

IN THE COURT OF THE DISTRICT JUDGE

AT MUMBAI, INDIA

Civil Suit No. 123 of 2025

PLAINTIFF:

Mr. Rajesh Kumar
S/o Late Sh. Ramesh Kumar
Resident of 123, MG Road, Mumbai - 400001

DEFENDANT:

Ms. Anita Sharma
D/o Sh. Suresh Sharma
Resident of 456, Park Street, Mumbai - 400002

PLAINTIFF'S PLAINT

Respectfully Submitted:

- The plaintiff states that he is the lawful owner of the property situated at 789, Green Avenue, Mumbai, bearing Survey No. 45/2, measuring approximately 2000 square feet. The plaintiff acquired this property through a registered sale deed dated 15th March 2020.**
- The defendant unlawfully entered the said property on 1st July 2025 without any legal right, title, or interest, and has since refused to vacate the premises despite repeated oral and written requests by the plaintiff.**
- The plaintiff has suffered substantial financial and mental loss due to the defendant's trespass and unauthorized occupation. The plaintiff has been unable to utilize his own property for residential or commercial purposes, causing economic hardship.**
- The defendant's actions constitute willful trespass as defined under Section 441 of the Indian Penal Code and tortious interference with the plaintiff's property rights under the principles of common law.**

5. **The plaintiff has exhausted all amicable means** of resolving this dispute, including sending a legal notice dated 15th August 2025, to which the defendant has failed to respond.

6. **The plaintiff prays that this Honorable Court may be pleased to:**

- Issue an injunction** restraining the defendant from entering, occupying, or in any manner interfering with the plaintiff's peaceful possession of the said property at 789, Green Avenue, Mumbai.
- Direct the defendant to vacate** the said property within 15 days of the Court's order and restore vacant possession to the plaintiff.
- Award compensation of INR 5,00,000** (Rupees Five Lakhs only) for damages, loss of use, mental agony, and legal expenses incurred by the plaintiff.
- Grant any other relief** as this Honorable Court may deem fit and just in the circumstances of the case.

7. **The plaintiff undertakes** to abide by any order this Honorable Court may pass in the interest of justice.

VERIFICATION

I, Rajesh Kumar, son of Late Ramesh Kumar, the plaintiff in the above suit, do hereby solemnly affirm and declare that the contents of the above plaint are true to my knowledge, no part of it is false, and nothing material has been concealed therefrom.

Place: Mumbai

Date: 20th October 2025

Plaintiff's Signature

Rajesh Kumar

Advocate for Plaintiff:

Adv. Priya Deshmukh

Enrollment No.: MH/1234/2015

Chamber Address: 567, Legal Chambers, Fort, Mumbai - 400001

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