PLAINT 29/2019

1. The Plaintiff is the absolute owner of the plaint schedule land in Sy.No.276-2B2 Ac.0.82 Cents paiki to an extent of Ac.0.70 Cents of Muthukuru Village in Aspari Mandalam, having purchased the same under a Regd. Sale deed dt.18.07.2018 bearing document Regn.No.1231 of 2018 for a valuable consideration of Rs.70,000/- from the defendant and on the same day the defendant delivered the possession of the suit land to the plaintiff. Since the date of purchase the plaintiff is in possession and enjoyment of the plaint schedule land as owner thereof without interruption from anybody. Prior to the above said purchase, the plaintiff’s vendor who is the defendant herein has purchased the land to an extent of 0.82 Cents in Sy.no.276-2B situated at Muthukuru Village of Aspari Mandalam from one Sujathamma wife of Reddy Neelakanta Goud of Muthukuru village of Aspari Mandalam under a Regd. Sale deed dt.24-11.2016 bearing Doct.Regn.No.1085 of 2016 for Rs.66,000/-, Two Regd.sale deeds stated above are filed herewith and contents therein may be read as part and parcel of this plaint. The Plaintiff is also filed the Xerox copies of pattadar passbook, Title deed book, Adangal, 1-B (ROR) and E.C stands in the name of plaintiff’s vendor.
2. The plaintiff is a poor women and she does not own any other property except the plaint schedule property. The plaintiff wants to convert the plaint schedule agricultural land into non-agricultural land and to convert into house plots for sale. The defendant is the brother of the plaintiff and he is giving troubles to the plaintiff un-necessarily with an intention to dispossess the plaintiff from the plaint schedule land. On 3.3.2019 at about 10.00 AM when the plaintiff was in the plaint schedule land for converting into house plots with the help of labours the defendant and his followers entered into the plaint schedule land and made an attempt to obstruct the plaintiff and tried to dispossess the plaintiff from the plaint schedule land. The plaintiff resisted the defendants and his followers with the help of her labours and neighbouring land owners with great difficulty. The defendant went away saying that he would come again with some more men and force to dispossess the plaintiff from the plaint schedule land. Hence the plaintiff is constrained to file this suit against the defendant for permanent injunction.
3. My Client is absolute owner of the notice schedule properties. My client purchased Item No.1 of the Notice schedule property under Regd. Sale Deed Dt:13-03-1986 bearing Doc.No.141/1986 at Sub-Registrar Office, Alur from your father Narayanappa and your mother Hanumakka. Since, then my client is in peaceful possession and enjoyment of the notice schedule property without interruption from anybody. Item No.2 property is purchased by my clients mother Smt. K.Lakshmamma under Regd.Sale Deed Dt:01-04-1966 bearing Doc.No.353/1966 at Sub-Registrar Office, Alur. Immediately after purchased my client’s mother got deliver possession over the suit schedule property. After demise of my client’s mother, my client is in possession and enjoyment of the Item.No.2 property without interruption from anybody. Recognized my client’s right with the plaint schedule properties Revenue Authorities got issued Pattadar Pass Book and Title Deed with respect of the notice schedule properties. R.O.R & Adangal also stands in the name of my client in respect of notice schedule properties.
4. Your deceased brother Rajanna and you No.1 to 4 created a death certificated of your father Narayanappa died on 15-02-1984; taking advantage that your father name is not got entered in the Death Registrar of Chippagiri Village. The deceased Rajanna who is non-other than father of you No.2 and you No.3 & 4 created affidavits stating that your father died on 15-02-1984 by placing false information before Revenue Authorities and obtained Death Certificate of your father as died on 15-02-1984 fraudulently. Then R.D.O, Adoni enquired into the matter and cancelled the death certificate issue in the name of Narayanappa by his Order Rc.G.532/2014, dt:15-07-2014. You have created your father death certificate with a view to counter attack on the sale deed dt:13-03-1986 that was executed and registered by your father in favour of my client and you have made a complaint before R.D.O, Adoni for cancellation of the Pattadar Pass book and Title Deeds stands in the name of my client. You no.1 to 4 colluded with then R.D.O, Obulesh and got order in your favour by cancellation of the Pattadar Pass Book and Title Deed of my client with respect of the notice schedule properties. The R.D.O., Adoni Obulesh colluded with you without referring into the order of the R.D.O., Adoni Ram Sundar Reddy who was caoncelled the death certificate stands in the name of deceased Narayanappa and the Document No.332/1988 which was executed by the proposed deceased Narayanappa in the year 1988 showing that the said Narayanappa was alive by the date 1986. These facts clinchingly show that R.D.O., Adoni Obulesh suppressed the facts which were in favour of my client and issued orders in favour of you no.1 to 4. You no.1 to 4 and then R.D.O., Adoni Obulesh are belongs to same caste people and you people colluded with him and got legal orders. Therefore, my client preferred appeal before Joint Collector, Kurnool on the orders issued by the R.D.O., Adoni Obulesh and set-aside his orders. Then you have preffered appeal before High Court of A.P., and it is pending.
5. You no.1 to 4 tried to trespass into the notice schedule properties on 14-02-2020, hence my client filled civil suit O.S.No.11/2020 on the file of Junior Civil Judge Court, Adoni and obtained interim injunction against you people not to interfere with peaceful possession and enjoyment of my client with the notice schedule properties in I.A.No.94/2020/
6. Knowing full well, you no.1 to 4 highhandedly trying to dispossess my client from the notice schedule properties and you have also threaten my client stating that you are willing to made false complaint under SC/ST Act before Police. My Client is law abiding person belongs to kuruva Caste and he is mild and peace loving person. Taking advantage of my client goodness and you believed muscle power and tried to trespass into the notice schedule properties and thereby tried to dispossess my client from the notice schedule properties.
7. Therefore, you no.1 to 4 called upon to not to interfere my client peaceful possession and enjoyment with the notice schedule properties till the disposal of all civil disputes, otherwise my client will be constrained to take appropriate legal steps in the court of criminal law for cheating my client on the fact that you have created death certificate and obtained fraudulently for band purpose, and my client reserve right to file cancellation of the death certificate stands in the name of your father Narayanappa holding you liable for all cost and consequences thereon including this notice charges of Rs.1000/- hence this notice.