

**IN THE SUPREME COURT OF INDIA
(CIVIL ORIGINAL JURISDICTION)**

I.A No. _____ OF 2018

IN

WRIT PETITION (CIVIL) No. _____ OF 2018

IN THE MATTER OF:

COMMON CAUSE

...PETITIONER

VERSUS

UNION OF INDIA & ORTS

...RESPONDENTS

**APPLICATION FOR DIRECTION
ON BEHALF OF THE PETITIONER**

To,

**THE HON'BLE CHIEF JUSTICE OF INDIA AND HIS COMPANION
JUDGES OF THE HON'BLE SUPREME COURT OF INDIA**

The Humble Petition of the
Petitioner above-named

MOST RESPECTFULLY SHOWETH: -

1) The present petition highlights how the Government through its brazen interference has attempting to subvert the institution of CBI. The instant writ petition is being filed in public interest for the enforcement of fundamental rights guaranteed under Articles 14 and 21, seeking quashing of orders issued by the Central Government dated 23.10.2018 that take away work from the CBI Director and entrust the same to a tainted officer. The petition also seeks a direction for the removal of CBI's Special Director Mr. Rakesh Asthana from the CBI in light of serious corruption cases pending against him in order to ensure institutional integrity.

2) This urgent interim application for direction is being filed by the petitioner owing to the immediate need to protect the CBI from interference from the Government which is in complete violation of not only statutory provisions but also rule of law. The detailed facts and grounds are mentioned in the writ petition and are not being repeated herein to avoid repetition. The petitioners seeks liberty to rely on the facts, grounds and documents which are part of the writ petition when this application is taken up for hearing.

PRAYER

In view of the facts and circumstances stated above, it is most respectfully prayed that this Hon'ble Court may in public interest be pleased to pass the following *ad interim* direction:-

- a. Direct that the order dated 23.10.2018, withdrawing the charge and work from the Director CBI Mr. Alok Kumar Verma (Respondent No.4) and the separate order dated 23.10.2018, handing over the charge and work of Director, CBI to Mr. Nageshwar Rao (Respondent No.5), both be kept in abeyance during the pendency of this writ petition.
- b. Issue or pass any other direction or order, which this Hon'ble court may deem fit and proper under the facts and circumstances of the case.

PETITIONER
THROUGH

PRASHANT BHUSHAN
COUNSEL FOR THE PETITIONER

DATE: 25TH OCTOBER 2018
NEW DELHI