**Before The Hon'ble Central Administrative Tribunal Chandigarh : Circuit Bench At Shimla**

OA No.:\_\_\_\_\_\_ /\_\_\_\_\_\_/\_\_\_\_\_\_

Applicant

Versus

Respondents

Application under Section 19 of the Central Administrative Tribunals Act

Shimla                                                                                      Applicant

\_\_\_\_\_\_                                                                                    Through, Advocate

Respectfully Sheweth:

Details of application:

1.    Particulars of Orders Against Which this Application is Made:

That this application is made against the order of the respondent \_\_

2.    Jurisdiction of Tribunal:

That the applicant declares that the subject  matter of this application is within the jurisdiction of this Hon'ble Tribunal and it is competent to issue the directions to the respondents for full compliance.

3.  Limitation:

That the applicant further declares that the application is within the limitation period as prescribed in section 21 of the Central Administrative Tribunals Act 1985.

4.    Facts of the Case:

(4.1)   That the applicant\_\_\_\_\_\_\_

5.    Grounds for Relief:

That the applicant seeks the indulgence of this Hon'ble Tribunal on the following grounds amongst others, each one of which is without prejudice to and independent of other:

(5.1)   That the impugned order \_\_ is malafide, arbitrary, discriminatory and issued in utter violation of rules, regulations, and is violative of Article 14 and 16 of the Constitution of India and natural justice.

(5.2)    hat the respondents are estopped due to their own act, deed and conduct. The principle of promissory Estopple applies against the respondents.

(5.3)   That the impugned order of the respondents is  also against the well settled principles laid down by the Hon'ble Supreme Court of India and this Hon'ble Tribunal in catena of cases.

6.    Details of Remedies Exhausted:

That the applicant has exhausted all the remedies available to him.  Moreover, the matter being of urgent nature, the applicant has no other way but to approach this Hon'ble Tribunal for speedy and efficacious remedy for staying and quashing the impugned order. \_\_\_\_\_\_\_

7.     Matters not Previously Filed or Pending with any Other Court:

The applicant further declare that he has not filed any application, writ petition or suit regarding the matter in respect of which this application has been made in any court, other authority or any other Bench of this Hon'ble Tribunal. No such application, writ petition or suit is pending before any of them. \_\_\_\_\_\_\_

8.    Reliefs Sought:

That in view of the facts in para 4 above and the grounds in para 5 supra, your Lordship's humble applicant prays for the following reliefs:

(a)    Quash the impugned order \_\_\_\_\_\_ being arbitrary, malafide, discriminatory and illegal;

(b)    Direct the respondents \_\_\_\_\_\_

(c)    Direct the respondents to produce all the records of the case alongwith their reply for perusal by this Hon'ble Tribunal;

(d)    Allow the cost of this application to the applicant.

(e)   Pass such other orders or reliefs as deemed fit and proper in the facts and circumstances of the case in the favour of the applicant and against the respondent.

AND FOR THIS ACT OF KINDNESS, THE HUMBLE  APPLICANT AS IN DUTY BOUND, SHALL EVER PRAY.

9.    Interim Orders:

 It is, therefore, most respectfully prayed that during the pendency of this O.A. the operation of impugned order A-\_\_\_\_\_\_ may kindly be stayed in the interest of justice.

10.    N.A.

11.    Particulars of Postal Order Towards Application Fees:

1. Postal Order Nos:\_\_\_\_\_\_\_

dated:\_\_\_\_\_\_\_

2. Issuing P.O. : \_\_\_\_\_\_\_

3. Amount Rs : 50/- [Rs fifty only]

4. Payable at : \_\_\_\_\_\_\_

12.    List of Enclosures:

         As per index.

Shimla                                                                                      Applicant

\_\_\_\_\_\_                                                                                    Through, Advocate

Verification:

I,\_\_\_\_\_\_, do hereby verify that the contents of paras 1 to 5  are true to my personal knowledge and paras 6 to 12 believed to be true on legal advice and that I have not suppressed any material fact.

          Verified here at Shimla this\_\_\_\_\_\_

Shimla

\_\_\_\_\_\_                                                             Applicant

**BEFORE THE HON'BLE CENTRAL ADMINISTRATIVE TRIBUNAL CHANDIGARH CIRCUIT BENCH AT SHIMLA**

OA No.: \_\_\_\_\_\_/\_\_\_\_\_\_/\_\_\_\_\_\_

Applicant

Versus

Respondents

Affidavit in support of application under Section 19 of the Central Administrative Tribunal Act 1985.

I, \_\_\_\_\_\_, do hereby solemnly affirm and declare as under :-

1.   That the accompanying application has been prepared under my instructions.

2.   That the contents of paras 1 to 12 of the O.A. are correct and true to the best of my knowledge.

3.   That I further solemnly affirm and declare that this affidavit of mine is true, no part of it is false and nothing material has been concealed therein.

      Affirmed at Shimla this the \_\_\_\_\_\_

Deponent

**Before the Hon'ble Central Administrative Tribunal at**

**Chandigarh: Circuit Bench at Shimla**

OA No.: \_\_\_\_\_\_ /\_\_\_\_\_\_/\_\_\_\_\_\_

Applicant

Versus

Respondents

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Shimla                                                                                      Applicant

\_\_\_\_\_\_                                                                                    Through, Advocate

**Before the Hon'ble Central Administrative Tribunal**

**Chandigarh : Circuit Bench at Shimla**

MA No.: \_\_\_\_\_\_/\_\_\_\_\_\_ in OA No.:\_\_\_\_\_\_/\_\_\_\_\_\_/\_\_\_\_\_\_

Applicants

Versus

Respondents/Non-applicants

MA under Rule 4 (5) (a) of Central Administrative Tribunal (Procedure) Rules 1987

Respectfully Sheweth:

1.   That the applicants have filed the above mentioned OA jointly.

2.  That on perusal of the above OA and documents attached therewith it is amply evident that all the applicants have common cause of action and common nature of relief prayed for by them and are desirous of joining in a single application as they have a common interest in the matter.

3.  That interest of justice demands that the applicants are allowed to file the OA in the jointly in the interest of justice.

4.  It is therefore, most respectfully prayed that this application may be allowed in the interest of justice and the applicants may be allowed to file the present OA jointly.  Such other orders be also passed as deemed fit and proper in the facts and circumstances of the case.

Shimla                                                                                      Applicant

\_\_\_\_\_\_                                                                                    Through, Advocate

Verification:

I, \_\_\_\_\_\_, do hereby verify that the contents of para 1 to \_\_\_\_\_\_are true on legal and that have not suppressed any material fact.

          Verified here at Shimla this \_\_\_\_\_\_

Shimla                                                                                      Applicant

\_\_\_\_\_\_                                                                                    Through, Advocate

**Before the Hon'ble Central Administrative Tribunal**

**Chandigarh : Circuit Bench at Shimla**

MA No.: \_\_\_\_\_\_\_/\_\_\_\_\_\_\_ in  OA No.:\_\_\_\_\_\_\_/\_\_\_\_\_\_\_/\_\_\_\_\_\_\_

Applicant

Versus

Respondents/Non-applicants

Affidavit in support of MA under Rule 4 (5) (a) of Central Administrative Tribunal  (Procedure) Rules 1987

I, \_\_\_\_\_\_\_, do hereby solemnly affirm and declare as under:-

1.    That I am duly authorised by the other applicants to file the present MA and am fully conversant with the facts of the case.

2.    That the accompanying MA has been drafted under my instructions.

3.    That the contents of paras 1 to 4 of the MA are correct and true to the best of my knowledge.

4.    That I further solemnly affirm and declare that this affidavit of mine is correct and true, no part of it is false and nothing material has been concealed therein.

       Affirmed at Shimla this the\_\_\_\_\_\_\_.

Deponent

**Before the Hon'ble Central Administrative Tribunal**

**Chandigarh : Circuit Bench at Shimla**

MA No.: \_\_\_\_\_\_\_/\_\_\_\_\_\_\_ in OA No.:\_\_\_\_\_\_\_ /\_\_\_\_\_\_\_/\_\_\_\_\_\_\_

Applicants

Versus

Respondents/Non-applicants

MA under Rule 4 (5) (b) of Central Administrative Tribunal (Procedure) Rules 1987

Respectfully Sheweth:

1.    That the applicants have filed the above mentioned OA jointly.

2.   That on perusal of the above OA and documents attached therewith it is amply evident that all the members of the applicant association have common cause of action and common nature of relief prayed for by them and are desirous of joining in a single application as they have a common interest in the matter.

3.   That interest of justice demands that the applicants are allowed to file the OA through their Association in the interest of justice.

4.   It is therefore, most respectfully prayed that this application may be allowed in the interest of justice and the applicants may be allowed to file the present OA through their Association.  Such other orders be also passed as deemed fit and proper in the facts and circumstances of the case.

Shimla                                                                                      Applicant

\_\_\_\_\_\_                                                                                    Through, Advocate

Verification:

I, \_\_\_\_\_\_\_\_, do hereby verify that the contents of para 1 to \_\_\_\_\_\_ are true on legal advice and that have not suppressed any material fact.

          Verified here at Shimla this \_\_\_\_\_\_\_.

Shimla                                                                                      Applicant

\_\_\_\_\_\_                                                                                    Through, Advocate

**Before the Hon'ble Central Administrative Tribunal**

**Chandigarh : Circuit Bench at Shimla**

MA  No: \_\_\_\_\_\_ /\_\_\_\_\_\_ in OA  No:\_\_\_\_\_\_/\_\_\_\_\_\_/\_\_\_\_\_\_

Applicant

Versus

Respondents/Non-applicants

Affidavit in support of MA under Rule 4 (5) (b) of Central Administrative Tribunal  (Procedure) Rules 1987

I, ,\_\_\_\_\_\_ do hereby solemnly affirm and declare as under:-

1.   That I am duly authorised by the other applicants to file the present MA and am fully conversant with the facts of the case.

2.   That the accompanying MA has been drafted under my instructions.

3.   That the contents of paras 1 to 4 of the MA are correct and true to the best of my knowledge.

4.   That I further solemnly affirm and declare that this affidavit of mine is correct and true, no part of it is false and nothing material has been concealed therein.

          Affirmed at Shimla this the \_\_\_\_\_\_

Deponent