

IN THE CITY CIVIL COURT, HYDERABAD METROPOLITAN
REGION, HYDERABAD, TELANGANA
(ORIGINAL JURISDICTION)

CIVIL SUIT NO. _____/2023

Ravinder Rao Akula & Anr.

PLAINTIFFS

Versus

The State of Louisiana & Ors.

DEFENDANTS

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Plaintiff No. 1 (Mr. Ravinder Rao Akula)

Plaintiff No. 2 (Akula Foundation – India, through its General Secretary and AR Mr. Ravinder Rao Akula)

Place: Hyderabad
Date: __.03.2023

THROUGH:
ADVOCATES FOR PLAINTIFF

IN THE CITY CIVIL COURT, HYDERABAD METROPOLITAN
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LIST OF DATES AND EVENTS WITH SYNOPSIS

DATE	DESCRIPTION OF EVENTS
05.08.2021	Dr. Shiva Akula, the nephew of Plaintiff No. 1 and the Chief Patron of the Plaintiff No. 2 was charged with indictment of 23 accounts inter alia for purported instances of financial irregularities in Medical Billing through his Company Canon Hospice operating in Louisiana, USA. The charges include those of health care fraud and Dr. Shiva Akula, an Indian turned American medical graduate from Osmania University in Hyderabad and emigrated to the US in 1983 faces legal action on multiple counts in the US since August 2021.
Early 2000s	Dr. Shiva Akula Founded the Akula Foundation in the US in the year 1994 and an Indian Chapter of the same under the name of Akula India Foundation is floated and launched in the early 2000s and the Foundation takes up community welfare and Social welfare activities in and around Hyderabad particularly, medical camps and health camps for the poor. The Foundation receives most of its funds through grant-in-aid

	from the Akula Foundation USA.
05.11.2021 and immediately thereafter	Late Smt. Lalitha Bai Akula, who was the mother of Dr. Shiva Akula and the Sister-in-law of the Plaintiff No. 1 dies in Hyderabad and her remains await the arrival of her son Dr. Shiva Akula from the US to come over and perform the last rites and funeral of the departed soul. However, the colluding Defendants built a false narrative and vehemently oppose his legitimate travel to Hyderabad and even question the genuineness of the incident of death and deprived the Plaintiff No. 1 and his nephew of his legitimate rights to bid a graceful and respectful farewell to his deceased mother. The Defendant No. 2 meanwhile illegally freezes and holds on to a significant amount of more than USD 30,000 meant for the grant to the Plaintiff No. 2 thereby bringing the activities and operations of the Plaintiff No. 2 to a near halt and makes its existence difficult.
November 2021 to till date	Plaintiffs are struggling to come to terms with the damages inflicted upon them and the Plaintiff No. 1 particularly, being the eldest member of the Akula Family now continues to be struggling with the severe agony to see how his nephew failed to adieu a graceful farewell to his mother all because of wrong charges bringing an irreparable and permanent loss to the family and leaving an indelible scar.
	Cause of action: The Cause of action in the present Suit is a perpetual and ongoing continuous cause of action

	and continues to arise with each day perpetually. Not only the Defendants have caused irreparable damage to the Plaintiff's reputation and legal rights but have caused a clear violation of human rights as well.
Present day	In the present day, the Plaintiff No. 1 suffers mentally and personally while the Plaintiff No. 2 continues to suffer financially and operationally. The Defendants have caused the said misery to the Plaintiffs and therefore the Plaintiffs have decided to file the present Suit and fight for their bona fide rights and liberties.

Plaintiff No. 1 (Mr. Ravinder Rao Akula)

Plaintiff No. 2 (Akula Foundation – India, through its General Secretary and AR Mr. Ravinder Rao Akula)

Place: Hyderabad
Date: __.03.2023

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PLAINTIFFS

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DEFENDANTS

MEMO OF PARTIES

1. Ravinder Rao Akula
13-2-368, Jali hanuman
Rahimpura
Asif Nagar
Hyderabad
Telangana
India 520006
2. The Akula Foundation – India Chapter
C/o The Akula Foundation USA
through its General Secretary
13-2-368 Jali hanuman
Rahimpura
Asif Nagar
Hyderabad
Telangana
India 520006

VERSUS

1. The State of Louisiana
through the Secretary of State
8585 Archives Avenue, Baton Rouge
LA 70809,
USA

.....Defendant No. 1

2. Capital One Bank
through its Officer-in-Charge
30 7th Avenue South
St Cloud
MN 56301
USA

.....Defendant No. 2

3. Kathryn McHugh
Attorney – US Department of Justice
650 Poydras St Ste 1600
New Orleans, LA, 70130-7212
USA

....Defendant No.3

Plaintiff No. 1 (Mr. Ravinder Rao
Akula)

Plaintiff No. 2 (Akula Foundation –
India, through its General Secretary
and AR Mr. Ravinder Rao Akula)

Place: Hyderabad
Date: __.03.2023

THROUGH:
ADVOCATES FOR PLAINTIFF

IN THE CITY CIVIL COURT, HYDERABAD METROPOLITAN
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DEFENDANTS

MEMORANDUM OF CIVIL SUIT UNDER ORDER VII RULE I OF
THE CODE OF CIVIL PROCEDURE 1908 INTER-ALIA SEEKING
SYMBOLIC COMPENSATION FROM DEFENDANT NUMBERS 1
TO 3, TO A TUNE OF RUPEES 2 (INR TWO ONLY), I.E. RUPEE
1 EACH FOR THE SENTIMENTAL LOSS, PERSONAL LOSS
AND PERSONAL INJURY & GRIEVANCES ON ACCOUNT OF
SEVERE MENTAL AGONY AND LOSS CAUSED TO THE
PLAINTIFFS AND DAMAGES TO A TUNE OF RUPEES
50,00,000.00 (RS.FIFTY LAKHS ONLY) ON ACCOUNT OF
LOSS OF OPPORTUNITY, FINANCIAL LOSSES ACCRUED
AND REPUTATIONAL LOSSES SUFFERED BY THE
PLAINTIFF NO. 2.

MAY IT PLEASE YOUR LORDSHIPS:

1. PLAINTIFF'S INTRODUCTION

The Plaintiff No. 1 named herein, i.e. Ravinder Rao Akula is a citizen and ordinary resident of India, residing at 13-2-368 Jali hanuman, Rahimpura, Asif Nagar, Hyderabad, Telangana, India 520006 and has been very active socially in his personal capacity and as a member of the Lions Club

of Hyderabad, which is a prominent and well known social service institution acclaimed globally. The Plaintiff No. 1 has been leading several social service campaigns in and around the city of Hyderabad and has always been on the forefront of executing various Social Service and Community welfare schemes. The Plaintiff was born in India in the city of Hyderabad in the year 1954 and has lived permanently in the city of Hyderabad ever since. A Copy of the UID Card of the Plaintiff No. 1 is attached herewith as Annexure P1.

The Plaintiff No. 2 is the Indian chapter / Indian Arm of the US based 'The Akula Foundation' which is a Social Service and Community Service Organization founded in the year 1994 by Dr. Shiva Akula, a native of USA, originally born and brought up in Hyderabad and having emigrated to the USA after obtaining specialized Medical Education from the Osmania University of Hyderabad. The Akula Foundation/ Akula Family Foundation is founded as a Charitable and Non-Profit Organization and has in accordance with Article VII of its Articles of Association appointed Mr. Ravinder Rao Akula as its General Secretary cum Authorized Representative (AR) to overlook the Indian Chapter of the Foundation and the operational activities/social welfare activities undertaken by the said Foundation through its

India Chapter which runs completely under the aegis of the Akula Foundation USA. Copy of the Articles of Incorporation of the Akula Foundation along with a copy of the Letter of Appointment in the name of Mr. Ravinder Rao Akula as its General Secretary in attached and marked Annexure P2 Collectively.

2. The Plaintiff No. 1 and 2 have jointly filed the present Suit and sued the Defendants herein. The Plaintiff No. 1 also acts for and on behalf of the Plaintiff No. 2 as its AR who is duly authorized vide Letter of Appointment, duly executed and issued in his favor by the sole Founder and Director of the Akula Foundation and the same is attached with this Plaint along with the Vakalatnama. The Plaintiff undertakes to present himself for answering any material questions or presentations of facts, before this Court in person as the Plaintiff No. 1 and in the capacity of the AR of the Plaintiff No. 2, as and when directed or called upon by this Hon'ble Court to do so.
3. The Plaintiffs are aggrieved by the high handedness of the Defendants especially towards the irreparable loss and immense perjury and mental agony caused to the Plaintiff No.1 personally and to the Plaintiff No. 2 as well, when the Founder Principal of the Plaintiff No. 2, i.e. Dr. Shiva Akula

was deliberately, rather compulsively prevented from traveling to Hyderabad India, to lit the funeral pyre of his deceased mother Smt. Lalitha Bai Akula who died on 05.11.2021 at Hyderabad and always deserved the respectful farewell by her eldest son Dr. Shiva Akula. The Plaintiff No. 1 is the brother-in-law of the deceased Smt. Lalitha Bai Akula and it was very painful for the Plaintiff No. 1 to bear the shock of unavailability of his real nephew Dr. Shiva Akula (son of the deceased) when his presence was most crucially required in the grief stricken family. Not only that, this deprivation caused an irreparable and permanent loss and perpetual injury for the entire family where no such incident had taken place in the past where an eldest son was unable to perform last rite of his deceased parents, something which is considered to be a sacred ritual and a duty of every person to perform the *Antim Sanskar* (last rites) of his/her deceased parents, for the overall solace and peace of the departed soul and for the well-being of the aggrieved family. The Plaintiff No. 1 submits that this right was forcefully taken away from the family and has not only caused acute distress, mental pain and agony not only to Dr. Shiva Akula but also to the entire family and in-particular, to the Plaintiff No. 1 who is now the eldest and most active member of the Akula Family in Hyderabad. The Plaintiff No. 2 is also aggrieved of the Defendants' collective

actions restraining the flow of funds and aid to the Plaintiff No. 2, which has resultantly caused huge loss to the operational and social welfare activities of the Plaintiff No. 2 organization as such schemes and activities cannot be carried out without adequate grant-in-aid and funding. This has caused direct injury to hundreds of needy persons and beneficiaries who would have been benefited from such welfare schemes and community welfare programs which the Plaintiff No. 2 would have undertaken had the financial interests of the Plaintiff No. 2 not been severely jeopardized by the Defendants collectively. Some photographs showing the community welfare schemes and social service programs undertaken by the Plaintiff No. 2 are annexed as Annexure P3.

4. DEFENDANTS' INTRODUCTION:

The Defendant No. 1 is a State Territory of the United States of America and through its Eastern District has caused direct perjury to the Plaintiff No. 1 and 2 by disallowing the nephew of the Plaintiff No. 1 to travel to Hyderabad and lit the funeral pyre of his deceased mother, the sister-in-law of the Plaintiff No. 1 and one of the key functionaries of the Plaintiff No. 2, Smt. Lalita Bai Akula, who died in Hyderabad on 05.11.2021. The Defendant No. 1 was completely insensitive and high handed towards the

multiple requests made by Dr. Shiva Akula and the deprivation caused to the Plaintiff No. 1 and 2 and to the entire aggrieved family despite the fact that the said Dr. Shiva Akula had given decades of Medical Service to the Defendants Number 1 and served in the most tough conditions even during the COVID Pandemic. On the Contrary, the Defendant Number 1 subjected the Plaintiffs to acute deprivation and mental agony by disallowing the Plaintiff No. 1's nephew Dr. Shiva Akula, a well-deserved and justified travel to Hyderabad to cremate his deceased mother all because of an indictment which the Defendant Number 1 had purportedly brought out against the said Dr. Shiva Akula citing some purported violations in a Medical Services Company run by the said Dr. Shiva Akula namely M/s Canon Hospice. The Defendant Number 1, being the state, has exclusively wide and unmatched power to prevent the travel and hence cause irreparable mental agony and loss to the Plaintiff No. 1 in person and to the Plaintiff No. 2.

5. Defendant No. 2 is a prominent Banking Corporation of the USA, which has, in all probability at the behest of the Defendant No. 1 blocked all major financial gains and grants to the Plaintiff No. 2, practically bringing the Social Welfare activities and schemes run by the Plaintiff No. 2 to a standstill. The Defendant No. 2 has blocked and withheld an

amount of USD 31,000 (Thirty One Thousand US Dollars) which were meant to be assigned and sent in grant to the Plaintiff No. 2 for carrying out Free Medical Check-ups amongst the underprivileged and downtrodden sections of the Society and for carrying out similar social welfare activities in and around Hyderabad. The Defendant No. 2, is a major US based Banking Corporation through which, the Plaintiffs usually received funds for running such schemes. The Defendant No. 2 has no apparent or cogent reason to block the funds assigned to the Plaintiffs and has withheld the funds illegally.

6. Defendant No. 3, Ms. Kathryn McHugh is the United States Attorney who represented the Government to file an indictment against Dr. Shiva Akula initially on 05.08.2021 and subsequently represented the state in vehemently opposing the extra ordinary request and motion filed by Dr. Shiva Akula seeking partial modification of Bond Conditions seeking to travel to India to perform the last rites of his deceased mother. The Defendant No. 3 is a prominent Attorney and should have acted with more compassion while dealing with the extra ordinary request of travel. She ought to have been circumspect of the sentimental value behind the request to travel and the emotional void and permanent scar it would create not only on Dr. Akula but on

the entire Akula Family including the Plaintiff No. 1, if Dr. Shiva Akula was not allowed to travel to Hyderabad to perform last rites of his deceased mother. The Defendant No. 3 presented a false narrative that Dr Shiva Akula is a flight risk compared however remained unmoved despite the fact such an extra ordinary request made in such compelling circumstances deserved to be allowed and the Courts are generally compassionate even in case of jailed inmates. The Defendant No. 3 largely contributed to the deep mental agony and perjury caused to the Plaintiffs and also to Dr. Shiva Akula who had provided Medical Services in New Orleans area for more than 30 years and had even worked relentlessly during COVID times. Dr Shiva Akula is an infectious diseases specialist who not only treated COVID patients but also participated in research leading to development of Pfizer vaccine. In fact during COVID times, Dr. Shiva Akula along with his Company Canon Hospice were the only Hospice serving New Orleans while all other hospice Companies ran away for their life knowing fully well that they could not make money. The same position occurred during hurricane Katrina and Dr Shiva Akula cared for the community and not the cash input and rendered his services throughout.

7. All the Defendants have collectively contributed to the misery of the Plaintiffs and the Akula Family and have been completely uncompassionate towards the selfless societal service rendered not only by Dr. Shiva Akula and his team in the USA but also by the deceased Smt. Lalitha Bai Akula as well, during her stay in the US while she visited her son and his family. The Defendants thus owe a moral responsibility towards the Plaintiffs as they have deprived them of their legal and bona fide entitlements.
8. The Plaintiffs have for now impleaded only the above described three Defendants. The Plaintiffs crave the leave of this Hon'ble Court to add or delete any Defendant and/or modify the Memo of Parties, if so needed at any stage of this case, with the advance leave of this Hon'ble Court.
9. The impleadment of the above Defendant is justified because it was at the behest of the Defendants that the rights of the Plaintiffs, as guaranteed to every Citizen of India under the Constitution of India, have been suppressed, so much so that the family remained devoid of a respectful and dignified farewell to one of the most senior and revered member of the family who died in the never ending pain of seeing her son for one last time and the one who departed as a soul whose funeral pyre could not be lit by her eldest

son, something that is considered to be a sacrament in the Hindu Indian system. This is a loss which cannot be measured or quantified in words and no amount of monetary compensation can ever fill the void which has been created in the family and particularly in the minds of the Plaintiff No.1 who shall always live with a sense of this deprivation.

10. **FACTS OF THE CASE:**

It is the case of the Plaintiffs that the real nephew of the Plaintiff No. 1, namely Dr. Shiva Akula who is presently a US Citizen, was born in Hyderabad in 1956 and secured his MBBS Degree from Osmania Medical College and had emigrated to the USA in 1983 for better career prospects and with definite plans to return to India and resume full time Medical Practice after retirement. He holds a US Citizenship and a Person of Indian Origin (PIO) visa. Dr. Shiva Akula established 'The Akula Foundation' in 1994 and has since then contributed to the selfless service of the community. Dr. Shiva Akula spearheaded the Mental Health Service for COVID afflicted patients, health care workers and their families through the Akula Foundation. On 05.08.2021, the said Dr. Shiva Akula, was indicted for violations mainly on the basis of purported disclosures made by a disgruntled former employee of Dr. Shiva Akula, namely Ms. Kelly Anderson, who was projected as a whistleblower. The

Company founded and operated by Dr. Shiva Akula, namely Canon Hospice Inc., provided Hospital care to the elderly and patients requiring Hospital like care and facility and comfort care in the final phases of life. Dr. Shiva Akula was charged with indictment on account of 23 charges including those of financial misappropriation and misuse of State funds, apart from the charges of operating shell companies with the help of his acquaintances settled in New Orleans USA. All this was done at the behest of frivolous complaints made by a disgruntled former employee Ms. Kelly Anderson. Dr. Shiva Akula was later released on 25.08.2021 on a Bond with a Travel restricted to the Eastern District of Louisiana, with allowance to the Continental U.S. with approval by the U.S. Probation. His passport was also seized by the U.S. state Authorities.

11. That subsequently, pursuant to the demise of his mother, the Late Smt. Lalitha Bai Akula on 05.11.2021, the said Dr. Shiva Akula requested temporary release of his Passport and a temporary modification of the ibid Order and Bond Conditions seeking modification of Bond Conditions to allow limited international travel from 05.11.2021 to 20.11.2021 to attend his mother's funeral service in Hyderabad. He duly informed and disclosed that during the course of such travel, he shall live and stay with his brother-in-law Sh. Suresh

Korivi who resides at 7-1-309 Maruthi St, Secunderabad AP (Now Telangana), India and further furnished an undertaking that he shall abide by all conditions of his release on Bond.

12. The Plaintiffs submit that death in Hindu tradition is a transition from body/mind to the spirit. It is an old Hindu tradition that laid the responsibility of the oldest son to light the funeral pyre. The Oldest son should take care of the funeral and cremation of the deceased mother. This is the ultimate process of getting the body back to ashes or natural elements of material remains of the body. This responsibility is more in the Hindu culture which treats mother as a Goddess who makes all the miracles in the life of her son. Additionally, the process of mourning and grieving is also not considered as a private affair. It involves the whole community and clan to be there and partake in the process for the bereaved family. The most important elements in the process are the 3rd, 5th and 10th day ceremonies which involve collecting ashes and immersing them in rivers, shaving heads and other humble tasks of mourning performed for the salvation (moksha) of the departed soul. There is sheer symbolism in immersing the ashes into waters so as to make them flow through rivers to sea and then into oceans symbolizing the confluence of the spirit

with the supreme self or cosmic self. The bereaved son Dr. Shiva Akula was deprived of all this heavenly duty which the almighty has tasked him with and all because of the collective high handedness of the Defendants, the deceased Smt. Lalitha Bai Akula departed without her son's participation in any of her last rites. Something that amounts to complete vedic deprivation and a spiritual loss which shall never be filled or compensated. The Plaintiff No. 1 kept on calling his nephew asking him about his final plans and schedule of arrival and even held up the last rites for some time because of this but the painful Legal part of Dr. Shiva Akula's life added just more pain to this and the family bid a tearful farewell to the deceased in the absence of Dr. Shiva Akula, who was not allowed to travel, even for conducting the last rites of his deceased mother. A series of trail of e-mails exchanged between Dr. Shiva Akula and his Attorney Rachel J. Conner, on this subject and the eventual denial of the same, are annexed herewith as Annexure P5 collectively.

13. The Plaintiff No. 1 submits that his nephew Dr. Shiva Akula has been a victim of unhealthy competition and racist approach at the hands of some selected groups and individuals who has particularly disliked the progress made by Dr. Akula and his Medical establishments and initiatives.

Dr. Shiva Akula, through Canon Hospice organization has worked relentlessly during hurricane Katrina and Rita and provided life saving hospice care to thousands of elderly and infirm residents of Louisiana but the money spent is providing all these life-serving services which was meant to be eventually reimbursed by the Insurance covers of respective beneficiaries, was illegally withheld and Dr. Akula was in fact forced to seek legal recourse to get these dues paid. Dr. Akula won an appeal against the US based Medicare and an amount of US Dollars 704,881.58 was paid to him after intense litigation.

14. That the Plaintiff No. 1 further submits that as a retributive fallout of the intense litigation leading to Dr. Shiva Akula ultimately succeeding in receiving his bona fide dues, a new set of retributive measures were launched against him only with the motive of bringing him permanent harm, perjury and reputational losses and the indictment was nothing but a part of the same strategy under which he was framed and ultimately suppressed to the fullest. At this stage the Plaintiff No. 1 submits that racial abuse against physicians, health professional and doctors coming from Asian and African communities is very common in USA and his Nephew Dr. Shiva Akula is a victim of the same. Dr. Shiva Akula has been fighting tooth and nail against this racial abuse and

injustice and has seen long years of litigation and continues to agitate these causes in US Courts. One of the main cases in this stride is Case No. 23-CV-60034-RS titled Shiva Akula Versus Bernard Cassidy & Ors which has been admitted in the United States District Court, Southern District of Florida on 09.01.2023 and the Plaintiff craves the leave of this Hon'ble to preserve his rights to place the case docket on record before this Hon'ble Court if the need so arises.

15. That the Plaintiff finds it very important to briefly highlight the menace of victimization of black and brown doctors coming from Asian and African regions. This is an increasingly spreading social menace in the USA. Doctors coming from third world countries who give the best of their physical and intellectual inputs in the healthcare and medicine industry and socially serves the American Society, are harassed and victimized for no fault of theirs. One would wonder if working day and night recklessly and gradually soaring the heights of profession is forbidden for someone who came from outside the set-up and rose on the basis of his core competence and hard work. Victimization of black and brown doctors is a hot topic and Dr. Shiva Akula has been prominently spearheading this campaign against the malpractices against Indian and African Doctors. Annexed

herewith is the placard / e-invite of one of the shows where Dr. Shiva Akula was called to share his views on this burning issue.

16. The Plaintiffs submit that after the period of 2013 when Medicare had to pay Dr. Akula, to the present, the Defendants have been running a collective conspiracy to have Dr. Shiva Akula eradicated from the American Medical Market through incarceration and some of the close competitors and rivals of Canon Hospice and Dr. Shiva Akula are assisting the Defendants in achieving their retributive goals against Dr. Akula. The decision to disallow Dr. Akula to travel to India for performing last rites of his deceased mother was a direct fall-out of this retributive build-up against Dr. Akula. It is intended to psychologically weaken him to not fight injustice against the family.

17. The Plaintiff submit that in the late 2021, the Defendant No. 3, attempted to level a series of charges by way of exparte communications with a US Federal Judge, with the intention to have the Court enter orders denying Dr. Shiva Akula the services of a physician Advocacy Group called 'Physicians Against Abuse'. The defendant Number 3 recognized that PAA had identified the conspiracy and pattern conducted by the US Insurance Industry in collusion with Government

agencies in which they target the successful ethnic minority physicians for civil and criminal prosecutions in order to eradicate the money owed to such doctors and physicians for properly rendered clinical services. The Defendant Number 3, through these ex parte communications attempted to illegally restrict Dr. Akula from presenting to the jury, relevant facts pertaining to this conspiracy. This generally included a racist approach against the Indian and African origin physicians and many poor Indian and African origin physicians had even languished in jails and had been wrongfully convicted under such collective conspiracy. However, Dr. Shiva Akula decided not to plead guilty to the false charges and rather decided to fight the indictment and this caused the Defendant No. 3 to recuse herself from the case consequent to her recognition of the risks to her professional career and liberty. The Plaintiff craves the liberty of this Hon'ble Court to bring on record additional related document in support of his claims made in this para with the leave of this Hon'ble Court should the need to do the same arise in the course of litigation.

18. The Plaintiff submit that a rival Company known as Passages Hospice, was hand in glove in the entire indictment process and had managed to collude with the Defendants.

19. The Plaintiffs submit that almost immediately after Dr. Shiva Akula's receipt of money, there commenced a vicious campaign of harassment and intimidation of Dr. Shiva Akula, his family and close acquaintances, that involved organized- crime syndicate like tactics of threatening and making highly defamatory propaganda about Dr. Shiva Akula and his family, which included threats against his life, liberty and property. The purpose of this campaign was to isolate Dr. Shiva Akula to socially and economically isolate Dr. Shiva Akula, in order to render him unable to defend himself against the subsequent criminal charges, and cause him to plead guilty. The Plaintiffs further submit that harassment of Doctors by Insurance Companies and their allies is not uncommon in the USA and Dr. Shiva Akula is a victim of the same and brunt has been borne by his family, including the Plaintiff No. 1.

20. The Plaintiffs submit that another rival Company namely Passages Hospice, which was a long-time market competitor of Dr. Shiva Akula Akula, Canon Hospice Inc. and The Akula Foundation, was the principal perpetrator of the conspiracy against Dr. Shiva Akula, and participated in hundreds of communications with persons associated with the insurance industry and US Governmental agencies, in

which their common purpose was the manufacturing of a scheme to have Dr. Shiva Akula illegally eliminated from the American healthcare market. The stress caused to Dr. Shiva Akula consequent to the Defendants conspiracy, caused him to require emergency life-saving cardiac care in 2018. The acute mental agony and trauma caused him to pass out on the floor he called 911 (US Emergency services) and got emergency help and later on underwent emergency life-saving cardiac procedure in 2018.

21. The Plaintiff No. 2 further submits that on account of the continuous harassment of its Chief patron Dr. Shiva Akula, the Plaintiff No. 2 remained deprived of the grant-in-aid it used to receive from Dr. Shiva Akula to run community welfare schemes in and around Hyderabad. The functioning of the Plaintiff No. 2 was reduced to its knees and the Plaintiff No. 2 just could not function without the funds and operational support from Dr. Shiva Akula who was being largely victimized by the colluding Defendants.
22. The Plaintiffs further submit that the indictment and harassment of Dr. Shiva Akula was largely orchestrated in the garb of a whistle-blower information by one of his former employees namely Ms. Kelly Anderson. The harassment of Dr. Shiva Akula continues till this date, with arbitrary,

unsubstantiated, and unrelenting chart audits, that are purposed to isolate and economically deplete Dr. Shiva Akula, with the expectation that if and when his indictment comes to trial, he will either plead guilty or be financially unable to retain his legal remedies.

23. The Plaintiffs submit that around the year 2018, Ms. Kelly Anderson started sending texts that my Canon Hospice, the Company founded by Dr. Shiva Akula would be forced to file for bankruptcy, and it subsequently was brought to Dr. Shiva Akula's attention that Ms. Kelly Anderson was being 'fed' this false information from her communications with Defendant No. 3. The said Mr. Kelly Anderson was later employed by the competitor of Canon Hospice called Passages Hospice.

24. The Plaintiff No. 1 further submits that Dr. Shiva Akula lost his mother in the year 2021. She had lived in the US, but returned to India. During her time in US, she volunteered at the Canon Hospice. It is an extremely important tradition within Indian culture that the eldest child administers the final death rights, in order that the soul of the departed rest in state of peace. Defendant No. 3 largely caused this right to be denied to the Akula family and to the Plaintiffs and largely to Dr. Shiva Akula. The Defendants also painted a

false picture before the agencies there in the US representing that Indian physicians who relocated to India had failed to return. Not only that, the colluding Defendants also leveled false allegations that Dr. Shiva Akula had fabricated his mother's cremation certificate, a document issued under the authority of Indian Government. All these factors collectively built a wrong and false narrative in respect of Dr. Shiva Akula and led to the unfortunate denial of his travel to Hyderabad for performing the last rites of his deceased mother. After the deceased Smt. Lalitha Bai Akula, the Plaintiff No. 1 happens to be the eldest member in the Akula family and feeling largely betrayed by the deprivation caused to his nephew and to his sister-in-law, had decided to fight for the genuine rights of the family and decided to file the present Suit against the colluding Defendants.

25. That the Plaintiff No. 1 submits that It was the intent of the Defendants to cause immense shame and disrepute not only to Dr. Shiva Akula but to the entire Akula family, and to psychologically weaken the entire family so as to make them give in to the pressure of the Defendants. Dr. Shiva Akula established the Akula Foundation, the parent body of the Plaintiff No. 2, as a means of using his resources to assist his community back here in Hyderabad and also the

local community outside of his medical practice in the USA, and commencing in approximately 2020, the Foundation assisted in COVID related vaccination programs, in poverty-stricken areas. The Defendants have harassed this Foundation and also the Plaintiff No. 2 with improper subpoenas and sanctions, the purpose of which is to destroy the entities associated with and founded by Dr. Shiva Akula and operating under his name.

26. That the Plaintiffs submit that during the hard times faced by the Akula Family in 2021 when the family lost the late Ms. Lalitha Bai Akula, it was not only Dr. Shiva Akula who was subjected to severe agony and pain but also his family. Dr. Akula's son, who works for the US Military, was also not spared. His Bank Account with the Defendant No. 2 Bank was frozen and remained so for more than three months. During the course of these three months, the family saw the demise of their eldest member but due to freezing of the Bank Account, even the son of Dr. Shiva Akula could not make it to India for partaking in the funeral of his grandmother. The financial stress brought to the family was so adverse that they were even unable to buy food and baby products for three babies in the family. All this was done to bring the family to knees and keep them deprived of

the basic rights and entitlements, including the right to bid a respectful farewell to the eldest member of the family.

27. That the Plaintiffs submit that there is sufficient material available to show that the Defendant No. 3 had sought millions of US Dollars in the name of deposit to facilitate the travel permission to Dr. Shiva Akula for performing the last rites of his deceased mother in India. This was an act of cruelty which added to the misery and depression caused to the entire Akula family.

28. That the Plaintiffs further submit that the Defendant No. 3 had even tried to directly call upon and influence the trial Court Judge in the US Trial Court so as to cause maximum damage to Dr. Shiva Akula. The said approach of the Defendant No. 3 was viewed seriously by the US trial Court and strong displeasure was accorded by the Court in its Order dated 26 January 2022 wherein the Hon'ble US Trial Court presided over by Ld. Judge Karen Wells Roby had inter alia observed as under:-

“It is this Court’s opinion that AUSA McHugh’s Call was an improper attempt to influence the judgment of this Court. While the Court did not contact the Judicial Officer, the behaviour of the Counsel was unprofessional. The Order shall serve as a warning to both Counsel to perform in a manner consistent with the Rules of Professional Conduct and the Louisiana Rules of ethics. Any further misconduct may result in

discipline and a referral to the Court's ethics committee.

The above mentioned strong observations clearly exhibit the unfair and hostile approach of the Defendant No. 3 towards Dr. Shiva Akula, eventually leading to his inability to perform the last rites of his mother. Plaintiffs crave the leave of this Hon'ble Court to place the Certified Copy of the ibid US trial Court Order on record in the present case as soon as a certified copy of the same is obtained from the Registry of the concerned Court.

29. That the Plaintiff No. 1 further submits that the even the son of Dr Shiva Akula, who works for the US Air Force, was victimized and harassed and even his Bank Accounts were frozen and he was left with no money even to buy groceries and provisions for himself and his infant child. Such treatment was met out despite the fact that the son of Dr. Akula had no concern with the Company of Dr. Shiva Akula, namely Canon Hospice. Upon being confronted, the officials of the Respondent No. 2 simply stated that they are conducting some internal investigation and beyond this no question was ever answered by the Bank Officials. The whole family has to live for more than three months under acute financial duress and deprivation. All this was done to break the family mentally.

30. That the Plaintiffs further submit that the Defendant No. 3 deliberately, while pressing for non-grant of permission to Dr Shiva Akula to travel to India to perform the last rites of his deceased mother, concealed the fact that there is already an Indo-American treaty in existence between the two Governments and in the event of Dr. Shiva Akula running away or not returning to the USA, the State always had the option of his criminal extradition under the said Indo-American Treaty. This fact was never argued and the only intent was to just prevent the travel of a son who simply intended to go and perform the last rites of his deceased mother. It is very unfortunate that such gruesome cruelty was met out to someone who had given decades of his life and medical service to the USA and treated thousands of patients.

31. That the Plaintiffs submit that Subsequent to Dr. Shiva Akula's indictment on August 5, 2021, Defendant No. 3 has provided no evidence to substantiate the charges and there is no credible evidence underpinning her knowingly false charges. The unsubstantiated indictment caused immense harm to the reputation of the entire Akula family back there in the US and here in Hyderabad as well. The illegal loss of these rights and privileges was orchestrated by the insurance industry, in an attempt to undermine the ability of

Dr. Shiva Akula to fight the criminal case, and constitutes an element of a far-wider conspiracy between the insurance industry and the American Government, against Indian and African American physicians.

32. That the Plaintiffs further submit that the Defendant No. 3 had lied to a Court in the US that a relative of Dr. Shiva Akula had allegedly left the country and that therefore he too was a flight risk, and as a consequence of this lie, he was deprived of his travel to his native city of Hyderabad for performing the last rites of his deceased mother and the deceased soul departed in acute deprivation looking for her son to lit her funeral pyre.
33. That the Plaintiffs submit that the indictment brought against Dr. Shiva Akula was procured through fraud, is fraudulent and that this illegal tactic has been widely used by the insurance-government industrial complex in the US leading to incarceration of many innocent ethnic minority and Indian physicians.
34. The Plaintiffs also submit that the defamatory acts of the colluding Defendants have caused deprivation not only to the Akula family but also in general to the Indian Physicians putting in the best of medical services in the USA.

35. The Plaintiffs further submit that the late Smt. Lalitha Bai Akula had herself lived in the USA for several years and she was a volunteer at Canon Hospice. She was proud that her family was serving the dying patients. The biggest tragedy that hit south Louisiana and south Mississippi regions in the USA was Hurricane Katrina in 2005. She stayed with Canon Hospice patients despite her own poor health condition, not afraid of dying in service to mankind. She returned to India in 2010. She was very spiritual and prayed and blessed the family to stay strong throughout the decade of these injustices inflicted upon her son in the USA. She finally died in India in 2021 and her son Dr. Shiva Akula was denied travel to perform the last rites despite him being the eldest son.

36. The Plaintiff No. 2 particularly submits that Capital One Bank, which is the Defendant No. 2 herein, is one of the many banks that closed the accounts held by Dr. Shiva Akula and the Akula Foundation. Capital One still holds several thousands of dollars from one of the closed accounts. A huge amount of USD 31,979.99 (US Dollars Thirty One Thousand Nine Hundred and Seventy Nine and Ninety Nine Cents only) which is approximately equal to Indian Rupees Twenty Six Lakhs has been illegally seized

and from the closed Akula Foundation Account in February 2021. They have banking and investment division in India through which the said amount was to be transferred to the Akula Foundation India Chapter, i.e. the Plaintiff No. 2 and the same was supposed to be given out to the Plaintiff No. 2 as grant-in-aid which the Plaintiff No. 2 was to use for community service and social welfare programs, but the illegal freeze on the said Account by the Defendant NO. 2 has practically brought the Plaintiff No. 2 on its knees, struggling to make it difficult to even exist. The Plaintiff No. 2 submits that the said frozen amount legally belonged to it and the deprivation has caused irreparable financial and operational loss to the Plaintiff No. 2 and the Plaintiff No. 2 has thus rightly sought due damages and compensation to the tune of Indian Rupees 50 Lakhs from the Defendants for the said deprivation caused to the Plaintiff No. 2.

37. The Plaintiffs submit that the efforts made by the Akula Foundation, the parent organization of the Plaintiff No. 2 have been largely applauded in the United States. Ms. Carla Brown, the Director of Nursing at Canon Hospice led from the front and under the operation " Covid Crusaders" gave vaccination from door to door in communities of color in East Baton Rouge parish in the Unites States of America. These efforts received national attention and Ms. Carla

Brown has been featured in NY Times, CBS, MSNBC, WGNO and WBRZ.

38. The Plaintiff No. 2 submits that its parent organization, "The Akula Foundation USA" still runs grief support groups even now and community welfare schemes and the deceased Smt. Lalitha Bai Akula was a prominent volunteer and support pier of the organization in the US as well as for the India Chapter, i.e. the Plaintiff No. 2. The Foundation also ran hotlines for aggrieved people and their families and some hospitals were using this as their resource for patients but the defamatory charges leveled against the Foundation have caused great disrepute to the organization as a whole and also to the Plaintiff No. 2.

39. That the Plaintiff No. 2 further submits that its website www.akulafoundation.in proudly showcases its achievements in India and also proudly propounds its associate network and patronage from the parent Foundation in USA. However, with the illegal withholding of more than USD 31,000.00 meant for the usage of Plaintiff No. 2 has caused an irreparable and permanent loss to the Plaintiff Number 2 and has practically reduced the very existence of the Plaintiff No. 2 to a near non est organization. It is because of this irreparable loss and social

disrepute, that the Plaintiff Number 2 has, by way of the present Suit staked a claim and demanded damages and compensation to a tune of Rs. 50 Lakhs so as to make up for the nefarious designs and loss which the colluding Defendants have orchestrated against the Plaintiff Number 2. Copies of the Website pages of the Plaintiff No. 2 Website, which show the voluminous Social Work and community welfare projects undertaken by the Plaintiff Number 2 under the aegis and patronage of the Akula Foundation USA, are annexed along and marked as Annexure P6.

40. That the Plaintiffs submit that Dr. Shiva Akula has been a physician since 1979 and has been caring for patients for the past 30 years in various Hospitals there in America and felt the pain of indigent patients in Hospitals. Any hospital in New Orleans city would endorse that Dr. Shiva Akula's Company Canon Hospice was the first call they made to send an indigent patient for assistance and relief. It had been the belief of Dr. Shiva Akula and the Akula Foundation that no one should have a miserable death from pain and suffering for lack of money. It is further submitted that since the advent of hurricane Katrina, there had been a lot of elderly nursing home residents who did not want to come

back because they were going through PTSD from horrific incidents during the hurricane. To fight that fear out, the Akula Foundation set up Reminiscence Therapy Counseling groups to talk about their glorious past of their war stories and about them being musicians, chefs or simply recollecting good times and great lives they had. The Foundation collaborated with University of Louisiana at Lafayette. The Foundation also conducted 3 Children's Bereavement Camps and we collaborated with LSU Medical students. These bereavement Camps are to resume, following gap through pandemic in the past two years and many months. There were many children who returned to school right after their siblings getting shot without proper grieving and they then ended up in drugs and gangs. A national expert Bager Habibi who visited the Canon Hospice site said " There is no Hospice in the nation that is doing this kind of work in Grieving and should serve as a model for hospices across the nation". But having put in all this effort, what did the grieving family got in return when they lost their family patriarch in the deceased Late Smt. Lalitha Bai Akula, was that her eldest son Dr. Shiva Akula was not even allowed to come and perform the funeral of his deceased mother. Such cruelty cannot be expected from any civilized institution or state or individual.

41. CAUSE OF ACTION

It is submitted that the cause of action in the present civil suit is an ongoing and continuous case of action. The colluding Defendants have built a false and adverse narrative against Dr. Shiva Akula thereby causing continuous and recurring damage and perjury to both the Plaintiffs not only in India but in USA as well because the Plaintiff No. 2 is largely supported through grant-in-aid by the US based parent body called The Akula Foundation which has all along supported the Plaintiff No. 2 but in the present times, the sanctions and freezed accounts and illegally blocked funds belonging to the Akula Foundation have brought the activities and existence of the Plaintiff No. 2 at a complete halt and its survival has becomes difficult and is becoming increasingly difficult with every passing day. The cause of action qua Plaintiff No. 1 arose with the death of Smt. Lalitha Bai Akula on 05.11.2021 and immediately thereafter when Dr. Shiva Akula, who is the nephew of Plaintiff No. 1 was illegally disallowed to travel to Hyderabad and perform the funeral rights of his deceased mother. This led to an irreparable loss to the Akula Family and in particular to the Plaintiff Number 1 who is now the eldest member of the family. For him the inability of his eldest nephew to come and perform the funeral of his

deceased mother was a huge sentimental loss and irreparable event for the entire Akula Family. For Plaintiff No. 2 likewise, the cause of action is an ongoing and perpetual one as the holding up of funds belonging to the Plaintiff No. 2 and the adverse impact caused on the very existence of the Plaintiff No. 2 has caused and is continuing to cause and irreparable and permanent loss to the Plaintiff No. 2 and the Plaintiff No. 2 has therefore rightly sought adequate damages from the colluding defendants, in – particular, the Defendant No. 2, Capital One Bank. This cause of action is occurring with every passing day and is an ongoing and continuous cause of action which is taking place perpetually within the jurisdiction of this Hon'ble Court.

42. **JURISDICTION**

It is submitted that this Honorable Court has the jurisdiction to admit the present case in accordance with the provisions of Section 20 (b) and (c) of the Code of Civil Procedure 1908. It is submitted that the Cause of action, as stated above, has arisen within the jurisdiction of this Hon'ble Court. The Defendant No. 1 has been instrumental in building a false narrative and propaganda against the Plaintiff No. 2 and its parent organization, "The Akula Foundation" while the Defendant No. 2 has brought huge monetary losses to the Plaintiff No. 2 and the Defendant No.

3 along with other colluding associates has built a defamatory narrative against the Plaintiff No. 2 and against the nephew of Plaintiff No. 1 leading to an irreparable family loss, something that has left an indelible scar on the face of each member of the family.

43. LIMITATION

It is submitted that the present suit is being filed within the period of limitation for filing a civil suit based on a continuous and ongoing cause of action and is not barred by limitation. The cause of action in the present Civil Suit is continuous and occurs with every passing day. The present Suit is not time barred.

44. VALUATION AND COURT FEE

It is submitted that the suit is valued at INR 1 for the notional damages and compensation which the Plaintiff No. 1 is seeking for the acute mental pain and agony and an irreparable and permanent loss caused to the family, while the Plaintiff No. 2 is seeking monetary damages and compensation to the tune of Rs. 50,00,000.00 (Rs. Fifty Lakhs only) due to the irreparable loss caused by illegally holding on to a significant amount of more than USD 31,000 which it was supposed to receive in grant – in – aid for conducting social welfare schemes and community welfare

services in and around Hyderabad. The non-receipt of funds has caused immense loss to the Plaintiff No 2 and hence the suit for the purposes of quantification of damages has been valued at Rs. 50,00,000.00 (Indian Rupees Fifty Lakhs only) which is approximately equal to approximately 60 Thousand US Dollars and the Plaintiff has sought a total compensation of INR 50,00,001.00 from all the colluding Defendants collectively. Thus the total pecuniary value of the present Civil Suit is valued at INR 50,00,001.00 (INR Fifty Lakhs and One only) and on which the ad valorem Court Fee is being paid by the Plaintiff. The Plaintiffs have accordingly filed a Court Fee of Rs. 1 Lakh (Rs. 1,00,000.00) presently and undertake to make good any deficiency in the Court Fee is pointed out by this Hon'ble Court within the shortest possible time as may be allowed by this Hon'ble Court.

45. Plaintiff further submits that on the basis of the present declared value of the suit, the ad valorem court fee component calculated as per Schedule – I of the Telangana State Court Fee and Suits Valuation Act has been paid and any deficiency or shortcoming in the same, if so, shall be immediately made good within the time as may be granted by this Hon'ble Court. The said ad valorem court fee amount has been computed in accordance with the provisions of the

Telangana Court Fee and Suits Valuation Act. The final amount of Court Fee may vary on the basis of the exact amount of compensation and damages which this Hon'ble Court may award. The Plaintiff accordingly undertakes to treat the said component of Court Fee as the matter of first lien on the quantum of damages and compensation he is likely to receive from the colluding Defendants.

46. Plaintiff further undertakes to make payment of any reasonable and adequate amount of court fee that this Honorable Court deems fit and necessary to be deposited at the very commencement of the trial proceedings in this Honorable Court with a condition that the balance amount of court fee shall be paid at the time of final adjudication of the present case.

47. GROUND:

The Plaintiff have accordingly filed the present Suit inter alia on the following grounds:

A Because the decision of the Defendant No. 1 at the behest of Defendant No. 3 of not allowing the nephew of the Plaintiff No. 1 to travel to Hyderabad for performing the last rites of his deceased mother was a big blow to the family

causing irreparable and permanent loss which cannot be quantified in monetary terms and is largely violative of the Human Rights.

- B The decision of the Defendant No. 1 at the behest of Defendant No. 3 of not allowing the nephew of the Plaintiff No. 1 to travel to Hyderabad for performing the last rites of his deceased mother was a clear violation of the legal and fundamental rights of the deceased soul who, as per the rights enshrined in the constitution was duly entitled to a respectful funeral and graceful departure from this material world, at the hands of her eldest son, who was illegally detained in the US.

- C Because the illegal withholding of substantial amount of funds belonging to the parent body of the Plaintiff No. 2 and practically belonging to the grant-in-aid meant for the Plaintiff No. 2, by the Defendant No. 2 is violative of the legal rights of the Plaintiff No. 2 and is a clear violation and suppression of the rights of the Plaintiff No. 2.

- D Because the deprivation caused to the Plaintiff No. 1, being the eldest member of the Akula Family is a direct damage to the Plaintiff No. 1 who leads the family as the eldest member now.

E Because the whole action of the colluding D has caused immense perjury, mental agony and irreparable loss to the Plaintiffs.

PRAYER

(Prayer in the main Civil Suit)

48. WHEREFORE, Plaintiff most respectfully prays that this Honorable Court may be pleased to:

- (i) Order and direct Defendant Nos. 1, 2 and 3 to pay to Plaintiff No., a sum of INR 1 (INR One only) on account of the several mental agony and irreparable loss and damage caused to the Plaintiff No. 1 in person.

- (ii) Direct the Defendant No 2 to pay damages and compensation amounting to Rs. 50 Lakh on account of severe financial and pecuniary losses caused to the Plaintiff No. 2 due to illegally withholding of the amount meant for the grant-in-aid for the Plaintiff No. 2.

- (iii) Direct the Defendant Numbers 1 to 3 to pay the Plaintiffs all legal costs of the suit including the court fee and litigation expenses and attorney fees.
- (iv) To Direct the Defendants not to publish any defamatory material or adverse material anywhere in India including on print and social media sites and other platforms which are accessible in India which brings bad name and disrepute to the Plaintiffs.
- (v) To restrain the Defendant Nos. 1 to 3 from spreading false and negative propaganda against the Plaintiffs.
- (vi) To direct the Defendant No. 2 to immediately release the amount of more than USD 31000 which it has illegally kept on hold, to the Plaintiff No. 2.
- (vii) Pass any such other order or direction that this Honourable Court may deem fit and appropriate in the facts and circumstances of the present case, and in the interest of Justice.

Plaintiff No. 1 Mr. Ravinder
Rao Akula

Plaintiff No. 1 Mr. Ravinder
Rao Akula, as the AR for the
Plaintiff No. 2 – Akula India
Foundation.

ADVOCATES FOR PLAINTIFFS

Place: Hyderabad
Date: .03.2023

IN THE CITY CIVIL COURT, HYDERABAD METROPOLITAN
REGION, HYDERABAD, TELANGANA
(ORIGINAL JURISDICTION)

CIVIL SUIT NO. _____/2023

Ravinder Rao Akula & Anr.

PLAINTIFFS

Versus

The State of Louisiana & Ors.

DEFENDANTS

VERIFYING AFFIDAVIT

I, Ravinder Rao Akula, S/o Mr. A. Swamy, aged 69 years, R/o 13-2-368 Jali hanuman, Rahimpura, Asifnagar, Hyderabad Telangana 500006 India do hereby solemnly affirm and state on the oath as under:

1. I am the Plaintiff No.1 in the above noted civil suit and I am well conversant with the facts and circumstances of the case.
2. The averments made in the accompanying civil suit are true and correct to best of my knowledge, belief and information and nothing has been concealed therefrom.
3. That the accompanying Memorandum of Civil Suit has been drafted by my counsels under my Instructions and I have carefully read and understood the contents therein, which are true and correct to the best of my knowledge and belief.
4. That the accompanying Memorandum of Civil Suit be kindly read as a part and parcel of this affidavit, the contents of which are not repeated herein for the sake of brevity.

DEPONENT

VERIFICATION

Verified in the City of Hyderabad, on this ____ day of January 2023. The contents of the verifying affidavit are true and correct to the best of my knowledge and belief and nothing has been concealed therefrom.

DEPONENT

Place: Hyderabad, Telangana

Date: ____ .03.2023

IN THE CITY CIVIL COURT, HYDERABAD METROPOLITAN
REGION, HYDERABAD, TELANGANA
(ORIGINAL JURISDICTION)

CIVIL SUIT NO. _____/2023

Ravinder Rao Akula & Anr.

PLAINTIFFS

Versus

The State of Louisiana & Ors.

DEFENDANTS

VERIFYING AFFIDAVIT

I, Ravinder Rao Akula, S/o Mr. A. Swamy, aged 69 years, R/o 13-2-368 Jali hanuman, Rahimpura, Asifnagar, Hyderabad Telangana 500006 India do hereby solemnly affirm and state on the oath as under:

1. I am the AR, General Secretary of the Plaintiff No.2 in the above noted civil suit and I am well conversant with the facts and circumstances of the case and duly authorized to swear this present Affidavit for and on behalf of the Plaintiff No. 2 by virtue of Authorization Document annexed with the main Suit.
2. The averments made in the accompanying civil suit are true and correct to best of my knowledge, belief and information and nothing has been concealed therefrom.
3. That the accompanying Memorandum of Civil Suit has been drafted by my counsels under my Instructions and I have carefully read and understood the contents therein, which are true and correct to the best of my knowledge and belief.

4. That the accompanying Memorandum of Civil Suit be kindly read as a part and parcel of this affidavit, the contents of which are not repeated herein for the sake of brevity.

DEPONENT

VERIFICATION

Verified in the City of Hyderabad, on this ____ day of January 2023. The contents of the verifying affidavit are true and correct to the best of my knowledge and belief and nothing has been concealed therefrom.

DEPONENT

Place: Hyderabad, Telangana

Date: ____ .03.2023