IN THE COURT OF THE PRL JUNIOR CIVIL JUDGE AT HUZURABAD

OS.NO. of 2024

Between:-Aluvala Kavitha plaintiff/Petitionrer

And

1)Karka Mohan Reddy

2)The Mandal Thasildhar ,Shankarapatnam

Defendant/Respondent

SUIT CLAIM:- SUIT FOR PERPETUAL INJECTION IN RESPECT OF SY.NO. 482/7 EXTENT AREA ACRE 1-03GTS AND OUT OF WHICH FOR AN EXTENT OF 0-15.GTS. THE NAME OF THE PLAINTIFF MAY BE ENTER IN TO THE REVENUE RECORD BY RECTIFICATION THE REVENUE ENTRIES SITUATED AT THADIKAL SHIVAR(CHINTHAGUTTA) VILLAGE OF SHANKARAPATNAM MANDAL OF KARIMNAGAR DIST WHICH IS SPECIFICALLY SHOWN IN THE SCHEDULE APPENDED TO THE PLAINT

## PLAINT SUBMITTED BY THE PLAINTIFFS UNDER ORDER VII RULE I AND II AND SEC 26 OF C.P .C

## 1.Description of the Plaintiff

1)Aluvala Kavitha w/o Sadaiah age 38 yrs occu.Anganvadi Activist R/O Chinthagutta village of Shankarapatnam Mandal of Karimnagar dist is the address of the plaintiff for the purpose of service of notices,summons ,and that of their cousel Mr.Nalla Bhoomi Reddy advocate ,Huzurabad cellno. 9948551706

**2.Description of the defendants**

1)Karka Mohan Reddy s/o Madava Reddy age 60 yrs occu.Agricul.r/o Chinthagutta village of Shankarapatnam Mandal of Karimnagar dist

2)The Mandal Thasildhar Shankarapatnam Mandal of Karimnagardist. is the adresss of the defendants for the purpose of the service of summons ,process ,etc,is as mentioned above .

3) The plaintiff is the owner and possessor of the land an extent area acrea1-03 gts in sy.no.482/7 situated at Thadikal revenue village shivar of Shankarapatnam Mandal of Karimnagar dist which is hereinafter called as suit land which specifically shown in the schedule appended to the plaint

4)The plaintiff further submitted that she is belongs to scheduled caste community as she is the land less poor person as under the scheme of the Land Less poor persons Scheme the Government Allotted the Land to the plaintiff an extent area Acre 1-03 gts in sy.no. 482/7 situated at Thadikal Revenue Shivar of Keshavapatnam Mandal of Karimnagar dist .Thus the Plaintiff become the owner and possessor of the suit land.

5)It is further submitted the Governament issued the patta certificates(Assignment Certificate )on 26-1-2005 vide file no.B/1026/04 for the extent area 0-28gts and further an extent area 0-15 gts through the assignment certificate dt 20-1-2005.It is further submitted that in fact the government assigned the land an extent area1-03 gts in two defferent dates because of after enquiry that the land availability on the spot the revenue authorities issued the two assignment certificate for the extent of Acres 1-03 gts in sy.no. 482/7.Since the date of the assignment the plaintiff is in possession and enjoyment of the suit land till to-day uninterruptedly. It is further submitted that the defendant is the abutting land owner to words the northern side of the suit and further the suit land will be more convenient to his existing land as the defendant frequently used to demand the plaintiff to sell the land to them on which the plaintiff many times stated that which is the government land only having the possessory rights for their lively wood and further stated that it is government land as not alienable to him although the defendant many times insisting them as if the plaintiff got executed the sale documents he will look after the everything then also the plaintiff bluntly refused to alienate suit land because of the only suit land is the lively wood source of the plaintiff and her husband family .It is keeping in the mind the defendant with bore grudge while the plaintiff and her husband while cultivating the suit land about two years back the malafide defendant gave a false complaint and caused to registered a criminal case however the husband of the plaintiff get-on from the case by engaging an Advocate although the defendant did not stop his illegal acts over the suit land .Since last several years the defendant is creating troubles over the suit land

.6) The plaintiffs further submitted that in support of her contention she has been filed the fallowing documents they are

i)Assignment certificate dt 26-1-2005vide file no. B/1026/2004 along with the then Chief Minister issued the Rythu Card

ii)Assignment Certificate dt 20-1-2005on the same proceedings

ii)C.C of pahani for the year 2005-2006

iiii) C.C of pahani for the year 2006-2007

v) C.C of pahani for the year 2007-2008

vi) C.C of pahani for the year 2008-2009

vii) C.C of pahani for the year 2009-2010

viii) C.C of I-B Register

ix)Original Pattedhar passbook (Old)

The all the above documents are genuine in support of Plaintiff contention and averments.

6)the plaintiff is being a lady and belongs to schedule caste to weaker section of the society and the defendant is belongs to forward caste being a reddy which is very forward caste in Telangana state as he is having influence in the village in political and police and further the defendant is money and muscle power as he is creating troubles on the peaceful possession of the plaintiff over the suit land in the circumstances the plaintiffs has no other go except approach the Hon”ble court for the equitable relief of perpetual injection oders over the suit lands and for rectification of revenue entries for an extent area 0-15 gts.

7)It is further submitted that the plaintiff many times given the applications to the Mandal Thasildhar who is herein the defendant.2 but the said concerned authority did not take any action further as it needed to make them as party to the suit proceedings to enter her name in relevant revenue records as per the assignment certificates issued by the Governament .

8)It is further submitted that when the plaintiff and her husband while cultivating the suit land on 25-2-2024 the defendantno.1and his yes men all of sudden attacked over the plaintiffand tried to disturbed her physical possession over the suit land but on timely help of the well wishers the plaintiff resisted the illegal acts of the plaintiff of the over the suit land and muscle power and having the police political influence in the village as without aid and assistance of the Hon”ble court the plaintiffs could not able to resist their illegal acts over the suit land in the circumstances the Hob”ble court may be grant the perpetual injection decree over the suit land and further rectify the revenue entires for part of the suit land for an extent area 0-15 gts by entering the name of the plaintiff

4) CAUSE OF ACTION -:The cause of action arose on 25-2-2024 when the plaintiffs working Agriculture operation in the field which is the suit land the the defendant and his yes men visited the suit land and tired to disturb the plaintiff agricultural work and warned the plaintiff with dire consequences at suit land and created some galata which is situated at Thadikal revenue shivar ( Chinthagutta) village of shankarapatnam Mandal of Karimnagar dist are above date and place of the cause of action to file the suit

5)JURISDICTION -:The suit land situated at Thadikal shivar of Shankarapatnam Mandal of Karimnagar dist which is with in the territorial jurisdiction of this Hon”ble court to entertain the suit and further the suit land valuation in peculiar jurisdiction of this Hon”ble court as this Hon”ble is having the jurisdiction to entertain the suit

6) LIMITATION-: The suit is filed with in the limitation

7) COURT FEE-:The valuation of the suit land rs 4,50,000/- per acre as the value of the suit land comes rs.4,83,750/- (11250X43= rs.4,83,750/- ) out of which the suit for perpetual injection for the extent of Acrs 1-03 gts which is suit land and further rectification of the revenue entries for the extent of 0-15 gts which is the part and parcel of the suit land for the last 12 years in the possession column for whci the plaintiff valued the court fee rs 15/- per year as total comes rs.180/- under sec 43 of court fee act and further the plaintiff valued the relief under sec 24 (c) notionally of the market value which comes rs 48375/- on which rs 2386 /- is paid as total court fee is rs.2566/- is paid under section 24 (c) and 43 of court fee and suit valuation act in total amount of rs.2566/- is paid and affixed to the plaint .

8)PRAYER-:It is therefore prayed that the suit may be decreed as under

i)Decreed the suit by granting the perpetual injection order by restraining the defendants their agents ,workmen,their kith and kin from the peaceful possession and enjoyment of the plaintiffs over the suit lands

ii)Rectify or enter in the revenue entries by entering the name of the plaintiff in all relevant revenue record for the extent of 0-15 gts which is part and parcel of the suit land

ii) Any such other relief or reliefs for which the plaintiffs is entitled may be awarded

iii) Costs of the suit may be awarded

date 10-4-2024 Plaintiff

VERIFICATION :-I the above named plaintiff what I stated in the plaint para no 1 to 8 are true and correct and to the best of my knowledge and read to me in telugu language through my counsel and verified the same and signed by me

Plaintiff

Filed through -: Nalla Bhoomi Reddy

Advocate ,Huzurabad

IN THE COURT OF THE PRL JUNIOR CIVIL JUDGE AT HUZURABAD

I.A.NO. OF 2024

IN

OS.NO. of 2024

Between:-Aluvala Kavitha Petitionrer

And

1)Karka Mohan Reddy

2)The Mandal Thasildhar ,Shankarapatnam

Respondent

AFFIDAVIT

I Aluvala Kavitha w/o Sadaiah age 38yrs occu.House wife and Anganvadi activist r/o Chinthagutta village of Shankarapatnam Mandal of Karimnagar dist dist dohere by state on oath as under

3) I am is the owner and possessor of the land an extent area acrea1-03 gts n sy.no.482/7 stuated at Thadkal revenue vllage shivar of Shankarapatnam Mandal of Karimnagar dist which is hereinafter called as suit land which specifically shown in the schedule appended to the petition/plaint

4) I further submitted that I belongs to scheduled caste community as I am the land less poor person as under the scheme of the Land Less poor persons Scheme the Government Allotted the Land to me an extent area Acre 1-03 gts in sy.no. 482/7 situated at Thadikal Revenue Shivar of Keshavapatnam Mandal of Karimnagar dist .Thus I become the owner and possessor of the suit land.

5)It is further submitted the Governament issued the patta certificates(Assignment Certificate )on 26-1-2005 vide file no.B/1026/04 for the extent area 0-28gts and further an extent area 0-15 gts through the assignment certificate dt 20-1-2005.It is further submitted that in fact the government assigned the land an extent area1-03 gts in two different dates because of after enquiry that the land availability on the spot the revenue authorities issued the two assignment certificate for the extent of Acres 1-03 gts in sy.no. 482/7.Since the date of the assignment I am in possession and enjoyment of the suit land till to-day uninterruptedly. It is further submitted that the respondent/respondent is the abutting land owner to words the northern side of the suit land and further the suit land will be more convenient to his existing land as the respondent frequently used to demand me to sell the land to them on which I many times stated that which is the government land only having the possessory rights for our lively wood and further stated that it is government land as not alienable to him although the respondent many times insisting me as if I got executed the sale documents he will look after the everything then also I bluntly refused to alienate suit land because of the only suit land is the lively wood source of our family and her husband family .It is keeping in the mind the respondent with bore grudge while I and my husband while cultivating the suit land about two years back the malafide respondent gave a false complaint and caused to registered a criminal case however my husband get-on from the case by engaging an Advocate although the respondent did not stop his illegal acts over the suit land .Since last several years the respondent is creating troubles over the suit land

.6) I further submitted that in support of my contention I have been filed the fallowing documents they are

i)Assignment certificate dt 26-1-2005vide file no. B/1026/2004 along with the then Chief Minister issued the Rythu Card

ii)Assignment Certificate dt 20-1-2005on the same proceedings

ii)C.C of pahani for the year 2005-2006

iiii) C.C of pahani for the year 2006-2007

v) C.C of pahani for the year 2007-2008

vi) C.C of pahani for the year 2008-2009

vii) C.C of pahani for the year 2009-2010

viii) C.C of I-B Register

ix)Original Pattedhar passbook (Old)

The all the above documents are genuine in support of my contention and averment

6)I am being a lady and belongs to schedule caste to weaker section of the society and the respondent is belongs to forward caste being a reddy which is very forward caste in Telangana state as he is having influence in the village in political and police and further the respondent is money and muscle power as he is creating troubles on the peaceful possession of me over the suit land in the circumstances I have no other go except approach the Hon”ble court for the equitable relief of intrem injection orders over the suit lands and for rectification of revenue entries for an extent area 0-15 gts.

7)It is further submitted that Imany times given the applications to the Mandal Thasildhar who is herein the respondent.2 but the said concerned authority did not take any action further as it needed to make them as party to the suit proceedings to enter my name in relevant revenue records as per the assignment certificates issued by the Governament .

8)It is further submitted that when Iand my husband while cultivating the suit land on 25-2-2024 the respondentno.1 and his yes men all of sudden attacked over my peaceful possession tried to disturbed my physical possession over the suit land but on timely help of the well wishers our relatives I have resisted the illegal acts of the respondents over the suit land and further they are having muscle power and having the police political influence in the village as without aid and assistance of the Hon”ble court the I could not able to resist their illegal acts over the suit land in the circumstances the Hob”ble court may be grant the interim injection order over the suit land .I further submitted that I am Having the prima facie case and balane of convinence is in my fever and further there is every apprehension of danger in the hands of the respondens as if injection is not granted the irrepairable loss would be caused to me

9) The rest of the grounds will be urged at the time of the arguments

Deponent

The deponent sworned and signed before me on this day of November 2 of 2023 at Sulthanabad of Peddapally dist

Identified by Attested by

IN THE COURT OF THE PRL JUNIOR CIVIL JUDGE AT HUZURABAD

I.A NO. 2024

IN

OS.NO. of 2024

Between:- 1)Aluvala Kavitha w/o Sadaiah age 38 yrs occu.Anganvadi Activist R/O Chinthagutta village of Shankarapatnam Mandal of Karimnagar dist Petitionrer/Plaintiff

And

1)Karka Mohan Reddy s/o Madava Reddy age 60 yrs occu.Agricul.r/o Chinthagutta village of Shankarapatnam Mandal of Karimnagar dist

2)The Mandal Thasildhar Shankarapatnam Mandal of Karimnagardist. Respondents/Defendnats

PETITION FILED UNDER ORDER 39 RULE 1 AND 2 OF C.P.C

May it Please YourHonour

For the reasons and grounds stated in the accompanying affidavit the Hon”ble court may be pleased to allow the petition by restraining the respondent their agents ,workmen ,labors ,and their kith and kin over the schedule properties in the interest of the justice and equity

Date 26-2-2024 Counsel for the Petitioner

IN THE COURT OF THE PRL JUNIOR CIVIL JUDGE AT HUZURABAD

OS.NO. of 2024

Between:-Aluvala Kavitha plaintiff/Petitionrer

And

1)Karka Mohan Reddy

2)The Mandal Thasildhar ,Shankarapatnam Defendant/Respondent

AFFIDAVIT FILED UNDER 26 OF C.P.C

I Aluvala Kavitha w/o Sadaiah age 38 yrs occu.Anganvadi Activist R/O Chinthagutta village of Shankarapatnam Mandal of Karimnagar dist dohereby state on oath as under

1) I am the petitioner herein and Plaintiff the suit as such I have fully acquinted with the facts of the case

3) I am s the owner and possessor of the land an extent area acrea1-03 gts n sy.no.482/7 stuated at Thadkal revenue vllage shivar of Shankarapatnam Mandal of Karimnagar dist which is hereinafter called as suit land which specifically shown in the schedule appended to the petition/plaint

4) I further submitted that I belongs to scheduled caste community as I am the land less poor person as under the scheme of the Land Less poor persons Scheme the Government Allotted the Land to me an extent area Acre 1-03 gts in sy.no. 482/7 situated at Thadikal Revenue Shivar of Keshavapatnam Mandal of Karimnagar dist .Thus I become the owner and possessor of the suit land.

of the petition schedule land /suit land till today with out any interruption any body in support of my contention I have filed all the documents and what I staed in the Plaint and in Injection application are true and correct to the best of my knowledge

Hence My Affidavt Deponent

The deponent sworned and signed before me on this day of November 2 of 2023 at Sulthanabad of Peddapally dist

Identified by Attested by

IN THE COURT OF THE PRL JUNIOR CIVIL JUDGE AT HUZURABAD

OS.NO. of 2024

Between:-Aluvala Kavitha plaintiff/Petitionrer

And

1)Karka Mohan Reddy

2)The Mandal Thasildhar ,Shankarapatnam

Defendant/Respondent

AFFIDAVIT FILED UNDER ORDER VII RULE 15 OF C.P.C

I Aluvala Kavitha w/o Sadaiah age 38 yrs occu.Anganvadi Activist R/O Chinthagutta village of Shankarapatnam Mandal of Karimnagar dist dohereby state on oath as under

1) I am the petitioner no.1 herein and Plaintiff no.1 the suit as such I have fully acquinted with the facts of the case

3) I am is the owner and possessor of the land an extent area acrea1-03 gts n sy.no.482/7 stuated at Thadkal revenue vllage shivar of Shankarapatnam Mandal of Karimnagar dist which is hereinafter called as suit land which specifically shown in the schedule appended to the petition/plaint

4) I further submitted that I belongs to scheduled caste community as I am the land less poor person as under the scheme of the Land Less poor persons Scheme the Government Allotted the Land to me an extent area Acre 1-03 gts in sy.no. 482/7 situated at Thadikal Revenue Shivar of Keshavapatnam Mandal of Karimnagar dist .Thus I become the owner and possessor of the suit land. I am in continues possession and enjoyment of the petition schedule land /suit land till today with out any interruption any body in support of my contention I have filed all the documents and what I staed in the Plaint and in Injection application are true and correct to the best of my knowledge

Hence My Affidavt Deponent

The deponent sworned and signed before me on this day of feb 26th 2024 at Huzurabad

Identified by Attested by

IN THE COURT OF THE PRL JUNIOR CIVIL JUDGE AT HUZURABAD

OS.NO. of 2024

Between:-Aluvala Kavitha plaintiff/Petitionrer

And

1)Karka Mohan Reddy

2)The Mandal Thasildhar ,Shankarapatnam

Defendant/Respondent

MEMO OF THE ADRESSEESS OF THE PARTIES

## 1.Description of the Plaintiff

1)Aluvala Kavitha w/o Sadaiah age 38 yrs occu.Anganvadi Activist R/O Chinthagutta village of Shankarapatnam Mandal of Karimnagar dist

**2.Description of the defendants**

1)Karka Mohan Reddy s/o Madava Reddy age 60 yrs occu.Agricul.r/o Chinthagutta village of Shankarapatnam Mandal of Karimnagar dist

2)The Mandal Thasildhar Shankarapatnam Mandal of Karimnagardist.

Date

Counsel for the Plaintiff

IN THE COURT OF THE PRL JUNIOR CIVIL JUDGE AT HUZURABAD

OS.NO. of 2024

Between:-Aluvala Kavitha plaintiff/Petitionrer

And

1)Karka Mohan Reddy

2)Th e Mandal Thasildhar ,Shankarapatnam

Defendant/Respondent

PLAINT FILED UNDER ORDER VII RULE 1 AND 2 AND SEC 26 OF C.P.C

Filed on :-

Filed Through-:Nalla Bhoomi Reddy and K.Soumithra ,Advocates

Huzurabad cell no. 9948551706

F O R M No.7

List of Document (Rule 9 10 & 262)

(Under Order VII Code of Civil Procedure)

IN THE COURT OF THE PRL JUNIOR CIVIL JUDGE AT HUZURABAD

OS.NO. of 2024

Between:-Aluvala Kavitha plaintiff/Petitionrer

And

1)Karka Mohan Reddy

2)The Mandal Thasildhar ,Shankarapatnam

Defendant/Respondent

LIST OF DOCUMENTS FILED BY THE PLAINTIFFS

i)Assignment certificate dt 26-1-2005vide file no. B/1026/2004 along with the then Chief Minister issued the Rythu Card

ii)Assignment Certificate dt 20-1-2005on the same proceedings

ii)C.C of pahani for the year 2005-2006

iiii) C.C of pahani for the year 2006-2007

v) C.C of pahani for the year 2007-2008

vi) C.C of pahani for the year 2008-2009

vii) C.C of pahani for the year 2009-2010

viii) C.C of I-B Register

ix)Original Pattedhar passbook (Old)

Date: 26-2-2024 Counsel for plaintiff

PROCESS PAYMENT FROM

IN THE COURT OF THE PRL JUNIOR CIVIL JUDGE AT HUZURABAD

OS.NO. of 2024

Between:-Aluvala Kavitha plaintiff/Petitionrer

And

1)Karka Mohan Reddy

2)The Mandal Thasildhar ,Shankarapatnam

Respondent/Defendant

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | Name of the party applying | Purpose for deposit | Value | Place of affixing process and for cancellation |

COUNSEL FOR PLAINTIFF

GENRAL NOTICE (SHOW CAUSE)

IN THE COURT OF THE PRL JUNIOR CIVIL JUDGE AT HUZURABAD

OS.NO. of 2024

Between:-Aluvala Kavitha plaintiff/Petitionrer

And

1)Karka Mohan Reddy

2)The Mandal Thasildhar ,Shankarapatnam

Defendant/Respondent

To,

1)Karka Mohan Reddy s/o Madava Reddy age 60 yrs occu.Agricul.r/o Chinthagutta village of Shankarapatnam Mandal of Karimnagar dist

2)The Mandal Thasildhar Shankarapatnam Mandal of Karimnagardist. is the adresss of the defendants for the purpose of the service of summons ,process ,etc,is as mentioned above .

Whereas the above named has made an application to this court that

You are hereby required to appear in this court in person or by an advocate duly authorized on day of 201 at 10:30 am o’clock in the forenoon to show cause against the application failing which the application will be heard and determined expert.

Give under my hand and the seal of court, this day of 2019

(Head clerk)

SUMMONS FOR SETTLEMENT FOR ISSUES

(OR.VR.1AND 5 C.P.C)

IN THE COURT OF THE PRL JUNIOR CIVIL JUDGE AT HUZURABAD

OS.NO. of 2024

Between:-Aluvala Kavitha plaintiff/Petitionrer

And

1)Karka Mohan Reddy

2)The Mandal Thasildhar ,Shankarapatnam

Defendant/Respondent

To,

1)Karka Mohan Reddy s/o Madava Reddy age 60 yrs occu.Agricul.r/o Chinthagutta village of Shankarapatnam Mandal of Karimnagar dist

2)The Mandal Thasildhar Shankarapatnam Mandal of Karimnagardist. i

Whereas has instituted a suit against your for vide plaintiff copy attached here with, you are here to answer all material question relating to the suit or who shall be accompanied by some other person able to answer all such question on the day…. 20 ……at a.m.in the fore noon to answer the claim and you are directed to produce on that day all the documents upon which you intend the relay in support of your defense.

1.you are also directed to the your written statement within 30 days from the date of receipt there summons.

2.take notice that in default or your appearance, on the day before mentioned, and failing to file your written statement within 30 days, the suit will be heard and determined in your absence. Give under my hand and seal of the court this……….dayof2023 (Seal) (By order) Superintendent

IN THE COURT OF THE PRL JUNIOR CIVIL JUDGE AT HUZURABAD

OS.NO. of 2024

Between:-Aluvala Kavitha plaintiff/Petitionrer

And

1)Karka Mohan Reddy

2)The Mandal Thasildhar ,Shankarapatnam

Defendant/Respondent

PETITION SCHEDULE PROPERTY ITEM NO.1

|  |  |  |  |
| --- | --- | --- | --- |
| SL.NO | SY.NO. | EXTENT AREA | BOUNDARIES |
| 1 | 482/7 | ACR.1-03gts. | East: Land of Pambala Srikanth  West: Land of Konda ramaswamy  North:-Land of Karka Mohan Reddyand Bakarapu Sampath  South:Land of Konda Ramswamy- |

The above schedule situated at Thadikal village of shankarapatnam Mandal of Karimnagar dist

Plaintiff

Verification : I the plaintiffs stated the above schedules true and correct and verified by me to the best our knowledge and belief ,hence verified

Date Plaintiff

Counsel for the plaintiff

FORM NO.8

IN THE COURT OF THE PRL JUNIOR CIVIL JUDGE AT HUZURABAD

OS.NO. of 2024

Between:-Aluvala Kavitha plaintiff/Petitionrer

And

1)Karka Mohan Reddy and another

2)The Mandal Thasildhar ,Shankarapatnam

Defendant/Respondent

VALUATION OF THE IMMOVEABLE PROPERTY

1)Market Valuation of the schedule property : rs. 4,83, 750/-

2)The property situated in which village: of Karimnagar dist :Thadikal village shivar Shankarapatnam Mandal of Karimnagar dist

3)The survey no.and rental value of the property : 482/7

4) The sub- Registrar office and Talaq :Joint-Sub Registrar cum Mandal Thasildhar Shankarapatnam mandal of Karimnagar dist .

5)Court fee and provision of law :In para no.15,16 of the plaint is paid as per the provision of law

6)under which the suit is valued and court fee is paid :In court fee para which is explained

date Counsel for the plaintiff