**CODE NO.- GROUP- WRIT-A**

**DISTRICT- LUCKNOW.**

**IN THE HON’BLE HIGH COURT OF JUDICATURE AT**

**ALLAHABAD, LUCKNOW**

Writ Petition No. (WRIT-A) of 2023

Parshuram Verma .........Petitioner

Versus

State of U.P. & others .........Opposite Parties.

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**Place: Lucknow Arpan Prakash Srivastava**

**Dated:** (Advocate)

AOR- B/A-2718

Regn No.: UP05773/2020

Mob: 8400231200

(Counsel For the Applicant)

**IN THE HON’BLE HIGH COURT OF JUDICATURE AT**

**ALLAHABAD, LUCKNOW**

Writ Petition No. (WRIT-A) of 2023

Parshuram Verma .........Petitioner

Versus

State of U.P. & others .........Opposite Parties.

**LIST OF DATED AND EVENTS**

|  |  |  |
| --- | --- | --- |
| **S. NO.** | **Dates** | **Events** |
| 1. | 05.04.1975 | The petitioner was initially appointed to the post of Tourist Guide/ Forester (**पथ प्रदर्शक)** on 05.04.1975 |
| 2. | 25.02.1991 | The petitioner was promoted to the post of Deputy Forest Ranger on 25.02.1991. |
| 3. | 10.07.1997 | The petitioner was further promoted to the post of Forest Ranger on 10.07.1997. |
| 4. | 15.07.2015 | The petitioner was submitted the first representation letter and requested for fixation of Assured Career Progression (ACP) and updating his Character Roll. |
| 5. | 15.07.2015 | The Chief Conservator of Forest (Madhya Kshetra) Lucknow issued direction to the Divisional Forest Officer Gonda to take action on the grievance letter dated 15.07.2015 submitted by the petitioner. |
| 6. | 31.12.2015 | After attaining the age of superannuation, the petitioner retired from the post of Forest Ranger. |
| 7. | 30.05.2020- 09.12.2020 | The petitioner has submitted several representation letters on different dated and requested the Opposite Parties to grant him 1st and 2nd ACP. |
| 8. | 22.12.2020 | the Chief Conservator of Forest (Administration), Lucknow, directed the authority concerned to furnish the Character Roll of the Petitioner in order to decide and grant the ACP to the petitioner. It is also relevant to mention here that after the letter was sent by the Chief Conservator of Forest (Administration), Lucknow to the concerned authority, the Opposite Parties kept that particular letter in abeyance and did not pay any heed to that letter. |
| 9. | 05.02.2021- 05.01.2022 | The petitioner again submitted several representation letters on different dates. |
| 10. | 07.01.2022 | the Chief Conservator of Forest (Administration), Lucknow sent a reminder to Chief Forest Conservator of Forest- Kanpur, Divisional Forest Officer- Gorakhpur division Gorakhpur, Divisional Director Social Forestry Division- Pratapgarh and Divisional Forest Officer- Gonda division Gonda requested to furnish the Character Roll of the Petitioner so that the benefit of ACP can be provided to the petitioner. |
| 11. | 03.03.2022 | The petitioner submitted a detailed representation letter for granting the benefits of Assured Career Progression in terms of the Government Order dated 05.11.2014 |
| 12. | 20.10.2022 | The petitioner filed a writ petition before this Hon’ble Court and this court disposed off the said writ petition with direction to Opposite Party No. 2 to decide the representation letter dated 03.03.2022 with 8 weeks from the date when the certified copy of the order is received in his office. |
| 13. | 02.11.2022 | The certified copy of the order of this Hon’ble Court was sent to the Opposite Party No. 2 was sent to her official address |
| 14. | 28.11.2022 & 20.12.2022 | The petitioner again submitted two representation letters on two different dates after the expiry of the period mentioned in the Hon’ble Courts Order. |
| 15. | 07.01.2023 | The Petitioner reminded the Opposite Party No. 2 to consider his representation letter dated 03.03.2022 as per the Hon’ble Court’s order dated 20.10.2022 otherwise the petitioner will again approach this Hon’ble Court and file Contempt against the Opposite Party No. 2 |
| 16. | 12.01.2023 | The impugned order was passed by O.P No. 2 which is baseless and completely based on false and bogus facts. |
| 17. | 19.01.2023 | The petitioner replied to the order passed by O.P No. 2 in which the petitioner has countered each and every allegation levied by the O.P No. 2 against the petitioner with sufficient evidences. |
| 18. | 03.04.2023 | the petitioner again sent a representation letter stated to O.P no. 2 to decide the 1st and 2nd ACP of the petitioner in two weeks otherwise the petitioner will again approach this Hon’ble Court. |
| 19. |  | Till date no action has been taken of the several representation letters sent by the petitioner and the petitioner is running from pillar to post to decide his Assured Career Progression as per the prevailing Government Order. |
| 20. |  | **Hence this Writ Petition** |

**Place: Lucknow Arpan Prakash Srivastava**

**Dated:** (Advocate)

AOR- B/A-2718

Regn No.: UP05773/2020

Mob: 8400231200

(Counsel For the Applicant)

**IN THE HON’BLE HIGH COURT OF JUDICATURE AT**

**ALLAHABAD, LUCKNOW**

Writ Petition No. (WRIT-A) of 2023

Parshuram Verma, aged about 67 years, son of Late Sri Raghubar Dayal, Resident of H. No. 624(cha)/ 34, Pakka Talab ke Purvv, Kotwali Road Chinhat, Lucknow .........Petitioner

Versus

1. State of U.P. through Principal Secretary, Forest Department, Government of U.P, Civil Secretariat, Lucknow
2. Smt. Mamta Sanjeev Dubey, Principal Chief Conservator of Forest and H.O.D, 17, Rana Pratap Marg, Lucknow.
3. Chief Conservator of Forest, Madhya Kshetra, Lucknow.
4. Shri Deepak Kumar, Chief Conservator of Forest, Administration, Lucknow. .........Opposite Parties.

**APPLICATION FOR INTERIM RELIEF**

For the facts, reasons and circumstances stated in the accompanying writ petition duly supported by and affidavit, it is most respectfully prayed that this Hon’ble Court may graciously be pleased to quash the order dated 12.01.2023 passed by Opposite Party No. 2 and direct the Opposite party no. 2 to re consider and grant the benefits of 1st and 2nd ACP in terms of Government Order dated 05.11.2014 from due date along with interest, thereafter revise the pay fixation and the pension of the petitioner and release the arrear of salary and areas of pension etc. along with interest, in the interest of justice.

Any other order or direction which this Hon’ble Court may deem just and proper may also be passed in interest of the justice.

**Place: Lucknow Arpan Prakash Srivastava**

**Dated:** (Advocate)

AOR- B/A-2718

Regn No.: UP05773/2020

Mob: 8400231200

(Counsel For the Applicant)

**IN THE HON’BLE HIGH COURT OF JUDICATURE AT**

**ALLAHABAD, LUCKNOW**

Writ Petition No. (WRIT-A) of 2023

Parshuram Verma, aged about 67 years, son of Late Sri Raghubar Dayal, Resident of H. No. 624(cha)/ 34, Pakka Talab ke Purvv, Kotwali Road Chinhat, Lucknow .........Petitioner

Versus

1. State of U.P. through Principal Secretary, Forest Department, Government of U.P, Civil Secretariat, Lucknow
2. Smt. Mamta Sanjeev Dubey, Principal Chief Conservator of Forest and H.O.D, 17, Rana Pratap Marg, Lucknow.
3. Chief Conservator of Forest, Madhya Kshetra, Lucknow.
4. Shri Deepak Kumar, Chief Conservator of Forest, Administration, Lucknow.

.........Opposite Parties.

**WRIT PETITION UNDER ARTICLE 226 OF THE CONSTITUTTION OF INDIA**

**To,**

The Hon’ble Chief Justice and his other Companion Judges of the aforesaid Hon’ble High Court.

The humble petitioner of the above-named petitioner, most respectfully showeth as under: -

1. That the petitioner declares that this is the second writ petition being filed by him on the present subject matter or cause of action. He further declares that the First Writ Petition bearing Writ Petition No. (WRIT-A) 7015 of 2022 Parshuram Verma versus State of U.P and Others was disposed on 20.10.2022 wherefore in which this Hon’ble Court directed O.P No. 2 to consider and decide the representation of the Petitioner within the period of eight weeks from the date of which certified copy of the order produced before him.

Copy of the order dated 20.10.2022 is annex herewith as **ANNEXURE NO. 1**

1. That petitioner further declares that he has not been served any notice through registered post or otherwise from the opposite parties in the present writ petition.
2. That the instant writ petition is being filed seeking a writ petition in the nature of certiorari, to quash the order dated 12.01.2023 passed by O.P No. 2 in reply of the order passed by this Hon’ble Court. The petitioner further submits that the order dared 12.01.2023 passed by O.P No. 2 is based on baseless and bogus facts and it was only passed to tackle the proceedings of Contempt of this Hon’ble Court.

True copy of the impugned order dated 12.01.2023 is annex herewith as **ANNEXURE NO. 2**.

1. That the succinct facts about the case is that the petitioner was appointed initially to the post of Tourist Guide/ Forester (पथ प्रदर्शक) on 03.04.1975 and joining on 05.04.1975. The petitioner was promoted to the post of Deputy Forest Ranger on 25.02.1991 and was further promoted to the post of Forest Ranger on 10.07.1997 but the Time Scale Pay Scale was not granted to the petitioner even after the second promotion. The petitioner was retired from the post of Forest Ranger on attaining the post of Superannuation on 31.12.2015.

Copy of initial appointment letter dated 03.04.1975 and retirement letter 16.06.2016 is annex herewith as **ANNEXURE NO. 3 & 4.**

1. That it is pertinent to mention here that as per the Government Order No. वे0आ0-2-773 /दस—62-(एम) /2008 dated 05.011.2014, any Government servant is entitled for the benefit of 1st, 2nd and 3rd Assured Career Progression (ACP) after successful completion of 10, 16 and 26 years of satisfactory service.

True copy of Government order dated 05.11.2014 is annex herewith as **ANNEXURE NO. 5**.

1. That is also relevant to mention before this Hon’ble Court is that the petitioner was initially joined on the post of Tourist Guide/ Forester and after receiving two promotions, the petitioner was appointed to the post of Forest Ranger on 10.07.1997 and has completed 10 years of satisfactory service on the same post on 10.07.2007 and 16 years of service on 10.07.2013 and hence as per the point 3 of the Government order dated 05.11.2014, the petitioner is entitled to receive 1st on 01.12.2008 and 2nd on 10.07.2013 Assured Career Progression (ACP).
2. That it is also relevant to mention here that the opposite parties cleared all the retiral dues and released the pension without even considering the 1st and 2nd Assured Career Progression (ACP) as per the Government Order dated 05.11.2014.
3. That the petitioner initially approached the department, when he was serving at the post of Forest Ranger, through first representation letter on 15.07.2015 and requested complete all the formalities and to cogitate the Assured Career Progression and restore his Character Roll before the date of his superannuation.

Copy of the Representation letter dated 15.07.2015 is annex here with as **ANNUXURE NO. 6.**

1. That it is pertinent to mention here that the Chief Conservator of Forest (Madhya Kshetra), Lucknow, on the letter submitted by the petitioner, directed the Divisional Forest Officer, Gonda Division and copy to Forest Conservator, Devipatan Mandal, Gonda to provide proper redressal to the grievances submitted by the petitioner but no heed was given by the concerned officer and till then all the proceedings are in abeyance.

Copy of the Order dated 15.07.2015 is annex herewith as **ANNEXURE NO. 7.**

1. That due to non-granting of the Assured Career Progression, the pension and other retiral dues of the petitioner is formed on the reduced pay and hence petitioner is suffering from huge loss as he is not getting his actual pension and other retiral benefits.
2. That thereafter, the petitioner has sent several representations to the Opposite Parties on 30.05.2020, 15.07.2020, 11.08.2020, 09.09.2020 and 09.12.2020 and near about 40 more representation letters through speed post which has seen elaborated by the letter dated 03.03.2022, but the Opposite Parties dealt with these letters as a piece of paper and never considered the Assured Career Progression of the Petitioner.

Copy of the letter dated 03.03.2022 is annex herewith as **ANEXURE NO. 8.**

1. That it is pertinent to mention here that the Chief Conservator of Forest (Administration), Lucknow, vide letter dated 22.12.2020, directed the authority concerned to furnish the Character Roll of the Petitioner in order to decide and grant the ACP to the petitioner. It is also relevant to mention here that after the letter was sent by the Chief Conservator of Forest (Administration), Lucknow to the concerned authority, the Opposite Parties kept that particular letter in abeyance and did not paid any heed to that letter and as a result, the Chief Conservator of Forest (Administration), Lucknow sent a reminder vide letter dated 07.01.2022 to Chief Forest Conservator of Forest- Kanpur, Divisional Forest Officer- Gorakhpur division Gorakhpur, Divisional Director Social Forestry Division- Pratapgarh and Divisional Forest Officer- Gonda division Gonda requested to furnish the Character Roll of the Petitioner so that the benefit of ACP can be provided to the petitioner.

Copy of the letters dated 22.12.2020 and 07.01.2022 is aanex herewith as **ANNEXURE NO. 9 & 10.**

1. That it is pertinent to mention here that the petitioner came to know through RTI that character rolls and the certificates related to character rolls of the petitioner was sent by different Forest Regions to O.P No.2 so that the ACP can be decided.

Copy of the replies to the RTI filed by the petitioner is annex herewith as **ANNEXURE NO. 11 (colly)**

1. That it is a professional obligation of the concerned authority is to maintain, examine up to date and verify service records of the employee so that he can get all his retiral benefits for which he is entitled but, in this case, the Opposite Parties, illegally and arbitrary manner failed to furnish the service records of the petitioner to the competent authority and as a result the petitioner is deprived of his rightful benefits and it is also relevant to mention here that as per the Government Order dated 04.05.1977 order no. 39/1977(1) Kramik 2, if the Character Roll of the Government Servant is not available with the Employer for certain period, that period should be considered as Satisfactory Service.

Copy of the Government Order dated 04.05.1977 is annex herewith as **ANNEXURE NO. 12.**

1. That when no heed was paid by Opposite Party No. 1 to the representation letters sent by the petitioner, the petitioner had no chance left but to approach this Hon’ble Court.
2. That the petitioner approached this Hon’ble Court by the means of Writ Petition under article 226 of the Constitution of India. The Writ Petition was registered as WRIT-A No. 7015 of 2022 Parshuram Verma versus State Of U.P and Ors. That particular Writ Petition was disposed of vide order dated 20.10.2022 where this Hon’ble Court directed O.P No. 2 to consider and decide the representation of the Petitioner within the period of eight weeks from the date of which certified copy of the order produced before him. (ANNEXURE NO. 1).
3. That the certified copy of the order of this Hon’ble Court was sent to the Opposite Party No. 2 was sent to her official address on 02.11.2022 vide speed post.

Copy of the letter dated 02.11.2022 is annex herewith as **ANNEXURE NO. 13.**

1. That it is pertinent to mention here that even after the expiry of 8 weeks from the date of delivery of the order 20.10.2022, the petitioner sent several representation letters dated 02.11.2022, 28.11.2022, 20.12.2022 and 07.01.2023 and reminded the Opposite Party No. 1 to consider his representation letter dated 03.03.2022 as per the Hon’ble Court’s order dated 20.10.2022 otherwise the petitioner will again approach this Hon’ble Court and file Contempt against the Opposite Party No. 2.

Copy of the representation letter dated 07.01.2023 is annex herewith as **ANNEXURE NO. 14.**

1. That after receiving the petitioner’s letter dated 07.01.2023, the Opposite Party No. 2 replied to his representation dated 03.03.2022 vide order dated 12.01.2023 in which the Opposite Party No. 2 stated that the petitioner is only entitle for one ACP as per point 7 of the Government order dated 05.11.2014. O.P No. 2 further stated that there are 5 punishments through Forest Orders dated 25.06.2004, 21.12.2007, 01.01.2009, 26.06.2009 and 16.10.2009 were awarded to the petitioner in his entire professional journey. The opposite party No. 2 further stated that as per the Government Order dated 22.09.2016 and official letter dated 30.06.1993, the petitioner is not entitled for Assured Career Progression (ACP). (ANNEXURE NO. 2)
2. That feeling aggrieved from the order of O.P No.2 dated 12.01.2023, the petitioner sent reply in the form of representation letter to the O.P No. 2 and brought in her knowledge that the order passed by O.P No. 2 is illegal and arbitrary in the eyes of Law as it is totally on presumptions without even considering the relevant paragraph of the Government Order dated 05.11.2014. It is also relevant to mention here that the O.P No.2 referred to point 7 of the Government Order dated 05.11.2014 which clearly says that after the arrangement of ACP came into force, the person who is direct recruited shall get the benefit of 1st, 2nd and 3rd ACP or 3 promotions will be given and apart from that nothing will be given to that particular person. It is very relevant to mention here that the point no. 7 does not apply on the present petitioner as it clearly states that the person recruited after the arrangement came into force. The petitioner further states that he will be governed by the point no. 3 of the said government order dated 05.11.2014.
3. That the petitioner further stated that the Government Order dated 22.09.2016 came into force after the retirement of the present petitioner and hence the conditions prescribed under the said Government order does not binds on the present petitioner.
4. That it is pertinent to mention here that the petitioner also denied the punishments awarded to the petitioner and in reply thereto, it is submitted, with evidence, by the petitioner that:
5. That the petitioner submitted that the punishment awarded by Forest Order dated 25.06.2004 is illegal and arbitrary manner and further stated that vide Forest Order dated 23.06.2004, the petitioner was suspended when he is posted in Mathura and within 2 days of suspension how can a punishment order be passed. It is also stated by the petitioner that the petitioner was reinstated vide forest order dated 19.01.2006. Hence the punishment awarded by the Forest Order dated 25.06.2004 was denied and not accepted by the petitioner.

Copy of the suspension order dated 23.06.2004 and reinstate order dated 19.01.2006 is annex herewith as **ANNEXURE NO. 15 & 16.**

1. That the petitioner submitted that no punishment was awarded by Forest Order dated 21.12.2007. It is further stated by the petitioner that vide Forest Order dated 26.12.2007, the petitioner was suspended while his posting was in Gorakhpur and hence no punishment was awarded to the petitioner. It is further stated that the date is wrongly mentioned in service book instead on 26.12.2007, 21.12.2007 is mentioned.

Copy of the order dated 26.12.2007 is annex herewith as **ANNEXURE NO. 17.**

1. That the petitioner further submitted that no punishment was awarded by Forest Order dated 01.01.2009. it is further stated that the date is wrongly mentioned and the correct date of Forest Order dated 01.01.2016 which shows that the petitioner was condemned by the Forest Order dated 01.01.2016 and in reply thereto it is submitted by the petitioner that the Forest Order dated 01.01.2016 was came in fore after the retirement of the petitioner and hence this Forest Order does not bind upon the petitioner.
2. That the petitioner further submitted that a punishment was awarded to the petitioner vide Forest Order dated 26.06.2009 when the petitioner was posted in Mathura in which the department also registered an FIR against the present petitioner. It is further stated by the petitioner that the petitioner was acquitted from Mathura Court vide order dated 26.02.2013 and hence the Court’s order prevails over the Forest order dated 26.06.2009 and punishment order dated 26.06.2009 stands cancelled.

Copy of the order passed by Mathura court dated 26.02.2013 is annex herewith as **ANNEXURE NO. 18**.

1. That the petitioner submits that the punishment awarded vide Forest Order dated 16.10.2009 needs no reply as the same is connected in Gorakhpur Region.

Copy of the letter dated 19.01.2013 is annex herewith as **ANNEXURE NO. 19.**

1. That it is pertinent to mention here that O.P No. 2 till date does not even reply to the representation letter dated 19.01.2023.
2. That even after the order dated 12.01.2023 of Chief Conservator of Forest (Administration), Lucknow, several representation letters with rightful evidences dated 19.01.2023, 08.02.2023 and 03.04.2023 by the petitioner and the reminder, the Opposite paid no heed and it was all in vain. Even after that the petitioner submitted 7 representation letters to the Opposite Parties never ever replied to any single letter by the petitioner.
3. That it is also relevant to mention here that the petitioner again sent a representation letter dated 03.04.2023 and stated to O.P no. 2 to decide the 1st and 2nd ACP of the petitioner in two weeks otherwise the petitioner will again approach this Hon’ble Court.

Copy of the letter dated 03.04.2023 is annex herewith as **ANNEXURE NO. 20**.

1. That the petitioner is a senior citizen retired Government servant with the age of more than 67 years and is suffering from various serious ailments which can cause for his life at any point who has served for more than 40 years but now he is running from pillar to post to get his rightful benefits for which he is entitled.

Copy of the medical prescriptions of the petitioner is annex herewith as **ANNEXURE NO.21**

1. That the petitioner has no other equally efficacious and alternative remedy available to him, files this instant writ petition on the following amongst other grounds.

**GROUNDS**

1. **BECAUSE,** the impugned order dated 12.01.2023 passed by O.P No. 2 is illegal and arbitrary in the eyes of law.
2. **BECAUSE,** the action of Opposite parties whereby not granting the 1st and 2nd Assured Career Progression (ACP) benefit to the petitioner while the petitioner is duly entitled for this benefit.
3. **BECAUSE,** as per the Government Order dated 05.11.2014, the Government Servant is entitled for 1st, 2nd and 3rd Assured Career Progression on completion of 10, 16 and 26 years of satisfactory service.
4. **BECAUSE,** the petitioner has completed 10 years of satisfactory service on 10.07.2007 and 16 years of satisfactory service on 10.07.2013 and hence as per the government order dated 05.11.2014, the petitioner is entitled for 1st Assured Career Progression w.e.f. 01.12.2008 and 2nd Assured Career Progression w.e.f. 10.07.2013.
5. **BECAUSE,** the petitioner has approached several times to the Opposite Parties for granting of his 1st and 2nd Assured Career Progression and revise of his pay scale accordingly.
6. **BECAUSE,** the petitioner has sent a detailed representation letter dated 03.03.2022 and requested the Opposite Parties to update the Character Roll of the petitioner and thereafter grant him 1st and 2nd ACP, but the Opposite Parties paid no heed towards it.
7. **BECAUSE,** the petitioner approached this Hon’ble Court and filed a Writ Petition which was registered as WRIT-A 7015 of 2022 Parshuram Verma versus State of UP and Ors. The Hon’ble Court vide order dated 20.10.2022 disposed the said Writ Petition with direction to Opposite Party No. 2 to decide the representation letter dated 03.03.2022 submitted by the petitioner within 8 weeks from the date when certified copy received in his office.
8. **BECAUSE,** thereafter the petitioner has sent a representation letter dated 02.11.2022 along with the certified copy of the above said order dated 20.10.2022 passed by this Hon’ble Court and requested the Opposite Party to kindly grant him his rightful benefits.
9. **BECAUSE,** the petitioner thereafter sent a representation letter after passing of 8 weeks from the date of the submission of the certified copy of the order dated 20.10.2022 and again requested the Opposite Party No. 2 to comply with order passed by this Hon’ble Court and grant him 1st and 2nd ACP or the petitioner will again approach this Hon’ble Court by the medium of Contempt of Court.
10. **BECAUSE,** then the Opposite Party No. 2 passed the order dated 12.01.2023 which is totally based on presumptions and baseless and bogus facts and was passed only to tackle the Contempt of Court proceedings.
11. **BECAUSE,** the petitioner has submitted reply dated 19.01.2023 of the order dated 12.01.2023 along with evidences and stated before Opposite Party No. 2 to re consider the 1st and 2nd ACP of the petitioner.
12. **BECAUSE,** thereafter the petitioner has sent several representation letters to the Opposite Party No. 2 but O.P No. 2 paid no heed and all these efforts of the petitioner went in vain.
13. **BECAUSE,** the petitioner is a senior citizen having more than 67 years of age and he is also suffering from various ailments related to heart and treatment is going on, but illegally and arbitrary he was deprived from his legitimate right and getting meager pension and retiral dues hence suffering financial hardship for which the petitioner is not responsible.

**PRAYER**

**WHEREFORE,** for the facts reasons and circumstances and grounds stated in the foregoing paragraphs, it is most respectfully prayed that the Hon’ble Court may be graciously be pleased:

1. To issue writ, order direction in the nature of certiorari, to quash the order dated 12.01.2023 passed by Opposite Party No. 2.
2. To issue writ, order or direction in the nature of mandamus commanding and directing the Opposite Parties to re consider and grant the benefits of 1st and 2nd ACP in terms of Government Order dated 05.11.2014 from due date along with interest, thereafter revise the pay fixation and the pension of the petitioner and release the arrear of salary and areas of pension etc. along with interest, in the interest of justice.
3. To issue any writ, order or direction as this Hon’ble Court deems just and proper, in the interest of justice.
4. To award the cost of the petition to the petitioner.

**Place: Lucknow Arpan Prakash Srivastava**

**Dated:** (Advocate)

(Counsel For the Applicant)

**IN THE HON’BLE HIGH COURT OF JUDICATURE AT**

**ALLAHABAD, LUCKNOW**

Writ Petition No. (WRIT-A) of 2023

Parshuram Verma .........Petitioner

Versus

State of U.P. & others .........Opposite Parties.

**AFFIDAVIT IS SUPPORT OF WRIT PETITION**

I, aged about 67 years, son of Late Sri Raghubar Dayal, Resident of H. No. 624(cha)/ 34, Pakka Talab ke Purvv, Kotwali Road Chinhat, Lucknow, Religion- Hindu, Occupation- Retired Government Servant, Qualification- Graduate, the deponent, do hereby solemnly affirm and state on oath as under:-

* 1. That the deponent is the petitioner himself and swear and file affidavit on his behalf in the Hon’ble High Court and doing pairvi as such he is fully conversant with the facts and circumstances of the case deposed here under.
  2. That the contents of paragraphs of the accompanying writ petition are true to my personal knowledge, and contents of paragraphs are believed to be true on the basis of information received from records and those of paras believed to be true on the basis of legal advice.
  3. That the Annexure No. 1 to 21 of the accompanying writ petition are the true/Photostat copies of their respective originals and are duly compared by the deponent.

**LUCKNOW:**

**DATED: /2023.** **DEPONENT**

**VERIFICATION**

I the above-named deponent do hereby verify that the contents of paragraphs 1 to 3 of this affidavit are true to my personal knowledge. No part of it is false and nothing material has been concealed.

**So, help me God.**

**LUCKNOW:**

**DATED: /2023.** **DEPONENT**

I, identify the deponent

Who has signed before me.

**ADVOCATE**

Solemnly affirmed before me on

At a.m. /p.m. by the deponent, who is identified by

**Arpan Prakash Srivastava, Advocate,** High Court, Lucknow.

I have satisfied myself by examining the deponent that he understands the contents of this affidavit, which have been read over and explained to him by me.

**OATH COMMISSIONER**

**IN THE HON’BLE HIGH COURT OF JUDICATURE AT**

**ALLAHABAD, LUCKNOW**

Writ Petition No. (WRIT-A) of 2023

Parshuram Verma .........Petitioner

Versus

State of U.P. & others .........Opposite Parties.

**ANNEXURE NO.**