**HC Reply Against BIFR.doc**

BEFORE THE HON'BLE HIGH COURT OF TN AT CHENNAI

CWP No. : \_\_\_\_\_\_

Petitioner

Versus

Respondents

Reply on behalf of the respondent No.\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Respectfully Sheweth:

Preliminary Submissions/Objections:

1. That no fundamental or constitutional right whatsoever of the petitioner has been infringed and as such the writ petition is not maintainable. The judgment passed by the Ld. Tribunal below is correct in law and there is no perversity or legal ambiguity in the same so as to call for judicial review by this Hon'ble Court. The petitioner has raised altogether new pleas and brought out new facts in the present writ petition, which are not permissible until and as long the same have been raised before the Ld. Tribunal below and adjudicated upon by the Ld. Tribunal. \_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_.  
  
Reply on Merits

1. That the contents of this para of the Writ Petition are not denied to the extent that the petitioner is a citizen of India. However, it is submitted that the petitioner is not entitled to file or maintain this writ petition before this Hon'ble Court.

2. That the contents of this para of Writ Petition are wrong and denied. \_\_   
3. That the contents of this para of Writ Petition are wrong and denied. \_\_   
4. That the contents of this para of Writ Petition are wrong and denied. \_\_   
5. That the contents of this para of Writ Petition are wrong and denied. \_\_   
6. That the contents of this para of Writ Petition are wrong and denied. \_\_   
7. That the contents of this para of Writ Petition are wrong and denied. \_\_   
8. That the contents of this para of Writ Petition are wrong and denied. \_\_   
9. That the contents of this para of Writ Petition are wrong and denied. \_\_   
10. That the contents of this para of Writ Petition are wrong and denied. \_\_   
11. That the contents of this para of Writ Petition are wrong and denied. \_\_   
12. That the contents of this para of Writ Petition are wrong and denied. \_\_   
13. That the contents of this para of Writ Petition are wrong and denied. \_\_   
14. That the contents of this para of Writ Petition are wrong and denied. \_\_   
15. That the contents of this para of Writ Petition are wrong and denied. \_\_   
16. That the contents of this para of Writ Petition are wrong and denied. \_\_   
17. That the contents of this para of Writ Petition are wrong and denied. \_\_   
  
It is, therefore, most respectfully prayed that the writ petition is lacking in material substance and is false, frivolous and vexatious and this writ petition deserves to be dismissed and may kindly be dismissed in the interest of justice with costs. Such other orders as deemed fit and proper in the facts and circumstances of the case may kindly also be passed in favour of the replying respondent.   
  
Chennai

Replying Respondent No. \_\_ \_\_\_\_\_\_\_

Through, Advocate

**BEFORE THE HON'BLE HIGH COURT OF TN AT CHENNAI**

CWP No.: \_\_\_\_\_\_\_

Petitioner

Versus

Respondents

Affidavit in support of reply

I, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, do hereby solemnly affirm and declare as under:-   
  
1. That the accompanying reply has been drafted under my instructions.   
  
2. That the contents of paras 1 to \_\_\_\_\_\_\_\_\_\_ of preliminary submissions and paras 1 to \_\_\_\_\_\_ of the reply on merits are correct and true to the best of my knowledge.   
  
3. That I further solemnly affirm and declare that this affidavit of mine is correct and true, no part of it is false and nothing material has been concealed therein.   
  
Affirmed here at Chennai this \_\_\_\_\_\_\_.

**IN THE HON'BLE HIGH COURT OF TN AT CHENNAI**

CMP No.: \_\_\_\_\_\_ in CWP No.: \_\_\_\_\_\_

Petitioner/Applicant

Versus

Respondents/Non-Applicants   
  
Reply to application under Section 151 of CPC   
  
Respectfully Sheweth:-   
  
Preliminary Objections/Submissions:   
  
1. \_\_\_\_\_\_\_ 

2. \_\_\_\_\_\_\_   
  
Reply on Merits   
  
1. That the contents of this para of the application are matter of record. \_\_\_\_\_\_\_

2. That the contents of this para of the application are wrong and denied. \_\_\_\_\_\_ 

3. That the contents of this para of the application are matter of record. \_\_\_\_\_\_ 

4. That the contents of this para of the application are wrong and denied. \_\_\_\_\_\_ 

In view of above submissions, it is most respectfully submitted that the application deserves to be dismissed and may kindly be dismissed in the interest of justice. Such other orders may also be passed in favour of the replying respondent as deemed fit and proper in the facts and circumstances of the case.   
  
Chennai   
  
Respondent/Applicant   
  
\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_   
  
Through, Advocate

**IN THE HON'BLE HIGH COURT OF TN AT CHENNAI**

CMP No.: \_\_\_\_\_\_\_

Petitioner/Non-Applicant

Versus

Respondents/Applicants

Affidavit in support of reply to the application under Section 151 of CPC

I, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, do hereby solemnly affirm and declare as under :-   
  
1. That the accompanying reply to the application has been prepared under my instructions.   
  
2. That the contents of paras 1 to \_\_\_\_\_\_\_\_\_\_\_\_\_\_ of the Preliminary Submission/Objections and paras 1 to \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ of the reply on merits of the accompanying reply to the application are correct and true to the best of my knowledge.   
  
3. That I further solemnly affirm and declare that this affidavit of mine is correct and true, no part of it is false and nothing material has been concealed therein.   
  
Affirmed at Chennai this the \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_.