

762

3rd Reminder

Civil Courts, Dabwali

In the Court of Shri Pardeep Kumar
Civil Judge (Junior Division)

CNR NO. HRSIA0-000238-2017
Case No. 84/16.02.17
CIS No. 186/17
Next Date: 14-11-2018

Surinder Kumar
Vs.
Rohit Kumar etc.

To,

The Manager/Editor
Dainik Bhaskar, Hindi News Paper,
Hissar

(Publication against Def. No. 2, 7 to 11, 13, 17 to 21, 23 to 25, 27, 30, 31, 35 to 43, 45 to 50, 54 to 57, 61, 64, 67)

In above titled case, civil case a publication Notice was issued to you vide Dispatch No. 1238 dt. 15.12.17. But copy of publication has not been recieved yet. You are directed to file the same on date fixed. Respondent(s) could not be served through ordinary process. It is ordered that defendant should appear in person or through counsel on **14-11-2018 at 10:00 a.m.**

Deposited No. 417 dt. 27-11-17

Rs. 4000+ MO. Fee

Dated, this day of 21-09-18
(Seal of the court)

(Pardeep Kumar)
Civil Judge (Jr. Divn.)
Dabwali



79
Sub Copy of plaint

In the court of Additional Civil Judge (Sr.Divn.)

Dabwali .

Surinder Kumar age 38 years son of Ramji Dass son of Hans Raj
resident of Mandi Dabwali Tehsil Dabwali District Sirsa.

...Plaintiff

Versus

1. Rohit Kumar son of Ashok Kumar son of Narata Ram resident of
near Bathinda Chowk Opp. Raju Vashno Dhaba, Mandi Dabwali
District Sirsa
2. Shekhar Bansal son of Bharat Bhushan son of Suraj Bhan R/o
Dabwali Tehsil Dabwali Distt.Sirsa
3. Jagan Nath son of Bishna Ram son of Sukh Ram R/o Anaj Mandi,
Mandi Dabwali Distt.Sirsa.,
4. Sunil Kumar son of Radhey Sham son of Bhim Sain R/o village
Sukhera Khera Tehsil Dabwali District Sirsa,
5. Rakesh Kumar son of Atam Parkash son of Ram Kishan R/o Mandi
Dabwali Tehsil Dabwali Distt.Sirsa
6. Sukhdev Singh son of Niranjan Singh son of Shingara Singh
resident of Shiv Nagar Mandi Dabwali District Sirsa.
7. Sunita wife of Ashok Kumar son of Lal Chand,
8. Shanti Devi wife of Ram Lal son of Jodha Ram,

9. Munni wife of Kamal Kishore son of Ramkaran,
10. Ram Kumar son of Nand Lal son of Jumma Ram resident of Mandi
Dabwali District Sirsa
11. Kuldep Kumar son of Jugal Kishore son of Sahaj Ram R/o Rajiv
Nagar Kothi no.94 Mandi Dabwali Distt.Sirsa
12. Harcharan Singh son of Ranbir Singh son of Mangat Singh R/o
Rajiv Nagar Mandi Dabwali Distt.Sirsa
13. Pawan Kuamr son of Hans Raj son of Tejju Ram R/o Mandi
Dabwali District Sirsa
14. Vinod Kumar son of jagan Nath son of Bishna Ram,
15. Dayawanti wife of Banarasi Dass son of Tulsi,
16. Naresh Kumar son of Laxman DAss son of Chet Ram,
17. Hem Raj son of Bishna Ram son of Sukhram,
18. Savitri wife of Laxman Dass son of Chet Ram,
19. Raj Rani wife of Jagan Nath son of Bishna Ram, resident of Anaj
Mandi Dabwali Tehsil Dabwali District Sirsa.
20. Chiman Lal,
21. Mahinder Singh sons of Rameshwar Dass son of Moola Ram R/o
Dabwali Distt.Sirsa,
22. Baljit Singh son of Diwan Singh son of Gopi Ram,

23. Raj Rani wife of Baljeet Singh son of Diwan Singh R/o Sirsa Road,
Tarsem Petrol Pump ke saath wali Gali, Mandi Dabwali Distt. Sirsa
24. Satwinder Kaur wife of Hardeep Singh son of Harbhajan Singh,
25. Raj Rani wife of Harbhajan Singh son of Harbans Singh R/o Opp.
Mehta Dharamshallan colony Road Dabwali Distt. Sirsa(CD shop)
26. Mukhtiar Singh son of Gurbachan Singh son of Kunda Singh R/o
Sirsa Road, Tarsem Petrol Pump ke saath wali Gali, Mandi Dabwali
Distt. Sirsa
27. Balbir Singh son of Niranjana Singh son of Shingara Singh R/o Shiv
Nagar Dabwali Distt. Sirsa
28. Jagdish Kumar son of Kala Singh son of chander Bhan,
29. Balwinder Singh son of Gajjan Singh son of Karnail Singh,
30. Gajjan Singh son of Karnail Singh son of Deva Singh R/o village
Khuiyan Malkana Tehsil Dabwali Distt. Sirsa
31. Jagtar Singh son of Dhan Singh son of Inder Singh R/o Mandi
Dabwali Distt. Sirsa
32. Shakuntala Devi wife of Chiranji Lal son of Ram Kishan R/o HUDA
Colony Sirsa M-09416305318
33. Shri Chand son of Gagan Ram son of Puran Ram R/o village
Kaluaana Tehsil Dabwali Distt. Sirsa M-94660-92965,

34. Sumit son of Sham Lal R/o Raju Dhaba Street near Hanuman
Mandir Dabwali Distt. Sirsa
35. Davinder Kumar son of Bhan Lal son of Lekhram,
36. Parmod Kumar son of Bhan Lal son of Lekhram
37. Raj Rani wife of Suresh Kumar son of Jagannath R/o Batra hospital
street Mandi Dabwali Distt. Sirsa,
38. Lalit Kumar son of Hari Singh son of Shikku Ram resident of Anaj
Mandi Dabwali District Sirsa,
39. Jitender Kumar
40. Prem Kumar sons of Radha Krishan son of Chatta Mal, resident of
Mandi Dabwali Tehsil Dabwali Distt. Sirsa.
41. Buta Singh son of Mukhtiar Singh son of Inder Singh resident of
near Bus Stand Sec-14 Hissar
42. Kedar Nath son of Bhagwan Dass son of Ranjit Ram resident of
Opp. Batra Hospital Mandi Dabwali District Sirsa,
43. Neeru wife of Basava Ram son of Bhushan Resident of Dabwali
District Sirsa,
44. Anurag son of Jagdish Rai on of Brij Lal R/o Raju Dhaban Street
Mandi Dabwali Distt. Sirsa.
45. Saroj Rani wife of Bharat Bhushan son of Suraj Bhan,

46. Pushpa Rani wife of Nand Lal son of Devi Dutt C/o Arya Vidya

Mandir School Mandi Dabwali Distt. Sirsa

47. Kaushlaya wife of Ashok Kumar son of Bihari Lal R/o Mandi.

Dabwali Distt. Sirsa.

48. Kishore Chand son of Rangji Ram son of Raunak Ram R/o Batra

Hospital Street Mandi Dabwali Distt. Sirsa

49. Baljit Kaur wife of Maghar Singh son of Hari Singh,

50. Satvinder Kaur wife of Sukhmander Singh son of Balbir Singh

residents of village Dabwali Tehsil Dabwali District Sirsa

51. Ashwani son of Shiv Kumar son of Mathra Ram R/o Vikas High

school street Colony Road Mandi Dabwali Distt. Sirsa.

52. Raj Kumar son of Mohan Lal son of Sehaj Ram R/o Bathinda chowk,

shop in Sidharth Hotel Dabwali Distt. Sirsa,

53. Tara Chand

54. Uggarsain sons of Kurda Ram son of Birbal R/o Raju Dhaba Street

Dabwali Distt. Sirsa,

55. Manoj Kumar son of Ram Lal son of Jagan R/o old post office street

Khu wali Gali Dabwali Distt. Sirsa,

56. Rajinder Kumar son of Sant Ram son of Ballu Ram R/o Ekta nagri

Mandi Dabwali Distt. Sirsa,

57. Babu Singh son of Chand Singh son of Hardit Singh r/o village
Dabwali Tehsil Dabwali Distt. Sirsa
58. Gora Singh son of Ranjit Singh son of Surmukh Singh R/o village
Dabwali Tehsil Dabwali Distt. Sirsa.
59. Surinder Kumar son of Visheshar Lal son of Diwan Chand,
60. Meena wife of Pawan Kumar son of Visheshar Lal resident of
Gandhi chowk (LIC wale) Mandi Dabwali Distt. Sirsa
61. Bimla Devi wife of Pritam Chand son of Buta Ram resident of ward
no.7 Jambeshwar Nagar Dabwali District Sirsa
62. Pal Kaur wife of Ranjit Singh son of Thana Singh R/o Rajiv Nagar
Mandi Dabwali Distt. Sirsa.
63. Rajinder Kaur wife of Gopal Inder Singh son of Nand Singh resident
of near Darpan Cinema Mandi Dabwali Distt. Sirsa
64. Renju wife of Sanjay son of Deen Dayal resident of village Khuiyan
Malkana Tehsil Dabwali Distt. Sirsa.
65. Vinod Kumar son of Jagan Nath son of Bishna Ram,
66. Neeraj Kumar son of Laxman Dass son of Chet Ram resident of
Anaj Mandi Dabwali District Sirsa.
67. Shanti Devi wife of Ram Lal son of Jodha Ram
68. Sunder Singh son of Hari Singh son of Narayan Singh residents of
village Dabwali Tehsil Dabwali District Sirsa.

---Defendants

Suit for partition of the land comprised in khewat no.586 khata no.878 kittas 4 area measuring 12 kanal 8 marlas vide fard jamabandi for the year 2012-2013 read with mutation

no.18899,18904,17928,17878,17677,17302,17303,17150 ,17037,17075,16958 and 18747 situated at village

Dabwali Tehsil Dabwali Distt.Sirsa as the plaintiff and

defendants are co-share over the said land and the khata

of the suit land is still joint and no partition has been

taken place so for and as a consequential relief

restraining the defendants from alienating the suit land by

way of specific killa numbers and more than their share

and without getting the suit land partitioned from any

competent authority and also restraining the defendants

from raising construction over the valuable portion of the

suit land and also from changing the nature of the suit

land without getting the suit land partitioned from any

competent authority ;on the basis of evidence of all kinds

oral as well as documentary of all kinds.

Sir,

It is respectfully submitted as under:-

1. That the plaintiff is owner in possession over the land detailed and described in the head note of the plaint along with the defendants as co-sharer.
2. That the plaintiff and defendants are co-sharer in the suit land and khata of the suit land is still joint as no partition has been taken place so for.
3. That the defendants being head strong person want to raise construction over the valuable portion of the suit land forcibly and illegally and want to alienate the suit land more than their share and by way of specific killa numbers and also want to change the nature of the suit land for which they have no right and justification as the khata of the suit land is still joint and no partition has been taken place so for.
4. That In case if the defendants succeeds in their evil and sinister design then there will be irreparable loss to the plaintiff which cannot be compensated in any way except to grant of injunction.
5. That the plaintiff approached and requested the defendants so many times not to alienate the suit land forcibly and illegally

and more than their share and by way of specific killa numbers and more than their share and not to raise construction over the valuable portion of the suit land without getting the suit land partitioned from any competent authority for which they have no right and justification and to get the suit land partitioned by way of meets and bounds to the extent of his/their share but the defendants did not pay any heed to the request of the plaintiff and given threat to raise construction over the valuable portion of the suit land and to alienate the suit land forcibly and illegally. Hence this suit.

6. That the cause of action arose to the plaintiff for this suit firstly about one month back when the defendants tried to alienate the suit land by way of specific killa numbers and more than their share and finally yesterday when the defendants given threat to alienate the suit land forcibly and illegally. Hence the suit of the plaintiff is well within the period of limitations.

7. That the suit land is situated at village Dabwali Tehsil Dabwali Distt.Sirsa which falls within the territorial jurisdiction of the civil court at Dabwali .Hence this Hon'ble court has jurisdiction to try the present suit.

8. That the value of the suit for the purpose of court fee and jurisdiction has been assessed at Rs.200\/- on which a court fee of Rs.25\/- is being affixed on the plaint.
9. That no similar suit between the same parties and same cause of action is pending and nor has been decided by any other court of law.

It is, therefore prayed that a decree for partition of the land comprised in khewat no.586 khata no.878 kittas 4 area measuring 12 kanal 8 marlas vide fard jamabandi for the year 2012-2013 read with mutation no.18899,18904,17928,17878,17677,17302,17303,17150,17037,17075,16958 and 18747 situated at village Dabwali Tehsil Dabwali Distt.Sirsa as the plaintiff and defendants are co-share over the said land and the khata of the suit land is still joint and no partition has been taken place so far and as a consequential relief restraining the defendants from alienating the suit land by way of specific killa numbers and more than their share and without getting the suit land partitioned from any competent authority and also restraining the defendants from raising construction over the valuable portion of the suit land and also from changing the nature of the suit land without

getting the suit land partitioned from any competent authority ;
may kindly be passed in favour of the plaintiffs and against the
defendants in the interest of justice.

Any other relief which this Hon'ble court may deems fit
be also awarded in favour of the plaintiffs and against the defendants.

Verification:- [Signature]
Verified that the content of this
application are true and correct
to the best of my knowledge and
belief and no part of it is false
one

Submitted by :
[Signature]
Surinder Kumar son of Ramji Dass
son of Hans Raj resident of Mandi
Dabwali Tehsil Dabwali District
Sirsa.

----Plaintiff

Dabwali 14-2-2017
----Plaintiff

Through:- [Signature]
Sh. G.S. Chohan Advocate Dabwali.