

was maintained for all the employees under your management schools. The said statement is a false one invented for the purpose of defeating our client's claim in the writ petition.

3. Our client states that pursuant to the false statement by way of counter affidavit, the Hon'ble Madras High Court was misled by both of you and ultimately, the writ petition was dismissed. It is pertinent to mention here that our client requested the copy of common seniority list for the years 1990-91 to 2010-2011 in full shape through application dated 15.03.2011 under RTI Act 2005, which as follows:-

"The following is the information requested from you under item 2 of RTI petition dated 15.03.2011.

In the counter affidavit submitted by Rev.Fr.M.G.Victor for the W.P.No.8491/2009 it is mentioned in paragraph 7 that a common seniority list is maintained at the Diocesan level according to the cadre from the date of appointments. Further, in the same paragraph it is mentioned that the common seniority list is being updated every year. Please send me the copies of updated common seniority lists from the year 1990-91 to 2010-2011. Please inform me the charges for making copies of the common seniority lists. I am prepared to send the money immediately"

4. Our client states that vide reply dated 12.04.2011, No.2 of you replied as though the seniority list will be disposed after the academic year and the seniority list for the current year is alone available and the same will be supplied on payment of Rs.292/- towards fees. In response to the above letter, our client immediately drew DD for the above amount and the same was sent to No.2 of you along with the letter on 28.04.2011. To our client's great shock and surprise, vide letter dated 04.05.2011, No.2 of you informed as though no seniority list is maintained and no rule insist for such maintenance of seniority list in respect of the schools run by them and the demand draft was returned.