From,

Abhay Pratap Singh II

Addl. District Judge,

Maharajganj

To,

The Registrar General,

Hon'ble High Court of Judicature at Allahabad,

Allahabad

Through,

The District Judge,

Maharajganj

Subject:- Representation for premature transfer from district Maharajganj on the ground of critical illness of applicant's wife.

Respected Sir,

Most humbly the applicant begs to submit the following facts for kind consideration of the hon'ble Court.

1. That due to urgent critical medical condition of my wife as specified below, the representation has been move today for kind consideration of Hon'ble Court.

2. That the Hon'ble High Court has been pleased to transferred the applicant from district Kasganj To Maharajganj vide notification no.193/ Admin.(Services)/2024 Dated: Allahabad: April 05th, 2024.

3. That the applicant wife (Shalini Singh) is suffering from critical and rare disease Rheumatoid arthritis (Refractory) with peripheral neuropathy with degenerative and chronic neurological disorder since last 10 years.

4. That the immuno therapy and treatment of my wife is going on with Dr.P.D.Rath,MD,Post graduate in rheumatology,Director and Head of Department Rheumatology, Max Super Speciality Hospital, Saket, Smart, panchsheel, New Delhi. Who certifies that my wife's disease is chronic and incurable. Her disease is severe and she is on biologicals

therapy which puts her at high risk of side effects. Hence she needs regular monitoring or follow under specialist care of a rheumatologist.

(Annexure I annexed)

5. That during the past ten years we have consulted with different doctors like Dr.Manjesh Rathi,MD,DM (Neuro), Dr. Upendra Pandey,MBBS,DCCP and Dr. Alok Sharma,MS(Trauma and Artho).

a. Dr.Manjesh Rathi, MD, DM (Neuro), certifies that my wife is not able to do her activity of daily living. She is advised to stay places where in she can consult rheumatologist simultaneously and higher medical facilities. She need regular and regular medical care because follow up of her degenerative and chronic neurological disease. (Annexure II annexed)

b. Dr. Upendra Pandey,MBBS,DCCP, certifies that applicant wife suffered from multiple disease chronic rheumatoid arthritis, hypothyroidism and repeated anemia breathlessness. As she is suffering from rheumatoid arthritis and treated on DMRD since 2014, but because of poor response of the given medicine she is shifted to biological therapy. During treatment she develops complication of recuring anemia along with urticaria and super infection and depressive episodes. (Annexure III annexed)

c. Dr. Alok Sharma, MS(Trauma and artho) certifies that applicant's wife is suffering from Poly rheumatoid arthritis and hypothyriodism and she is prone to chronic anemia in which she oftens requires blood transfusion. Due to multiple nature of disease her activity of daily living are severely compromised. (Annexure IV annexed)

6. That at present treatment of my wife's critical and severe disease is going on from New Delhi with Dr.P.D. Rath, Rheumatologist. No such medical treatment and facilities are available in Maharajganj as needed to applicant's wife. Maharajganj district is almost 900 km far away from New Delhi and from Super speciality hospitals. Therefore, it is difficult task for the applicant to get the frequent and regular treatment and checkup from the concerned doctor. In absence of such facilities, it may cause high risk to the life of applicant's wife.

7. That as per Hon'ble Court letter no. 94/Admin.(Services)/2024;Dated: February 19,2024 applicant's wife disease falls under category II(Degenerative and Progressive Neurological disorders) of the annexure-I of that letter, which is certified by C.M.O./C.M.S. of Maharajganj district.

8. That in addition to that applicant's wife constant weakness due to her disease, due to sudden unconsiousness she falls in the month of October,23 and her left leg and left hand got fractured. Doctors advised her immediate surgery. She was operated and two screw was implanted in her left hand and leg at Yashoda hospital at Ghaziabad.

(Annexure V annexed)

9. That the desired affidavit in support of this representation related to the ailment, treatment and also the certificate of the CMO/CMS of Maharajganj is duly annexed for kind perusal of the Hon'ble High Court.

(Annexure VI and VII)

10. That New Delhi is about 900 km away from district Maharajganj. There is no train route or railway facilities at Maharajganj. No rheumatologist doctor is available at Maharajganj district. She requires constant medical treatment in able guidance of Rheumatologist which is almost impossible at district Maharajganj. She is not in a condition to travel alone by herself. Therefore, it is not possible for the applicant to provide constant higher medical facilities to my wife.

11. In the above compelling circumstances it is most humbly prayed that the Hon'ble High Court may kindly be moved to consider the request of applicant sympathetically and post the applicant at any district of given choice or any district near New Delhi so that the applicant may be able to pursue my wife treatment and provide her better medical care and attention in the able guidance of Rheumatologist doctor.

The applicant will ever remain greatfull to the Hon'ble Court.

With utmost regards. Encls. As above Dated:03.05.24

Your's Faithfully

105/2024

(Abhay/Pratap Singh II) ADJ(FTC) Maharajganj H.C.ID-UP1815