

**IN THE HIGH COURT FOR THE STATE OF TELANGANA
AT HYDERABAD**

(Special Original Jurisdiction)

(Rule 4(e) of the High Court of Judicature at Hyderabad for the State of
Telangana Public Interest Litigation Rules, 2015)

W.P. (PIL) No. of 2024

BETWEEN:

Juluru Gowrishankar,
S/o Juluru Basvaiah
Aged about 62 years,
R/o Flat No. 410, MSK Towers,
Street No. 11, Himayatnagar,
Hyderabad – 500029

...Petitioner

AND

1. State of Telangana
Rep. by its Principal Secretary to Government,
Secretariat Buildings, Hyderabad.
2. Principal Secretary,
General Administration Department,
Government of Telangana,
Secretariat, Telangana.
3. Special Chief Secretary to Government,
Finance Department,
Government of Telangana,
Secretariat, Telangana.

...Respondents

CONTENTS OF THE WRIT PETITION
PUBLIC INTEREST LITIGATION

**I. PARTICULARS OF THE CAUSE/ORDER AGAINST WHICH THE PETITION
IS MADE:**

The present Public Interest Litigation is being filed challenging the
action of the Respondents in changing the statue of Telangana Talli by



hurting the sentiments of the Telangana people, and further the decision to spend hefty amounts in replacing all the statues of Telangana Talli with the new version being unveiled by the Respondents, all over the State of Telangana, which costs the State's exchequer unnecessarily, which is the public money as being arbitrary, illegal and unconstitutional and seeking a consequential direction to the Respondents to refrain from changing the Telangana Talli statue and retain the existing statues of the Telangana Talli in its current form and other consequential reliefs.

II. PARTICULARS OF THE PETITIONER:

The Petitioner is a notable and well-known writer and authored many books like Sakala Janula Samme. He also received many awards and accolades for his books. He served for several organizations in various positions. He is the ex-Chairman of Telugu Sahitya Academi and ex-Member of Telangana BC Commission.

III. LOCUS STANDI:

The Present Petition is being filed by way of Public Interest Litigation (PIL) and the Petitioner does not have any personal interest in the matter. This Petition is filed in the larger interest of the public of Telangana. This Hon'ble Court has got territorial jurisdiction to entertain the above PIL under the Public Interest Litigation Rules, 2015, since cause of action has arisen in the State of Telangana, which is well within the jurisdiction of this Hon'ble Court.

IV. DECLARATION AND UNDERTAKING OF THE PETITIONER:



I, Juluru Gowrishankar, S/o Juluru Basvaiah, Aged about 62 years, R/o Flat No. 410, MSK Towers, Street No. 11, Himayatnagar, Hyderabad – 500029, hereby declare that I am the Petitioner herein and I am a resident of Hyderabad.

The Petitioner herein declares and undertakes:

- i. That the present Petition is being filed by way of a Public Interest Litigation in the larger interest of the Telangana people and the Petitioner does not have any personal interest in the matter. The Petition is being filed in the interest of protecting the identity, pride and interests of the citizens of Telangana.
- ii. The entire litigation costs including the Advocate Fees is being offered by the Advocates free of cost.
- iii. That thorough research has been conducted in the matter raised through the Petition.
- iv. That to the best of the Petitioner's knowledge and research, the issue was not dealt with or filed earlier by the Petitioner.
- v. That the Petitioner has understood that in the course of hearing of this petition the Court may require any security to be furnished towards costs or any other charges and the Petitioner shall have to comply with such requirements.
- vi. That the Petitioner has never faced contempt of court proceedings.
- vii. That the Petitioner has never been ordered by any Hon'ble Court not to file any further PIL cases.



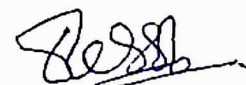
V. FACTS IN BRIEF, CONSTITUTING THE CASE:

1. It is submitted that, the Petitioner is an author and is also actively involved in social activism. The Petitioner was part of the Telangana movement and fought strenuously to attain the statehood by partaking in various protests, rallies, etc. The Petitioner is a notable and well-known writer and authored many books like Sakala Janula Samme. He served for several organizations in various positions. He is the ex-Chairman of Telugu Sahitya Academi and ex-Member of Telangana BC Commission.
2. It is submitted that, the current Public Interest Litigation is being filed challenging the action of the Respondents in changing the statue of Telangana Talli by hurting the sentiments of the Telangana people, and further, the decision to spend hefty amounts in replacing all the statues of Telangana Talli across the State of Telangana, with the new version being unveiled by the Respondents, which costs the State's exchequer substantial amounts unnecessarily, as being arbitrary, illegal and unconstitutional and seeking a consequential direction to the Respondents to refrain from changing the Telangana Talli statue and retain the existing statues of Telangana Talli in its form and other consequential reliefs.
3. It is submitted that, Telangana Talli (Mother of Telangana) is a symbol of the Telangana State's historical and cultural identity. The Term "Talli" means "mother" in Telugu, reflecting the deep sense of affection and pride that the people of Telangana have for their land. The idea of Telangana Talli is similar to that of Bharat Matha, representing the whole country's sentiments and pride.
4. It is submitted that, Telangana Talli is a concept that gained traction and prominence during the Telangana movement dating back to 2001, which aimed at creation of separate state of Telangana from Andhra Pradesh. The idea of Telangana Talli became a potent symbol during the statehood movement. It



represents the nurturing and protective nature of the land and its people. The image is often used in posters, slogans, and public discourse to evoke a sense of unity and pride among the Telangana citizens. As such, Telangana Talli embodies the spirit and resilience of the people of Telangana. It is a symbol of their struggle and achievements in securing their own state and preserving their cultural heritage. In essence, Telangana Talli is a modern symbol born from the historical and cultural context of the Telangana statehood movement, representing the unity and identity of the Telangana people. During the time the State of Telangana attained statehood, the people have adopted the current version of the Telangana Talli.

5. It is submitted that, as it stands today, the Telangana Talli statue has a crown, symbolizing pride and self-governance, holds maize corn (harvest) in one hand, reflecting prosperity of the region, while Bathukamma, the unique cultural symbol of Telangana is one the other hand. The silk saree worn by Telangana Talli is a testament of Gadwal and Pochampalli sarees. The corn in one of her hands represents 50 % of Telangana's dry crop and Bathukamma in her other hand represents the world's greatest women's festival, which Telangana owns. The toe-rings of Telangana Talli symbolize married women with husband. The toe rings signify the filigree ornaments of Karimnagar. The statue also has various jewellery, besides the crown. Originally, the idea of Telangana Talli as a common woman was disregarded because the people would want their state to prosper. By portraying Telangana Talli similar to that of a goddess wearing all jewellery, which the Telangana people would aim for every woman of Telangana to be, symbolizing the aim of prosperity of the state. As such, the statue has been and continues to be the true symbolism to the aim of Telangana people.
6. It is submitted that, in February 2024, the Telangana State's cabinet had taken several decisions including changing the state emblem, Telangana Talli statue and the state song. It was also recently reported in various newspapers and channels that the Respondents had gotten a new statue for Telangana Talli



ready and are unveiling it on December 9th, 2024 at the *Telangana Secretariat*. The new statue is a common rural woman who does not have a crown but merely a hair top knot (*koppu*). As a jewellery, she has a *kante* around her neck and *kadiyalu* on her ankle as opposed to *patta golusulu* in the old statue. She also holds *vanke* in her hand and is blessing with the other hand. The Respondents substantially changed the idea of *Telangana Talli*, disregarding the emotions and sentiment of the people of *Telangana*.

7. It is submitted that the new statue lacks several key features that were present in the original design including its crown. The crown, symbolizing the pride and self-governance of *Telangana* was gone. The traditional floral festival *Bathukamma*, which represents the cultural heritage of *Telangana*, was absent. The anklets of *Telangana Talli*'s feet, a symbol of tradition and culture were not present. Having all the above things missing, the new *Telangana Talli* statue symbolizes a loss of identity and as such, it hurts the feelings of the people.
8. It is submitted that, while the original statue has a crown and jewellery symbolizing the vision and aim of the people of *Telangana* for prosperity of *Telangana*, the proposed design of the statue lacks all of it. As demonstrated above, the *Telangana Talli* in the current form symbolizes the pride, vision and aim of citizens of *Telangana*. Changing the statue completely hurts the sentiments of the people of *Telangana* and without considering their emotions and concerns.
9. It is submitted that, by changing the *Telangana Talli* statue, the Respondents is hurting sentiments of almost 4 crores people of *Telangana*. Changing the statue, only for the sake it and without any reason, effects the identity and pride of the people of *Telangana* as they have been identifying the *Telangana Talli* as the statue as it stands today and taking pride in the same. The Respondents, by changing the statue, is disrespecting the feelings of the *Telangana* people who have been taking pride in the same.



10. It is submitted that, Respondents cannot keep changing the statues in such a way, which hurts the feelings and sentiments of the people. They have already accepted and take pride with the current Telangana Talli statue. It forms part of their cultural identity. If the Governments keep changing the statues this way, people's identity is affected. Changing of the statue is stirring emotional reactions. For example, the idea and statue of Bharath Maatha has remained same since its inception and was never a moot point. Just because a new Government had taken charge, it cannot be a reason for changing the design of the statue, as it would hurt the feelings of all Indians. Similarly, changing the design of Telangana Talli statue affects and hurts the feelings of people of Telangana.
11. It is submitted that the Telangana Talli statue represents and symbolizes the historical events of struggle for the attainment of statehood. This goes into the very roots of the identity, struggle and pride of the people. Telangana Talli reinforces the sense of shared identity and victory over their struggles. Therefore, by changing the Telangana Talli statue, the Respondents is deeply and mentally affecting the cultural identity of the people.
12. It is further submitted that, the Respondents had chosen the said date of December 9th, 2024 as it is the birthday of the Member of Parliament and ex-President of the Indian National Congress Party Ms. Sonia Gandhi. The Respondents is clearly trying to politicize the issue by trying to take credits for the statehood by inviting Sonia Gandhi to the statue unveiling ceremony as a gift for her birthday. It is submitted that underscores the importance and significance of the Telangana Talli. This is merely a move by the Respondents indulging in vendetta politics and resorting to erase and undo the things that the previous Government had undertaken. This completely underscores the purpose and idea of Telangana Talli.



13. It is submitted that, it was also reported in several newspapers and news channels that the Respondents would install the new version of Telangana Talli statue in all constituencies across the state.

14. It is submitted that, currently, almost each Mandal and Gram Panchayat has a Telangana Talli statue already installed. The replacement of the Telangana Talli statue in each Gram Panchayat and Mandal in the whole state would cost the State's exchequer substantial amounts of money, which could be put to use for other beneficial and welfare schemes for the benefit the people.

15. It is further submitted that, there are a total of 32 Zilla Parishads, 540 Mandal Parishads and 12769 Gram Panchayats in the rural areas and 150 GHMC wards. Installing one new statue in each of these Gram Panchayats, Zilla Parishads and Mandal Parishads would cost the State exchequer a lot. Estimating the cost of replacement of each statue is Rs. 1,00,000/- (Rupees One Lakh only), the State exchequer is estimated to spend a staggering Rs. 150,00,00,000/- (Rupees One Hundred and Fifty Crores only) for replacement of around 15,000 statues in the State. This significant expenditure raises serious concerns about the prudent utilization of public funds.

16. It is submitted that, in fact, given the pressing needs of the State, ranging from infrastructure, development, healthcare and education to addressing the challenges faced by farmers, unemployed youth, etc. spending an estimated amount of Rs. 150 crores on replacing existing statues is an unnecessary burden on the common man and the State exchequer.

17. It is submitted that, as per the White Paper released by the Finance Department of the Respondents, as of December 2023, the State has an outstanding debt of Rs. 6.71 Lakh Crores. Spending an estimated amount of Rs. 150 crores in such a situation is only burdening the common man with additional debt. The Respondents cannot prioritize the statue replacement over other needs such as



healthcare and education which are essential and important for the well-being of the citizens.

18. It is submitted that, during the election time, the current Government has promised and announced various beneficial schemes to the people of Telangana. One of the primary reasons for the Government to come into power is the said promises made by them to the people. The promises are yet to be fulfilled. As such, the Government could utilise the said funds that is going to spent on changing of the statue to ensure that the promises made to the people are fulfilled and for their social and economic benefit.
19. It is submitted that, the statues which are already in place adequately serve their purpose as symbols of Telangana's cultural identity. Replacing them at such a high cost would not only strain public resources but could also divert funds from more critical and impactful initiatives. The Respondents is planning to spend an estimated amount of Rs. 150 crores when the purpose of such statues is already being served, causing further debt burden on the people.
20. It is submitted that the Respondents are, merely with a political motive, unnecessarily changing the statues of Telangana Talli without considering the financial burden it imposes on the State's exchequer while changing them serves no purpose. In fact, replacing the statues is hurting the sentiments and feelings of the people
21. It is also submitted that the decision of replacing the statue seems to be a politically motivated one. The decision was taken by the new Government formed in December 2023. The original Telangana Talli statue was unveiled and installed by the previous Government and the new Government that is formed by the Indian National Congress in December 2023. The new Government formed by the Indian National Congress is indulging in acts to erase and redo the acts of the previous Government. As stated above, in



February 2024, the Telangana State's new cabinet had taken several decisions including changing the state emblem, Telangana Talli statue and the state song.

22. It is submitted that, if every new Government that comes engage in the acts of changing the statues, emblems, songs, etc. by spending hundreds of crores of rupees of the public money, the people are going to be heavily burdened with such an unnecessary expenditure. As such, this Hon'ble Court's intervention is required to set a precedent to ensure that the Governments do not spend money on such activities and protect the financial interests of the citizens of Telangana.

SOURCE OF INFORMATION:

The Petitioner came to know about the facts from newspapers and news reports and official statements released by the Respondents and its officials.

VI. NATURE AND INJURY APPREHENDED

It is submitted that, by changing the statues, the Respondents is hurting the sentiments of the people of Telangana and spending substantial amounts from the State's exchequer, especially during a time when the State is burdened with heavy debt, causing additional financial burden on the people of Telangana.

VII. REPRESENTATIONS

Not applicable.

VIII. DELAY, IF ANY, IN FILING THE PETITION AND EXPLANATION:



1. It is submitted that there is no delay in filing this Petition as the new statue of Telangana Talli is scheduled to be unveiled on December 9th, 2024 at Telangana Secretariat.
2. Aggrieved by the action the Respondents, the Petitioner has no other alternative and effective remedy except to approach this Hon'ble Court under Article 226 of the constitution of India.
3. The Petitioner has not filed any other writ or proceedings before any other Court or Authority praying for the same relief sought for in this writ petition.

IX. MATERIAL RELIED UPON

The newspaper articles, white paper released by the Government, Government orders, memos, and circulars.

X. MAIN PRAYER:

In light of the above, it is humbly prayed that this Hon'ble Court may be pleased to issue a writ, more particularly a writ in the nature of mandamus, declaring the action of the Respondents in changing the statue of Telangana Talli by hurting the sentiments of the Telangana people, and further, the decision to spend hefty amounts in replacing all the statues of Telangana Talli with the new version being unveiled by the Respondents, all over the State of Telangana, which costs the State's exchequer unnecessarily, which is the public money as being arbitrary, illegal and unconstitutional and seeking a consequential direction to the Respondents to refrain from changing the Telangana Talli statue and retain the existing statues of the Telangana Talli in its form, and pass any



other order or orders as this Hon'ble Court may deem fit in the circumstances of the case.

XI. INTERIM PRAYER:

In light of the above, pending disposal of the Writ Petition, it is humbly prayed that the Hon'ble Court may be pleased to direct the Respondents to forthwith refrain from changing the statues of Telangana Talli across the State and retain the existing statues of the Telangana Talli in its form, and pass any other order or orders as this Hon'ble Court may deem fit in the circumstances of the case.

XII. CAVEAT

I submit that no notice has been received of lodging a caveat by the Respondents.

Sworn and signed before me
On this the ___ day of December, 2024
At Hyderabad



DEPONENT

//Advocate//

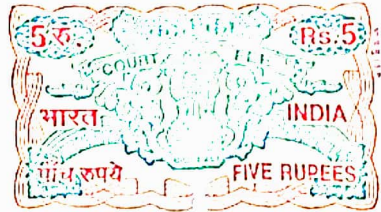
VERIFICATION

I, Juluru Gowrishankar, S/o Juluru Basvaiah, Aged about 62 years, R/o Flat No. 410, MSK Towers, Street No. 11, Himayatnagar, Hyderabad – 500029, do hereby declare that the contents of the above writ affidavit are true and correct to the best of my knowledge and belief. Hence verified on this the 7th day of December, 2024 at Hyderabad.


Counsel for Petitioner



DEPONENT



DISTRICT: HYDERABAD

**IN THE HON'BLE HIGH COURT FOR
THE STATE OF TELANGANA AT
HYDERABAD**

(SPECIAL ORIGINAL JURISDICTION)

WP (PIL).NO. OF 2024

**MEMORANDUM OF WRIT
PETITION(P.I.L)**

FILED BY:

**P.RAMULU (17285)
ADVOCATE
COUNCIL FOR PETITIONER**