



399

COURT NOTICE
(U/o 5 Rule 20 CPC)
IN THE COURT OF Sh. Himanshu Singh
Additional Civil Judge (Senior Division) ,Sirsa

SHISPAL
Vs.
State of Haryana

CNR No. HRSI02-000124-2022
CS-80-2022
Next Date:- 28-05-2024

PUBLICATION ISSUED TO:

Defendants No. 5.NISHU W/O LUCKY, 7.SHASHI BALA, 9. ASHA RANI @ ANITA – D/O DAWARKA PARSHAD. 11.KAUSHLYA DEVI WD/O SATPAL S/O DWARKA PARSHAD, 12.AJAY KUMAR S/O SATPAL S/O DWARKA PARSHAD, 13.ANURADHA, 14.POONAM – D/O SATPAL S/O DWARKA PARSHAD, 16.MAINA DEVI W/O MAHINDER S/O DUNI RAM, 17.KAMAL KUMAR S/O GIRERDHARI S/O MATTU RAM, Defendants No.18 to 42 and performa defendants No.43, 44(i to ix).
ALL RESIDENTS OF VILLAGE KHAJAKHERA TEH AND DISTT SIRSA

In above titled case, the defendant No.5,7,9,11,12,13,14,16,17,18 to 42 and performa defendants no.43,44(i to ix) could not be served. It is ordered that defendant(s)/respondent(s) should appear in person or through counsel on 28-05-2024 at 10:00 a.m.

For details logon to https://highcourtchd.gov.in/?mod=district_notice&district=Sirsa




Himanshu Singh
Additional Civil Judge (Senior Division)
Sirsa

Dated, this day of 08-04-2024

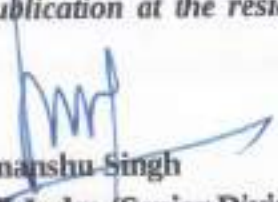
(Not to be published in newspaper)

Forwarded to the Manager, Dainik Chetna, for publication at least 2 weeks before the next

Copy of Publication be sent to the Court of undersigned before the next date of hearing.

You are, also directed to send one set of process/ publication at the residential (above mentioned) address of respondent for the date fixed.




Himanshu Singh
Additional Civil Judge (Senior Division)
Sirsa &



COURT NOTICE

IN THE COURT OF Sh. Himanshu Singh
Additional Civil Judge (Senior Division) ,Sirsa

SHISPAL
Vs.
State of Haryana

PAYMENT ORDER

To


The Advertisement Manager,
Dainik Chetna.

Receipt No. : 34

Amount : 2200+110/-

Dated : 06.04.2024




Himanshu Singh
Additional Civil Judge (Senior Division)
Sirsa

Form No. 77

For Uploading on Website



COURT NOTICE
(U/o 5 Rule 20 CPC)

IN THE COURT OF Sh. Himanshu Singh
Additional Civil Judge (Senior Division) Sirsa

Next Date, Purpose of case, Orders and Judgments as well as other
case information is available on <http://ecourts.gov.in>

SHISPAL
Vs.
State of Haryana

CNR No. HRSI02-000124-2022

Next Date:- 28-05-2024

PUBLICATION ISSUED TO:

Defendants No. 5.NISHU W/O LUCKY, 7.SHASHI BALA, 9. ASHA RANI @ ANITA - D/O DAWARKA PARSHAD. 11.KAUSHLYA DEVI WD/O SATPAL S/O DWARKA PARSHAD, 12.AJAY KUMAR S/O SATPAL S/O DWARKA PARSHAD, 13.ANURADHA, 14.POONAM - D/O SATPAL S/O DWARKA PARSHAD, 16.MAINA DEVI W/O MAHINDER S/O DUNI RAM, 17.KAMAL KUMAR S/O GIRERDHARI S/O MATTU RAM, Defendants No.18 to 42 and performa defendants No.43, 44(i to ix).
ALL RESIDENTS OF VILLAGE KHAJAKHERA TEH AND DISTT SIRSA

To,

The Manager
Dainik Chetna.

Whereas it has been proved to the satisfaction of the Court that the defendants above named cannot be served in the ordinary way of service. Hence, this proclamation **under order 5 Rule 20** CPC is hereby issued against him/them and should appear personally or through their counsel on **28-05-2024 at 10:00 a.m.**

Take notice that, in default of his/their appearance on the day before mentioned, the above said case will be heard and determined in his/their absence according to law.

Given under my hand and the seal of the Court, this **08-04-2024**.



Himanshu Singh
Additional Civil Judge (Senior Division)
Sirsa

IN THE COURT OF CIVIL JUDGE, SENIOR
DEVISION SIRSA.

Shispal aged about ⁶³ years son of Sh. Nand Ram son of Sh. Jagmal resident of village Nathor Tehsil Rania District Sirsa.

...Plaintiff.

VERSUS

1. State of Haryana through District Collector, Sirsa.
2. S. D. O. (civil), Sirsa Tehsil and District Sirsa.
3. Assistant Collector 1st Grade, Sirsa.
4. Chander kala wife of Sh. Subash Chand son of Sh. Ruli Ram
5. Nishu wife of Sh. Lucky son of Sh. Kashmiri Lal
6. Subash Chander son of
7. Smt. Shashi Bala
8. Smt. Usha Rani
9. Smt. Asha Rani @ Anita
10. Smt. Neelam Rani Daughters of Sh. Dawarka Parshad son of Sh. Shiv Dayal
11. Smt. Kaushlya Devi widow of
12. Ajay Kumar son of
13. Smt. Annuradha
14. Smt. Poonam Daughters of Sh. Satpal son of Sh. Dawarka Parshad son of Sh. Shiv Dayal
15. Harbans Kaur wife of Sh. Tara Singh son of Sh. Ujjager Singh
16. Smt. Maina Devi wife of Sh. Mahinder son of

17. Kamal Kumar son of Sh. Girverdhari son of Sh. Mattu Ram
18. Hari Ram son of Sh. Jawana Ram son of Sh. Ramji
19. Pardeep
20. Sandeep sons of Smt. Kanta Devi wife of Sh. Musafir son of Sh. Mangla Parshad
21. Sukhdev Singh son of Sh. Mukhtiar Singh son of Sh. Jeet Singh
22. Dharmender Kumar son of Sh. Harbhagwan son of Sh. Ram Lal
23. Yogesh Kumar son of Sh. Hari Chand son of Sh. Kanhiya Lal
24. Rameshwar Dass son of Sh. Hari Ram son of Sh. Jawana Ram
25. Smt. Kamala Devi daughter of Sh. Birbal son of Sh. Kishna
26. Ram Chand son of Sh. Sheo Lal son of Sh. Fatta Ram
27. Jyoti Parshad son of Sh. Jug Ram son of Sh. Harji Ram
28. Mula Ram son of Sh. Thandi Ram son of Sh. Udmi Ram
29. Anguri Devi wife of Sh. Des Raj son of Sh. Hari Ram
30. Ram Kumar son of Sh. Lal Chand son of Sh. Chunni Ram
31. Kamla Devi Daughter of Sh. Birbal son of Sh. Kishna
32. Smt. Geeta Devi wife of Sh. Rajinder Kumar
33. Sant Kumar son of Sh. Gajjanand son of Sh. Durga Parshad

34. Gordhan
35. Bhagirath sons of Sh. Mani Ram son of Sh. Ji Ram
36. Smt. Anguri Devi Daughter of Sh. Mani Ram son of Sh. Shri Ram
37. Rameshwar Lal son of Sh. Sheo Lal son of Sh. Fatta Ram
38. Ram Chand son of Sh. Sheo Lal son of Sh. Fatta Ram
39. Smt. Kamlesh wife of Sh. Inderjit son of Sh. Annu Ram
40. Mange Ram son of Sh. Ram Partap son of Sh. Birbal Dass
41. Smt. Bachno Devi widow of Sh. Ved Parkash son of Sh. Babu Ram
42. Smt. Rajni wife of Sh. Sonu son of Sh. AmarNath all resident of village Khajakhera Tehsil and District Sirsa.

...Defendants.

1. Dharampal son of Sh. Surja Ram son of Sh. Raju Ram resident of Mela Ground, near Jain Park, Sirsa, Tehsil & district Sirsa.
2. Bihari Lal son of Sh. Chuni Lal son of Sh. Budh Ram now deceased through Lr's
 - i. Smt. Sarto Devi widow
 - ii. Surjeet
 - iii. Ajay
 - iv. Rajesh
 - v. Pankaj sons of Sh. Bihari Lal son of Sh. Chunni Lal all resident of village Shiswal Tehsil Adampur District Hisar.

- vi. Smt. Murti devi (Daughter) wife of Sh. Madan Lal resident of village Dulhari Tehsil Tosam District Bhiwani.
- vii. Smt. Meera (Daughter) wife of Sh. Raj Kumar resident of Nohar Tehsil Nohar District Hanumangarh (Raj.).
- viii. Smt. Maya (Daughter) wife of Sh. Nand Lal resident of Nohar Tehsil Nohar District Hanumangarh (Raj.).
- ix. Smt. Bala (daughter) wife of Sh. Satyawan resident of Sattroad Khurd Tehsil and District Hisar.

...Performa Defendants.

Suit for declaration:

- i. under section 45 of the Punjab Land Revenue Act, to the effect that the plaintiff and Performa defendants are joint owner and in possession as per their respective share of land measuring 16 marlas comprised in khewat no. 127 khetoni no. 182 Sq. no. 34 killa no. 28/1(0-12), 28/3/3(0-6), 28/3/4(0-4), 28/3/5(2-9) khewat no. 584 khetoni no. 698 Sq. no. 34 killa no. 28/3/2(0-6) khewat no. 585 khetoni no. 699 sq. no. 34 killa no. 28/3/1(0-6) khewat no. 3158 khetoni no. 3641 sq. no. 34 killa no. 30/2(0-6), 30/3(1-2),

30/4(0-2) khewat no. 3273
khetoni no. 3801 sq. no. 34
killa no. 30/1(0-6) situated
within revenue estate of village
Khajakhera Tehsil and District
Sirsa, on the basis of judgment
and decree dated 15.06.1991
passed the court of Sh. J. S.
Jangra, Add. Senior Sub-Judge,
Sirsa, in civil suit no. 1680-
C/1990 titled as 'Shispal etc.
versus Smt. Harbans Kaur' and
revenue record subsequent
thereto showing contrary with
regard to the suit land is wrong
and incorrect, against law and
facts, null and void not binding
upon the rights of plaintiff and
performa defendants, liable to
be corrected in favour of
plaintiff and performa
defendants and against the
defendants and also mutation no.
23260 entered and sanctioned on
10.04.2013 on the basis of
judgment and decree dated
15.06.1991 is wrong and
incorrect, liable to be
correction,

ii. the alleged sale deed no. 434
dated 04.03.1991 regarding suit
land measuring 05 marlas 06

sarsai shown executed by defendant no. 15 Harbans Kour in favour of defendant no. 28 Mulla Ram & subsequent mutation no. 11550 dated 09.01.2006 entered and sanctioned on the basis of alleged sale deed

iii. the alleged sale deed no. 11312 dated 08.02.2006 regarding land measuring 02 marlas shown executed by defendant no. 28 in favour of Smt. Kanta Devi (Now deceased through Lr's defendant no. 19, 20) & subsequent mutation no. 21782 dated 02.05.2012 entered and sanctioned on the basis of alleged sale deed

iv. the alleged sale deed no. 6820 dated 11.10.2006 regarding land measuring 03 marlas shown executed by defendant no. 28 in favour of defendant no. 29 & subsequent mutation no. 18486 dated 09.03.2011 entered and sanctioned on the basis of alleged sale deed

v. the alleged sale deed no. 14338 dated 30.03.2011 regarding land measuring 03 marlas 01 Sarsai shown executed by defendant no. 29 in favour of defendant no. 40

- & subsequent mutation no. 19431 dated 27.07.2011 entered and sanctioned on the basis of above said alleged sale deed
- vi. the alleged sale deed no. 10722 dated 12.07.2011 regarding land measuring 03 marlas 01 Sarsai shown executed by defendant no. 40 in favour of defendant no. 5 & subsequent mutation no. 19988 dated 30.08.2011 entered and sanctioned on the basis of above said alleged sale deed
- vii. the alleged sale deed no. 18533/ dated 02.12.2011 regarding land measuring 03 marlas 01 Sarsai shown executed by defendant no. 5 in favour of defendant no. 32 & subsequent mutation no. 29631 dated 25.01.2020 entered and sanctioned on the basis of above said alleged sale deed
- viii. the alleged sale deed no. 11205/1 dated 18.02.2020 regarding land measuring 03 marlas 01 Sarsai shown executed by defendant no. 32 in favour of defendant no. 42 & subsequent mutation no. 31229 dated 26.2.2020 entered and sanctioned on the basis of above said alleged sale deed, All the above

said sale deeds are also wrong and incorrect, not binding upon the rights of the plaintiff, liable to ignored, cancelled being obtained by playing fraud upon the plaintiff, and subsequent mutation and other revenue records thereto is null and void, voidable, hit by principal of natural justice, no more in the eyes of law, is also liable be corrected in favour of plaintiff and performa defendants and defendants have nothing to do with the suit land & has confer with no right, title or interest on the basis of fraudulent sale deeds, and further transaction thereto to the extent of the suit land is without right and authority and also against law and facts and also fraud on plaintiff and is null and void, voidable and is liable to be set aside to this extent and further consequential relief of possession of the suit land to the plaintiff as per his respective share, if he disposed during the pendency of the present suit from the defendants and also consequential relief of

permanent injunction restraining the defendants from further alienation or creating charge on the suit land in any way and also for restraining the defendants for interference into the peaceful possession over the suit land and also for restraining the defendants for not to disposes the plaintiff from the suit land forcibly and illegally, on the basis of evidence of every description oral as well as documentary.

Sir,

The plaintiff respectfully submits as under:-

1. That the plaintiff along with performa defendants filed a civil suit for declaration on dated 25-10-1990 against present defendant no. 15 which was decreed by the court of Sh. J. S. Jangra, Add. Senior Sub-Judge, Sirsa, in civil suit no. 1680-C/1990 titled as 'Shispal etc. versus Smt. Harbans Kaur' (certified copy of judgment and decree is attached herewith) and the plaintiff and performa defendants became lawful owner and in possession of the land measuring 1 kanal 02 marla out of land measuring 2 kanal 04 marlas fully detailed and described in the judgment and decree dated 15.06.1991 and till today the plaintiff is owner and in possession of the suit land as per his share.

2. That in the month of January 2021 the plaintiff wants to get loan against the suit property for raising construction over the suit land as per his respective share, then he came to know that on the basis of judgment and decree dated 15.06.1991 the defendants no. 1 to 3 entered and sanctioned the mutation no. 23260 inclusion with remaining defendants, wrongly and illegally, without notice to the plaintiff, which is liable to be corrected in favour of plaintiff. After that the plaintiff get the whole revenue record and inquire about the matter and then first time the plaintiff came to know that the defendants inclusion with each other got prepared the wrong and illegal revenue record, as defendant no. 15 during pendency of the civil suit no. 1680-C/1990 transfer 06 marlas to the defendant no. 28 vide alleged sale deed no. 434 dated 04.03.1991 whereas she have no right, title or interest to do so. It is relevant to mention here that plaintiff on coming to know about the alleged sale deed filed application for getting certified copy of the above said alleged sale deed and the Sub-Registrar, Sirsa on the application of the plaintiff, reported that as per their record the above said sale deed No. does not exist/match with their record, and on the basis above said alleged sale deed revenue authority inclusion with defendants, wrongly and illegally enter and sanctioned

mutation no. 11550 dated 09.01.2006 which is liable to be corrected in favour of plaintiff and against the defendants and subsequent transfer/entries thereto in the revenue records on the basis of above said alleged sale deed is also wrong and incorrect, liable to set aside, ignored, without right, title or interest.

3. That it is relevant to mention here that vide judgment and decree dated 21.01.1992 passed by the court of Sh. R. C. Godara in civil suit no. 579/1991 transfer land measuring 06 marlas to the present defendant no. 18 (certified copy of judgment and decree attached herewith) hence the plaintiff did not claim his share given in the above said judgment and decree. It is also relevant to mention here that vide mutation no. 26152 dated 24.09.2015, the defendants no. 19 and 20 are impleaded as party in the present suit being legal heirs of the deceased Smt. Kanta Devi who was alleged purchaser from the defendant no. 28.

4. That the revenue authorities wrongly and illegally deduct the share of the present plaintiff vide mutation 23260 which is entered and sanctioned on the basis judgment and decree dated 15.06.1991, which is wrong and incorrect, not binding upon the rights of the plaintiff, liable to be set aside qua the share of the plaintiff. Hence this suit.

5. That about two months ago, the defendants started working negotiation in the village to alienate the suit land and threatened the plaintiff for dispossess him from the suit land which is lawfully owned and possessed by the plaintiff, forcibly and illegally which they have no rights to do so. The plaintiff approached and requested the defendants not to do so but the defendants did not pay any heed to the request of the plaintiff. Hence this suit.
6. That the defendants in collusion with each other on the basis of above said wrong and incorrect mutations subsequent thereto entered and sanctioned in favour of defendants regarding the suit land, wants to alienate the suit land forcibly and illegally, which they have no right, title or interest to do so, which is wrong and incorrect, against law and facts, null and void, void abinitio, without authority, result of mis-representation, result of fraud, nonest in the eyes of law, inoperative upon the rights of the plaintiff and the same have been created with malafide intention to defeat the legal rights of the plaintiff in the suit land and the same are liable to be set-aside.
7. That in case the defendants succeeds in their evil and sinister design, in alienating the suit land or dispossessing the plaintiff from the suit land forcibly and illegally, then it

shall cause irreparable loss to the valuable rights of the plaintiff. The loss likely to cause to the plaintiff never be compensated except by grant of injunction, hence the plaintiff are entitled to seek the relief of permanent injunction.

8. That the cause of action for filing the present suit arose to the plaintiff first time in the month of January 2021 when the plaintiff gained knowledge about mutation no. 23260, and secondly two months ago when the defendants started negotiation to alienate the suit land forcibly and illegally and finally a day before yesterday, when the defendants totally refused to admit the claim of the plaintiff over the suit land and still continues.

9. That the subject matter of the present suit is very urgent and imminent in nature, as such the defendants are trying to further alienate the suit land on the basis of manipulated sale deeds, taking benefits of wrong entries in the revenue records or other relevant records of rights on the basis of above said alleged wrong and void sale deeds and are threatening to dispossess the plaintiff from the suit land. In case the defendants basing forged and fabricated/manipulated sale deeds, succeed to further alienate/transfer the suit land to anyone else, in that event the plaintiff would suffer an irreparable loss and legal

injury, the relief of ad-interim injunction in favour of the plaintiff and against the defendants shall met the ends of the justice, otherwise the very purpose of filing the suit would be defeated, hence a separate application for grant of Ad-interim injunction is hereby enclosed with the plaint of suit.

10. That the suit is well within the period of limitation from the date of knowledge of the above said facts and circumstances and also as per order and guideline of the Hon'ble Supreme Court of India as well as Government of India due to Covid-19.

11. That there is no other litigation is pending or decided in any Court of law regarding the same cause of action and subject matter.

12. That the suit land is situated in Village Khajakhera, which falls within the jurisdiction civil courts at Sirsa, hence this Hon'ble Civil Court has got jurisdiction to try & entertain the suit.

13. That the suit is valued for the purpose of court fee & jurisdiction is assessed as Rs.200/- & a court fee stamp of Rs.25/- is affixed on the plaint. If any deficiency is found the plaintiff is ready to pay the same.

It is therefore prayed that a decree for declaration:

- i. under section 45 of the Punjab Land Revenue Act, to the effect

that the plaintiff and Performa defendants are joint owner and in possession as per their respective share of land measuring 16 marlas comprised in khewat no. 127 khetoni no. 182 Sq. no. 34 killa no. 28/1(0-12), 28/3/3(0-6), 28/3/4(0-4), 28/3/5(2-9) khewat no. 584 khetoni no. 698 Sq. no. 34 killa no. 28/3/2(0-6) khewat no. 585 khetoni no. 699 sq. no. 34 killa no. 28/3/1(0-6) khewat no. 3158 khetoni no. 3641 sq. no. 34 killa no. 30/2(0-6), 30/3(1-2), 30/4(0-2) khewat no. 3273 khetoni no. 3801 sq. no. 34 killa no. 30/1(0-6) situated within revenue estate of village Khajakhera Tehsil and District Sirsa, on the basis of judgment and decree - dated 15.06.1991 passed the court of Sh. J. S. Jangra, Add. Senior Sub-Judge, Sirsa, in civil suit no. 1680-C/1990 titled as 'Shispal etc. versus Smt. Harbans Kaur' and revenue record subsequent thereto showing contrary with regard to the suit land is wrong and incorrect, against law and facts, null and void not binding

upon the rights of plaintiff and performa defendants, liable to be corrected in favour of plaintiff and performa defendants and against the defendants and also mutation no. 23260 entered and sanctioned on 19.04.2013 on the basis of judgment and decree dated 15.06.1991 is wrong and incorrect, liable to be correction,

ii. the alleged sale deed no. 434 dated 04.03.1991 regarding suit land measuring 05 marlas 06 sarsai shown executed by defendant no. 15 Harbans Kour in favour of defendant no. 28 Mulla Ram & subsequent mutation no. 11550 dated 09.01.2006 entered and sanctioned on the basis of alleged sale deed

iii. the alleged sale deed no. 11312 dated 08.02.2006 regarding land measuring 02 marlas shown executed by defendant no. 28 in favour of Smt. Kanta Devi (Now deceased through Lr's defendant no. 19, 20) & subsequent mutation no. 21782 dated 02.05.2012 entered and

sanctioned on the basis of
alleged sale deed

- iv. the alleged sale deed no. 6820
dated 11.10.2006 regarding land
measuring 03 marlas shown
executed by defendant no. 28 in
favour of defendant no. 29 &
subsequent mutation no. 18486
dated 09.03.2011 entered and
sanctioned on the basis of
alleged sale deed
- v. the alleged sale deed no. 14338
dated 30.03.2011 regarding land
measuring 03 marlas 01 Sarsai
shown executed by defendant no.
29 in favour of defendant no. 40
& subsequent mutation no. 19431
dated 27.07.2011 entered and
sanctioned on the basis of above
said alleged sale deed
- vi. the alleged sale deed no. 10722
dated 12.07.2011 regarding land
measuring 03 marlas 01 Sarsai
shown executed by defendant no.
40 in favour of defendant no. 5
& subsequent mutation no. 19988
dated 30.08.2011 entered and
sanctioned on the basis of above
said alleged sale deed
- vii. the alleged sale deed no. 18533/
dated 02.12.2011 regarding land
measuring 03 marlas 01 Sarsai

shown executed by defendant no. 5 in favour of defendant no. 32 & subsequent mutation no. 29631 dated 25.01.2020 entered and sanctioned on the basis of above said alleged sale deed

viii. the alleged sale deed no. 11205/1 dated 18.02.2020 regarding land measuring 03 marlas 01 Sarsai shown executed by defendant no. 32 in favour of defendant no. 42 & subsequent mutation no. 31229 dated 26.2.2020 entered and sanctioned on the basis of above said alleged sale deed, All the above said sale deeds are also wrong and incorrect, not binding upon the rights of the plaintiff, liable to ignored, cancelled being obtained by playing fraud upon the plaintiff, and subsequent mutation and other revenue records thereto is null and void, voidable, hit by principal of natural justice, no more in the eyes of law, is also liable be corrected in favour of plaintiff and performa defendants and defendants have nothing to do with the suit land & has confer with no right, title or interest

on the basis of fraudulent sale deeds, and further transaction thereto to the extent of the suit land is without right and authority and also against law and facts and also fraud on plaintiff and is null and void, voidable and is liable to be set aside to this extent and further consequential relief of possession of the suit land to the plaintiff as per his respective share, if he disposed during the pendency of the present suit from the defendants and also consequential relief of permanent injunction restraining the defendants from further alienation or creating charge on the suit land in any way and also for restraining the defendants for interference into the peaceful possession over the suit land and also for restraining the defendants for not to dispose the plaintiff from the suit land forcibly and illegally, in the interest of justice and to avoid multiplicity of litigation. Any other relief which this Hon'ble Court deems fit proper may also

granted to the plaintiff, in the interest of
justice.
Sirsa/

Submitted By:- *Pratik*
Shispal son of Sh. Nand Ram
son of Sh. Jagmal resident
of village Nathor Tehsil
Rania District Sirsa.
...Plaintiff.

Through: AMIT KUMAR VERMA, ADVOCATE, SIRSA.

VERIFICATION:-

Verified that the contents of para no.1
to 9 and prayer clause are true and correct to
the best of my knowledge and belief, nothing has
concealed therein and remaining paras are true
and correct as per the legal information.
Verified at Sirsa on

Pratik

IN THE COURT OF CIVIL JUDGE, SENIOR
DEVISION SIRSA.

Shispal vs State of Haryana etc.

Suit for Declaration.

APPLICATION U/O 39 RULES 1 & 2 READ WITH SECTION
151 OF THE CPC

Sir,

The Plaintiff respectfully submits as under:-

1. That the Plaintiff/ applicant brought the above titled suit before this Hon'ble court and are very much sure of its success, as per the detailed facts and circumstances mentioned therein the plaint, which may also be read as a part of this application.

2. That in case the defendants succeeds in their evil and sinister design, in

dispossessing land forcibly

shall cause

able rights of

ly to cause to

ensated except

hence the

seek the relief

is most urgent

defendants are

erference into

plaintiff over

Dated, _____

(Not to be published in newspaper)

Forwarded to the Manager, Dainik
date of hearing.

IN THE COURT OF CIVIL JUDGE, SENIOR
DEVISION SIRSA.

Shispal vs State of Haryana etc.
Suit for Declaration.

APPLICATION U/O 39 RULES 1 & 2 READ WITH SECTION
151 OF THE CPC

Sir,

The Plaintiff respectfully submits as under:-

1. That the Plaintiff/ applicant brought the above titled suit before this Hon'ble court and are very much sure of its success, as per the detailed facts and circumstances mentioned therein the plaint, which may also be read as a part of this application.
2. That in case the defendants succeeds in their evil and sinister design, in alienating the suit land or dispossessing the plaintiff from the suit land forcibly and illegally, then it shall cause irreparable loss to the valuable rights of the plaintiff. The loss likely to cause to the plaintiff never be compensated except by grant of injunction, hence the plaintiff is entitled to seek the relief of permanent injunction.
3. That subject matter of suit is most urgent & imminent in nature, as defendants are much excited to cause interference into the peaceful possession of plaintiff over

granted to the plaintiff, in the interest of justice.

Sirsa/

Submitted By:- *पतिवित्त*

Shispal son of Sh. Nand Ram
son of Sh. Jagmal resident
of village Nathor Tehsil
Rania District Sirsa.

..Plaintiff.

Through: AMIT KUMAR VERMA, ADVOCATE, SIRSA.

VERIFICATION:-

Verified that the contents of para no.1 to 9 and prayer clause are true and correct to the best of my knowledge and belief, nothing has concealed therein and remaining paras are true and correct as per the legal information.

Verified at Sirsa on

पतिवित्त