6. I humbly submit that the averments in pairs 9 and 10 are mere republican

separate seniority list is maintained for each school is false. A common seniority list is maintained at the Diocesan level according to the cadre, from the date of their appointments. The common seniority list is being updated every year. The averment in para 16, that the 7<sup>th</sup> respondent has no power and authority to transfer any staff from one school to another is also denied as false. The 7<sup>th</sup> respondent has powers to effect transfers, based on the requirements of every school, from one school to another, as it is permissible under law.

respondent the Superintendent of schools. This was very much practiced

8. I humbly submit that the averment in para 17, that the transfers are effected in order to harass the staff; to deprive the lawful right of the teachers; to bring their own men or to bring candidates from the open market are utter distortainent of salary directly to the bank account falsehood. The transfers are effected only for administrative expediency and based on the needs of the staff. All the transfers and the reasons are highly transparent and are decided by the Diocesan Education Board. The petitioner is bound to explain what it means by "from the open market", because there is an of a particular school, because of t employment registry at the diocesan level and unemployed Catholics are natio, the said posts can be deployed either with p registered therein and appointed according to their seniority. Except the au person, to any other subnot having the said eligibility, by the co religious persons like priests and nuns, from the congregations, there is no appointment from outside the registered employment registry. The vital decisions in the management of the 7th respondent are usually taken in the hat there is no rhyme of reason in the averment in pur Diocesan Education Board. There is no right of the teacher deprived by the transfers, in respect of their pay scale, salary, allowances and emoluments. Their promotions are based on seniority and merits, as permissible for the minority institutions. There is no change of seniority, because of any transfer. Even if a teacher joins a school at a later point of time, than his juniors in

service in the same school, he/she may not lose the seniority at the diocesan

Rymen

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espondent the Superintendent of schools. This was very much practiced 8. I humbly submit that the averment in para 17, that the transfers are sally at the level of elementary education, till June 2009. However, the effected in order to harass the staff; to deprive the lawful right of the teachers; to bring their own men or to bring candidates from the open market are utter distansuraction of salary directly to the bank account falsehood. The transfers are effected only for administrative expediency and based on the needs of the staff. All the transfers and the reasons are highly transparent and are decided by the Diocesan Education Board. The petitioner is bound to explain what it means by "from the open market", because there is an employment registry at the diocesan level and unemployed Catholics are the said posts can be deployed either with p registered therein and appointed according to their seniority. Except the out person, to any other school having the suid eligibility, by the conreligious persons like priests and nuns, from the congregations, there is no appointment from outside the registered employment registry. The vital decisions in the management of the 7th respondent are usually taken in the mit that there is no rhyme or reason in the averment in pen Diocesan Education Board. There is no right of the teacher deprived by the transfers, in respect of their pay scale, salary, allowances and emoluments. Their promotions are based on seniority and merits, as permissible for the minority institutions. There is no change of seniority, because of any transfer. Even if a teacher joins a school at a later point of time, than his juniors in

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