**BEFORE THE REGISTRAR OF CO-OPERATIVE SOCIETIES, PUDUCHERRY.**

***R.P. No. 2/2015***

Present : **Dr. A. S. SIVAKUMAR**
Registrar of Co-operative Societies
Puducherry.

A.N. Dhileeppan
Legal Assistant
The Pondicherry State Co-operative
Bank Limited
Pondicherry. .. Petitioner

Vs.

1. The Administrator
   The Pondicherry State Co-operative
   Bank Limited.

2. The Managing Director
   The Pondicherry State Co-operative
   Bank Limited. .. Respondents

**ORDER**

*(Issued under Section 141 of the Puducherry Co-operative Societies Act, 1972)*

Laying serious challenge and lament to the order dated 3.8.2009 of the second respondent, as confirmed by the order dated 21.2.2011 and later modified by order dated 16.5.2012 of the first respondent, the petitioner, working as Legal Assistant in the Pondicherry State Co-operative Bank Limited (for easy reference the 'Bank' hereinafter) invoked his statutory remedy of revision under Section 141 of the Puducherry Co-operative Societies Act, 1972.

**THE TRIGGER**

2. The exposition of facts, with essential details is imperative to appreciate the controversy in proper prospective and also consider the manner in which the petitioner has taken the battle to this field. A panoramic view of the case, as narrated by the petitioner in his affidavit and connected records would be as under:

2.1 The petitioner was appointed as Legal Assistant in May 1998 on consolidated salary and was placed on time scale in July 2000. Contemplating disciplinary proceedings against him, he was placed under suspension with effect from 28.3.2008.

2.2 Three charges were levelled against him, viz.,

(i) He manipulated and furnished false legal opinion of his own by forging the signature of the Legal Advisor Thiru V.A. Edward Kumar on five loan files which were sent for legal opinion by the bank;

(ii) He paid Rs.250 in cash, violating the official procedure of paying legal fees by cheque to Thiru R. Parthasarathy, Legal Advisor; and

(iii) He has wilfully and unauthorizedly retained a couple of loan files with him which were sent to the Legal Advisor and handed over them belatedly.

2.3 As he denied the charges framed against him, an enquiry officer was appointed on 21.8.2008 and the enquiry report was submitted by the said officer on 19.1.2009.

2.4 The enquiry officer discharged the petitioner from the first charge and declared that the charge was not proved. On the second charge, the finding of the enquiry officer was that knowing fully well that it was not the practice to make any payment in the form of cash, but only by cheque, the action of the petitioner was quite impertinent though the misconduct was very trivial and unintentional. This charge was held proved, subject to the above observation. The third charge was held partially proved only to the extent of negligence in the delayed return of the files but without any ulterior motive of perpetrating any forgery.

2.5 Taking exception to the finding of the enquiry officer, the disciplinary authority, the second respondent herein, came to a definite conclusion that all the charges levelled against the petitioner have been proved conclusively and held him guilty of major misconduct under Rule 54 (e), (j) and (q) of the subsidiary regulations governing the service conditions of the employees of the bank.

2.6 By order dated 3.8.2009 the second respondent demoted the petitioner to the lower scale of Junior Assistant-cum-Cashier Grade III. It was further ordered that he shall not be merged with the post of Junior Assistant-cum-Cashier Grade III and continue as Legal Assistant. He was reinstated in service without any back wages for the period of suspension except for the subsistence allowance granted.

2.7 Aggrieved by the said order, the petitioner preferred an appeal to the Administrator of the bank, the first respondent herein, under the relevant provisions of the subsidiary regulations. Placing reliance on the judgment of the Hon'ble Supreme Court in *Nyadar Singh and another vs. Union of India, AIR 1988 SC 1979 : (1988) 4 SCC 170 : JT 1988 (3) 448 : 1998 (2) SCALE 409* wherein it was held that a person appointed directly to a highest post, service, grade or time scale of pay cannot be reduced by way punishment to a post in lower time scale/grade of service to a post which he never held before. The petitioner submitted that punishment of demotion without entitlement of back wages was extremely harsh and would cause a very heavy financial loss in the entire career and prayed to accept the findings of the enquiry officer and pardon him for the minor lapse.

2.8 The appeal was dismissed by a brief order dated 21.2.2011 by the first respondent. Against the said order, the petitioner submitted a representation under Regulation No. 63(d) of the Bank Staff Regulations, 1986 to the first respondent on 7.12.2011. The lynchpin of the representation was that though the disciplinary authority was free to disagree with the findings of the enquiry office and decide the nature of punishment, the disciplinary authority has neither furnished a copy of the enquiry report nor gave an opportunity to the petitioner to represent against the disagreement of the disciplinary authority over the findings of the enquiry officer. The petitioner got the assistance from the dictum of the Hon'ble Apex Court in *Punjab National Bank and others vs. Kunj Behari Misra, (1998) 7 SCC 84 : 1998 (2) CTC 742 : AIR 1988 SC 2713 : 1998 (II) LLJ 809.* The petitioner also narrated how he was deprived of various monetary benefits on account of the impugned order. On the above premises, the petitioner prayed to reconsider the order of penalty.

2.9 Taking the representation on file, the first respondent ordered to issue a show cause notice to the petitioner and furnished a copy of the enquiry report, calling for his explanation. On considering the explanation the appellate authority, the first respondent herein, by order dated 16.5.2012, gave a finding on the first charge that there was not much scope for someone else to interpolate a false opinion or signature in the files entrusted to the care of the petitioner and held that the petitioner was guilty of misconduct unbecoming of a bank employee and deserved a major penalty. Modifying the earlier punishment, the first respondent imposed reduction of pay to the bottom of the scale of pay enjoyed by him with cumulative effect from the date of the original punishment imposed, i.e., with effect from 3.8.2009 and the petitioner would receive increments thereafter at the bottom of the scale each year with effect from 2010 onwards. Resultantly, the petitioner was retained in the same post and his basic pay was fixed as Rs. 7,990.

2.10 On receiving the above order, the petitioner submitted a representation dated 24.5.2012 to the Administrator of the bank bringing to his notice that after the earlier punishment of reversion, his basic pay was Rs. 10,435 in the lower scale of Rs. 5,775 – 23,970 in August 2009. After restoration of the post of Legal Assistant, vide order dated 16.5.2012, his basic pay would be Rs. 7,990 resulting in a recurring loss of Rs. 2,445 p.m. The overall monetary loss, inclusive of loss of D.A., would be Rs. 4,500 p.m. If the review order was implemented, it would result in recovery of pay to the extent of Rs.1,50,000. The petitioner pleaded that his salary may be claimed at the old calculation itself without effecting any recovery and keep the review order in abeyance.

2.11 The petitioner approached the Labour Officer (Conciliation) seeking relief over the order of the respondents and having found that a relief was available by way revision petition, came before me with this revision petition. He also filed a petition to condone the delay in submission of the petition. When the revision petition was taken on file and notice was ordered to the respondents, the respondents opposed the revision petition both on maintainability and on laches. By order dated 8.12.2015, I condoned the delay in preferring the revision petition and also held that the revision petition was maintainable under Section 141 of the Act. Thus the main petition was taken up for disposal.

**GROUNDS OF REVISION**

3. Unsuccessful in both the orders of the appellate authority, the petitioner is castigating all the orders, the nitty-gritty and the gist and kernel, as stood exposited from the petition, are thus:

3.1 The petitioner was under suspension for a period of 16 months, but he was not paid the enhanced subsistence allowance at 75%, as he has not contributed for any delay in completion of enquiry.

3.2 Various financial benefits given to other employees were denied to him, like two special increments given on the Golden Jubilee of the bank, bonus and ex-gratia for 2007-08, extra increments under the welfare scheme of career development.

3.3 The appellate authority modified the penalty of reversion to one of reduction of pay to the bottom of the scale of pay in the original grade has, in fact, resulted in enhancement of the quantum of punishment by reducing the pay to the bottom scale with effect from 3.8.2009.

3.4 By converting the petition dated 7.12.2011 for reconsideration as one of review, the subsequent appellate authority has inflicted enhanced punishment than the previous one, without affording an opportunity to represent against the decision to disagree with the findings of the enquiry officer in respect of the first charge and the proposed enhancement in the quantum of punishment.

3.5 In the backdrop of the submissions, the petitioner prayed to set aside the orders dated 3.8.2009, 21.2.2011 and 16.5.2012 of the respondents and sanction all the consequential service and monetary benefits and award other relief, as deemed fit.

**THE CONFUTE**

4. Per contra, in a bid to torpedo and pulverize and to make mincemeat of the arguments advanced on the side of the petitioner, the respondents would pilot their arguments, the pith and marrow of the same would be thus :

4.1 By order dated 16.5.2012 the petitioner has regained the post of Legal Assistant. The attempt of the petitioner seeking relief from the decisions cited in Swamy's Hand Book is unsustainable, because the bank is bound to follow the Act, the Rules, the bye-laws and other regulations. Provisions of the Government employees cannot be imported to the bank employees per se.

4.2 The bank has not recovered the difference in emoluments between the first and second order of the appellate authority and the petitioner was liable to refund around Rs.2,50,000.

4.3 In spite of the grave misconduct, the disciplinary and appellate authorities were so considerate on the petitioner and the petitioner cannot expect more mercy from the respondents. The petitioner has accepted his guilt vide letter dated 10.5.2008.

4.4 In view of the above, the respondents sought for dismissal of the revision petition.

**REPLY AFFIDAVIT**

5. A copy of the counter affidavit filed was forwarded to the petitioner to enable him to file his reply affidavit. Controverting the submissions of the respondents, the petitioner would state thus:

5.1 The letter dated 10.5.2008 contended by the respondents as acceptance of guilt by the petitioner pertains only with regard to misplaced files and this letter was given much earlier than the charge sheet itself. It is not a submission on other charges.

5.2 The Central Acts passed by the Parliament, the provisions contained therein will have an over-riding effect over any executive orders like internal bye-laws, rules and regulations of the bank.

5.3 There was no reason recorded for keeping the petitioner under suspension beyond three months, as mandated under Regulation No. 59.

5.4 The petitioner has not quoted any provisions applicable exclusively to Government employees in support of his claim. The case laws cited will have general application to all the employees.

5.5 While forwarding the enquiry report, the appellate authority has not indicated his disagreement over the findings of the enquiry officer, which means that the appellate authority has impliedly accepted the findings rendered by the enquiry officer. No opportunity was given to the petitioner to represent against the proposal of disagreement and the enhancement of punishment, which is contrary to Regulation No. 56 of the bank.

**THE SEMINAL QUESTIONS**

6. On hearing the rival submissions and on perusal of records twin issues come up for reckoning in this revision petition, viz.,

*(i) Whether the orders dated 3.8.2009, 21.2.2011 and 16.5.2012 of the respondents call for any interference?*

*(ii) If yes, to what relief the petitioner is entitled for?*

**DECIDING THE QUESTIONS**

<u>*On the first issue*</u>

7. Procedural irregularities leading to legal lacuna are writ large on the face of the orders under challenge. The second respondent has not supplied a copy of the enquiry report where the findings of the enquiry officer were almost in favour of the petitioner. Definite prejudice is caused by the non-furnishing of the copy of the report and the principle of law as enunciated by the Hon'ble Supreme Court in *Union of India* vs. *Mohd. Ramzan Khan,* reported in *AIR* 1991 *SC* 471 : *1991-1-LLJ-29,* where in it was held that non-furnishing of the report would amount to violation of rules of natural justice and make the final order liable to challenge, was given a complete go-by. The disciplinary authority, by order dated 3.8.2009 has inflicted a punishment on the petitioner demotion to a lower post, which he never held and this was another infraction in the light of the judgment in *Nyadar Singh and another vs. Union of India,* cited by the petitioner.

8. When the matter was taken on appeal before the first respondent, he dismissed the appeal vide order dated 21.2.2011. When the petitioner has assailed the order of the disciplinary authority, the order of the appellate authority has not spelt out any reason to substantiate how he was convinced with the reasoning and logic of the disciplinary authority. The order was bereft of reasons.

9. When the petitioner represented to the first respondent for reconsidering the decision, the first respondent in his order dated 16.5.2012 was gracious enough to advert the infirmities and provided a copy of the enquiry report to the petitioner. He modified the punishment imposed by the second respondent, as confirmed by the first respondent in order dated 21.2.2011. But the order of the first respondent dated 16.5.2012 turned out to be the medicine was worse than the disease to the petitioner. Though the petitioner was restored his original position of Legal Assistant equal to the cadre of Senior Assistant, by ordering him to the starting pay in the cadre it resulted in huge monetary loss to the petitioner, besides he has repay considerable amount. Adding insult to the injury, the petitioner would be entitled to receive increments at the bottom of the scale each year with effect from 2010 onwards. In other words, the reversion to the bottom of the scale was perpetual.

10. It is strange, nevertheless true, that both the orders of the appellate authority, dated 21.2.2011 and 16.5.2012 were signed by the second respondent as 'By order'. The petitioner has preferred the appeal only against the order of the second respondent and in that case it is baffling that the order of the appellate authority has come to the notice of the second respondent much before the petitioner and the second respondent forwarded the quasi judicial order as if he was forwarding an administrative order. I am at loss to understand how such a procedural squabble was allowed to be crept in.

11. It is perceptible from the order dated 16.5.2012 that the appellate authority has his own reasons to disbelieve the innocence played by the petitioner that he has no role to play in the manipulation of the legal opinion and on the forged signature of the Legal Advisor of the bank. But the question before me is whether the petitioner is entitled for an opportunity

for making a representation before the first respondent has taken a stand to differ from the findings of the enquiry officer who has found the petitioner not guilty of the charge.

12. Canvassing this point to his favour, the petitioner found formidable support from the decision of the Hon'ble Supreme Court in *Punjab National Bank and others vs. Kunj Behari Misra [supra].* The petitioner has brought to my notice the decision taken by my learned predecessor in *J. Radhakrishnan vs. The Pondicherry Co-operative Sugar Mills Limited and another,* in which a similar issue was decided. I am tempted to quote few passages from his order dated 24.7.2014, which have strong bearing on this revision petition:

> "13. This takes me to next issue, whether the petitioner was entitled to be heard before the first respondent comes to a conclusion that findings of the enquiry officer, holding the petitioner unblemished, are not convincing to him and hence he differed from the findings and hold him guilty of the charges. The issue is no more res integra. The Hon'ble Supreme Court of India, in *Punjab National Bank and others vs. Kunj Behari Misra, (1998) 7 SCC 84 : 1998 (2) CTC 742 : AIR 1988 SC 2713 : 1998 (II) LLJ 809* settles the issue beyond debate. The Court observed thus:
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> *"When, like in the present case, the inquiry report is in favour of the delinquent officer but the disciplinary authority proposes to differ with such conclusions then that authority which is deciding against the delinquent officer must give him an opportunity of being heard for otherwise he would be condemned unheard. In departmental proceedings what is of ultimate importance is the findings of the disciplinary authority.*
>
> *When the disciplinary authority differs with the view of the inquiry officer and proposes to come to a different conclusion, there is no reason as to why an opportunity of hearing should not be granted. It will be most unfair and iniquitous that where the charged officers succeed before the inquiry officer they are deprived of representing to the disciplinary authority before that authority*

*differs with the inquiry officer's report and, while recording of guilt, imposes punishment on the officer. In our opinion, in any such situation the charged officer must have an opportunity to represent before the Disciplinary Authority before final findings on the charges are recorded and punishment imposed.*

*Whenever the disciplinary authority disagrees with the inquiry authority on any article of charge then before it records its own findings on such charge, it must record its tentative reasons for such disagreement and give to the delinquent officer an opportunity to represent before it records its findings. The report of the inquiry officer containing its findings will have to be conveyed and the delinquent officer will have an opportunity to persuade the disciplinary authority to accept the favorable conclusion of the inquiry officer. The principles of natural justice, as we have already observed, require the authority, which has to take a final decision and can impose a penalty, to give an opportunity to the officer charged of misconduct to file a representation before the disciplinary authority records its findings on the charges framed against the officer."* [Underlined by me for emphasis]

14. In *Chennai Metropolitan Water Supply and Sewerage Board, rep. by its Board of Directors and others vs. P. Palanivelan, 2005 (3) CTC 656,* the facts of the case are that the respondent was an employee of the appellant Board and he was charge-sheeted on several charges. In the departmental enquiry, the enquiry officer found him innocent. The disciplinary authority disagreed with the finding of the enquiry officer and without giving an opportunity of hearing to the respondent/petitioner imposed the punishment of stoppage of increment. The learned single Judge of High Court of Madras held that opportunity of hearing should have been given to the employee concerned. When the matter was taken on appeal before the Division Bench, the Court held that no doubt even if the enquiry officer finds an employee to be innocent, it is open to the disciplinary authority to disagree with such finding but in that case, the disciplinary authority must give an opportunity of

hearing to the delinquent and record his reasons for disagreeing with the findings of the enquiry officer. Reliance was placed on the judgment of the Hon'ble Supreme Court in *Punjab National Bank and others vs. Kunj Behari Misra [supra].*

15. The view taken by the Hon'ble Apex Court in the aforesaid case has consistently been approved and followed as is evident from the judgments in *Yoginath D. Bagde vs. State of Maharashtra & another, AIR 1999 SC 3734; State Bank of India & others vs. K.P. Narayanan Kutty, AIR 2003 SC 1100 : 2003 (1) Supreme 778*; *J.A. Naiksatam vs. Prothonotary and Senior Master, High Court of Bombay & others, AIR 2005 SC 1218*; *P.D. Agrawal vs. State Bank of India & others, AIR 2006 SC 2064;* and *Ranjit Singh vs. Union of India & others, AIR 2006 SC 3685.*

16. In *Canara Bank & others vs. Shri Debasis Das & others, AIR 2003 SC 2041,* the Hon'ble Supreme Court explained the ratio of the judgment in *Kunj Behari Misra* (supra), observing that it was a case where the disciplinary authority differed from the view of the inquiry officer. In that context, it was held that denial of opportunity of hearing was *per se* violative of the principles of natural justice.

17. Reiterating the principles laid down in *Kunj Behari Misra* (supra), the Hon'ble Supreme Court in a recent judgment, *S.P. Malhotra vs. Punjab National Bank and others, (2013) INSC 652 : 2013 (3) KLT SN 40,* held that not furnishing the copy of the recorded reasons for disagreement from the enquiry report itself causes the prejudice to the delinquent.

18. In the light of the settled law on the subject I hold in unequivocal terms that non-furnishing of tentative reasons to the petitioner, who was set free by the enquiry officer, before differing from the findings of the enquiry officer is a violation of principles of natural justice which in turn exposes the vulnerability in the impugned order. The impugned order does not stand to legal scrutiny, as the petitioner was held guilty without being heard."

14. I am in respectful agreement with the finding and ratio. Though the order dated 16.5.2012 was of the appellate authority the law laid down by the Hon'ble Supreme Court by a host of decisions would be squarely applicable on the impugned order. The first respondent, before arriving at a decision, has forwarded a copy of the enquiry report and the petitioner has submitted his representation on the findings of the enquiry officer. Neither the impugned order nor the submissions made by the respondents made any whisper that the appellate authority has given an opportunity to the petitioner before recording his finding distancing and dissenting from the conclusion reached by the enquiry officer holding that the petitioner was not guilty of the first charge of manipulation of opinion and forgery of signature of the Legal Advisor. On the above premises, the petitioner is entitled to succeed and all the impugned orders are set aside.

*On the second issue*

15. As the impugned orders failed the litmus test, the second issue comes alive, viz., to what relief the petitioner is entitled to? It must be remembered that the petitioner has established a cause of action in his favour on the first issue purely on technical ground and impugned orders were quashed because of the legal infirmities suffered by them. This, however, does not mean that the petitioner should be let off the hook. Though the petitioner was proceeded against in three charges, the first charge was vital and the others were supplementary and subsidiary. The enquiry officer held him not guilty of the first charge purely on benefit of doubt, since the Legal Advisor did not participate in the enquiry and there was a probability that such misdemeanour could have been committed by someone else. In this regard, I find considerable force on the findings reached by the appellate authority in his order dated 16.5.2012 that the Legal Advisor did not wish to unequivocally implicate the petitioner, who he had a working relationship for many years, while at the same time not wantonly to give a patently false statement to protect the charged official of the bank with whom he has a fiduciary relationship and hence did not turn up for enquiry.

16. Though the Legal Advisor did not turn up before the enquiry officer he has gone on record, vide notings dated 27.3.2008, to confirm that he was not the author the opinion given on files and his signatures were forged. It

is the usual practice that the petitioner takes the files to the Legal Advisor for his opinion and brings the files back to bank. Before the enquiry officer the petitioner has established that the manipulation and forgery were not committed by him and the non-appearance of the Legal Advisor before the enquiry officer was to his advantage. But no prudent man, having head over the shoulder, would hold the petitioner is completely innocent, as projected by him. Even if he has not authored the entire episode, there is every possibility for him to know who committed the mischief. In short, I have every reason to believe that the petitioner is trying to save someone and is caught in the web in the process.

17. What is next? It is usual that when the order of the disciplinary or appellate authority is set to naught, the case would be remitted to disciplinary authority to start afresh all over and pass appropriate order within a time frame. But in the instant case, the petitioner has already spent considerable time in litigating before the appellate authority and this revisional authority. The punishment imposed by the appellate authority, vide order dated 16.5.2012, taking him to the bottom of the scale permanently certainly needs a re-look and revisit. I am aware that the scope of intervention by the Courts in the matter of punishment imposed by the disciplinary/appellate authority is limited, but in deserving cases, to shorten the litigation, the Courts come to the rescue of the employees. My mind is reminiscent and redolent of the following decisions:

(i) In *B.C. Chaturvedi v. Union of India , 1995(6) SCC 749* the Supreme Court held thus:...A review of the above legal position would establish that the disciplinary authority, and on appeal the appellate authority, being fact-finding authorities have exclusive power to consider the evidence with a view to maintain discipline. They are invested with the discretion to impose appropriate punishment keeping in view the magnitude or gravity of the misconduct. The High Court/Tribunal, while exercising the power of judicial review, cannot normally substitute its own conclusion on penalty and impose some other penalty. If the punishment imposed by the disciplinary authority or the appellate authority shocks the conscience of the High Court/Tribunal, it would appropriately mould the relief, either directing the disciplinary/appellate authority to reconsider the penalty imposed, or to shorten the litigation, it may itself, in exceptional and rare cases, impose appropriate punishment with cogent reasons in support thereof. [Emphasis supplied].

(ii) In *Om Kumar v. Union of India (2001) 2 SCC 386,* the Supreme Court held thus: Thus, from the above principles and decided cases, it must be held that where an administrative decision relating to punishment in disciplinary cases is questioned as "arbitrary" under Article 14, the court is confined to Wednesbury principles as a secondary reviewing authority. The court will not apply proportionality as a primary reviewing court because no issue of fundamental freedoms nor of discrimination under Article 14 applies in such a context. The Court while reviewing punishment and if it is satisfied that Wednesbury principles are violated, it has normally to remit the matter to the administrator for a fresh decision as to the quantum of punishment. Only in rare cases where there has been long delay in the time taken by the disciplinary proceedings and in the time taken in the Courts, and such extreme or rare cases can the court substitute its own view as to the quantum of punishment. [Underlined by me].

(iii) In *V. Ramana, 2005(6) Supreme 183,* the Supreme Court held thus: To put differently unless the punishment imposed by the disciplinary Authority or the appellate authority shocks the conscience of the Court/tribunal, there is no scope for interference. Further to shorten litigations it may, in exceptional and rare cases, impose appropriate punishment by recording cogent reasons in support thereof.

18. The petitioner has every reason to feel grieved that by taking the order of the disciplinary authority for reconsideration, the appellate authority though restored him to his original post has done more harm than good by pushing him to the bottom of the scale and making the stoppage of increment as perpetual.

19. I have given my thoughtful consideration on the entire gamut of the case and the orders of the disciplinary and appellate authorities. There is no gainsaying that the petitioner has already suffered mentally and

financially for the folly committed by him. Any further suffering will not in the interest of justice. The clock cannot be turned back. Enough is enough for the petitioner. Whatever he has suffered thus far, let it be the penalty he deserves. The appropriate punishment would be to put him back to the original basic pay he was drawing at the time of inflicting punishment in the year 2009. He shall draw regular increments from now on. Whatever he has lost all these years by way of bonus, additional increments etc., will not be restored. No recovery of any kind shall be made from him in pursuance of the order dated 16.5.2012. I do hope that the petitioner would take this as a hard learnt lesson and would live up to the expectation of the Legal Assistant of the bank and protect its interest to the best of his ability.

**THE UPSHOT**

20. The revision petition is disposed on the above terms. Let the parties meet their respective costs.

Pronounced in open forum on the 9th day of November 2016.

OFFICE OF THE REGISTRAR OF CO. OPERATIVE SOCIETIES * PONDICHERRY-9 *

9/11

**[Dr. A. S. SIVAKUMAR]**
**REGISTRAR OF CO-OPERATIVE SOCIETIES**

To

The parties.