**Before The Hon'ble Presiding Judge, Labour Court At Shimla**

Ref No: \_\_\_\_\_\_

Petitioner

Versus

Respondents

Reply on behalf of the Respondent to the petition.

Respectfully Sheweth:

Preliminary Objections:

1. That the petition is not maintainable in the present forum.

2. That the petition is barred by the limitation.

3. That this Hon'ble court has no jurisdiction to try or entertain the present petition.

**Reply on Merits:**

1. That the contents of para 1 of the petition are wrong and denied. The petitioner be put to the strict proof of the averments made therein.

2. That the contents of para 2 of the petition are wrong and denied. The petitioner be put to the strict proof of the averments made therein.

3. That the contents of para 3 of the petition are wrong and denied. The petitioner be put to the strict proof of the averments made therein.

4. That the contents of para 4 of the petition are wrong and denied. The petitioner be put to the strict proof of the averments made therein.

5. That the contents of para 5 of the petition are wrong and denied. The petitioner be put to the strict proof of the averments made therein.

6. That the contents of para 6 of the petition are wrong and denied. The petitioner be put to the strict proof of the averments made therein.

7. That the contents of para 7 of the petition are wrong and denied. The petitioner be put to the strict proof of the averments made therein.

8. That the contents of para 8 of the petition are wrong and denied. The petitioner be put to the strict proof of the averments made therein.

9. That the contents of para 9 of the petition are wrong and denied. The petitioner be put to the strict proof of the averments made therein.

10. That the contents of para 10 of the petition are wrong and denied. The petitioner be put to the strict proof of the averments made therein.

11. That the contents of para 1 of the petition are wrong and denied. The petitioner be put to the strict proof of the averments made therein.

12. That the contents of para 1 of the petition are wrong and denied. The petitioner be put to the strict proof of the averments made therein.

13. That the contents of para 1 of the petition are wrong and denied. The petitioner be put to the strict proof of the averments made therein.

14. That the contents of para 1 of the petition are wrong and denied. The petitioner be put to the strict proof of the averments made therein.

15. That the contents of para 1 of the petition are wrong and denied. The petitioner be put to the strict proof of the averments made therein.

16. That the contents of para 1 of the petition are wrong and denied. The petitioner be put to the strict proof of the averments made therein.

It is, therefore, most respectfully prayed that the petition is false, frivolous and vexatious and bereft of merits and therefore deserves to be dismissed and may kindly be dismissed with cost.

Shimla Replying Respondent

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

Verification:-

I, \_\_\_\_\_\_, do hereby verify that the contents of this affidavit of mine are correct and true to the best of my knowledge derived from the official records and no part of it is false and nothing material has been concealed therein.

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