

**BEFORE THE HON'BLE PREISIDING OFFICER, LABOUR COURT,
GURGAON, HARYANA**

IN THE MATTER OF:-

**Sanjeev Kumar
Village- Rafiyat Gunj,
P.O.-Bilgram,
Distt.-Hardoi, U.P**

..... WORKMAN/PETITIONER

Versus

**M/s. Richa & Co.
Plot No. 239, Phase-I,
Udyog Vihar, Gurgaon
Haryana**

..... MANAGEMENT/RESPONDENT

SUBJECT: STATEMENT OF THE CLAIMS

1. That the workman **Sanjeev Kumar**, S/o- Bhim Singh, Resident of Village- Rafiyat Gunj, P.O.-Bilgram, Distt.-Hardoi, U.P., is employed with **M/s Richa & Co.** as tailor. The workman has been appointed on dated **(08-11-2011)** He has been appointed on monthly salary of INR 5,613/-. He was working in company with full honesty and integrity.
2. That the Management of the company has terminated the workman on **19.08.2014** without citing any reason and prior information and against the norms of Industrial Dispute Act, 1947, which is unlawful, unjustified and illegal. The Management not served any notice before his termination. The deed of the Management was not only illegal but also against the Labour laws and natural justice.
3. That the workman never intended to leave his job and neither made any such mistake, which may be reason of his termination. He was performing his duties with utmost sincerity.
4. That he has been called by personnel department and they have asked him to take his full and final dues without citing any reasons.

Management personnel told him that we do not have work for you and hence you are terminated.

5. That the above mentioned workman has already completed the tenure of 240 days in the said company hence he is eligible for all Labor rights under Industrial Dispute Act, 1947 and other Labor laws.
6. That the management did not pay salary and overtime wages on the time prescribed by law and with intention to criminal misappropriation of the worker's salary and its interest. Management repeatedly called him to factory for his payment but did not pay him and harassed him mentally and physically.
7. That the management has harassed and threatened workman, when he asked for his earned wages.
8. That the workman is still unemployed since he has been terminated from the company by the management.

PRAYER

It is therefore, most respectfully prayed that this Hon'ble Court may kindly be pleased to:-

- 1) Deliver an order/award to reinstate **Sh. Sanjeev Kumar** in his original service along with full back wages and all other service benefits.
- 2) Pass an exemplary order to direct the management to pay Rs. 20,000/- as legal cost and cost for his sufferings and damages.

It is prayed accordingly.

Through

Advocate/Representative


Petitioner

Sanjeev Kumar

Balwant Singh; Production manager

- 17 When he reported next, they said they will issue a new I-Card, [^] he refused
- 27 He insisted to continue his old I-Card but they refused
- 27 Next time I came ~~later~~ to join duty, then they refused to take him