

From,

**Abhay Pratap Singh II
Civil Judge (S.D.),
Moradabad**

To,

**Assistant Registrar (Services),
Hon'ble High Court of Judicature at
Allahabad**

Through:

**District Judge
Moradabad**

Subject: Representation for stay of annual transfer of the applicant due in upcoming annual transfer, 2020

Respected Sir,

Most humbly the applicant begs to submit the following facts for kind consideration of the hon'ble court.

1. That this is my first representation for stay of annual transfer of myself since joining my service.
2. That the applicant was transferred from district Kushinagar at Padrauna to district Moradabad in the year 2017 on the ground of my wife critical illness through representation for premature transfer, which was kindly allowed by the hon'ble court.
3. That the applicant wife is suffering from rare and critical disease called rheumatoid since past four-five years. Rheumatoid is a chronic auto-immune inflammatory disorder affecting many joints, including those in the hands and feet which requires constant medical diagnosis, tests and imaging. This disease may result in low red blood cell count, inflammations around lungs, heart etc and also cause multi organ failure if not properly treated regularly.
4. The drugs (DMARD'S) used in this ailment has severe adverse effect on body which should be monitored regularly with toxicity including gastrontestinal, hematologic, pulmonary and hepatic.
5. That rheumatoid occurs when immune system mistakenly attacks your own body's tissue. It majorily affects the lining of joints, causing painfull swelling that can eventually result in bone erosion and joint deformity and it sometimes be life threating due to multi organ failure.
6. That the treatment of my wife is going on with one of the few DM qualified rheumatologist of the country Dr. (Lt General) Ved Chaturvedi. He is the senior most super specialist in rheumatology at Sir Ganga Ram hospital, Delhi and also under Dr. Sundeep Grover, MD, DM, clinical immunologist & rheumatologist practising at district Meerut.

The drugs (DMARD'S) are not properly responding in my wife case due to severe aggravation of the disease, due to which now the doctor has suggested in her case for drug called Biologic modifiers which requires number of tests and vaccinations to be done before giving the aforesaid drug to the patient.

My wife is currently going under critical treatment and if i have been transfered to any farther place from Delhi and Meerut in the upcoming annual transfer, her health will be hampered badly and also her going on treatment will be affected haphazardly.

7. *That she is the only family member to look after our 7years old daughter in my absence during court's time. Due to her bad health she is not in a position to provide much needed care to our daughter. Our little daughter is wholly dependant on her mother and if her health will be compromised due to my upcoming transfer, my family will not be able to recover from that shock.*

8. *That if i have been transfered in upcoming annual chain to farther place it is almost impossible for us to pursue her treatment from Delhi and Merrut. It is my bounden duty toward's my wife to provide her best treatment available. If the applicant have been transfered to any place far away from Delhi and Merrut it will be impossible for me to provide her the best treatment and care.*

9. *That i am enclosing herewith the papers of medical checkup and treatment of my wife for kind perusal of the hon'ble court.*

So, on the above mentioned grounds and circumstances it is most humbly requested that the hon'ble court may kindly be moved to consider applicant request sympathetically and stay the applicant annual transfer in upcoming annual tranfer of 2020.

With profound regards.

Your's faithfully

Encl: As above
Date: 25.11.2019

(Abhay Pratap Singh II)
Civil Judge (S.D.),
Moradabad
I.D. NO- 1815

Office, District Judge, Moradabad

Letter No. / 2019 (Administrative) Moradabad, Dated: .11.2019

Duly forwarded to,

Assistant Registrar (Services)
Hon'ble High Court, Allahabad

District Judge,
Moradabad

PROFORMA OF TRANSFER/STAY APPLICATION-2020

1. NAME OF THE JUDGESHIP- MORADABAD
2. FULL NAME OF THE OFFICER- ABHAY PRATAP SINGH II
3. NAME & ID OF SPOUSE-
(In case of judicial officer) -NA-
4. HOME TOWN OF OFFICER- GORAKHPUR
5. AT PRESENT POSTED AS- CIVIL JUDGE(S.D.)
6. PLACES OF POSTING IN THE JUDGESHIP- 11.05.2017
7. Places of posting during last 6 years with date-
- a. from 19.12.09 to 15.04.13 at Allahabad
 - b. from 18.04.13 to 07.05.16 at Mathura
 - c. from 10.05.16 to 08.05.17 at Kushinagar at Padrauna
 - d. from 11.05 17 to till now at Moradabad
8. NATURE OF TRANSFER-
- (A) Due for transfer on expiry of 3 years tenure at headquarter or 2 years tenure in an outlying court or at Sonbhadra by 31st May of the year. -
- (B) Stay of transfer beyond normal tenure of 3 years in District or 2 years tenure in an outlying court or Sonbhadra. YES
- (C) Premature transfer before completion of normal of 3 years in District or 2 years tenure in an outlying court or Sonbhadra. -
9. CHOICE OF STATIONS-
- a. Meerut
 - b. Gautambudh Nagar
 - c. Ghaziabaad
 - d. Muzaffarnagar
 - e. Bulandshahar
 - f. Saharanpur

10. Grounds in support of request-

That the treatment of my wife is going on with one of the few DM qualified rheumatologist of the country Dr. (Lt General) Ved Chaturvedi. He is the senior most super specialist in rheumatology at Sir Ganga Ram hospital, Delhi and also under Dr. Sundeep Grover, MD, DM, clinical immunologist & rheumatologist practising at district Merrut. The drugs (DMARD'S) are not properly responding in my wife case due to severe aggravation of the disease, due to which now the doctor has suggested in her case for drug called Biologic modifiers which requires number of tests and vaccinations to be done before giving the aforesaid drug to the patient. My wife is currently going under critical

treatment and if i have been transfered in the upcoming annual transfer to any farther place from Delhi and Meerut, her health will be hampered badly and also her going on treatment will be affected haphazardly.

11.Places in U.P. where near & blood relations reside and carry on their business.

(a) Gorakhpur

(b)Basti

(c) Ghazipur

13.Places where received education

(a)Gorakhpur

(b)Lucknow

14.Number & age of children alongwith places where they are receiving education.

I have a seven and a half year old daughter and she study in class Ist at Moradabad.

13.REMARKS, if any

Nothing

DECLARATION

I ABHAY PRATAP SINGH II,read and understood the contents of appendix “A” to this application and do hereby declare that the facts mentioned above by me are correct, true and in confirmity with the guidelines laid down by the High Court.

DATE-25.11.19

SIGNATURE OF THE OFFICER