

6. I humbly submit that the averments in para 9 and 10 are mere repetition from the statute and unwarranted for the purpose of the case. The averment in para 11 that each school, under the 7th respondent management, is treated as a separate unit and entity, is denied as false. The averment in para 12 that Grant-in-Aid is provided for each school separately is also not fully true. The Pay Bill is necessarily forwarded by each school under the statute, due to the verification of records kept in the school. However until recently many of the schools under the 7th respondent were grouped together under the competent educational authorities of every range and cheques were issued only in the name of the 8th respondent, the Superintendent of schools. This was very much practiced especially at the level of elementary education, till June 2009. However, the introduction of Electronic Clearing System (ECS), in the name of individual teachers, necessitated the disbursement of salary directly to the bank accounts of the individual teacher. However, the averment in para 12, regarding grant-in-aid, does not affect the nature of the management. The averment in para 13, that the authorities sanctioned the posts separately for each school is not true. Though the posts are sanctioned in respect of a particular school, because of the student-teacher ratio, the said posts can be deployed either with person or without person, to any other school having the said eligibility, by the competent authority. There is legal provision for the same.

7. I humbly submit that there is no rhyme or reason in the averment in para 14, that speaks of appointments and approvals. It is common knowledge that under the statute, there are appointments in the same cadre and they are transferable to any school under Tamil Nadu Recognised Private Schools (Regulation) Act, 1973 and the rules there under. The averment in para 15, that

2nd respondent
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Order?
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