IN THE HIGH COURT OF JUDICATURE AT MADRAS

DATED: 24.11.2021

CORAM :

THE HON'BLE MR.MUNISHWAR NATH BHANDARI,

ACTING CHIEF JUSTICE

AND

THE HON'BLE MR.JUSTICE P.D.AUDIKESAVALU

W.P.No.9972 of 2021 & WMP.Nos.10597 & 10604 of 2021

Indian Institute of Insurance
Surveyors and Loss Assessors
Tamil Nadu Chapter rep.by its
authorized representative
Mr.A.R.Ramesh ..Petitioner

Vs

1. Government of India
   Ministry of Finance
   Rep. by its Secretary
   North Block New Celhi 110001.

2. Insurance Regulatory and Development
   Authority (IRDA) Rep. by its
   Chairman, Parishram Bhavan,
   3rd Floor, Basheer Bagh,
   Hyderabad 500004.

3. United india Insurace Co.Ltd
   Rep. by its CEO/CMD, 24
   Whites Road
   Chennai 600 014.

4. ACKO General Insurance Ltd.
   Rep. by its CEO/CMD, Unit No.301 and 302
   3rd Floor, F wing,
   Lotus Corporate Park Off
   Western Express Highway,
   Goregaon East,
   Mumbai 400063.

5. Bajaj Allianz General Insurance Co.Ltd.
   Rep. by its CEO/CMD, Bajaj Allianz House,
   Airport Road, Yerawada, Pune
   411006.

6. Bharti AXA General Insurance
   Co.Ltd., Rep. by its CEO/CMD,
   19th Floor Parinee Crescenzo,
   G Block, Bandrakurla
   Complex, Opposite MCA Club, Bandra (E),
   Mumbai 400051.

7. Cholamandalam MS General Insurance
   Co.Ltd., Rep. by its CEO/CMD, Dare
   House, 2nd Floor, No.2,
   NSC Bose Road
   Chennai 600001.

8. Navi General Insurance Ltd.,
   Rep. by its CEO/CMD, 402 403
   and 404 A and B Wing, 4th Floor,
   Fulcrum Sahar Road,
   Next to Hya Regency
   Andheri (East) Mumbai
   400099.

9. Edlweiss General Insurance Co.Ltd.
   Rep. by its CEO/CMD, Edleweiss
   House, Off CST Road, Kalina,
   Mumbai 400098.

10. Furture General India Insurance
    Co.Ltd., Rep. by its CEO/CMD, India
    Bulls Finance Centre, 6th Floor, Tower 3,
    Senapa Bapat Marg, Elhinstone Road (w),
    Mumbai 400013.

11. Go Digit General Insurance ltd.,
    Rep. by its CEO/CMD, Smart works
    Business Center, 1st Floor,
    Nya Unitree West Wing,
    Samarat Ashok Road, Yerawada,
    Pune 411006.

12. HDFC ERGO General Insurance
    Co.Ltd., Rep. by its CEO/CMD, HDFC House,
    1st Floor, 165 -166,
    Back bay Reclamaon, H.T.
    Pareks Marg, Churchgate, Mumbai 400020.

13. ICICI Lombard General Insurace
    Co.Ltd., Rep. by its CEO/CMD, ICICI
    Lombard House, 414, Veer Savarkar Marg, Near
    Siddhivinayak Temple, Prabhadevi,
    Mumbai 400025.

14. IFFCO Tokio General Insurance Co.Ltd., Rep. by its CEO/CMD, IFFCO Tower II, 4th and 5h Floor, Plot No.3 Sector 29, Gurugram-122001.

15. Kotak Mahindra General Insurance Co.Ltd.,Rep. by its CEO/CMD, 8th Floor, Kotak Towers, Building No.21, Infinity Park off Western Express Highway Malad (E) Mumbai 400 09

16. Liberty General Insurance Ltd., Rep. by its CEO/CMD, 109th Floor, Tower A, Peninsula Business Park, G.K.Marg Lower Parel, Mumbai 400013

17. Magma HDI General Insurance Co.Ltd. Rep. by is CEO/CMD, 401, 4th Floor, Rustomjee Aspiree, Off. Eastern Express Highway, Imax Dome Theatre Road, Sion (East), Mumbai 400022.

18. National insurance Co.Ltd. Rep. by its CEO/CMD, 3, Middleton Street, Prafulla Chandra Sensarani, Kolkata 700071.

19. Raheja QBE General Insurance Co.Ltd. Rep. By its CEO/CMD, Windsor House, 5th Floor, CST Road Kalina, Santa Cruz (East), Mumbai 400098.

20. Reliance General Insurance Co.Ltd., Rep. by its CEO/CMD, Reliance Centre, 6th Floor, North Wing, Off Western Express Highway, Santacruz (East), Mumbai – 400 005.

21. Royal sundarm General Insurance, Rep. by its CEO/CMD, Vishranthi Melaram Towers, No.2/319, Rajiv Gandhi Salai (OMR). Karapakkam, Chennai 600097.

22. SBI General Insurance Co.Ltd, Rep. by its CEO/CMD, 'Natraj', 301, Junction of Western Express Highway, Andheri - Kurla Road Andheri (East) Mumbai 400069.

23. Shriram General Insurance Co.Ltd.,
Rep. by its CEO/CMD, E-8, EPIP
RIICO Industrial Area, Sitapura,
Jaipur
302022.

24. Tata AIG General Insurance Co.Ltd.,
Rep. by its CEO/CMD, Peninsula
Business Park, Tower A,
15h Floor, G.K.Marg,
Lower Parel, Mumbai 400013.

25. The New India Assurance Co.Ltd.,
Rep. by its CEO/CMD, 87, M.G.Road,
Fort, Mumbai 400001.

26. The Oriental Insurance Co.Ltd.,
Rep. by its CEO/CMD Oriental House,
A25/27, Asaf Ali Road,
New Delhi-110002.

27. Universal Sompo General Insurance
Co.Ltd., Rep. by its CEO/CMD Unit,
No.401, 4th floor, Sangam Complex, 127,
Andheri Kurla Road, Andheri (E),
Mumbai 400 059. ..Respondents

Prayer: Petition filed under Article 226 of the Constitution of India for a Writ of Declaration declaring Section 64 UM(8)(c) of the Insurance Act as unconstitutional and ultra vires under Articles 14, 21 and 19(1)(g) and consequently delcare the Notification dated 14/07/2015 vide Ref.No.IRDA/NL/Cir/Misc/129/07/2015 issued by the 2nd respondent as illegal and void and issue such order or other orders any other writ order or direction directing 1st respondent in the nature of the declaring Section 64UM(8) of the Insurance Act as null and void and consequentially forbearing respondents 3 to 27 from engaging unauthorized personnel for carrying out survey and assessment of motor own damage loss in respect of claims up to Rs.50 000/- under the pretense of empanelment of loss assessment agencies and direct the second respondent to issue directions to the insurers at large mandating them to employ only approved surveyors or loss assessors for claims below Rs.50,000/- as well in accordance with Section 64UM of the Insurance Act.

For the Petitioner : Mr.V.Prakash
Senior Counsel For
Mr.C.P.R.Kamaraj

For the Respondents : Mr.R.Sankaranarayanan,
ASG-I assisted by
Mr.A.Kumaraguru, SPC for R1

Mr.M.B.Raghavan for M/s.
M.B.Gopalan&AssociatesforR2

Mr.S.Arunkumar for R3, R7,
R14 and R17

Mr.S.Stanley John for R6
and R13

No appearance for R5, R8,
R11, R12, R13, R18, R20,
R21, R23 and R25 to R27

R4, R9, R10, R15, R16, R19,
R22 and R24 deleted from
cause list vide order dated
24.11.2021

ORDER
(Order of the Court was made by
the Hon'ble Acting Chief Justice)

The challenge to Section 64UM(8) of the Insurance Act, 1938 (hereinafter the Act of 1938) has been made with a prayer to declare it to be ultra vires The Constitution of India.

2. For ready reference, Section 64UM is quoted hereunder :

> "64UM. Surveyors or loss assessors. — (1) Save as otherwise provided in this Section, no person shall act as a surveyor or loss assessor in respect of general insurance business after the expiry of a period of one year from the commencement of the Insurance Laws (Amendment) Act, 2015 (5 of 2015), unless he— (a) possesses such academic qualifications as may be specified by the regulations made under this Act; and (b) is a member of a professional body of surveyors and loss assessors, namely, the Indian Institute of Insurance Surveyors and Loss Assessors: Provided that in the case of a firm or company, all the partners or

directors or other persons, who may be called upon to make a survey or assess a loss reported, as the case may be, shall fulfill the requirements of clauses (a) and (b).

(2) Every surveyor and loss assessor shall comply with the code of conduct in respect of his duties, responsibilities and other professional requirements, as may be specified by the regulations made under the Act. (3) Notwithstanding anything contained in the foregoing provisions, a class or class of persons acting as a licensed surveyor or loss assessor prior to the commencement of the Insurance Laws (Amendment) Act, 2015 (5 of 2015) shall continue to act as such for such period as may be specified by the regulations made under this Act: Provided that the surveyor or loss assessor shall, within the period as may be notified by the Authority, satisfy the requirements of clause (a) and clause (b) of Sub-Section (1), failing which, the surveyor or loss assessor shall be automatically disqualified to act as a surveyor or loss assessor.

(4) No claim in respect of a loss which has occurred in India and requiring to be paid or settled in India equal to or exceeding an amount specified in the regulations by the Authority in value on any policy of insurance, arising or intimated to an insurer at any time after the expiry of a period of one year from the commencement of the Insurance Laws (Amendment) Act, 2015 (5 of 2015), shall, unless otherwise directed by the Authority, be admitted for payment or settled by the insurer unless he has obtained a report, on the loss that has occurred, from a person who holds a licence issued under this Section to act as a surveyor or loss assessor (hereafter referred to as "approved surveyor or loss assessor"): Provided that nothing in this Sub-Section shall be deemed to take away or abridge the right of the insurer to pay or settle any claim at any amount different from the amount assessed by the approved surveyor or loss assessor.

(5) The Authority may, at any time, in

respect of any claim of the nature referred to in Sub-Section (4), call for an independent report from any other approved surveyor or loss assessor specified by him and such surveyor or loss assessor shall furnish such report to the Authority within such time as may be specified by the Authority or if no time limit has been specified by him within a reasonable time and the cost of, or incidental to, such report shall be borne by the insurer.

(6) The Authority may, on receipt of a report referred to in Sub-Section (5), issue such directions as it may consider necessary with regard to the settlement of the claim including any direction to settle a claim at a figure less than, or more than, that at which it is proposed to settle it or it was settled and the insurer shall be bound to comply with such directions: Provided that where the Authority issues a direction for settling a claim at a figure lower than that at which it has already been settled, the insurer shall be deemed to comply with such direction if he satisfies the Authority that all reasonable steps, with due regard to the question whether the expenditure involved is not disproportionate to the amount required to be recovered, have been taken with due dispatch by him: Provided further that no direction for the payment of a lesser sum shall be made where the amount of the claim has already been paid and the Authority is of opinion that the recovery of the amount paid in excess would cause undue hardship to the insured: Provided also that nothing in this Section shall relieve the insurer from any liability, civil or criminal, to which he would have been subject but for the provisions of this Sub-Section.

(7) No insurer shall, after the expiry of a period of one year from the commencement of the Insurance Laws (Amendment) Act, 2015 (5 of 2015) pay to any person any fee or remuneration for surveying, verifying or reporting on a claim of loss under a policy of insurance unless the person making such survey, verification or report is an approved surveyor or loss assessor.

(8) Where, in the case of a claim of less than the amount specified in Sub-Section (4) in value on any policy of insurance it is not practicable for an insurer to employ an approved surveyor or loss assessor without incurring expenses disproportionate to the amount of the claim, the insurer may employ any other person (not being a person disqualified for the time being for being employed as a surveyor or loss assessor) for surveying such loss and may pay such reasonable fee or remuneration to the person so employed as he may think fit.

(9) The Authority may in respect of any claim of value of less than the amount specified in Sub-Section (4) on an insurance policy, if the claim has not been or is not proposed to be reported upon by a surveyor or loss assessor, direct that such claim shall be reported upon by an approved surveyor or loss assessor and where the Authority makes such direction, the provisions of Sub-Sections (5) and (6) shall apply in respect of such claim.

(10) Where, in relation to any class of claims, the Authority is satisfied that it is customary to entrust the work of survey or loss assessment to any person other than a licensed surveyor or loss assessor, or it is not practicable to make any survey or loss assessment, it may, by an order, exempt such class of claims from the operation of this Section.] ."

3. The challenge to Section 64UM(8) is precisely on the ground that in the case of a claim of less than the amount specified in Sub-Section (4) of Section 64UM in value on any policy of the insurance, if it is not practicable for any insurer to employ an approved surveyor or loss assessor without incurring expenses disproportionate to the amount that has been claimed, the Insurer may employ any other person.

4. The challenge is mainly on the ground that unguided powers have been given to the Insurer to engage any other person, who may not be even having knowledge to determine the loss. In view of the above, challenge to the provision has been made as it is hit by Articles 14, 19(1)(g) and 21 of The Constitution.

5. The learned counsel for the petitioner submits that for assessment of the claim, an approved surveyor or loss assessor needs to be employed for proper assessment of loss. Sub-Section (8) of Section 64UM has given unbridled and unguided power to the Insurer to engage "any other person". It may be a minor or person not acquainted with the subject and thereby, the prayer is made to strike down the provisions of Section 64UM(8) to the extent aforesaid.

6. The contest to the writ petition has been made by the side opposite.

7. Mr.R.Sankaranarayan, learned Additional Solicitor General appearing for the first respondent submits that Sub-Section (8) of Section 64UM does not provide unguided power to the Insurer to employ any other person other than an approved surveyor or loss assessor. Any other person can be employed only when the claim is less than the amount specified in Sub-Section (4) in value on any policy of the Insurer and when it is not practicable for any Insurer to employ an approved surveyor or loss assessor without incurring expenses disproportionate to the amount of claim. The Insurer has been permitted in such case to employ any other person not disqualified for the time being for being employed as a surveyor or loss assessor for surveying the loss. Any other person can be only one who is not disqualified to be a surveyor or loss assessor. Thus, it is not appropriate to illustrate that while exercising the power under Section 64UM (8), the Insurer can engage even a minor or any other person despite disqualified to be a surveyor.

8. A reference of Section 42D of the Act of 1938 has been given to refer to the disqualification. For engaging any other person while invoking Section 64UM(8), the person should not incur disqualification given under Section 42D of the Act and hence, the powers are neither unbridled nor unguided.

9. Section 64UM(8) of the Act of 1938 was given interpretation by the Delhi High Court in the case of Surveyors Welfare Association (Regd.) Vs. Union of India & Others [ILR 1996 (2) Delhi 22]. It was in reference to unamended provision of Section 64UM(6), which is now Section 64UM(8) after the amendment. The challenge to the policy decision was made in regard to engagement of any other person for survey of the loss other than the approved surveyor or loss assessor.

10. The provision aforesaid would apply when claim is less than the amount specified in Sub-Section (4) of Section 64UM and is not found practicable to employ approved surveyor or loss assessor without incurring expenses disproportionate to the amount of claim, any other person can be engaged. The provisions

of Sub-Section (8) apply only to the claims, which are of a value of less than the amount specified in Sub-Section (4) and that too, when the Insurer finds it to be not practicable to employ an approved surveyor or loss assessor without incurring expenses disproportionate to the amount of claim. It is to save the claimants from incurring expenses disproportionate to the claim.

11. The provision aforesaid was made in public interest and for the reasons and in the situation when expenses to be incurred towards approved surveyor or loss assessor is found to be disproportionate to the amount of claim. An illustration was given specifying that in a given case, the claim is for a sum of Rs.10,000/- and to survey the loss, the fee of the approved surveyor or loss assessor comes to Rs.5,000/-, then, expenses on engagement of approved surveyor become disproportionate to the claim and in that eventuality, the engagement of any other person would be appropriate. It is also that such person should not be one disqualified for time being to be employed as surveyor or loss assessor.

12. The learned Additional Solicitor General has given a further reference to the Insurance Regulatory and Development Authority of India (Insurance Surveyors and Loss Assessors) Regulations, 2015 (for brevity, the Regulations, 2015). The amount of value of loss, for which, any other person can be engaged, is now provided under Regulation 12 after amendment under Section 64UM. A reference of the amount specified under Regulation 12 of the Regulations 2015 has also been given. The amount is specified every three years. In view of the aforesaid, the prayer is to dismiss the writ petition.

13. We have carefully considered the rival submissions of the parties and perused the records.

14. Section 64UM(8) has been reproduced in the preceding paragraph. The challenge is precisely on the ground that Insurer has been given unguided and unbridled power to engage any other person other than the approved surveyor or loss assessor, for survey of the claim of less than the amount specified under Sub-Section (4) and it is now provided under Regulation 12 of the Regulations 2015. Emphasis is on the engagement of approved surveyor or loss assessor for survey of all the claims irrespective of the amount of loss and fee for survey.

15. Sub-Section (8) of Section 64UM is made applicable when it is not practicable for the Insurer to employ an approved surveyor or loss assessor without incurring expenses disproportionate to the amount of claim. It is also when the claim is of an amount less than the specified under Sub-Section

(4) read with under Regulation 12 of the Regulations 2015. The provision aforesaid is to save the claimants from incurring expenses disproportionate to the claim.

16. Apart from the aforesaid, the engagement of any other person is not unguided. The provision does not permit engagement of a person disqualified for the time being to be employed as a surveyor or loss assessor. In view of the above, any other person would be such a person, not disqualified for being a surveyor or loss assessor. The argument that unguided powers have been given to the Insurer for engagement of any other person cannot be accepted.

17. The disqualification for registration of intermediary or insurance intermediary is given under Section 42D of the Act of 1938, which is quoted hereunder for ready reference. :

> "42D. (1) The Authority or an officer authorized by it in this behalf shall, in the manner determined by the regulations made by the Authority and on payment of the fees determined by the regulations made by the Authority, issue to any person making an application in the manner determined by the regulations, and not suffering from any of the disqualifications herein mentioned, a licence to act as an intermediary or an insurance intermediary under this Act:
>
> Provided that,-
>
> (a) in the case of an individual, he does not suffer from any of the disqualifications mentioned in sub-section (4) of section 42, or
>
> (b) in the case of a company or firm, any of its directors or partners does not suffer from any of the said disqualifications.
>
> (2) A licence issued under this section shall entitle the holder thereof to act as an intermediary or insurance intermediary.
>
> (3) A licence issued under this section shall remain in force for a period of three years only from the date of issue, but shall, if the applicant, being an individual does not, or being a company or firm any of its directors or partners does not suffer from any of the disqualifications mentioned in clauses (b), (c), (d), (e) and (f) of sub-section (4) of section 42 and the application for renewal of licence reaches the issuing authority at least thirty days

before the date on which the licence ceases to remain in force, be renewed for a period of three years at any one time on payment of the fee, determined by the regulations made by the Authority and additional fee for an amount determined by the regulations, not exceeding one hundred rupees by way of penalty, if the application for renewal of the licence does not reach the issuing authority at least thirty days before the date on which the licence ceases to remain in force.

(4) No application for the renewal of a licence under this section shall be entertained if the application does not reach the issuing authority before the licence ceases to remain in force:

Provided that the Authority may, if satisfied that undue hardship would be caused otherwise, accept any application in contravention of this sub-section on payment by the application of the penalty of seven hundred and fifty rupees.

(5) The disqualifications above referred to shall be the following: -

(a) that the person is a minor;

(b) that he is found to be a unsound mind by a court of competent jurisdiction;

(c) that he has been found guilty of criminal misappropriation or criminal breach of trust or cheating or forgery or an abetment of or attempt to commit any such offence by a court of competent jurisdiction:

Provided that, where at least five years have elapsed since the completion of the sentence imposed on any person in respect of any such offence, the Authority shall ordinarily declare in respect of such person that his conviction shall cease to operate as a disqualification under this clause;

(d) that in the course of any judicial proceedings relating to any policy of insurance of the winding up of an insurance company or in the course of an investigation of the affairs of an insurer it has been found that he has been guilty of or has knowingly participated in or connived at any fraud dishonestly or misrepresentation against an insurer or an insured;

(e) that he does not possess the requisite qualifications and practical training for a period not exceeding twelve months, as may be specified by the regulations made by the Authority in this behalf;

(f) that he has not passed such examinations as may be specified by the regulations made by the Authority in this behalf;

(g) that he violates the code of conduct as may be specified by the regulations made by the Authority.

(6) If it be found that an intermediary or an insurance intermediary suffers from any of the foregoing disqualifications, without prejudice to any other penalty to which he may be liable, the Authority shall, and if the intermediary or an insurance intermediary has knowingly contravened any provisions of this Act may cancel the licence issued to the intermediary or insurance intermediary under this section.

(7) The Authority may issue a duplicate licence to replace a licence lost, destroyed or mutilated, on payment of such fee, as may be determined by the regulations made by the Authority.

(8) Any person who acts as an intermediary or an insurance intermediary without holding a licence issued under this section to act as such, shall be punishable with fine, and any insurer or any person who appoints as an intermediary or an insurance intermediary or any person not licensed to act as such or transacts any insurance business in India through any such person, shall be punishable with fine.

(9) Where the person contravening sub-section (8) is a company or a firm, then, without prejudice to any other proceedings which may be taken against the company or firm, every director, manager, secretary or other officer of the company, and every partner of the firm who is knowingly a party to such contravention shall be punishable with fine."

18. The provision aforesaid was ignored by the petitioner while making challenge to the provision for engagement of any other person for survey of loss in a given situation. Any other

person should be one not disqualified to be a surveyor. This power is not unguided, rather governed by Sub-Section (4) of Section 64UM and Section 42D of the Act.

19. Section 64UM(8) is to provide safeguard to the claims if the value of the claim is less than the amount provided under Regulation 12 of the Regulations 2015. It is for the reason that the approved surveyor or loss assessor is entitled to claim fee, as specified. The fee payable to them may remain disproportionate to the claim in the given case and in that case, the Insurer has been given liberty to engage any other person for survey of claim, who is not disqualified for being an approved surveyor. Accordingly, we find that the only ground taken by the petitioner for challenge to Section 64UM(8) is not made out. The intent of Legislature is to provide safeguards to the claimant.

20. The learned Additional Solicitor General has cited the judgment of the Delhi High Court in the case of Surveyors Welfare Association (Regd.) (supra) where the challenge was made to the policy of the Insurance Company not to employ approved surveyor or loss assessor for small claims and the appeal was ultimately dismissed. Paragraph 19 of the judgment is quoted hereunder for ready reference:

> "Now the question arises for our consideration in respect of which a controversy is being raised is with regard to the true meaning of the word "not being a person disqualified". The learned Single Judge has held that if a person does not fulfill the requisite qualifications in clause (a) to (g) of Sub-Section 1(D) of Section 64UM, he is to be considered a person disqualified for being employed as surveyor or loss assessor. We, however, feel that the aforesaid conclusion arrived at by the learned Single Judge appear to us to be not correct and we express our pain for not being able to agree with him on this count. In our opinion, the word 'disqualified' does not mean not being qualified. We also feel that while interpreting the provisions of a statute the plain meaning of the words or the expressions should be given effect to and in case the said word or expression is found to be already defined in the Act itself, then the said definition as enumerated in the Act itself should be held to be the guiding principle for giving true meaning to the expression. As we have staled

earlier Sub-Section (4) of Section 42 of the Act clearly lays down the criteria and/or grounds on which a person is said to be disqualified. In our opinion, while interpreting the provisions of Sub-Section (6) of section 64UM, the expression "any other person not being a person disqualified for the time being" should be given the same meaning as is given to the said expression appearing in Section 42 (4) and nothing beyond it and thereby qualifying a person not suffering from any of the disqualifications' occurring in Sub-Section (1) of Section 42 and enumerated in Sub-Section (4) of Section 42 of the Act."

21. Another judgment cited by the learned Additional Solicitor General is in the case of R.K.Elango Vs. Insurance Regulatory and Development Authority (IRDA) [W.P.(MD).No.9681 of 2018 decided by judgment dated 27.2.2019] wherein challenge to the Constitutional validity was not made, but issue raised before this Court had been discussed holding the provision neither arbitrary nor violative of Article 14 of The Constitution of India.

22. In view of the above, we do not find the provision under challenge to be unconstitutional. It does not hit Articles 14, 19(1)(g) and 21 of The Constitution of India.

23. Accordingly, the writ petition fails and is dismissed. Consequently, the connected WMPs are also dismissed. There will be no order as to costs.

Sd/-
Deputy Registrar(CS)

//True Copy//

Sub Assistant Registrar

RS

To:

1. The Secretary
   Government of India
   Ministry of Finance
   North Block New Celhi 110001.

2. The Chairman,
   Insurance Regulatory and Development
   Authority (IRDA)
   Parishram Bhavan,
   3rd Floor, Basheer Bagh,
   Hyderabad 500004.

3. The Chief Executive Officer
   United india Insurace Co.Ltd
   24, Whites Road
   Chennai 600 014.

4. The Chief Executive Officer,
   New India Assurance Co. Ltd
   87, M.G.Road,
   Fort, Mumbai - 400 001.

+1cc to Mr.S.Stanley John, Advocate, S.R.No.61384

+1cc to Mr.S.Arunkumar, Advocate, S.R.No.61277

+1cc to Mr.C.P.R.Kamaraj, Advocate, S.R.No.61210

W.P.No.9972 of 2021
&
WMP.Nos.10597 & 10604 of 2021

MG(CO)
RGA(07/12/2021)