

DEBSMITA BISWAS

**ADVOCATE
HIGH COURT CALCUTTA
BAR ASSOCIATION ROOM NO.**

CHAMBER:-

**5, FANCY LANE
1ST FLOOR**

KOLKATA-700001

M. No. 9831507324

9830529388

TO,

1. The Government Pleader,
High Court Calcutta,
Appellate Side,

DATED- **22/04** /2016

2. The Director of Pension, Provident Fund and Group Insurance, Finance
Department, Purta Bhawan (2nd Floor) Salt Lake City, Kolkata - 700 091.

3. The Treasury Officer, ~~Canning~~ ^{Barnipur}, P.O. ~~Canning~~ ^{Barnipur}, Dist- South 24- Parganas, Pin
code no. ~~743329~~ ⁷⁰⁰¹⁴⁴.

4. The District Inspector of School, South 24-Parganas(P.E) P.O.-Alipore
Dist.- South 24- Parganas, Pin code- 700027.

Re: - W.P. No. **7500** (W) Of 2016

MD. Ziad Ali Mollah

-Versus-

The State Of West Bengal & Ors

Dear Sir,

I am sending herewith a petition under 226 of the constitution of India,
along with all annexures, as mentioned above to you for your ready reference
and the same will be moved before His Lordship the Hon'ble Justice Tapabrata
Chakraborty as listed Motion on **28/04/2016** or soon thereafter as and
when, the business of the Hon'ble court permit when please attend.

Kindly acknowledge receipt copy of the same and oblige.

Enclose. As above.

Your faithfully

Debsmita Biswas

Advocate

DISTRICT : North -24 Parganas

IN THE HIGH COURT AT CALCUTTA
CONSTITUTIONAL WRIT JURISDICTION

APPELLATE SIDE

W.P. No. 7580 (W) of 2016

Subject Matter Relating to:

West Bengal Board of Secondary
Education Act, 1963, Under Group -
II; Head - (h) of the Classification list.

-And-

In the matter of:
Md. Ziad Ali Mollah

Petitioner

-Versus-

The State of West Bengal and Others

Respondents

Debsmita Biswas

Advocate on record
DEBSMITA BISWAS

Advocate
High Court, Calcutta.
5, FANCY LANE,
KOLKATA-700001

DISTRICT : North -24 Parganas

IN THE HIGH COURT AT CALCUTTA
CONSTITUTIONAL WRIT JURISDICTION

APPELLATE SIDE

W.P. No. 7500 (W) of 2016

In the matter of:

An application under Article 226 of
the Constitution of India;

-And-

In the matter of:

Md. Ziad Ali Mollah

Petitioner

-Versus-

The State of West Bengal and Others

Respondents

I N D E X

SL. NO.	PARTICULARS	ANNEXURE	PAGE NO.
1.	Writ Petition		1-15
2.	Xerox copy of the P.P.O. dated 23.07.2007;		
3	Xerox copy of the revised P.P.O. dated 06.03.2013;	"P-1"	16
		"P-2"	17

DISTRICT : North -24 Parganas

IN THE HIGH COURT AT CALCUTTA
CONSTITUTIONAL WRIT JURISDICTION

APPELLATE SIDE

W.P. No. 7588 (W) Of 2016

In the matter of:

An application under Article 226 of
the Constitution of India;

-And-

In the matter of:

Md. Ziad Ali Mollah

Petitioner

-Versus-

The State of West Bengal & Others

Respondents

LIST OF DATES

- | | |
|---------------|--|
| 1. 31.07.2007 | The Petitioner was superannuated from service. |
| 2. 23.07.2007 | The pension payment order was issued. |
| 3. 06.03.2013 | The revised pension payment order was issued. |
| 4. 03.11.2007 | The Petitioner received death- cum- retirement Gratuity, without any interest. |
| 5. 02.05.2013 | The petitioner revised amount received death-cum retirement Gratuity, with out any interest. |

DISTRICT : South- 24 Parganas

IN THE HIGH COURT AT CALCUTTA
CONSTITUTIONAL WRIT JURISDICTION

APPELLATE SIDE

W.P. No. 7500 (W) of 2014

In the matter of:

An application under Article 226 of
the Constitution of India;

-And-

In the matter of:

Md. Ziad Ali Mollah

Petitioner

-Versus-

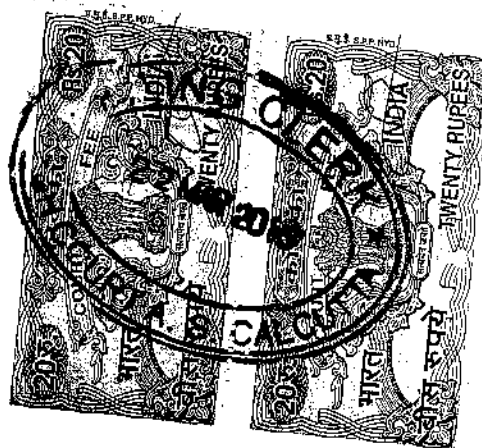
The State of West Bengal & Ors.

Respondents

POINTS OF LAW FOR DETERMINATION

1. WHETHER the Payment of Gratuity amount can be with held a long time?
2. WHETHER the petitioner is entitled to get interest?
3. WHETHER the concerned authority have not taken only steps for realizing the interest for delayed payment of gratuity amount, for which the petitioner is very much entitled to and as such the entire act, actions and /or inactions of concerned authority are attracted by the Article 14, 21 and the Constitution of India?.

DISTRICT : North 24 Parganas



Through
Debsmita Biswas
Advocate

IN THE HIGH COURT AT CALCUTTA
CONSTITUTIONAL WRIT JURISDICTION

APPELLATE SIDE

W.P. No. 7570 (W) Of 2016

In the matter of:

An application under Article 226 of
the Constitution of India;

-And-

In the matter of:

A Writ in the nature of Mandamus
and/or Prohibition and/or Certiorari
and/or any other order or orders,
direction or directions;

-And-

In the matter of:

Death Cum Retirement benefits
Scheme 1981.

-And-

In the matter of:

Illegal denial by the respondents
authority to disburse and /or release
the interest to the tune of 18% per
annum, for delayed payment of

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gratuity amount of the petitioner, even on a similar circumstances our Hon'ble High Court, Passed several orders on the case of similarly situated persons;

-And-

In the matter of :

The West Bengal Recognised Non-Government Aided Educational Institutions Employees (Revision of pay and Allowances) Rules, 2009.

-And-

In the matter of:

Pension payment order dated 23.07.2007 and revised Pension Payment order dated 06.03.2013 issued by the office of the Director of Pension, Provident Fund And Group Insurance, Finance Department, Government of West Bengal, Purta Bhavan, Salt Lake City, Kolkata, in favour of the petitioner even petitioner superannuated from service on 31.07.2007 as an Clerk of Satulia Islamia Sr. Madrasah at P.O.



Pithapukur, District- 24-Parganas
(South).

-And-

In the matter of:
Article 14, 21 and 41 of the
Constitution of India;

-And-

In the matter of :
West Bengal Board of Secondary
Education Act, 1963.

-And-

In the matter of:
Md. Ziad Ali Mollah, son of Late K.
Mollah, residing at Vill.- West Voids,
P.O.- Chouhatta, District- North 24
Parganas, Pin code no- 743425.

Petitioner

-Versus-

1. The State of West Bengal,
service through the Secretary,
Education Department (S.E.) Bikash
Bhawan, Salt Lake City, Kolkata -
700 091.

2. The Director of Pension,
Provident Fund and Group
Insurance, Finance Department,

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Purta Bhawan (2nd Floor) Salt Lake
City, Kolkata - 700 091.

3. The Treasury Officer, Baruipur,
P.O. - Baruipur, District- South 24
Parganas, Pin code no. 700144.

4. The District Inspector of School,
South 24 Parganas, (S.E) New
Administrative Building, Alipore,
Kolkata -700027.

.....Respondents

To

The Hon'ble Mrs. Manjula Chellur, Chief Justice and Her Companion
Justices of the said Hon'ble Court.


The humble petition on behalf of the
petitioner abovenamed most
respectfully -

SHEWETH:

1. That the petitioner is a Law abiding Citizen of India and
resides at the address given in the Cause Title.

My

2. That the petitioner was an approved Clerk of Satulia Islamia Sr. Madrasah at P.O. Pithapukur, District- 24-Parganas (South) (hereinafter referred to as the said School) and he was superannuated from service on 31.07.2007.
 3. That the petitioner properly submitted all the necessary papers before the pension sanctioning authority much prior to his retirement for early releasing of his pensionary benefits and as such the respondent no.2 herein issued pension payment order being Memo no. 3699/S dated 23.07.2007, in favour of the petitioner.

Photo copy of the pension payment order dated 23.07.2007 is annexed herewith and marked as annexure- P-1.
 4. That the petitioner submitted the said P.P.O. to the Treasury Office at Baruipur for early action on behalf of the concerned respondent regarding payment of gratuity of pension as well as other retiral benefits, with interest.
 5. That the matter was unnecessarily delayed by the respondents and they did not discharge their duties and obligations in time as provided under the different Government Circulars and acted as per their sweet will and computation and disbursement of the same was illegally kept in abeyance in derogation to the Government guidelines.
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6. That the pensionary benefit including gratuity is the property of the petitioner and the respondent's authority by depriving the petitioner of the same have violated the provision of the Constitution of India.
7. Your petitioner states that the respondent authorities disbursed the gross DCRG amounting Rs. 1, 93,347.00 only in respect of 1st P.P.O. and also disbursed the revised DCRG amounting Rs. 2, 46,345.00 only in respect of revised P.P.O. and the petitioner received the amount on 03.11.2007 and 02.05.2013 without interest.
8. That the petitioner is already superannuated from service and the respondents have disbursed the Gratuity amount commuted value of the Pension after the retirement and they have enjoyed the interest, petitioner received the gratuity and commuted value of pension amount on 03.11.2007 and 02.05.2013 and such action is blatantly ultravires and malafide and interest amount to comparison of a punishment upon the petitioner who is compelled to survive under extreme financial Hardship and several orders passed by the Apex Court warranting comparison of penal interest @ 18% upon the respondents.
9. That the petitioner superannuated from service on 31.07.2007 but unfortunately he received the gratuity and commuted value of pension on 03.11.2007 and 02.05.2013 without interest. And as such

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the concern respondent's authority could not compliance of penal interest as provided by the statute for such delay payment of gratuity amount to the petitioner in this regard.

10. Your petitioner states that after retirement from service the respondents authority, have no rights to withhold the petitioners retirement benefits, like as gratuity amount as well as other retirement benefits, is this regard, and as such in the similar facts and circumstances of this instant case, our Hon'ble High Court Delivered an unreported judgment, dated 27.03.2006 in W.P. No. 6305 (W) of 2006 by relying a Division Bench Decision of our Hon'ble Court being F.M.A No. 720-725 of 2004 with F.M.A. No. 731 of 2004 and an unreported judgment dated 26.09.2008 passed in W.P. No. No. 14343 (W) of 2008, by relying the W.P. No. 10750 (W) of 2007 (Abha Acharya - VS- State of West Bengal and Ors) which was disposed of on 09.07.2008, directing the Secretary, Department of Finance, Government of west Bengal to do the needful and pay interest @ 10% within 90 days from the date of receipt of a copy of the order failing which an additional interest @ 2% P.A. was made pay able, in this regard.

11. That the petitioner states that after receiving the amount of gratuity as well as other retrial benefits, your petitioner personally several times met with the concern respondent authority and also requested to release the interest against the delayed payment of

gratuity but the respondent authorities always assured to the extent that the prayer of your petitioner will be considered immediately, but all are in vain as yet. The petitioner finding no other alter native your petitioner had made contact with the learned Advocate of High Court, Calcutta through one of his relative and instructed to file writ petition for ventilating his grievances and the petitioner also went to the Treasury Office, but the concerned Treasury officer told him that without the order of Hon'ble High Court nothing can be paid by the treasury officer and as such the petitioner prays for condonation of delay in filing the instant application otherwise your petitioner will suffer irreparable loss and injury.

12. Your petitioner states that, after superannuation from his service, the Director of Pension, Provident Fund and Group Insurance, Finance Department, Government of West Bengal, issued First pension payment order, in favour of the petitioner on 23.07.2007 and there after the aforesaid authority also issued revised pension payment order in favour of the petitioner on 06.03.2013 under the revision of pay and allowances Rules, 2009.

Be it noted herein that, the petitioner, praying before this Hon'ble Court, to payment of interest on gratuity for delayed payment of the principal amount as also for payment of interest on the ground of delayed payment of benefit of The West Bengal Recognised Non-Government Aided Educational Institutions Employees (Revision of



pay and Allowances) Rules, 2009, from the date on which it was payable till the date of its actual payment, by foregoing the interest of principal amount, which was reflected from his first pension payment order, alongwith claiming interest to the tune of 18% per annum.


Photo copy of the revised pension payment order being Memo no. S/00969/2013 dated 06.03.2013 by the respondents no. 2 herein is annexed herewith and marked as annexure -P-2.


13. your petitioner submitted that entitlement to interest has been accepted by a decision of Hon'ble Supreme Court (2008) 3 SCC, para-44 and held that a claim for interest for delayed payment of retrial dues can be made under part-III of the constitution of India be relying on Article 14, 19, and 21 of the constitution of India.

14. Being aggrieved by and dissatisfied with the purported denial of the respondents as to disbursed the interest amount towards gratuity and others your petitioner begs to move this petition before Your Lordship on the following amongst others :-

GROUND S

- I. FOR THAT the matter was unnecessarily delayed by the respondents and they did not discharge their duties and allegations in times as provided under different Government Circulars and acted as per their sweet will and computations and availability of the pensionary benefits, the mentioning and disbursement of the same was illegally kept in abeyance in derogation to the Government guidelines.

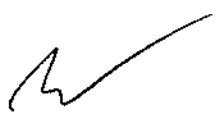


- II. FOR THAT pension and gratuity are no longer bounty to be distributed by the Government to its employees or their heirs but have become under the various decisions of the Hon'ble Court, rights and property in their hands and any culpable delay in settlement and disbursement thereof must be visited with the penalty of payment of interest till actual payment.
- III. FOR THAT the concerned authority being the Public authority are required to act fairly, justly and reasonably but in the instant case while dealing with the case of the petitioner the concerned authorities are denying to act fairly, justly and without sense of responsibilities and such action/actions are calling for the interference of this Hon'ble Court for be slowing due justice to your petitioner.
- IV. FOR THAT, the respondents authority are duty bound to release interest on gratuity for delayed payment of the principal amount as also for payment of interest on the ground of delayed payment of benefit of the West Bengal Recognized Non- Government Aided Educational Institutions Employees (Revision of pay and Allowances) Rules, 2009 in favour of the petitioner, by virtue of the order passed by this Hon'ble Court, in a similar Circumstances.
- V. FOR THAT the concerned authorities have not taken any steps for realizing the interest for which the petitioner is very
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entitled and as such the entire act, action and/or inactions of concerned authority are hit by Article 14, 21 of the Constitution of India.


- VI. FOR THAT the entire action of the respondents are other wise bad in law.
15. Your petitioner states that on the same facts of cause of action neither any writ petition is pending.
16. That there is no other alternative legal remedy and the remedy sought for herein would be adequate, full and complete.
17. That the records of the case lying within the Appellate Side Jurisdiction of the Hon'ble Court.
18. That the application is made bonafide and for the ends of justice,

Under the facts and circumstances stated herein above your petitioner most humbly prays that Your Lordship would graciously pleased to pass the following orders:

- a) A Writ in the Nature of Mandamus commanding the respondents authority for payment of
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interest on gratuity for delayed payment of the principal amount as also for payment of interest on the ground of delayed payment of benefit of the West Bengal Recognised Non-Government Aided Educational Institutions Employees (Revision of pay and Allowances) Rules, 2009 from the date on which it was payable till the date of its actual payment, along with interest of 18% per annum, in favour of the petitioner forthwith.

b) A Writ in the nature of certiorari commanding the respondents and each of the produce all in records, papers and documents pertaining to this case before this Hon'ble Court to annum that conscionable justice may be done by perusing the same.

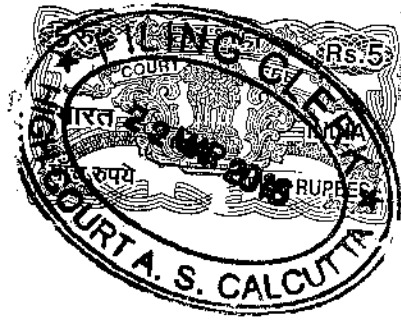


- c) Rule in terms of prayer (a) and (b) above.
- d) Rule is made absolute if no cause for insufficient case is shown.
- e) Ad-Interim order directing the concern respondent authority for payment of interest on gratuity for delayed payment of the principal amount as also for payment of benefit of the West Bengal Recognised Non- Government Aided Educational Institutions Employees (Revision of pay and Allowances) Rules, 2009 from the date on which it was payable till the date of its actual payment, alongwith interest to the tune of 18% per annum, in favour of the petitioner till the disposal of this instant writ petition.
- f) Any other or further relief or reliefs and/or order or orders, direction or directions as Your Lordship may deem fit and proper.

And your petitioner as in duty bound shall ever pray.

1





AFFIDAVIT

I, Md. Ziad Ali Mollah, son of Late K. Mollah, aged about 69 years, by faith Muslim, by occupation - retired person, residing at Vill.- West Volda, P.O.- Chouhatta, District- North 24 Parganas, Pin code no- 743425, do hereby solemnly affirm and say as follows :-

1. That I am the petitioner in this case and as such am well acquainted with the facts and circumstances of the above case.
2. That the statements made in paragraphs 1 to 12 are true to my knowledge and rests are my humble submissions before this Hon'ble Court.

Prepared in my Office
and I Certify that all
annexure are legible,

Debenmila Biswas
Advocate

Solemnly affirmed before me on
this *2nd* day of March, 2016.

The deponent is known to me

Gopal Chandra Panigrahy
Clerk to Mr. *J. R. R. R.*
Advocate

Commissioner

Am 3/14
Commissioner of Affidavit
High Court, Appellate Side
Calcutta

W

Atgirdavimas - 15 -

TO:
 Treasury Officer, BARUJIPUR

FILE NO.: SEC/ALP/0431/2006

MEMO NO.: 3699/5 DATE: 23.07.07

(MEET AS PER INSTRUCTIONS OVERLEAF)

A. SERVICE PENSION AND/OR DEATH / RETIRING GRATUITY
(RELIEF AS PER INSTRUCTIONS OVERLEAF)

DEBIT 207101107447001

NAME: MD ZIAD ALI MOLLAH

2 DATE OF BIRTH 02-JUL-1947

3. QUALIFYING SERVICE

ROPA-1981/1990/1998

4. ADDRESS WILL:WEST VOIDA;
PO:CHUGHATTAI
NURTH 24 PGS; 743425

AMOUNT
RECKONABLE: Rs. 6308.00

3. PENSION SANCTIONING AUTHORITY
D-148, SEC. EN. SMITH 34-P

PENSION W.E.F.: 01-AUG-2007
AMOUNT: 7150.00
UPDTD

6A. PENSIDN W.F.F.

three thousand one hundred Fifty only.)

WHETHER PROVISIONAL
PENSION IS RUNNING :

IN CASE OF DEATH OF PENSIONER, PENSION AND RELIEF PAYABLE FOR LIFE UPTO :

GROSS D/RG: Rs.193347.00

3 NET D/RG PAYABLE (W.R.T.7A)RS- 193347.00
Dne 1 akh N: 100115

only seven on July.)

2. IN CASE 7A>7, AMOUNT TO BE DEDUCTED FROM PENSION/EP/RELIEF =

(i) PROVISIONAL PENSION	Rs.	0.00
(ii) PROVISIONAL GRATUITY	Rs.	0.00
(iii) EMPLOYERS SHARE OF CPF	Rs.	0.00
(iv) OVERDRAWAL IN PAY ETC	Rs.	0.00

NAME(S) — 1MST RDKIYA BIRI
— 2

RELATION — 1 WIFE
DATE OF BIRTH - 1-1

(i) E.E.R. : Rs.3150.00	(Three thousand One hundred Fifty only.)
(ii) E.E.R. : Rs.0.00	(- NIL.)
(iii) N.E.R. : Rs.1690.00	(One thousand Eight hundred
(iv) N.E.R. : Rs.0.00	(- NIL.)
	Ninety only.

HRDM: TO: 01-JUL-2012
FROM: TO:
FROM: 02-JUL-2012 TO:
FROM: TO:

UPTO: LIFE TIME APPEAR OF PERSONALITY

NO.	NAME	AMOUNT OF PENSION AND RELIEF AND C.V.P. PAYABLE TO :

11. DEATH/RETIRING GRATUITY PAYABLE TO

MST ROM:YA BIBI (NGM)

SHARE	RELN	AM	SL NO.	NAME	SHARE	RELN	AM
WIFE	A	1.	NO	ZIAD ALI	MULLAH	1/2	NO

NAME OF NOMINEE FOR D/F GRATUITY

C. COMPUTED VALUE OF PENSION - PAYABLE AFTER 1

AMOUNT COMMUTED: \$250.00

148227.00

Ma. de A. P. P. P.

... ..

to in paragraph 3
foregoing Petition affirmed
by Ms. J. H. M. M.
on this 2nd Day of Nov
1986

Commissioner of Affidavit
Third and Appellate Side
PPO/PO ISSUED
PREVIOUSLY BY
DPFG.

**PENSION/FP+
RELIEF & GROSS
D / RG ALREADY
AUTHORISED**

ISSUED WIDE
MEMO NO.

-18-

TO BE ADJUSTED

OFFICE OF THE DIRECTOR OF PENSION, PROVIDENT FUND AND GROUP INSURANCE

TO : Treasury Officer BARUFUR

FILE NO. : SEC/ALP/031/2006/REV

MEMO NO. : S/00066/2013

DATE : 06/03/13

A SERVICE PENSION AND/OR DEATH/RETIRING GRATUITY (RELIEF AS PER INSTRUCTIONS OVERLEAF)

PRO NO. : SEC/SA/00079/2013

DEBIT : 2071011094001W04

REVENUE BRANCH, 2nd FLOOR, SAFTI LAGE KOLKATA - 700091

FINANCE DEPARTMENT, GOVERNMENT OF WEST BENGAL

FORM-2035

1. NAME : MD ZIAD ALI MOLLAH

4. ADDRESS : WILL, WEST VOIDA, PO-CHOUHATTA, NORTH 24 PGS, 743425

6. PENSION W.E.F. : 01-AUG-2007
AMOUNT : RS. 3150.00
(Three Thousand One Hundred Fifty only.)

INCASE OF DEATH OF PENSIONER, PENSION AND RELIEF PAYABLE FOR LIFE UP TO :

7. GROSS DRG : RS. 246345.00

7B. NET DRG PAYABLE (W.A.T. 7A) : RS. 246345.00
(Two Lakh Forty Six Thousand Three Hundred Forty Five only.)

7C. IN CASE 7A>7, AMOUNT TO BE DEDUCTED FROM PENSION/PR/RELIEF = RS.

8. NAME(S) : 1. WEST ROKIYA BIBI

2.

9. (i) E.F.P. : RS. 3150.00 (Three Thousand One Hundred Fifty only.)
(ii) E.F.P. : RS. 7465.00 (Seven Thousand Four Hundred Sixty Five only.)
(iii) N.E.P. : RS. 4979.00 (Four Thousand Four Hundred Seventy Nine only.)
(iv) N.E.P. : RS. 0

10. LIFE TIME ARREAR OF PENSION AND RELIEF AND C.V.P. PAYABLE TO :
* N.E.P. : RS.
* E.F.P. : RS.

B. FAMILY PENSION (EFFECTIVE FROM DATE FOLLOWING THE DATE OF DEATH OF MEMBER)
RELATION : 1. WIFE

2.

DATE OF BIRTH : 1.

2.

II. DEATH-OLM/RETIRING GRATUITY PAYABLE TO

3. QUALIFYING SERVICE : 33(Y)0000000

5. PENSION SANCTIONING AUTHORITY : D.S. SEC. EDN. SOUTH 24 PGS

6. PENSION W.E.F. : 01-APR-2008
AMOUNT : RS. 7465.00
(Seven Thousand Four Hundred Sixty Five only.)

7A. DEDUCTIONS ON ACCOUNT OF

ACCOUNT OF	HEAD OF AC TO WHICH AMOUNT TO BE DEPOSITED	AMOUNT
(i) PROVISIONAL PENSION	00710100000110	RS. 0.00
(ii) PROVISIONAL GRATUITY	00710100000110	RS. 0.00
(iii) EARLY OVERS SHARE OF CPF	00710100000110	RS. 0.00
(iv) DEDUCTION DUE TO	00201000000327	RS. 0.00

PROPOSED ISSUED PREVIOUSLY BY DRPG
PENSIONER + RELIEF & GROSS DRG ALREADY AUTHORISED BY PRO NO. ALP/57/0017

ISSUED VIDE MEMO NO. 309/S

DT. 23.11.2007

TO BE NOTIFIED

SHARE RELN AMM
FULL SELF A

SL. NO.	NAME	SHARE RELN AMM	ST. NO.	NAME	SHARE RELN AMM
1	WEST ROKIYA BIBI	FULL WIFE A	1	MD ZIAD ALI MOLLAH	FULL SELF A

NAME OF NOMINEE FOR DR GRATUITY
WEST ROKIYA BIBI

SHARE RELN AMM
FULL WIFE A

C. CALCULATED VALUE OF PENSION - PAYABLE AFTER FIRST PAYMENT OF PENSION :
ALREADY PAID AMOUNT : RS. 1260.00
ADDITIONAL CALCULATED : RS. 1726.00

NET PAYABLE C.V.P. AMOUNT : RS. 165323.00
(One Lakh Sixty Five Thousand Three Hundred Twenty Three only.)

ATTACH PHOTOGRAPH HERE

BANK :
BRANCH :
ACCOUNT :
Annexure 12

Commissioner of Affidavit
High Court, Appellate Side
Calcutta

ASSISTANT DIRECTOR
DIRECTOR

Annexure 12
to in paragraph 12
foregoing Petition signed
by *Md. Ziad Ali Mollah*
on this *23/11/2007* Day of *Nov*
2016

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DISTRICT : North 24- Parganas

IN THE HIGH COURT AT CALCUTTA
CONSTITUTIONAL WRIT JURISDICTION
APPELLATE SIDE

W.P. No. 7580 (W) of 2016

In the matter of:
An application under Article 226 of the
Constitution of India;

-And-

In the matter of:

Md. Ziad Ali Mollah

Petitioner

-Versus-

-The State of West Bengal & Ors.

Respondents

PETITION

DEBSMITA BISWAS
Advocate
High Court, Calcutta.
5, Fancy Lane,
Kolkata- 700001.