



ईपीएफओ मुख्य कार्यालय EPFO HEAD OFFICE
भविष्य निधि संगठन, श्रम एवं रोजगार मंत्रालय, भारत सरकार
EMPLOYEES' PROVIDENT FUND ORGANISATION
MINISTRY OF LABOUR AND EMPLOYMENT, GOVERNMENT OF INDIA
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No: LitigationManagement/E58312/113883

Date:

20 NOV 2025

To,

All Addl. CPFCs (Hqrs.)
 Addl. CPFCs (Zones)
 Addl. CPFC (HRM) / Addl. CPFC (ASD)

Subject: Strengthening Litigation Management – Mandatory Compliance in Handling of Court Cases

Madam/Sir,

The *Legal Framework Document* of EPFO mandates meticulous and timely handling of court cases to safeguard the Organisation's statutory and financial interests. However, persistent lapses have been observed in the handling of legal cases by Regional Offices and in the performance of panel advocates before judicial forums.

2. Key Issues Observed:

- a. Instances where EPFO remained unrepresented during hearings due to non-appearance of panel advocates.
- b. Delays in preparation of para-wise comments, vetting of drafts, and supply of documents by Regional Offices.
- c. Failures in filing appeals/replies/written statements within prescribed limitation.
- d. Postponements, dismissals, or *ex-parte* orders arising from such lapses, exposing the Organisation to adverse directions, cost impositions, and reputational harm.
- e. Non-updation of case details and next-hearing dates on the LIMBS portal.
- f. Delayed Comply-vs-Appeal decisions and failure to seek stay in time, leading to contempt or other adverse consequences.
- g. Non-adherence to IBC timeline in filing of claims or filing of appeal before the NCLT/NCLAT.

3. Mandatory Measures:

a. Timely Preparation & Filing:

Regional Offices shall ensure para-wise comments, vetted drafts, and complete briefs are prepared and provided to panel advocates in time to adhere to time limitation and directions of the concerned forum. Panel advocates shall file replies, statements, appeals and other pleadings within limitation and strictly as per court/authority directions.

b. Counter Affidavit / Reply Filing (Compulsory):

The counter affidavit/reply in court cases must be filed within 15 days from service of notice/petition or within the time stipulated by the concerned court/authority, whichever is earlier, without fail.

c. Compulsory Attendance:

Panel advocates must attend all hearings. Where appearance is genuinely not possible, prior written intimation to the concerned Regional Office is mandatory and substitution shall be arranged so that EPFO remains represented at all times.

d. Performance Monitoring at Regional Level:

Regional Offices shall maintain case-wise records of delayed preparation, non-appearance, delayed filing, or breach of professional duties by advocates. Persistent defaults shall invite immediate corrective action.

e. Comply-vs-Appeal & Stay Protocol and Post-Order Review:

For every order, the Regional Office shall promptly assess whether to comply or prefer an appeal. Where appeal is preferred, the appeal along with a stay/interim application shall be filed within the limitation prescribed by the concerned court/tribunal or statute, computing limitation as per applicable rules (including certified-copy time, where relevant). The decision (comply/appeal), the limitation cut-off date, and task ownership shall be recorded in LIMBS. All matters in which an order has been passed, and all contempt cases, shall be placed for immediate review and kept under regular monitoring on LIMBS until disposal/compliance. Zonal Offices shall regularly review the LIMBS dashboard for all post-order and contempt matters and enforce corrective measures as required.

f. Adherence to LFD Timelines:

All officers shall strictly adhere to the timelines and processes prescribed in EPFO's Legal Framework Document (LFD) for litigation handling—including diarisation, approvals, filings, LIMBS updation, and periodic reviews—in addition to the limitation periods prescribed by the concerned courts/tribunals or statutes.

4. LIMBS – Mandatory Updates:

All cases shall be entered and maintained on the LIMBS portal. Case details, pleadings/orders, and the next hearing date shall be updated on priority after each hearing or order. It shall be ensured that by the end of November 2025 every case gets updated. Zonal and Regional Offices shall use LIMBS dashboards for ongoing monitoring and rectification.

5. Zonal Oversight:

Zonal Offices shall regularly and critically review litigation management to identify systemic issues, repeated defaults, and delays in compliance with court orders, and shall ensure corrective measures.

The Addl. CPFC (Zone) shall be personally responsible for monitoring litigation within the Zone, ensuring that Regional Offices prepare para-wise comments and documents in time, panel advocates file and attend hearings without delay, that court orders are complied with

/appealed against (as the case may be) promptly , and that both Regional Offices and advocates are held accountable for deficiencies. Furthermore, all Addl. CPFCs should appoint an officer of the rank of RPFC-I in the Zonal Office to oversee all litigations in the Zone, who will be held accountable, along with the concerned officers at the Regional Offices, for any delays or omissions as per this Circular.

Any case of delay or contempt arising from failure of the Zonal Office to adequately monitor litigation as per these instructions will be viewed adversely and shall impact the Annual Performance Appraisal (APAR) of the concerned Officers, including the ACC-H.Qs./Addl. CPFCs (Zone)/ and the Officers-in-Charge at the Regional Office.

(This issues with the approval of CPFC)

Yours sincerely,


(Gautam Dixit) 20.11.25

**Addl. Central P.F. Commissioner (Head Quarters)
Legal, Head Office**

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1. PS to CPFC for information.
2. PS to FA&CAO for information.
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4. Web-admin for uploading on EPFO website.
5. Director(OL),HO – for Hindi Version.


(Kunal Thakur) 19.11.2025

**Regional P.F. Commissioner - I
Legal, Head Office**