



IN THE KERALA ADMINISTRATIVE TRIBUNAL AT
THIRUVANANTHAPURAM
(ADDITIONAL BENCH, ERNAKULAM)

Present:

The Hon'ble Justice P V Asha, Judicial Member

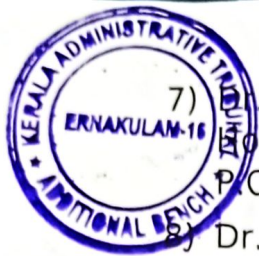
Dated this the 9th of September 2024

OA[EKM]-993/2023

Applicant(s):

- 1) Dr. Mohammed Ashraf, Aged 49 years, S/o A.M. Ibrahim, AIMO, ESI Hospital, Ernakulam - 18, Residing at NAS Villa, Peechingaparambu Road, Koonamthai, Edappally, Ernakulam-682024, Mob No. 9809882398.,Kerala.
- 2) Dr. Sreechith P. Karippuram, Aged 34 years, S/o M.K. Ponnappan, AIMO, ESI Hospital, Ernakulam - 18, Residing at Karippuram (H), Villoonni P.O., Arpookara, Kottayam - 686008. Mob No : 9562707755.,,Kerala
- 3) Dr. Atheetha R., Aged 34 years, D/o T.C. Ramyakumar, AIMO, ESI Hospital, Ernakulam -18, Residing at Thooyath (H), Keenjathukara, Edathala P.O., Aluva, Ernakulam - 683561. Mob No: 9809823800.,,,Kerala
- 4) Dr. Sheena T.A., Aged 38 years, D/o T.M. Abdul Salam, AIMO, ESI Hospital, Ernakulam - 18, Residing at Oleya (H), Chullickal, Kochi - 682005. Mob No. 9496335219.,,,Kerala
- 5) Dr.Vibi Varghese, Aged 34 years, D/o P.D. Varghese, AIMO, ESI Hospital, Ernakulam -18, Residing at Pattathil (H), KRA-137, Vidya Nagar Road, Kadavanthra, Ernakulam- 682020, Mob No. 9400629433.,,,Kerala
- 6) Dr. Balu K.G., Aged 33 years, S/o K.G. Gopinath, AIMO, ESI Hospital, Ernakulam - 18. Residing at Kadavungassery (H), Poosarippady, North Paravur, Ernakulam - 683513, Mob No.9633907320.,,,Kerala





- 7) Dr. Rojo Sebastian, Aged 37 years, S/o Sebastian, AIMO, ESI Hospital, Ernakulam -18, Residing at Alencheril (H), Kothanalloor P.O., Kottayam - 686632, Mob No : 9809539927.....Kerala
- 8) Dr. Arun P.R., Aged 43 years, S/o P.V. Rajendra Prasad, AIMO, ESI Hospital, Ernakulam -18, Residing at Thindamkeril, Thannermukkom P.O., Cherthala, Alappuzha - 688527. Mob No. 9497731834.....Kerala
- 9) Dr. Anish P. Jose, Aged 43 years, S/o P.J. Jose, AIMO, ESI Hospital, Ernakulam - 18, Residing at House No.3502/A, Thykoodam, Vytilla, Ernakulam - 682019. Mob No : 9809029744.Kerala

By Advs. KALEESWARAM RAJ & THULASI K RAJ

Respondent(s):

- 1) State of Kerala, represented by Chief Secretary to the Government of Kerala, Secretariat, Thiruvananthapuram - 695001.,, Kerala
- 2) Secretary to Government, Labour and Skills Department, Mahathma Gandhi Road, Near Central Stadium, Junction, Statue, Palayam, Thiruvananthapuram - 695001.,, Kerala
- 3) The Director of Insurance Medical Services, Directorate of Insurance Medical Services, Panchdeep Bhavan, Housing Board, Thycaud, Thiruvananthapuram - 695014.,, Kerala
- 4) Secretary, Department of Health and Family Welfare, Secretariat, Thiruvananthapuram - 695001. ,, Kerala
- 5) The Superintendent, ESI Hospital, Near North Railway Station, Ernakulam - 682012. ,, Kerala

SRI.JIBU T S, GOVERNMENT PLEADER FOR RESPONDENTS

This Original Application having been finally heard on 9th of September 2024, the Tribunal on the same day passed the following:

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Justice P.V.Asha, Judicial Member

O.A.(Ekm) No.993 of 2023

Dated this the 9th day of September, 2024

ORDER

Applicants, who are Assistant Insurance Medical Officers working in ESI Hospital, Ernakulam, are aggrieved by Annexures A3 and A9 orders by which their request for rationalizing the duty hours and to introduce a third shift is rejected.

2. Applicants' case is that, as per Annexure A2 order Government had prescribed the duty hours of various categories of employees in the Insurance Medical Services including that of Medical Officers. The duty hours of Medical Officers are : O.P from 8 a.m to 1 p.m and shift duty - 1st shift from 8 a.m. to 8 p.m. and 2nd shift from 8 p.m. to 8 a.m. In implementation of Annexure A2 order, the Superintendent of ESI Hospital Ernakulam - the 5th respondent issued Annexure A3 circular reiterating the duty hours provided in Annexure A2. It was also ordered that those who are attending the



night shift (8 p.m to 8 a.m) would be given duty off on the day on completion of the night duty. But the day on which they attend the 2nd shift (night duty), they have to attend duty from 8 a.m to 1 p.m. In other words their duty time would be from 08.a.m to 1 p.m and from 8 p.m to 8 a.m. Therefore, they would be compelled to serve 17 hours within 24 hours. In the case of the Medical Officers under the Health Services Department, on a complaint by the Association of Kerala Government Medical Officers, Human Rights Commission had as per Annexure A4 order dated 21.08.2015 directed the 1st respondent to issue orders clarifying that there shall not be a situation when the Medical Officers are compelled to work more than 12 hours within 24 hours. Thereafter the Government issued Annexure A5 order dated 21.01.2016, fixing the duty hours of the Medical Officers in the Health Services Department, specifically directing that the Medical Officers would not be insisted to take more than 12 hours of duty within a duty day of 24



hours. The Superintendents/Medical Officers in charge are directed to ensure that the duty arrangements are not adversely affecting the proper functioning of the hospital and the hospital services such as OP, Surgeries, Labour Room duty etc. Applicants allege discrimination towards the Medical Officers in Insurance Medical Services.

3. The applicants further contend that the Doctors who are living far from the hospital staying for their next turn duty, are looking after the patients and casualty patients. At the same time in the hospitals under the Health Services Department ward duty is attended by separate doctors which includes casualty work by casualty Medical Officers in three shift turns while casualty duty, ward duty and ICU duties are taken by a single Medical Officer in IMS and that too in two shifts turn. On the basis of information obtained under the Right to Information Act in Annexure A6, applicants have stated that the doctors who are taking day duty are



provided with compensatory off for the excess hours they are working. At the same time there is no compensatory off for the Medical Officers like the applicants for the second turn duty. Pointing out all their grievances they submitted Annexure A7 representation before respondents 2 and 3. The Government thereafter heard the applicants based on the direction in Annexure A8 order dated 26.4.2023 in O.A.(Ekm)No.640 of 2023. Thereafter the 2nd respondent rejected their request as per Annexure A9 order. The 2nd respondent stated that a Medical Officer gets turn duty i.e a combination of first and second shift only two or three times in a month at fixed intervals; the Medical Officers who are taking night duty are attending the night duty after 7 hours of rest between 1 p.m. to 8 p.m; they can also take post night off for 24 hours after the said duty; the Medical Officers are required to work only for 17 hours within 48 hours and that is not continuous; there is no Circular or Government orders granting Pre night off to the Medical



Officers; in case the Doctors in ESI Hospitals are given pre night off and post night off, it will result in shortage of doctors; the hospitals under the Department operate in two shifts, due to lack of cadre system in the Department and shortage of Medical Officers; in the event of granting pre night off to the Medical Officers who are taking second shift duty, it will seriously affect the functioning of the hospital; it would be necessary to increase the strength of staff which would create additional financial commitment for the Government and would set a wrong precedent; ever since the commencement of the Department of "Medical Services the Medical Officers have been performing the OP duty during 8 a.m. to 1¹ p.m. in continuation of their second shift night duty from 8 p.m. to 8 a.m; in view of the emergent nature of duties it is required for the Medical Officers to perform duty as directed by the Superintendent. Producing Annexure A10 list of doctors applicants claimed that the Assistant Insurance Medical



Officers of the Department are taking 5 to 7 shifts including Sundays in a month. The applicants have produced Annexures A11, A12 and A13 in support of the contention, producing the list of Doctors and the duties assigned to them and they have alleged that the second applicant is taking 6 first shifts including Sunday and in order to work in OP shift he has to work for 17 hours out of 24 hours of work. The applicants alleged that the stand of the respondents in Annexure A9 order is unreasonable and shortage of Doctors cannot be a reason for denying pre night or post night off to the Medical Officers as it is the duty of the Government to create sufficient number of posts in order to meet the needs of the patients. It is also their contention that the delay in the introduction of Cadre System in the Insurance Medical Services despite a recommendation made by the 11th Pay Revision Commission is arbitrary and the said inaction causes inconvenience and hardship to the Medical Officers like the applicants. It is their



further contention that the insured person strength under the SRO Ernakulam as on 31.1.2021 is 4,98,956. Therefore, it cannot be said that there would be much financial commitment if the Cadre System is implemented and working hours are reduced. According to them they are also to be treated on par with the Doctors working under the Health Department without subjecting them to discrimination. The applicants are seeking for reduction of their working hours and to fix it to 8 hours or treat them on par with the Medical Officers in the Health Services Department by rationalizing the duty hours.

4. Respondents 2 and 3 had filed reply statements. According to the 2nd respondent the duties of Gazetted Officers in IMS and that of those in the Health Services Department are not similar and there cannot be any parity in the conditions of service with those in Health Services Department. The Medical Officers in IMS are allowed turn duty when they will be



on duty from 8 p.m. to 8 a.m. and 8 a.m. to 1 p.m. In such circumstances they will be given post night off on the next day and therefore, it cannot be said that they are compelled to work for 17 hours within 48 hours. When compared to the workload of Medical Officers in Health Services Department, the workload of Medical Officers in IMS Department is considerably lower. The Medical Officers work for 17 hours in 48 hours and post night off is allowed after 17 hours duty. Annexure A5 order of the Health Services Department cannot be implemented in IMS since the functioning, sanctioned staff pattern, workload etc., at the Hospitals under IMS are entirely different. The turn duty of Doctors in addition to the normal duty time of 8 a.m. to 1 p.m. as OP time is being followed from the date of inception of the Department and that is being followed in all other ESI Hospitals in the State. The Department has not issued any orders or circulars stating that those taking night duty can avail pre night off in addition to the



customary duty off/post night off. The existing 12 hours duty pattern without the pre night off was followed by all the Doctors of the ESI Hospitals in Kerala till August 2022. The maximum workload in the Hospital is between 8 a.m. and 1 p.m. Pre night and post night offs create a deficiency of two to three doctors in a day leading to an artificial scarcity of Doctors and it would affect the smooth functioning of the Hospital. There is only 19 sanctioned posts of Doctors, including Superintendent and Dental Surgeon in the hospital at Ernakulam. The Doctors who attend to night duty avail weekly off on week days. Specialist Doctors attend only day duty. They are exempted from night duty since they have to conduct OP on all days. There are 13 Doctors on turn duty and their 12 hour turn is only once in 7 days or once per week. The minimum number of Doctors for turn duty is fixed as 8 for ESI Hospital, Ernakulam as per Annexure A2 order dated 2.7.2015. It would be necessary to send Doctors on deputation/special duty to



other institutions where there is scarcity of Doctors. A Doctor who is attending OP duty for 5 hours gets a gap of 7 hours before the night duty starts at 8 p.m., which would extend till 8 a.m. on the next day. Therefore, the 17 hours duty is not continuous within 24 hours. On the other hand, they are able to avail duty off or post night off as are availed as at present. The Doctors are taking only 8 hours duty instead of taking 12 hours day duty, till Annexure A9 order was issued. The Doctors have to take 12 hours duty only once in a week. The ESI Hospital, Peroorkada is following the 12 hours turn duty schedule without pre night off, as per Annexure A2 order. The Doctors of other ESI Hospitals are following 24 hours duty schedule and are availing only post night off. The applicants are expected to work in tune with the directions issued by the Medical Superintendent, who is having the discretionary powers to make duty arrangements. The introduction of Cadre System is purely a policy matter and a policy decision is to be



taken by the Government, in which the applicant did not have any say.

5. The 3rd respondent filed a reply statement in more or less similar lines. It is stated that the Doctors in the ESI Hospitals do not attend to delivery cases and the same is handled by Gynecologists of the concerned Hospitals. The workload of the Doctors in IMS is considerably less than that of those in the DHS. There is no administrative duty for them except for the Superintendents. The Doctors in IMS are expected to reside within 8 kms. radius of the Hospital. The travel time to their residence would be less than half an hour and in case there is a leisure period of 7 hours from 1 p.m. to 8 p.m. it is open to them to go home before attending the turn duty/second shift. Therefore, Officers like applicants are compelled to work continuously for long hours. As the applicants are not working for a continuous stretch of 17 hours, the judgment in **Seenath Beevi's** case does not apply to them.



6. The applicant has filed a rejoinder to the reply statement filed by the 2nd respondent and produced Annexures A19 and A20 in order to assert their claim that they were also subject to the very same interview by the PSC before their advice and appointment. According to them the gap between 1 p.m. and 8 p.m. cannot be considered as rest period as it involves the travelling time and other time for day to day activities. It is their further contention that more duration of work will affect the quality of patient care. As the Doctors are dealing with human life, any error in judgment in disease treatment, identification may adversely affect the life of the patients. According to them the duty list would indicate that Doctors like applicants have to attend to 5 duties per month in ESI Hospital, Ernakulam. According to them the workload in ESI Hospital, Ernakulam and those in IMS Department is considerably more.

7. Heard Sri.Kaleeswaram Raj, learned counsel for the applicant and Sri. Jibu T.S, the learned



Government Pleader.

8. The learned Counsel for the applicants, relying on various judgments of the Hon'ble Supreme Court in **Consumer Education and Research Centre and Others v. Union of India and Others, (1995) 3 SCC 42, State of Punjab and Others v. Mohinder Singh Chawla, AIR 1997 SC 1225, Seenath Beevi v. State of Kerala, 2003 (3) KLT 788** and the order passed by this Tribunal in O.A.No.204 of 2023 argued that compelling the applicants to work for 17 hours a day is arbitrary and impermissible.

9. On the other hand, according to the respondents those cases would not apply to the Medical Officers working in ESI Hospitals.

10. The duty list produced by the applicants in Annexures A11 to A13 would show that the Medical Officers of the ESI Hospital, Ernakulam are compelled to work more than 12 hours per day. They are also taking 5 to 7 shifts in a month. When one has to take OP shift



he/she will have to work for 17 hours. The issue as to the violation of human rights on account of the prolonged working hours was elaborately considered by the Hon'ble High Court in Seenath Beevi's case. That was followed in Sethulakshmi's case by this Tribunal with reference to the constitutional provisions, the provisions under Universal Declaration of Human Rights etc., and it was found that to compel one to work continuously for 17 hours would amount to violation of human rights. In the order dated 30th May, 2024 following the judgment in Seenath Beevi's case this Tribunal had held as follows:-

"9. As rightly contended by Smt. Aruna, under Article 24 of the Universal Declaration of Human Rights (UDHR) [Annexure A7], everyone has the right to rest and leisure, including reasonable limitation of working hours and periodical holidays with pay, while Article 23 provides that everyone has the right to choice of employment as well as the right to just and favourable conditions of work. Under Article 2 of the Hours of Work (Industry) Convention, 1919, working hours of persons employed in any public or private industrial undertaking or in any branch thereof, shall not exceed 8 in a day and 48 in the week. It further provides that where persons are employed in shifts it shall be permissible to employ persons in excess of 8 hours in any one day and 48 hours in any one week, if the



average number of hours over a period of 3 weeks or less does not exceed 8 per day and 48 per week. Article 4 of the Holidays with Pay Convention, 1970 provides that persons whose length of service in any year is less than that required, he shall be entitled to a holiday, proportionate to his length of service during a year. Article 6 of the Weekly Rest (Commerce and Offices) Convention, 1957 provides that all persons to whom the convention applies shall be entitled to an uninterrupted weekly rest period for not less than 24 hours in the course of 7 days. Under Articles 1 to 6 of the Workers with Family Responsibilities Convention, 1981, all measures compatible with national conditions and possibilities shall be taken to enable workers with family responsibilities shall be taken to take account of the needs of the workers with family responsibilities in community planning and to enable them to exercise their right to free choice of employment and to take account of their needs in terms and conditions of employment and in social security. Hours of Work (Commerce and Offices) Convention, 1930, under Article 3 thereof, provides that the hours of work of persons shall not exceed 48 hours in the week and 8 hours in the day. As per the Forty-Hour Week Convention, 1935, the principle of forty hour week to classes of employment shall be implemented in accordance with the provisions to be prescribed by separate Conventions.

10. After considering the various provisions contained in the aforesaid and other international Conventions, Universal Declaration of Human Rights, the provisions in the Constitution of India, etc., the Hon'ble High Court of Kerala, rendered the judgment in ***Seenath Beevi v. State of Kerala: 2003(3) KLT 788***, directing the Health Services Department to fix the working hours of Nurses at 8 hours a day and not exceeding 48 hours a week. It was a case where a Head



Nurse working in the Health Service Department approached the Hon'ble High Court with the grievance that she was compelled to work for 14 hours at a stretch and 6 days consecutively. The Hon'ble High Court, after analysis of various provisions contained in the Universal Declaration of Human Rights, 1948, international covenants, labour legislations, etc. held that rationalization of the working hours so as to make it humane and to bring it within just and reasonable limits is not only the need of the nursing staff but also the patients who are at the receiving end and that in a broader sense it is the concern of the society at large. It was further observed that though the power to prescribe the hours of employment is the prerogative of the employer there shall not be any unfettered power regardless of the problems of the employees. The State Government has to regulate the working hours in tune with the constitutional provisions and also in tune with the relevant articles under the Universal Declaration of Human Rights. Relying on the judgment in ***Samatha v. State of Andhra Pradesh & others [(1997) 8 SCC 191]***, ***Consumer Education and Research Centre & others v. Union of India [(1995) 3 SCC 42]***, etc, it was held that the "right to life" is a fundamental right as well as a human right and therefore the State has the duty to see that the right to live with human dignity enshrined in Article 21 of the Constitution of India is ensured to its citizens and it is duty bound to ensure just and humane conditions of work in order to enable a person to live human dignity. It was further held that, it is the constitutional obligation of the State to rationalize the working hours to make it just, reasonable and humane. It was further held that the rationalization of working hours has to be done taking into account the basic realities and other relevant aspects prevailing in each establishment. In the light of Constitutional mandate under Article 21; no employer including the Government has got the



unfettered freedom to prescribe conditions of work imposing duty hours exceeding certain limits. Referring to the provisions contained in various legislations and also the District Office Manual, Kerala Secretariat Manual, the Manual of Office Procedure, etc., the Hon'ble High Court observed that though there should not be absolute parity in the matter of working hours between different categories and classes of employees, the difference in the working hours from 6 hours to 14 hours is too wide as to cause agony and hardship to one section of the employees of the Government. Relying on the judgment of the Apex Court in **Municipal Council, Ratlam v. Vardhichand (AIR 1980 SC 1622)** etc., the Hon'ble High Court held that financial stringency pleaded by the State is no good ground to avoid implementation of shift duty system. Finally it was declared that the hours of employment thrust on the petitioner and similarly situated persons is an infringement of the fundamental right to life guaranteed under Article 21 of the Constitution of India. It was also declared that compelling the petitioner to be on duty continuously for 14 hours a day and for 6 days consecutively in a week is illegal and unconstitutional. The respondents were directed to introduce 3 shift duty system in the Government Hospital, Thirloorangadi, immediately and redress forthwith the grievance of the petitioner."

Seenath Beevi's case was with respect to rationalization of duty hours of Nurses in the Government Hospitals, whereas Sethulakshmi's case is with reference to Ayahs in Social Justice Department.

11. In the present case the minimum working



hours of an Assistant Insurance Medical Officer in ESI Hospitals, especially in the Hospital at Ernakulam where the applicants are working, is 12 hours. Apart from that, they will have to work 17 hours a day. The contention of the respondents in the reply statement is that the 17 hours duty is not continuous on the ground that they will get a leisure for a period of 7 hours from 1 p.m. to 8 p.m. The respondents attempt to justify the allocation of duty hours stating that it has been the practice in the Department ever since its inception. If a practice is found to be in violation of the fundamental and constitutional rights and contrary to the constitutional obligation of the State, there is no justification in continuing such practice. There cannot be any practice contrary to law especially when it is made clear by way of the judgments/orders aforesaid.

12. The respondents have also stated that the duty hours are fixed in such a manner on account of scarcity of Doctors. That also cannot be a justifiable



reason to compel the Medical Officers to work for such long hours and deny parity with the officers under the Health Services Department in the matter of duty hours. As contended by the learned counsel for the applicants the prolonged duty hours of the Medical Officers is likely to affect the interest of the patients also. Right to health is a fundamental right guaranteed under Article 21 of the Constitution of India. The respondents are duty bound to protect the health of everyone including the patients as well as Doctors. The patients would be able to avail the qualitative service from the Medical Officers if they are also given sufficient leisure time for which rationalization of duty hours is required. It is for the Government to see that appropriate steps are taken to ensure that the welfare of the people are promoted. In order to protect and promote such welfare the State has to ensure that the patients are getting quality service in the hospitals for which the State has to ensure just and humane working condition for the Medical Officers who



have to attend them, as envisaged under Articles 38 and 42 of the Constitution of India, apart from the obligations of the Government by virtue of various provisions contained in Articles 23 and 24 of the Universal Declaration of Human Rights coupled with Article 21 of the Constitution of India.

13. Therefore, there shall be a direction to respondents 2 to 5 to see that the duty hours of the Medical Officers who are working in the ESI Hospital, Ernakulam are fixed in such a manner that they are not compelled to work more than 12 hours of duty within a duty day of 24 hours, as ordered in Annexure A5 order, and to issue such orders within a period of three months from the date of receipt of a copy of this order.

The Original Application is accordingly disposed of.

Sd/- Justice P V Asha (Judicial Member)

ahg.

APPENDIX



OA[EKM]-993/2023

APPLICANT'S ANNEXURES:

- Annexure A1- True copy of the relevant pages of the handbook issued by the Directorate of Insurance Medical Services.
- Annexure A2- True copy of the G.O(Rt)No.861/2015/Labour dated 02.07.2015 issued by 2nd respondent.
- Annexure A3- True copy of the circular No.E1-654/2023 dated 22.03.2023 issued by the 5th respondent.
- Annexure A4- True copy of the Proceedings of the Kerala Human Rights Commission, Thiruvananthapuram in HRMP No.4694/2015 dated 21.08.2015.
- Annexure A5- True copy of the G.O(MS)No.12/2016/H&FWD dated 21.01.2016 issued by the Health and Family Department.
- Annexure A6- True copy of the RTI reply from DHS dated 29.05.2009 vide No.M4-31748/09/DHS .
- Annexure A7- True copy of the representation submitted by the applicants before the Respondents 2 and 3 dated 03.04.2023.
- Annexure A8- True copy of the order dated 26.04.2023 in OA(EKM)640/2023 of this Honourable Tribunal.



- Annexure A9- True copy of the G.O(MS)No.667/2023/LBR dated 02.06.2023 issued by the 1st respondent.
- Annexure A10- True copy of the duty list of doctors for the month of March 2023.
- Annexure A11- True copy of the duty list of doctors for the month of April 2023.
- Annexure A12- True copy of the duty list of doctors for the month of May 2023.
- Annexure A13- True copy of the duty list of doctors for the month of June 2023.
- Annexure A14- True copy of the relevant page notification G.O(P)No.98/2013/LBR dated 23.08.2013 issued by Additional Chief Secretary to Government .
- Annexure A15- True copy of the relevant pages report of the XI Pay Revision Commission dated 08.2021.
- Annexure A16- True copy of the judgment Seenath Beevi v.State of Kerala 2003 3 KLT 788(2004) 4 LCJ(supp)NOC95 High Court of Kerala.
- Annexure A17- True copy of order No.E1-2704/2023/DGME dated 07.07.2023 issued by the 3rd respondent.
- Annexure A18- True copy of the order No.E1-4448/2023/DIMS dated 07.12.2023 issued by the 3rd respondent.

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Annexure A19- True copies of call letter for interview for selection to the post of Assistant Insurance Medical Officer(Insurance Medical Services) and Assistant Surgeon/Causality Medical Officer (Health Services) dated 06.02.2017 issued by Secretary, PSC to one Ms.Atheetha R.

Annexure A20- True copy of call letter for interview dated 20.02.2017 for selection to the post of Assistant Insurance Medical Officer(Insurance Medical Services) and Assistant Surgeon/Causality Medical Officer (Health Services) issued by Secretary, PSC to one Mr Rojo Sebastian.

certified that this is a true and accurate copy of the document/order as in the case file (CAIRMA/ICP/MAIPT No. CAIRMA/993.20.....2...3.....) and faithfully copied with no modification

[Signature]
Officer in charge of Copying Branch