESTIGATIVE / INQUIRY PROCEDURE WHEREIN IT IS A LAID DOWN ‘SOP’ THAT DOCUMENTS BE PROVIDED TO ALL PARTIES INVOLVED, AS PART OF PRODUCTION AND DISCOVERY; RATHER THAN SHROUDING IT WITH OPACITY AND SUSPICION, AS IS BEING DONE PRESENTLY BY YOURSELVES; UNLESS THERE IS SOME ULTERIOR MOTIVE TO HIDE SOMETHING OR SHIELD THE CULPRITS ?

4 **HENCE, IT IS DIFFICULT TO COMPREHEND AS TO, ON WHAT LEGALLY TENABLE BASIS CAN YOU CLAIM TO CONTEND THAT MY REQUESTS FOR DOCUMENTS “are not relevant” AND “cannot be acceded to” ESPECIALLY WHEN AS PER THE HONOURABLE COURT, IT IS APPERTAINING to the “matter that involves issues of a wider social impact involving flight safety and passenger safety”. Infact, APART FROM the documents for the dates BEFORE and AFTER Your Order dated 24.01.2024, Your actions of refusing to share EVEN THE OTHER DOCUMENTS INCLUDING THE COPY OF YOUR ORDER dated 24.01.2024 which I had requested for, have **NOT YET** been furnished to me; and which is an act of omission against all prevalent principles of equity and natural justice and a direct contempt of the Order of The Honourable Court which has clearly stated this “matter that involves issues of a wider social impact involving flight safety and passenger safety” and **NEEDS TO BE DEALT “SQUARELY”** by You; but on the contrary and instead, what is being indulged in by You is **UNFORTUNATELY A CLEAR-CUT APPROACH OF SCUTTLING A HIGHLY CRUCIAL AND CRITICAL DUTY BOUND ISSUE WITH IMPUNITY.****

5 Please understand, that **WITHOUT** my requested Documents being furnished to me, I am being throttled and incapacitated from being able to make my complete submissions, and hence so far, I have only shared the Documents that were in my knowledge. And **ONLY AFTER RECEIVING MY REQUESTED DOCUMENTS FROM YOU**, will I be able to make my submissions orally in a genuinely and transparently conducted Video Conference which would be duly recorded, so as to be able to be referred to by The Honourable Court for the purposes of evidence; and **WITHOUT** which the very exercise of investigation / inquiry is fraught with **UNFAIR, UNJUST, ONE SIDED** and **INIQUITOUS** approach, much against the Principles of Natural Justice and *audi alteram partem* emanating from the Rule of Law.

Please oblige and substantiate as to why Your approach does **NOT** qualify to being labelled as **UNFAIR, UNJUST, ONE SIDED** and/or **INIQUITOUS** ?

6 Moving further on, as is indicated in Para 3 of the Order dated 19.12.2024, wherein The Honourable High Court of Judicature at Bombay has unequivocally stated

as reproduced below, that :

Para 3 : “Consequently, we put it to the Learned Counsel of the parties that we were inclined to send the matter for full consideration of the DGCA. In forming this view, we were also cognizant of the fact that the penalty order dated January 24, 2024 passed by the DGCA, and the appellate order dated May 24, 2024, upholding the penalty, do not articulate the issues involved in a manner that enables us to form a view on the merits of the matter, in the course of judicial review by us. Consequently, it is only appropriate that these facets are squarely considered and dealt with by Respondent No.1, in an articulate and comprehensible manner”.

Herein this afore-said Para 3, The Honourable High Court of Judicature at Bombay has mentioned that the matter needs to be sent for **“full consideration of the DGCA”** and that the **“facets are squarely considered and dealt with by Respondent No.1, in an articulate and comprehensible manner”**.

It is brought to Your notice that by capriciously turning down my request for Documents and brushing them off as if they **“are not relevant”** AND **“cannot be acceded to”**, is actually an issue of Yourselves not acceding to the important part of the afore-said Para 3 of the Order of The Honourable High Court of Judicature at Bombay; especially when The Honourable Court has mentioned that the matter needs to be sent for **“full consideration of the DGCA”** and that the **“facets are squarely considered and dealt with by Respondent No.1, in an articulate and comprehensible manner”**. Without furnishing me with my requested Documents, how do You intend to comply with the Order of The Honourable Court and deal with the matter in **“full consideration”** and see to it that the **“facets are squarely considered and dealt with in an articulate and comprehensible manner”** ?

7 Moving still further on, as is indicated in Para 5 of the Order dated 19.12.2024, wherein The Honourable High Court of Judicature at Bombay has unequivocally stated that :

Para 5 : “We direct the DGCA to examine the foregoing, consider all material relevant to the compliance, and the need for remedial

measures and directions, if any”.aforesaid issue, and arrive at its findings on

Herein this afore-said Para 5, The Honourable High Court of Judicature at Bombay has re-iterated that ***“the DGCA to examine the foregoing, consider all material relevant to the aforesaid issue and arrive at its findings on compliance, and the need for remedial measures and directions, if any”***.

It is once again brought to Your notice that on the one hand, despite The Honourable Court rightly and honestly categorising the crucial and critical issue as being an issue of ***WIDER SOCIAL IMPACT INVOLVING FLIGHT SAFETY AND PASSENGER SAFETY*** (as seen in their Para2), on the other hand, Your looking at the crucial and critical issue **THROUGH SUCH A NARROW COMPASS** does **NOT** lend any deserved honesty to the issue on hand. And Your turning down my request for Documents and admonishing my **LEGITIMATE** requests, as if they ***“are not relevant”*** AND ***“cannot be acceded to”*** is actually a dis-service to onus of Your responsibilities being a **SECTORAL REGULATOR** (as The Honourable Court has addressed You as in their Para 7).

Without furnishing me with my requested Documents comprising ***all material relevant to the aforesaid issue*** as The Honourable Court has ordained in their Para 5, how do You intend to judiciously comply with the Order of The Honourable Court and **TRANSPARENTLY** deal with the matter, and not indulge in conducting a **CONDITIONAL, RESTRICTED, LIMITED, BIASED** and **SUFFOCATING Inquiry / Investigation OVER SUCH A CRUCIAL AND CRITICAL ISSUE OF WIDER SOCIAL IMPACT INVOLVING FLIGHT SAFETY AND PASSENGER SAFETY?**

8 Sirs, to further emphasise Your duties, responsibilities and obligations; please refer to Para 7 of the Order dated 19.12.2024, whereby The Honourable High Court of Judicature at Bombay has unequivocally mentioned that :

Para 7 : “We trust the DGCA as a sectoral regulator, to take into account all facets of its regulatory mandate in the course of dealing with the issue that the parties have agreed to have us refer to the DGCA, with the due dispatch that the DGCA considers appropriate to deal with the

issue at hand. We trust that the DGCA, which has a number of pilots from Air India on deputation, would ensure that the entire process is conducted in a manner that does not leave any room for a perception of conflict of interest at any level of its regulatory review".

It is amply clear from the foregoing that The Honourable Court has reposed its immense trust upon Yourselves as a **"sectoral regulator"** with the confidence that You will **"take into account all facets of its regulatory mandate"**. This clearly casts upon Yourselves, the responsibility and onus of coming forward as a **"sectoral regulator"** and taking into accounts **"all facets of its regulatory mandate"** and **NOT** hiding behind words or escaping with some lame excuse or the other.

9 Yet again, as is indicated in Para 6 of the Order dated 19.12.2024, The Honourable High Court of Judicature at Bombay has further unequivocally stated that :

Para 6 : "The DGCA shall conduct the proceedings in accordance with law, and following the principles of natural justice. In the peculiar facts of this case only, we permit both the Petitioner and Respondent No.3 to present their submissions to the DGCA, with all relevant documents and their contentions and both shall be granted an opportunity of being heard by Respondent No.1, with an opportunity of controverting any contentions and submissions of the other. It is clarified that we have not expressed any view on the merits of the matter one way or the other and that all contentions of the parties in connection with the issues referred to the DGCA are expressly kept open".

Herein this afore-said Para 6, The Honourable High Court of Judicature at Bombay has stated the very **BASICS** of **LAW** that **"The DGCA shall conduct the proceedings in accordance with law, and following the principles of natural justice"** and **"with all relevant documents"**; and **THEREFORE NOTHING** and **NO EXCUSE REMAINS FOR THE DGCA TO NOT SHARE all relevant documents SO AS TO DULY CONDUCT the proceedings in accordance with law and following the principles of natural justice AS STATED BY THE HONOURABLE COURT; UNLESS THERE IS FEAR IN YOUR MINDS THAT**

SOME MORE SKELETONS WILL FALL OUT FROM THE CLOSET OF EITHER AIR INDIA OR THE DGCA ?

10 Therefore, it is a sincere request to NOT skirt the issue and come with clean hands before The Honourable Court, essentially because the matter deals with **CRUCIAL AND CRITICAL ISSUE OF WIDER SOCIAL IMPACT INVOLVING FLIGHT SAFETY AND PASSENGER SAFETY ?**

11 Yet again, as is indicated in Para 8 of the Order dated 19.12.2024, The Honourable High Court of Judicature at Bombay has further stated that :

Para 8 : “The Petition is disposed of in the aforesaid terms. Needless to clarify, we make it clear that we do not intend to circumscribe the exercise of regulatory jurisdiction by the DGCA on any facet of any matter outside the scope of these proceedings”.

Herein this afore-said Para 8, The Honourable High Court of Judicature at Bombay has **EXPLICITLY CLARIFIED** and taken a firm stand that they :

- (i) **“do not intend to circumscribe the exercise of regulatory jurisdiction by the DGCA”**
- (ii) **“on any facet”**
- (iii) **“of any matter outside the scope of these proceedings”**

The afore-said **EXPLICITLY CLARIFIES** that The Honourable Court **do not intend to “circumscribe” the exercise of regulatory jurisdiction by the DGCA**; but which is precisely what You are doing, by refusing to furnish me with my requested Evidentiary Documents and **BLUDGENING** the very meaning, spirit and process of the entire inquiry / investigation; which is why The Honourable Court has said that it should delve upon **“on any facet”** and **“of any matter outside the scope of these proceedings”**; **especially since my Writ Petition is “not a matter of bilateral dispute between two parties, but a matter that involves issues of a wider”**

social impact involving flight safety and passenger safety” (quoted *ad verbatim* from Para 2 of the Order of The Honourable Court dated 19.12.2024); primarily because the risks at hand could extend to even Other Types of Aircrafts and/or Other Air Safety / ‘CAR’ violations of any kind including but not limited to Violations of the Terms and Conditions of the Insurances.

But as a so-called response, You are casually stating that my requested Evidentiary Documents are **“are not relevant”** AND **“cannot be acceded to”**. This is not only **SHOCKING TO THE EARS** but even **SHOCKING THE CONSCIENCES**.

12 After, explaining to Yourselves about the important intents and contents of the Order of The Honourable Bombay High Court dated 19.12.2024; we are now desirous of addressing **Your Letter dated 20.02.2025**.

13 Reply to Your Para Nos 2 and 3 of Your Letter dated 20.02.2025 :

We have **EXTENSIVELY, LEGITIMATELY and LAWFULLY** addressed the contents of Your Paras 2 and 3 of Your Letter dated 20.02.2025, vide our Para Nos 3 to 11 hereinabove.

14 Reply to Your Para No 4 of Your Letter dated 20.02.2025 :

Whilst I was very happy to receive Your phone call on 10.01.2025, followed immediately by an email that same day, mentioning that You were wanting to hold a hearing on 16.01.2025 at 1500 hrs; but at the same time I found Your requirement of wanting me to report physically before Yourselves **at New Delhi**, practically unviable and unreasonable due to my financial and dire straits caused by the very act/s and omission/s of Air India Ltd; and therefore I promptly replied and requested for a Video Conference Link and also requested for certain important and relevant evidentiary documents (which You untenably and illegitimately turned down.)

However, whilst I was eagerly waiting in attendance, from before 1500 hrs till 1615 hrs for your VC Link to participate in the afore-mentioned VC hearing of 16.01.2025; **You dealt another shock by UNILATERALLY, UNETHICALLY, UNPROFESSIONALLY, and CAPRICIOUSLY CANCELLING the above-stated hearing of 16.01.2025, WITHOUT ANY INTIMATION and/or EVEN A WHISPER OF A MENTION TO ME through WHATSOEVER ANY AND ALL THE MEANS OF COMMUNICATION available at Your disposal.**

And to which high handed act / omission of Yourselves, I called **Mr Hemanta Srivastava** but he CONVENIENTLY did not answer my call. However, I immediately wrote to Yourselves and reported the choreographed-failed hearing and asked for an explanation to Your **UNILATERAL, UNETHICAL, UNPROFESSIONAL, and CAPRICIOUS ACT / OMISSION OF CANCELLING the above-stated hearing of 16.01.2025, WITHOUT ANY INTIMATION and/or EVEN A WHISPER OF A MENTION TO ME through WHATSOEVER ANY AND ALL THE MEANS OF COMMUNICATION available at Your disposal.**

There was CONVENIENTLY NO REPLY from Yourselves to the afore-said.

However, on 20.01.2025, I once again wrote to Yourselves serving You a Notice for Your above acts, and received an appalling SO-CALLED reply from You on 20.01.2025, wherein You **ONCE AGAIN CONVENIENTLY ESCAPED / EVADED and AVOIDED THE RESPONSE TO THE EXPLANATION ASKED OF YOU, AS TO WHY DID YOU UNILATERALLY, UNETHICALLY, UNPROFESSIONALLY, and CAPRICIOUSLY CANCEL the above-stated hearing of 16.01.2025, WITHOUT ANY INTIMATION and/or EVEN A WHISPER OF A MENTION TO ME through WHATSOEVER ANY AND ALL THE MEANS OF COMMUNICATION available at Your disposal.**

YOU SKIRTED THE MAIN TOPIC and instead in the same said SO-CALLED reply of Yourselves of 20.01.2025; You made FALSE ALLEGATIONS upon me that I *“refused to attend the hearing of 16.01.2025”*. Whereas the fact of the matter is that I **NEVER EVER “refused to attend the hearing of 16.01.2025”**; and all that I sincerely communicated and requested was for a VC Link, simply and honestly because of the genuine difficulties cast upon me by the act/s and omission/s of Air India Ltd.

Then You made another FALSE ALLEGATION upon me that You *“requested me to advise a suitable date for an online meeting VC on 20 or 21 January 2025 alongwith*

suitable time". I vehemently state that You **NEVER EVER** made any such request or even any such offer to me; but instead UNILATERALLY OF YOUR OWN VOLITION kept the date of the hearing as 21.01.2025.

Please note that in my earlier written communication dated 21.01.2025, I have put You to strict burden and onus of furnishing me with legally tenable evidence of Your afore-mentioned FALSE ALLEGATIONS that :

- (i) I *"refused to attend the hearing of 16.01.2025"*
- (ii) Your *"request made to me to advise a suitable date for an online meeting VC on 20 or 21 January 2025 alongwith suitable time"*.

It is NOT surprising that You have **TILL DATE NOT YET** furnished me with **WHATSOEVER** any evidence of Your afore-mentioned FALSE ALLEGATIONS made against me. Thereby, confirming that **Your ALLEGATIONS were ABSOLUTELY FALSE, FRIVOLOUS and UNTENABLE.**

15 Reply to Your Para No 5 of Your Letter dated 20.02.2025 :

It is an admitted position that the proceedings of the matter was conducted on 21.01.2025 at 1530 hrs through Video Conferencing Link provided to me by Yourselves and which was accessed through my Laptop at my residence; HOWEVER, the question of WHY IT WAS NOT CONDUCTED on the Original Previous date of 16.01.2025 is A MYSTERY TILL DATE UNANSWERED DUE TO CLANDESTINE REASONS AND HIDDEN AGENDAS KNOWN ONLY TO YOURSELVES.

Further, the afore-stated Video Conference dated 21.01.2025 had the following blaring and shocking defects :

- (a) **NO INQUIRY PANEL** was constituted.
- (b) Air India was **NOT** called by Yourselves to participate in the Inquiry / Investigation. And when I raised an objection about the absence of Air India, there was **PIN DROP SILENCE** by You and to top it all there was NO MENTION of correcting Your defect by assuring me that Air India would be called in the next VC Meeting.

(c) **ALL RELEVANT** Evidentiary Documents related to the Case were **NOT YET** furnished to me by Yourselves, as well as by Air India; even despite my requesting for them since 10.01.2025; and infact were **REFUSED** to be furnished to me by Yourselves, even in the very subject VC meeting of 21.01.2025, despite it being an **INTEGRAL PART OF THE BASIC STRUCTURE** of any **LEGITIMATE INQUIRY / INVESTIGATION**, mandating the incorporation of the **PRINCIPLES OF NATURAL JUSTICE** into it and which said fundamental has even been duly mentioned in Para 6 of the Order of The Honourable High Court dated 19.12.2024.

Especially, when it has also been mentioned in Para 5 of the Order of The Honourable High Court dated 19.12.2024; wherein it has been stated that :

“We direct the DGCA to examine the foregoing, consider all material relevant to the aforesaid issue, and arrive at its findings on compliance, and the need for remedial measures and directions, if any”.

The non-compliance of the above-stated, therefore brings one to conclude that the afore-stated VC Meeting of 21.01.2025 was a **BIG SHAM and FARCE with MANIPULATION and EXPOSING LACK OF DUE PROCESS WRIT LARGE OVER IT.**

16 Reply to Your Para No 6 of Your Letter dated 20.02.2025 :

It is a fact of the matter that I have asked for the Evidentiary Documents as stated in the said Para No 6 of Your Letter dated 20.02.2025.

It is also a fact of the matter that, the Evidentiary Documents that I have asked for are **ALL RELEVANT** Evidentiary Documents related to the Case and which have **NOT YET** been furnished to me by Yourselves or by Air India, even despite my requesting for them since 10.01.2025; and infact were **REFUSED** to be furnished to me by Yourselves, even in the very subject VC meeting of 21.01.2025, despite it being an **INTEGRAL PART OF THE BASIC STRUCTURE** of any **LEGITIMATE INQUIRY / INVESTIGATION** meaning to be held, mandating the incorporation of the **PRINCIPLES OF NATURAL JUSTICE** into it and which said fundamental has even

been duly mentioned in Para 6 of the Order of The Honourable High Court dated 19.12.2024.

Especially, when it has also been mentioned in Para 5 of the Order of The Honourable High Court dated 19.12.2024; wherein it has been stated that :

“We direct the DGCA to examine the foregoing, consider all material relevant to the aforesaid issue, and arrive at its findings on compliance, and the need for remedial measures and directions, if any”.

Once again, the non-compliance of the above-stated, therefore brings one to conclude that the afore-stated VC Meeting of 21.01.2025 was a **BIG HOAX OF A BOGUS INQUIRY / INVESTIGATION BEING AN EXERCISE FRAUGHT with MISCHIEF and DECEIT, THEREFORE EXPOSING DISHONESTIES WRIT LARGE OVER IT.**

17 Reply to Your Para No 7 of Your Letter dated 20.02.2025 :

We have **EXTENSIVELY, LEGITIMATELY and LAWFULLY** addressed the contents of Your Para 7 of Your Letter dated 20.02.2025, vide our Para Nos 3 to 11 hereinabove.

18 Reply to Your Para No 8 of Your Letter dated 20.02.2025 :

I have already attended to this issue raised by Yourselves, of the files not being openable / accessible by Your IT Department; and have **ALTERNATIVELY ALSO** sent You an emails in 4 Parts on 28.02.2025 comprising all that was contained in my earlier submission vide *buzzheavier.com* (which is **NOT** a **FISHY SITE** as alleged by Yourselves, which please note).

As additional info : I also hereby place on record, that I will be deposing what I have to submit in the next VC Meeting, to be held vide Video Link sent to me on my email ID, so that I can access and participate in it from any place of practical convenience (since it is a **VIRTUAL** Conference and **NOT A DESIGNATED AND/OR CONFINED**

PHYSICAL Conference) and **THEREFORE YOUR DICTATING IT TO BE HELD IN A DESIGNATED AND/OR CONFINED PLACE OF YOUR CHOICE IS NEITHER REASONABLE, NOR ACCEPTABLE OR TENABLE.**

Further the VC Meetings should even be recorded for future reference to be placed before The Honourable Court as evidences of following the principles of transparencies and fair play as well as natural justice; and thereby even facilitating the due recording of minutes of the said VC Meetings with requisite accuracies and without any discrepancies creeping into it, due to any foul play or hidden agendas by any Party to the inquiry / investigations.

19 Reply to Your Para No 9 of Your Letter dated 20.02.2025 :

19 (i) : We have **EXTENSIVELY, LEGITIMATELY and LAWFULLY** addressed the contents of Your Para 9 (i) of Your Letter dated 20.02.2025, vide our Para Nos 3 to 11 hereinabove.

19 (ii) : We have **EXTENSIVELY, LEGITIMATELY and LAWFULLY** addressed the contents of Your Para 9 (ii) of Your Letter dated 20.02.2025, vide our preceding Para No 18.

19 (iii) : We have **EXTENSIVELY, LEGITIMATELY and LAWFULLY** addressed the contents of Your Para 9 (iii) of Your Letter dated 20.02.2025, vide our preceding Para Nos 18 hereinabove.

Further, I state that I will make oral submissions in the next VC Meeting encompassing the relevant contentions based on the evidentiary documents submitted by me to Yourselves, which will be only partial submissions **SINCE I HAVE NOT YET BEEN FURNISHED THE RELEVANT EVIDENTIARY DOCUMENTS REQUESTED VIDE MY EMAIL DATED 10.01.2025 TILL DATE.**

Regarding Your date mentioned of 18.03.2025 for the next VC Meeting, apart from the explanation tendered above; I also state that though I had sent You an email dated 17.03.2025 confirming my every intention to attend the VC of 18.03.2025; but You did NOT send me the VC Link on my email ID so that I could access and participate in it

from any place of practical convenience, thus handicapping me from attending the said VC, for reasons best known to Yourselves. Or who knows, was it that, perhaps the said VC Meeting was NEVER “seriously / genuinely” meant to be conducted by Yourselves in the first place, and was only an attempt to show some kind of so-called compliance or just lip service ?

19 (iv) : I will respond to the evidentiary documents submitted by Air India in due course during the next VC Meeting to be held vide Video Link sent to me on my email ID so that I can access and participate in it from any place of practical convenience, to be held at a mutually agreeable date (AND NOT A SHORT AND UNFAIR NOTICE OF LESS THAN 24 HOURS WHICH YOU HAVE BEEN UNREASONABLY ADAPTING).

19 (v) : This is a fact of the matter. However, it is deeply regretted that TILL DATE, SO FAR, UPTILL NOW You have been ONLY making TALL PROMISES of conducting a SO-CALLED INQUIRY / INVESTIGATION, which You have NOT YET EVEN COMMENCED in the true sense and spirit of the legal mandates.

20 After, duly replying to Your Letter dated 20.02.2025; we are now desirous of addressing Your email dated 26.03.2025.

It is APPALING to read in Your afore-stated email dated 26.03.2025 that You have now chosen to announce that You are according me a “***final opportunity to present your case or raise any objections in connection with the ongoing investigation. Failure to do so within the prescribed time frame shall result in the closure of the matter, based on the findings and conclusions drawn from the investigation conducted by the Directorate General of Civil Aviation (DGCA).***”

The afore-quoted OBNOXIOUS statements by Yourselves that You are giving me a “***final opportunity***” to present my case, SHAMELESSLY EXPOSES Your ILL-INTENTIONS OF SCUTTLING THE INQUIRY / INVESTIGATIONS, ESPECIALLY WHEN YOU HAVE NOT YET EVEN COMMENCED THE SAID INQUIRY / INVESTIGATIONS; BY FAILING TO EVEN GO THROUGH EVEN THE FIRST STAGE OF HOLDING A FAIR INQUIRY / INVESTIGATION, being that of furnishing

me the relevant Evidentiary Documents appertaining to the **CRUCIAL AND CRITICAL ISSUE AS BEING AN ISSUE OF “WIDER SOCIAL IMPACT INVOLVING FLIGHT SAFETY AND PASSENGER SAFETY”** (as mentioned in the Order of The Honourable Court dated 19.12.2024) **DEALING WITH THE LIVES OF LAKHS OF PASSENGERS AND CREW**; under Your **FRIVOLOUS and FLIMSY** grounds and guise of some **“before”** and **“after”** dates and which said dates are legally untenable; and regarding which I have duly contested in my Para Nos 3 to 11 hereinabove.

Then again, You have mentioned in the afore-quoted GROSS statements that **“Failure to do so within the prescribed time frame shall result in the closure of the matter, based on the findings and conclusions drawn from the investigation conducted by the Directorate General of Civil Aviation (DGCA).”**

The above-stated PERVISITY of Yours, VISIBLY reveals Your **TEARING HURRY** to **STEALTHILY** get **DONE-AND-OVER-WITH** the Inquiry / Investigations by **HOOK-OR-BY-CROOK** WHEREBY YOU HAVE :

- (a) NOT EVEN CONSTITUTED A PANEL;
- (b) NOT EVEN ACTUALLY CONDUCTED A **MULTI-PARTY INQUIRY / INVESTIGATION** AND INSTEAD CALLED **ONLY ME AND NOT AIR INDIA**, THUS VIOLATING THE VERY TENETS OF FAIR PLAY, NATURAL JUSTICE AND PRINCIPLES OF EQUITY;
- (c) NOT GIVEN REASONABLE NOTICE PERIODS FOR ATTENDING MEETINGS (in Your instant and subject email dated 26.03.2025 received at 1559 hrs, whereby You have called for a VC Meeting on 27.03.3025 at 1430 hrs; which is BY NO MEANS ANY REASONABLE NOTICE PERIOD, and BY NO MEANS AFFORDING ANY CO-ORDINATION WITH ME OF MY AVAILABILTY;
- (d) NOT FURNISHED RELEVANT EVIDENTIARY DOCUMENTS TILL DATE;

(e) NOT GIVEN VC LINKS ON MY EMAIL ID SO THAT I CAN ACCESS AND PARTICIPATE IN IT FROM ANY PLACE OF PRACTICAL CONVENIENCE;

(f) NOT GIVEN TENABLE REPLIES TO SO MANY AND SEVERAL OF MY QUESTIONS IN MY VARIOUS emails;

(g) NOT ACTED PRO-ACTIVELY AFTER THE DATE OF THE ORDER OF THE HONOURABLE BOMBAY HIGH COURT DATED 19.12.2024; BECAUSE THE FIRST TIME YOU WOKE UP WAS ON 10.01.2025 AND FIXED A DATE OF MEETING OF 16.01.2025 WHICH WAS AFTER 4 WEEKS / 28 DAYS AFTER THE AFORE-STATED ORDER; AND WHICH CLEARLY SHOWS YOUR LACK OF INTEREST, SERIOUSNESS, INTENTIONS TO GET TO THE TRUTH OF THE MATTER; AS WELL AS SHOW YOUR DISREGARD FOR THE ORDERS OF THE HONOURABLE COURTS OF JUDICATURES; AND INFACIT WHICH SAID MEETING OF 16.01.2025 WAS NEVER EVEN CONDUCTED BY YOURSELVES; AND THAT TOO FOR A CRUCIAL AND CRITICAL ISSUE AS BEING AN ISSUE OF *“WIDER SOCIAL IMPACT INVOLVING FLIGHT SAFETY AND PASSENGER SAFETY”* (as mentioned in the Order of The Honourable Court dated 19.12.2024) DEALING WITH THE LIVES OF LAKHS OF PASSENGERS AND CREW.

Then again, You have mentioned in the afore-quoted OBSCENE statements that ***“Please consider this your final opportunity to engage in the proceedings. Any failure to attend or respond will result in further proceedings based on the investigation and findings available to the competent authority.”***

The above-stated ABSOLUTELY exposes Your LUST FOR EXCLUDING ME AND MANIPULATING ME, ESPECIALLY SINCE YOU HAVE MENTIONED THE WORD ***“final”*** IN THE OPENING PARA AS WELL AS THE CLOSING PARA OF YOUR SUBJECT email DATED 26.03.2025, AS IF YOU ARE, ONLY AND SOLELY INTERESTED IN REACHING SOME HURRIED ***“FINALITY”*** DESPITE MISCONDUCTING THE INQUIRY / INVESTIGATION BASED ON YOUR OWN SCHEDULES AND SO-CALLED STANDARDS AT THE COST

OF PREJUDICING ME FROM THE FAIRNESS OF INQUIRY AND INVESTIGATIONS.

21 To summarise the foregoing, I humbly state as under :

I There is WHATSOEVER NO ENEMITY from my side with either Your Respected Selves or Air India Ltd.

II The crux of the matter before us is of a very crucial and critical nature, concerning the safety, security and lives of lakhs of passengers and crew; which even The Honourable Bombay High Court has stated in its Order that it is :

“a matter that involves issues of a wider social impact involving flight safety and passenger safety”

-

III Further the Honourable Court has also directed that :

(a) **the “issues are squarely dealt with by the DGCA”**

(b) **“of all facets involved in the matter”**

(c) **“to send the matter for full consideration of the DGCA”**

(d) **“We direct the DGCA to examine the foregoing, consider all material relevant to the aforesaid issue, and arrive at its findings on compliance”.**

(e) **“We trust the DGCA as a sectoral regulator, to take into account all facets of its regulatory mandate in the course of dealing with the issue”**

(f) **“We trust that the DGCA, which has a number of pilots from Air India on deputation, would ensure that the entire process is conducted in a manner that does not leave any room for a perception of conflict of interest at any level of its regulatory review”**

(g) **“in an articulate and comprehensible manner”.**

IV Despite all the above-mentioned; You are conveniently scuttling the investigative process and rule of law format, by refusing to share even the mandated vital and evidentiary information with me, **FRIVOLOUSLY** and **CAPRICIOUSLY** stating that they **“are not relevant”** and **“cannot be acceded to”**

V Please understand that **THERE IS NEITHER A NEGATIVE COVENANT NOR AN EMBARGO BY THE HONOURABLE COURT RESTRICTING YOURSELVES FROM COMPLYING WITH YOUR ONUS OF FURNISHING MY LEGITIMATELY REQUESTED DOCUMENTS, AND WHICH EMANATES FROM THE VERY CAUSE OF ACTION ARISING OUT OF MY COMPLAINT DATED 29.10.2023; AND WHICH LED TO YOUR ORGANISATION ISSUING A ‘SCN’ (SHOW CAUSE NOTICE) TO AIR INDIA LTD DATED 02.11.2023 AND THEREAFTER, ONLY PURSUANT TO A SO-CALLED “DETAILED” PROCESS CONDUCTED BY YOU, YOU ISSUED A SECOND ‘SCN’ (SHOW CAUSE NOTICE) TO AIR INDIA LTD DATED 30.11.2023; WHICH EVEN AND EVENTUALLY BROUGHT YOU TO THE STAGE AND EXTENT OF LEVYING A PENALTY UPON AIR INDIA LTD FOR A MEAGRE, PUISNE AND TOKEN AMOUNT OF RS.1,10,00,000/= (RUPEES ONE CRORE TEN LAKHS) AND THAT TOO FOR THAT “SINGULAR FLIGHT ONLY”.**

VI **KEEPING THE AFORE-MENTIONED IN MIND, KINDLY OBLIGE AND ANSWER WITH LEGALLY TENABLE RESPONSES, THE IMPENDING QUESTIONS AS LISTED BELOW; FAILING WHICH WE WILL BE CONSTRAINED TO CONSTRUE THAT YOU HAVE NO VALID REASONS EITHER FOR NOT ANSWERING THE SAID QUESTIONS AND ALSO DO NOT HAVE ANY DEFENCES FOR AND TOWARDS THEM :**

(1) **WHY IS IT THAT, ON THE ONE HAND, FOR YOUR SIDE OF THE PURPOSES, YOU WENT INTO THE WHOLE GAMUT OF STEPS OF ISSUING “SCN” 1 TO “SCN 2” TO EXCHANGING SEVERAL emails, ANNEXURES, COMMUNICATIONS INCLUDING HAND DELIVERED CORRESPONDENCES, BY AND BETWEEN, YOU AND**

AIR INDIA LTD; WHILST ON THE OTHER HAND HOW COME YOU ARE UNFAIRLY TURNING DOWN MY LEGITIMATE REQUEST FOR THOSE DOCUMENTS WHICH ARE RELEVANT, AND NOT PROVIDING ME WITH THE EQUAL OPPORTUNITY TO GO THROUGH THE GAMUT OF STEPS AS PER THE PRINCIPLES OF NATURAL JUSTICE, WHICH ARE, ONLY AND SIMPLY, REQUIRED TO SERVE THE HONEST PURPOSE OF DELVING INTO THE SUBJECT MATTER IN THE RIGHT PERSPECTIVE WITH THE DESERVING QUOTIENT OF TRANSPARENCY AS WITH ANY INVESTIGATIVE / INQUIRY PROCEDURE WHEREIN IT IS A LAID DOWN 'SOP' THAT DOCUMENTS BE PROVIDED TO ALL PARTIES INVOLVED, AS PART OF PRODUCTION AND DISCOVERY; RATHER THAN SHROUDING IT WITH OPACITY AND SUSPICION, AS IS BEING DONE PRESENTLY BY YOURSELVES ?

(2) When The Honourable Court has referred to Yourself as a **"sectoral regulator"** with the confidence that You will **"take into account all facets of its regulatory mandate"** and also expressed that **"The DGCA shall conduct the proceedings in accordance with law, and following the principles of natural justice" and "with all relevant documents"**. THEN WHY ARE YOU NOT FULFILLING YOUR RESPONSIBILITIES BEING A SECTORAL REGULATOR (AS THE HONOURABLE COURT HAS ADDRESSED YOU AS IN THEIR PARA 7) BY FURNISHING ME WITH THE EVIDENTIARY DOCUMENTS REQUESTED ? IS THERE A FEAR IN YOUR MINDS THAT SOME SKELETONS WILL FALL OUT FROM THE CLOSET OF EITHER AIR INDIA OR THE DGCA ? OR DO YOU FEAR THAT IT WILL EXPOSE YOUR MISCONDUCT OF NOT ADHERING TO **FAIR PLAY** BUT INSTEAD CLEARLY ADAPTING **FOUL PLAY** ?

(3) When The Honourable Court has even stated that **"we make it clear that we do not intend to circumscribe the exercise of regulatory jurisdiction by the DGCA on any facet of any matter outside the scope of these proceedings"**. WHY IS IT THAT YOU ARE PRESENTING FRIVOLOUS AND UNTENABLE AND

CIRCUMVENTING EXCUSES FOR NOT FURNISHING ME THE REQUESTED EVIDENTIARY DOCUMENTS ? (especially when it is clearly evidenced in the afore-quoted, vide the stand of The Honourable Court that they :

(i) **“do not intend to circumscribe the exercise of regulatory jurisdiction by the DGCA”**

(ii) **“on any facet”**

(iii) **“of any matter outside the scope of these proceedings”**

(4) Why are You looking at such a crucial and critical issue THROUGH SUCH A NARROW COMPASS and **NOT** lending any deserved honesty to the issue at hand, especially when even The Honourable High Court has stated that it is **“a matter that involves issues of a wider social impact involving flight safety and passenger safety”** ?

(5) Why is it that the very exercise of investigation / inquiry is fraught with UNFAIR, UNJUST, ONE SIDED and INIQUITOUS approach, much against the Principles of Natural Justice and *audi alteram partem* emanating from the Rule of Law ?

(6) Why are You by-passing the INTEGRAL PART OF THE BASIC STRUCTURE of any LEGITIMATE INQUIRY / INVESTIGATION, mandating the incorporation of the *PRINCIPLES OF NATURAL JUSTICE* into it and which said fundamental has even been duly mentioned in Para 6 of the Order of The Honourable High Court dated 19.12.2024 ?

(7) How do You intend to JUDICIOUSLY comply with the Order of The Honourable Court and TRANSPARENTLY deal with the matter, and not indulge in conducting a CONDITIONAL, RESTRICTED, LIMITED, BIASED and SUFFOCATING Inquiry / Investigation OVER SUCH A CRUCIAL AND CRITICAL ISSUE OF *WIDER SOCIAL IMPACT INVOLVING FLIGHT SAFETY AND PASSENGER SAFETY* ?

(8) WHY HAVE YOU NOT CONSTITUTED AN INQUIRY PANEL ?

(9) WHY DID YOU NOT CALL Air India to participate in the Inquiry ?

(10) Why have You been UNILATERALLY, UNETHICALLY, UNPROFESSIONALLY, and CAPRICIOUSLY CANCELLING the VCs, WITHOUT ANY INTIMATION and/or EVEN A WHISPER OF A MENTION TO ME THROUGH WHATSOEVER ANY AND ALL THE MEANS OF COMMUNICATION AVAILABLE AT YOUR DISPOSAL ?

(12) Why are You, all the time INSISTING on me attending a Virtual Conference from YOUR Office Room; when the very meaning of a VIRTUAL Conference does not imply and/or include A DESIGNATED AND/OR CONFINED PHYSICAL Conference; and THEREFORE YOUR DICTATING IT TO BE HELD IN A DESIGNATED AND/OR CONFINED PLACE OF YOURS IS UNTENABLE ?

(13) Why have You been levelling FALSE ALLEGATIONS upon me that I *“refused to attend the hearing of 16.01.2025”* ? Whereas the fact of the matter is that I NEVER EVER *“refused to attend the hearing of 16.01.2025”*. (And despite all this You never even conducted the VC) ?

(14) Also why have You levelled another FALSE ALLEGATION upon me that You *“requested me to advise a suitable date for an online meeting VC on 20 or 21 January 2025 alongwith suitable time”*. Whereas the fact of the matter is that You NEVER EVER made any such request or even any such offer to me; but instead UNILATERALLY OF YOUR OWN VOLITION kept the date of the hearing as 21.01.2025 ?

-

(15) Why have You not TILL DATE NOT YET furnished me with WHATSOEVER any evidence of Your afore-mentioned FALSE ALLEGATIONS made against me and which has confirmed that Your ALLEGATIONS were ABSOLUTELY FALSE, FRIVOLOUS and UNTENABLE ?

(16) Why have You TILL DATE, SO FAR, UPTILL NOW been ONLY making TALL PROMISES of conducting a *SO-CALLED INQUIRY*, when actually You have NOT YET EVEN COMMENCED in the true sense and spirit of the legal mandates; of going through even the FIRST STAGE OF HOLDING A FAIR INQUIRY / INVESTIGATION, being that of furnishing me the relevant Documents appertaining to the CRUCIAL AND CRITICAL ISSUE AS BEING AN ISSUE OF “*WIDER SOCIAL IMPACT INVOLVING FLIGHT SAFETY AND PASSENGER SAFETY*” ?

-

(17) Due to

(a) NO Panel being constituted;

(b) Air India NOT being a part of the said VC;

(c) My requested Documents being REFUSED to be furnished to me;

(d) No Video Recording being permitted for EVIDENTIARY Court Referrals;

(e) Despite my asking, NO DISCUSSION or DECISION in the said VC of the NEXT MUTUALLY AGREED UPON DATE of Inquiry;

(f) AND AMONGST OTHER DISCREPANCIES;

HOW DO YOU DEFEND YOURSELVES that the afore-stated VC Meeting of 21.01.2025 was not a BIG SHAM and FARCE with MANIPULATION and LACK OF TRANSPARENCIES AND DUE PROCESS COUPLED WITH DISHONESTY WRIT LARGE OVER IT ?

-

(18) WHY IS IT THAT YOU HAVE NOT TAKEN REQUISITE COGNISANCE OF THE CONTINUING VIOLATIONS AND OMISSIONS BY AIR INDIA LTD FROM THE PAST ONWARDS PERHAPS TILL DATE ?

(19) ARE YOU CONFIDENT THAT AIR INDIA LTD HAS NOT COMMITTED ANY VIOLATION AFTER 24.01.2024 WHEN YOU LEVIED A FINE UPON THEM ?

(20) ARE SOME PERSONS WAITING OR WANTING FOR MORE MISHAPS TO OCCUR, INVOLVING THE PRECIOUS LIVES OF

UNSUSPECTING AND INNOCENT PASSENGERS AND CREW, SO AS TO THEN CONDUCT LATE-IN-THE-DAY INQUIRIES ?

(21) IS THERE SOME ULTERIOR MOTIVE TO HIDE SOMETHING OR SHIELD SOMEONE IN AIR INDIA AND/OR DGCA ?

(22) WHY ARE YOU SKIRTING THE INTEGRAL AND INTRINSIC ISSUES, AND INSTEAD INDULGING IN WHAT IS NOT ONLY SHOCKING TO THE EARS BUT EVEN SHOCKING THE CONSCIENCES :

(a) BY NOT constituting a Panel being constituted;

(b) BY NOT making Air India being a part of the VC;

(c) BY NOT furnishing me with my requested Evidentiary Documents;

(d) BY NOT permitting Video Recording for EVIDENTIARY Court Referrals;

(e) BY NOT, discussing or deciding in the VC of 21.01.2025 about the NEXT MUTUALLY AGREED UPON DATE of Inquiry ?

-

(23) HOW DO YOU DEFEND YOURSELVES that the afore-stated VC Meeting of 21.01.2025 was not a BIG SHAM and FARCE with MANIPULATION and LACK OF TRANSPARENCIES AND LACK OF DUE PROCESS COUPLED WITH DISHONESTY WRIT LARGE OVER IT ?

(24) Why have You APPALINGLY stated in Your email dated 26.03.2025 that You have now chosen to announce that You are according me a :

“final opportunity to present your case or raise any objections in connection with the ongoing investigation. Failure to do so within the prescribed time frame shall result in the closure of the matter, based on the findings and conclusions drawn from the investigation conducted by the Directorate General of Civil Aviation (DGCA).”

The afore-quoted OBNOXIOUS statements of Yours are SHAMELESSLY EXPOSING Your ILL-INTENTIONS OF SCUTTLING THE INVESTIGATIONS, ESPECIALLY WHEN YOU HAVE NOT YET EVEN COMMENCED THE SAID INVESTIGATIONS ?

(25) WHAT IS YOUR TEARING HURRY to STEALTHILY get DONE-AND-OVER-WITH the Inquiry / Investigations AND BRING ABOUT A “closure of the matter” of the Inquiry / Investigations by HOOK-OR-BY-CROOK WHEN YOU HAVE :

(a) NOT EVEN CONSTITUTED A PANEL

(b) NOT EVEN ACTUALLY CONDUCTED A ALL-PARTY INQUIRY / INVESTIGATION AND INSTEAD CALLED ONLY ME AND NOT AIR INDIA, THUS VIOLATING THE VERY TENETS OF FAIR PLAY, NATURAL JUSTICE AND PRINCIPLES OF EQUITY

(c) NOT GIVEN REASONABLE NOTICE PERIODS FOR ATTENDING MEETINGS (in Your instant and subject email dated 26.03.2025 received at 1559 hrs, whereby You have called for a VC Meeting on 27.03.3025 at 1430 hrs; which is BY NO MEANS ANY REASONABLE NOTICE PERIOD, and BY NO MEANS AFFORDING ANY CO-ORDINATION WITH ME OF MY AVAILABILTY.

(d) NOT FURNISHED RELEVANT EVIDENTIARY DOCUMENTS TO ME

(e) NOT GIVEN VC LINKS ON MY email ID, so that I can access and participate in it from any place of practical convenience

(f) NOT GIVEN TENABLE REPLIES TO SO MANY AND SEVERAL OF MY QUESTIONS IN MY VARIOUS PREVIOUS emails

(g) NOT ACTED PRO-ACTIVELY AFTER THE DATE OF THE ORDER OF THE HONOURABLE BOMBAY HIGH COURT DATED 19.12.2024; BECAUSE THE FIRST TIME YOU WOKE UP WAS ON 10.01.2025 AND FIXED A DATE OF MEETING OF 16.01.2025 WHICH WAS AFTER 4 WEEKS / 28 DAYS AFTER THE AFORE-STATED ORDER; AND WHICH CLEARLY SHOWS YOUR LACK OF INTEREST, SERIOUSNESS, INTENTIONS TO GET TO THE TRUTH OF THE MATTER; AS WELL AS SHOW YOUR DISREGARD FOR THE ORDERS OF THE HONOURABLE COURTS OF JUDICATURES; AND INFACIT WHICH SAID MEETING OF 16.01.2025 WAS NEVER EVEN CONDUCTED BY YOURSELVES; AND THAT TOO FOR A CRUCIAL AND CRITICAL ISSUE AS BEING AN ISSUE OF “*WIDER SOCIAL IMPACT INVOLVING FLIGHT SAFETY AND PASSENGER SAFETY*” (as mentioned in the Order of The Honourable Court dated 19.12.2024) DEALING WITH THE LIVES OF LAKHS OF PASSENGERS AND CREW ?

(23) Why have You OBSCENELY stated in Your email dated 26.03.2025 that : “*Please consider this your final opportunity to engage in the proceedings. Any failure to attend or respond will result in further proceedings based on the investigation and findings available to the competent authority.*”

The above-stated ABSOLUTELY exposes Your GREED FOR EXCLUDING ME AND MANIPULATING ME, ESPECIALLY SINCE YOU HAVE MENTIONED THE WORD “*final*” IN THE OPENING PARA AS WELL AS THE CLOSING PARA OF YOUR SUBJECT email DATED 26.03.2025, AS IF YOU ARE, ONLY AND SOLELY INTERESTED IN REACHING SOME HURRIED “FINALITY” DESPITE MISCONDUCTING THE INQUIRY / INVESTIGATION BASED ON YOUR OWN SCHEDULES AND SO-CALLED STANDARDS AT THE COST OF PREJUDICING ME FROM THE FAIRNESS OF INQUIRY / INVESTIGATIONS, AND INCAPACITATING ME FROM TENDERING MY VALID

SUBMISSIONS DUE TO YOURSELVES DEPRIVING ME OF THE RELEVANT LEGALLY REQUIRED EVIDENTIARY DOCUMENTS ?

22 Therefore, Your misconduct of not adhering to FAIR PLAY is nothing but CLEARLY adapting FOUL PLAY.

23 Your playing a Cloak-and-Dagger Game and NOT furnishing the requisite Evidentiary Documents with the LAME and FRIVOULOUS EXCUSE AS IF THE SAID DOCUMENTS **“are not relevant”** AND **“cannot be acceded to”** does NOT augur well and hence would make You indulge in conducting a DEFECTIVE, DISHONEST, FAKE and FALSE INQUIRY / INVESTIGATION of such a crucial and critical issue as being an issue of ***WIDER SOCIAL IMPACT INVOLVING FLIGHT SAFETY AND PASSENGER SAFETY.***

24 Further, Your communication dated 21.02.2025 wherein You have quoted (or rather mis-quoted) the words of the afore-mentioned Order dated 19.12.2024; exposes Your UNHOLY indulgence in adding and/or deleting words at Your convenience and capriciousness.

25 So much so it is very very unfortunate to note that Your afore-stated communication not only :

- (i) mischievously plays with the words,
- (ii) but also plays with the conscience of all those involved,
- (iii) plays into the hands of Air India Ltd
- (iv) as well borders to play with safety, security and lives of lakhs of passengers and crew, travelling by the much reputed Air India Ltd.

26 This game-play of hide-n-seek with the words and non-furnishing OF RELEVANT EVIDENTIARY DOCUMENTS AND **“all material relevant to the aforesaid issue”**, and **“to take into account all facets of its regulatory mandate”** does not befit or augur well for a **SECTORAL REGULATOR** such as Yourselves, whereby it is expected of You to be **NEUTRAL, JUST** and follow the principles of **NATURAL JUSTICE** and **NOT**

EXPOSE YOUR LUST for murdering the Inquiry / Investigations by not duly conducting it as per the principles, tenets and laws for the time being in force.

27 **Please do not forget that even Members of Your Families could also be flying by the DANGEROUS Flights in question, thus risking their lives due to a DISHONEST AND MANIPULATED SO-CALLED INQUIRY / INVESTIGATION BY YOURSELVES.**

28 Whether Your conscience wakes up or not, I will not and never allow my conscience to go into any slumber; because I will fight tooth-and-nail to get to the TRUTH OF THE MATTER; NO MATTER HOW MUCH YOU TRY YOUR BEST TO OBFUSCATE THE ISSUE AND/OR OBSCURE THE FACTS.

██████████

On Wednesday, 26 March, 2025 at 03:59:13 pm IST, FSD Section <fsdsec.dgca@gov.in> wrote:

Subject: Final Opportunity to Present

Your Case

Dear Capt. ██████████

Please be advised that, pursuant to the decision of the competent authority, you are hereby granted a final opportunity to present your case or raise any objections in connection with the ongoing investigation. Failure to do so within the prescribed timeframe shall result in the closure of the matter, based on the findings and conclusions drawn from the investigation conducted by the Directorate General of Civil Aviation (DGCA).

You are permitted to attend the meeting via video conference (VC), which will be held exclusively at the DGCA regional office in Mumbai. It is imperative that you attend the meeting at the scheduled time and location.

Please consider this your final opportunity to engage in the proceedings. Any failure to attend or respond will result in further proceedings based on the investigation and findings available to the competent authority.

Date of meeting 27/03/2025.
Mode through VC .
Location from DGCA regional office in Mumbai

Regards,

Section Office,
Flight Standards Directorate,
DGCA.
Extn. 452

---- On Tue, 18 Mar 2025 11:34:49 +0530 [REDACTED] > wrote -
--

Dear sir / madam,

This in continuation of my earlier email sent yesterday on 17 March 2025 it is requested to defer the time of the hosting the inquiry on the VC by a day or two, as i am required to be present in the bombay high court since the hearing of the same contempt petition (L) 5072 of 2025 matter is kept at 14 30 hrs in the afternoon by the honourable high court. Hence I will be unable to attend the inquiry on VC at 15 00 hrs today. You are requested to inform your advocates on record to be present in court.

Regards
[REDACTED]

[Yahoo Mail – Email Simplified](#)

On Mon, 17 Mar 2025 at 19:14, [REDACTED]
[REDACTED] wrote:

To

all the dgca officials listed by separately by their email address in this email and to whomsoever it may concern in the office of DGCA,

Sir / Madam,

the Applicant /Petitioner chooses to appear online by VC (video conferencing) for the inquiry at 1500 hrs tomorrow. It is also requested that the Applicant / Petitioner be allowed to record the proceedings of the inquiry on the VC to verify the draft of the minutes of the meeting.

Incidentally there are contempt proceedings CONPW no.5072 of 2025 taken out by Applicant / Petitioner on DGCA and Air India in this matter due to various reasons stated in the petition which you and your legal cell is aware of. The next hearing of this matter is tomorrow i.e. 18 March 2025.

One of the reasons is your refusal to share the documents related to the complaints of the Applicant / Petitioner against Air India regarding its illegal

and dangerous flights, on the basis of which investigation was carried out by DGCA amongst other reasons listed in it. these documents have been requested to be shared by the Applicant / Petitioner for his perusal on 10-Jan-2025.

therefore it is again requested to share the documents by email as asked by the Applicant / Petitioner so that a proper, fair and just investigation can be carried out to get into the matter of the illegal and dangerous flights being conducted by Air India with impunity. Without perusing these documents which have been asked for by the Applicant / Petitioner, it will not be possible to get to the truth of the matter and it will not serve to deliver any justice through the inquiry if it is not conducted on the principles of natural justice. this act of refusal to share the documents is being viewed seriously and is reported to the court as contempt of the order of the honourable high court.

DGCA has refused to share the documents so far. Tomorrow is the next date of hearing.

Applicant of CONPW no.5072 of 2025 / Petitioner in WP 1935 of 2024

On Friday, 21 February, 2025 at 11:53:16 am IST, FSD Section <fsdsec.dgca@gov.in> wrote:

Sir,

RTM ,kindly find the attached notice on the subject matter.

Regards,

Section Office,
Flight Standards Directorate,
DGCA.
Extn. 452

---- On Tue, 21 Jan 2025 21:47:25 +0530 [REDACTED] wrote ---

to all the recipients of this email in the office of DGCA and Air India Ltd as per its name or designation in the email address mentioned above:

1) the documents that have been sought by the Applicant / Petitioner from the DGCA and Air India as listed in Applicant / Petitioner's email dtd 10 Jan 2025 have been refused to be given to the the Applicant / Petitioner. This is against the principle of natural justice and no legally tenable reasons are given for the same so far. this is put the Respondents Air India and DGCA to notice that contempt proceedings will be taken to if legally tenable reasons are not given for refusal to the give documents relevant to the complaint of the Applicant and the investigation thereof by tomorrow. Due to lack of knowledge of these documents it is not possible to make some submissions and find support to certain contentions of the Applicant / Petitioner and the inquiry conducted under these conditions will lead to incomplete and incorrect investigation.

2) the DGCA is purposely delaying the process of inquiry and not even revealing the next date of the inquiry where Air India will be called upon to also give their submissions in the presence of the Applicant / Petitioner in spite of asking the DGCA several times. There seems to be no urgency shown by DCGA to conduct this inquiry although prima facie case was made in high court which proved that Air India is deliberately operating illegal flights to the extent that it is endangering lives of the lakhs of passengers and crew and hence the Honourable Bombay High Court was pleased to

pass an order for re-investigation of the complaint of the Applicant / Petitioner as these flights are still continuing till date.

3) the meeting was held on VC without any representative from Air India being present and was not informed to be present. Whatever submissions and contentions given by one party should be known to all of the other parties who should be included in the inquiry when it is conducted. Air India was not part of the meeting hence objection was raised on those grounds that the inquiry is not conducted on the principles of natural justice. This is in contempt of the order of the Honourable High Court.

4)Therefore a free and fair inquiry cannot be conducted under these conditions and it is evident that the DGCA has not formed a proper inquiry panel which will follow the procedures so as to conduct the inquiry under principles of natural justice. therefore this inquiry will be vitiated and produce only biased results. Hence it is clear that DGCA is coming with malafide intentions of hiding the truth and most of the evidence will not be taken into consideration during the inquiry making it incomplete. it is clear that DGCA does not want to maintain transparency during the whole process of investigation.

5)These are the documents (the link of which are mentioned below and can be downloaded from the drive) which are in the knowledge of the Applicant / Petitioner of WP 1935 of 2024 at present and also a part of the writ petition of 1935 of 2024 can be considered as a part of documents that the Applicant / Petitioner will be relying on during the course of the inquiry. there is one file attached with the

email which is the sur-rejoinder of Air India to the rejoinder of the Applicant / Petitioner in WP of 1935 of 2024.

[Redacted]

[Redacted]

Amended WP 1935 of 2024 dtd 19 apr 24.pdf

Simple fast anonymous file sharing for everyone.

[Redacted]

[Redacted]

[Redacted]

[Redacted]

the other document is attached below which is the sur-rejoinder of AI to my rejoinder to AI

Just click on the links given and you will be able to download it from the drive its uploaded on. Had to use this feature as it is difficult to send all these documents in one email.

Best Regards

[Redacted]

On Friday, 10 January, 2025 at 11:51:51 pm IST, [Redacted] wrote:

To
- Jan - 2025

Date : 10

1) Shri Faiz Ahmed Kidwai (Present - Director General of Civil Aviation),

Office of The Director General of Civil Aviation (DGCA),

Aurobindo Marg,

Opp. Safdarjung Airport,

New Delhi 110 003,

India

Phone No: 011 -24622495 / 24622499 / 24622500 / 24628986 /
24628987 / 24628988 / 24627497 / 24611168

Email : dgoffice.dgca@nic.in

mobile: 8826611717 (DDG)

2) Shri VumlunmangVualnam

The Civil Aviation secretary,

Ministry of Civil Aviation (MOCA),

Rajiv Gandhi Bhawan 110003, Block B,

Safdarjung Airport Area, New Delhi

Phone No: 011- 24604283 / 24695094

Email : secy.moca@nic.in

3) Air India ltd.,

Through its Accountable Manager,

William Campbell (CEO),
N.Chandrasekaran (CMD),
Block-4, Vatika One on One,
Sector-16, NH-48, Industrial Estate,
Gurgaon, Haryana, India, 122 007

Dear sirs,

Whilst, me being the Applicant / Petitioner of WP 1935 of 2024 was wondering as to why there is no action forthcoming from the office of the DGCA (Respondent no 1) despite more than 21days / 3 weeks having elapsed pursuant to the order of Honourable Bombay High Court on 19-Dec-2024 in the above said WP; however now the Applicant / Petitioner has just received a call from the office of the DGCA and an email at 16:30 IST on 10-Jan-2025 informing the Applicant / Petitioner to appear for the inquiry in Delhi at 15:00 on 16-Jan-2025. While the Respondent no 1(DGCA) has taken more than 3 weeks or 21 days to make the preparatory arrangements for the inquiry; the Applicant has been given only 6 days to present itself in Delhi with all the relevant documents, evidences, and written contentions along with him. It is not possible for Applicant/ Petitioner to be present in person in Delhi as he has been illegally terminated by Respondent no 3 (Air India) and undergoing mental and financial hardships as the Applicant / Petitioner has been unemployed for more than 19 months and it is difficult to arrange for a discounted

travel and stay with those privileges being taken away along with the employment. Therefore the Applicant / Petitioner would prefer to appear through video conferencing (VC) for the inquiry.

It is also mentioned to carry out this inquiry based on principles of the natural justice hence the Applicant / Petitioner of WP 1935 of 2024 seeks certain documents and data accessible to any of the Respondents connected and relevant to the inquiry.

Keeping this view in mind it is requested to grant access to certain documents initially as mentioned below which can be emailed for the Applicant's / Petitioner's perusal on email address

[REDACTED]

1) the copy of the first show cause notice dtd 02-Nov-2023 sent to Air India from the office of DGCA (Respondent no 1) seeking a reply to the complaint dtd 29-Oct-2023 of the Applicant / Petitioner.

2) the copy of various replies received from the office of Air India Ltd (Respondent no 3) to DGCA (Respondent no 1) and copy of all other documents exchanged on the subject matter in the emails, proceedings, observations, file notings of Respondent no 1 and, further communication to and fro between the office of the DGCA and the office of Air India Ltd from 02-Nov-2024 till the date of the order dtd 24-Jan-2024.

3) the copy of the order of DGCA (Respondent no 1) imposing a fine of Rs.1.1 crore on Air India ltd (Respondent no 3) dtd 24-Jan-2024 based on the Applicant / Petitioner's complaints to the Respondent no 1.

4) The copy of all the documents exchanged thereafter from the date of the order dtd 24-Jan-2024 on the subject matter in the emails, proceedings, observations, file notings of the Respondent no 1 and further communication to and fro between the office of the DGCA and the office of Air India ltd (Respondent no 3) leading to the hearing of appeal on 24-May-2024 and the order of the disposal of appeal dtd 24-May-2024.

5) The email copies of the flight plan on the leased B777 200 LR aircraft and the leased B777 300 ER aircraft from inception of these aircraft into Air India ltd. till date.

6) The email copies of the operations manual part A of Air India ltd (Respondent no 3) prevalent in January 2023 and the later versions as amended by Air India ltd. (Respondent no 3), approved and accepted by DGCA (Respondent no 1) thereafter till date.

7) The email copies of FPPM of the leased B777 200 LR aircraft and the leased B777 300 ER aircraft from the time of induction of these aircraft into the company Air India Ltd and the later versions as amended by the OEM, approved and accepted by the Respondent no 1 thereafter till date.

The Applicant / Petitioner is hereby attaching the copies of the illegal flights being still operated by Air India Ltd within the last fortnight on various routes from the flight radar app which are still being operated by Air India Ltd despite the order of 24-Jan-2024 with impunity thereby putting lives in danger of the travelling public at large.

Therefore please oblige and share these documents to the Applicant / Petitioner's email address [REDACTED] within the next 3 days so that it can be studied properly or please give legally tenable reasons for refusing to disclose the same.

with best regards

[REDACTED]

Applicant / Petitioner of WP 1935 of 2024

email [REDACTED],

[REDACTED]

list of Attachments with this email:

- 1) Copy of the illegal flights as shown on the flight radar app bearing dates with flight nos and A/c registration in the bookmarks being operated by Air India ltd.