**WRITTEN STATEMENT IN A SERVICE MATTER**

IN THE COURT OF....................

Written statement

in

Suit No..................... of 19........................................

A. B................................................................... Plaintiff

*versus*

C. D............................................................... Defendant

Written statement on behalf of Defendants Nos. 1 and 2.

Sir,

The defendants above mentioned most respectfully submit as follows: Para wise reply to the plaint:

1. That para No. 1 of the plaint as stated is not correct and is not admitted. The correct facts are disclosed in Additional Pleas.

2. That para No. 2 of the plaint is wrong and is not admitted.

3. That para No. 3 of the plaint also is not admitted being not correct.

4. That in para No. 4 of the plaint it is admitted that the plaintiff was suspended for his misconduct and embezzlement and mis-deeds, and insubordination. The rest of the contents thereof are denied.

5. That para No. 5 of the plaint as stated is not correct except the facts that the plaintiff was dismissed in June 1960 for various reasons and made it incumbent on the defendant to dismiss the plaintiff immediately.

6. That the allegations of para No. 6 of the plaint as stated are not correct. Correct facts are disclosed in the Additional Pleas.

7. That the para 7 of the plaint, it is admitted that the plaintiff voluntarily and willingly submitted his resignation to the defendant fearing the charges against him to be proved and he might be dealt with criminally also and no force was brought on him to submit the resignation. It was an after-thought on his part to circumvent with ulterior motives.

8. That the fact of the appeal by the plaintiff having been rejected as not entertainable is admitted.

9. That in para No. 9 of the plaint, the rejection of writ and dismissal of special appeal is admitted.

10. That the contents of para No. 10 of the plaint are totally false and are denied emphatically. The plaintiff was not entitled to any payment after suspension.

11. That para No. 11 of the plaint it is admitted as the District Inspector of Schools called the defendant to discuss matters and came to the conclusion that the plaintiff is not entitled to any amount or any pay or any emolument of dues under the circumstances of the case.

12. That para No. 12 of the plaint as stated is not admitted. The plaintiff was

practically in charge of the whole institution and everything was in his charge and after dismissal and resignation, he did not hand over charge of various items and withheld important documents and paper, registers etc., did not hand over to the defendant, hence the District Inspector of Schools did not take any action.

13. That the contents of para 13 are wrong and denied.

14. That the allegations of para 14 are incorrect and not admitted, the defendant never admitted the dues of seven months.

15. That the contents of para No. 15 are wrong and denied.

16. That the contents of para No. 16 are wrong and denied.

17. That the contents of para No. 17 are false and emphatically denied.

18. That the allegations of para No. 18 are wrong and as such are denied.

19. That the contents of para No. 19 of the plaint are wrong and denied.

20. That the contents of para No. 20 are wrong and denied and the plaintiff is not entitled to any relief.

**ADDITIONAL PLEAS**

21. That the Plaintiff has no cause of action for the suit against the defendant and the suit is misconceived.

22. That the suit is not maintainable being time barred and multifarious.

23. That the plaintiff never acted as Principal of the College nor he was promised to pay his salary in that grade, but he had been only an assistant master throughout his career in the College.

24. That the suit deserves to be dismissed with costs. It is accordingly prayed.

Plaintiff

Through Advocate

**VERIFICATION**

Verified that the contents of paras 1 to 20 and 23 of this written statement are true to my personal knowledge, and those of paras 21, 22 and 24 thereof are based on legal advice which I believe to be true.

Verified on.................... 19.................... at....................

Plaintiff

Filed by

Counsel for the defendant.

LIST OF DOCUMENTS RELIED BY THE DEFENDANT

1.....................

2.....................

3.....................