

**BEFORE THE HON'BLE PRESIDING OFFICER/LABOUR COURT OF**  
**GURGAON, HARYANA**

IN THE MATTER OF:-

**Sanjeev kumar** ..... WORKMAN/PETITIONER

Versus

**M/s. Richa & Co.** ..... MANAGEMENT/RESPONDENT

**EVIDENCE BY THE WAY OF AFFIDAVIT**

It is respectfully submitted that,

1. That the deponent **Sanjeev Kumar**, S/o- Bhim Singh, resident of Vill-Rafiyat ganj, P.O- Bilgram, Dist- Hardoi, was employed with **M/s Rich & Co** as Operator in Sewing Department. The workman has been appointed on dated **08-11-2011**. He was appointed on a monthly salary of INR 5613/-. He was working in company with full honesty and integrity.
2. That the deponent took leave and went home for celebrating Rakshabandhan with his family and when he came back from his home and went to the company to resume the duty on **19-08-2014**, he was said that his services are not required, hence he is terminated henceforth.
3. That the deponent, being a poor migrant worker requested the management several times not to terminate his services abruptly, as it was his only source of income. He was then told that he can join the duty with a new ID card number. Balwant Singh, production manager said that a new I-card will be issued with new joining date and then only he can join the duty again.

4. That the deponent knowing well that if he agrees to the new joining date he will be lose his seniority and other benefits, so he denied accepting the new I-card. He requested several times that he be allowed to continue his services with his old I-card, but his request was denied and was not allowed to work.
5. That the deponent was also called upon in the personnel department and was told that he should take his full and final if he is not ready to join the company with new I-card. The deponent refused to take his full and final. He was finally illegally terminated from the services on 19-08-2014.
6. That the deponent during conciliation proceeding was ready to join the duty but the management failed to reinstate the deponent back into the services and thus due to adamant attitude of the management conciliation proceedings failed.
7. That the copy of ID card bearing employee code PS26148 is attached here as **Ex. P.W-1/A**. Copy of wage slip for the month of October 2013 is attached here as **Ex.P.W- 1/B**.
8. That the deponent is still unemployed after his illegal termination by the management. The deponent is facing stiff economic crisis.
9. The facts of this case are true and correct to the best of my knowledge.

Deponent

#### VERIFICATION

It is verified on this <sup>29<sup>th</sup> Aug.</sup> ~~5<sup>th</sup> January~~ 2016 at Gurgaon that the contents of my affidavit are true and correct to the best of my knowledge and on the information received and believed to be true. This affidavit has been drafted under my direction and its content has been clearly read out to me and explained in my vernacular language.

Deponent



**RICHA & CO.**

PHASE - I, UDYOG VIHAR, GURGAON HARYANA, INDIA  
Ph: 0124-4804400

**IDENTITY CARD**

Code : PS26148

Name : SANJEEV KUMAR

Name : MR BHIM SINGH

Position : OPERATOR

Department : SEWING (OPERATOR)

Joining : 08-11-2011

C/O. MATADDIN  
KAPASHERA  
NEW DELHI



Signature of Employee

Signature of Issu

239, PHASE - I, UDYOG VIHAR, GURGAON, HARYANA, INDIA.

**RICHA & CO.**

**वेतन पर्ची/PAY SLIP**

कोड/Code PS2614B  
 नाम/Name MR. SANJEEV KUMAR  
 पति/पति का नाम  
 Father's/Husband's Name MR. GURM SINGH  
 पद/Designation OPERATOR  
 श्रेणी/Grade 2001 FOUR

क. रा. बीमा क्रमांक/E.S.I. Ins. No. 6921835224  
 भविष्य निधि खाता क्रमांक/P.F A/C No. 70083  
 कार्य दिवस/Wage days 26 1 5 1 0 7 31  
 / DEPT. - SLWING (OPERATOR)  
 मास/Month October 2013  
 भुगतान का प्रकार/Mode of Payment CHEQUE/1011200213

कुल वेतन/Total Salary	दर/Rate	कमाया वेतन/ Earning	Arrear Rate	Arrear Earning	कटौतियाँ/Deductions	रशि/अंश Deduction	वेतन/Net Pay
मूल वेतन/Basic Pay	5472.00	5472.00			क. रा. बीमा/E.S.I.	114.00	
मकान किराया भत्ता/H.R.A.	278.00	278.00			भविष्य निधि/P.F.	657.00	
यात्रा भत्ता/Conveyance All.	0.00	0.00			स्त्रोत कर/T.D.S.	0.00	
चिकित्सा भत्ता/Medical All.	0.00	0.00			अग्रिम राशि/Advance	0.00	
शिशु शिक्षा भत्ता/C.E. All.	0.00	500.00			अन्य कटौती/Other Ded.	0.00	
अन्य भत्ता/Other Allowance					V P F	0.00	
					P L W F	10.00	
उप योग/Sub Total	5750.00	6250.00				777.00	5473.00
अतिकाल घट/O.T. Hours	15.00	829.33			क. रा. बी./Ded ESI	14.00	815.00
कुल योग/Total	5750.00	7079.33				791.00	6288.00