IN THE COURT OF THE PRL JUNIOR CIVIL JUDGE AT SUTHANABAD

IA No OF 2023

IN

OS.NO.

Between:-Bolli Sadanandam plaintiff/Petitionrer

And

1. Erra Rayamallu
2. Erra Saraiah
3. Erra Kanakaiah
4. Erra Odelu
5. Erra Sammaiah

SUIT CLAIM:- SUIT FOR PERPETUAL INJECTION IN RESPECT OF SY.NO. 554 AN EXTENT AREA 0-20 GTS SITUATED AT SHANAGONDA REVENUE SHIVAR OF RUPUNARAYANPET OF ODELA MANDAL OF PEDDAPALLY DIST WHICH IS SPECIFICALLY MENTIONED IN THE SCHEDULE APPENDED TO THE PLAINT

## PLAINT SUBMITTEDBY THE PLAINTIFF UNDER VII RULE I AND II AND SEC 26 OF C.P .C

## Description of the Plaintiff

1)Bolli Sadanadam s/o Samuel age 45 yrs occu. Agri.coolie Native village Rupunarayanpet of Odela Mandal of Karimanagar 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

**Description of the defendants**

1)Erra Rayamallu s/o Rayalingu age 70 yrs occu Agriculture

2)Erra Saraiah s/o Rayalingu age 50 yrs occu.Agri.

3)Erra Kanakaiah s/o Rayalingu age 55 yrs occu.Agri. 4)Erra Odelu s/o Rayalingu age 51 yrs occu.Meckanic

4)Erra Kanakaiah s/oRaya Lingu age 51 yrs occu. Mechanic

5)Erra Sammaiah s/o Rayalingu age 45 yrs working as a cmompounder in the hospital all r/o Supunarayanapet village of Odela Mandal of Karimnagar dist is the addressee of the defendants for the purpose of the serving of the summons ,notices and etc is as mentioned

3) The plaintiff is the owner and possessor of the land in respect of sy.no. 554 an extent area 0-20 gts situated at shanagonda revenue shivar of rupunarayanpet of odela mandal of peddapally dist which is specifically mentioned in the schedule appended to the plaint which is herein after called as suit schedule land

4) It is further submitted that the plaintiff got the above land from the government under the scheme of land less poor persons of the then governments .It further submitted that infact long back the father of the plaintiff got the land after his death in heridietry the plaintiff got the suit land from the revenue officials as he got the suit land since long time he is in continuation possession and enjoyment of the suit land till today with out any interruption any body

5) It is further submitted that the plaintiff as he become owner and possessor of the suit land and he is in possession of the suit land in support of his contention he filed the “ASSIGNMENT CERTIFICATE BEARING NO.815 OF 1996 “ since the date of issue the assignment he is possession and in enjoyment of the suit land but the revenue officials did not record the pahanies as now he could not able to file the same for the rectification of the revenue entries he filed the application before the concerned revenue officials as it is under process ,in due course of time he will file the same in support of his contention

6)It is further submitted that the defendants 1 to 5 are the close relatives of the plaintiff and further the mother of the defendants and mother of the plaintiff are the own sisters as they are close relatives it is taking advantage the defendants 1 to 5 in collusion hatched a plan to grab suit land with out any valid title or possession .The plaintiff while cleaning the suit land plant the paddy craf the all the defendants visited the suit land on 3-11-2023 and also questioned the plaintiff on which the plaintiff given suitable reply on which they get back from suit land but while they are going they openly declared that they would disposess the plaintiff at any cost and at any time as there every apprehension of danger in the hands of the defendants .It is further submitted that the defendants are having mejorty peoples in the village further they have money and muscle power and further they are having the political and police influene in the village as without aid and assistance of the Hon”ble court the plaintiff could not able to resist them in the circumstances the plaintiff has othergo except approach the Hon”ble court for the equtable relief of perpetual injection order over the suit land .Hence the suit

4) CAUSE OF ACTION -:The cause of action arose on 3-11-2023 when the plaintiff cleaning the suit land the all the defendants visited the suit land and warne the plaintiff with dire consequences at suit land situated at Shangonda revenue shivar of the Odela Mandal of Peddapally dist are above date and place of the casue of action to file the suit

5)JURISDICTION -:The suit land situated at Shangonda revenue shivar of the Odela Mandal of Peddapally dist 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. 2,25,000/- on which the plaintiff valued the relief notionally on rs 22,500/- on which the amount of rs 1550 /- is paid under section 24 (c) of court fee and suit valuation act

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

i)Decreed 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 plaintiff over the suit land

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

iii) Costs of the suit may be awarded

date 5-11-2023 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 SUTHANABAD

IA No OF 2023

IN

OS.NO.

Between:- Bolli Sadanandam Petitionrer/plaintiff

And

1. Erra Rayamallu and others

Respondent/Defendant

AFFIDAVIT

I Bolli Sadanadam s/o Samuel age 45 yrs occu. Agri.coolie Native village Rupunarayanpet of Odela Mandal of Karimanagar dist dohere by state on oath as under

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

3) That I am the the owner and possessor of the land in respect of sy.no. 554 an extent area 0-20 gts situated at Shanagonda revenue shivar of Rupunarayanpet of Odela mandal of Peddapally dist which is specifically mentioned in the schedule appended to the plaint which is herein after called as suit schedule land

4) It is further submitted that I got the above land from the government under the scheme of land less poor persons of the then governments .It is further submitted that infact long back my father got the land after his death in heridietry I got the suit land from the revenue officials as I got the suit land since long time I am in continues possession and enjoyment of the petition schedule land /suit land till today with out any interruption any body

5) I further submitted that as I have become owner and possessor of the suit land and I am in possession of the suit land in support of my contention I have filed the “ASSIGNMENT CERTIFICATE BEARING NO.815 OF 1996 “ since the date of issue the assignment I am in possession and in enjoyment of the suit land but the revenue officials did not record the pahanies as now I could not able to file the same and I have filed the petition for the rectification of the revenue entries before the concerned revenue officials as it is under process ,in due course of time I will file the same in support of my contention

6)It is further submitted that the Respondents 1 to 5/defendants 1 to 5 are the close relatives of me and further, the mother of the Respondents/defendants and my mother are the own sisters as they are close relatives it is taking advantage the Respondents 1 to 5/defendants 1 to 5 in collusion hatched a plan to grab suit land with out any valid title or possession .That while I am cleaning the suit land to plant the paddy craf the all the Respondents 1 to 5/defendants 1 to 5 visited the suit land on 3-11-2023 and also questioned me on which I have given suitable reply on which they get back from suit land but while they are going they openly declared that they would disposess me at any cost and at any time as thereis every apprehension of danger in the hands of the Respondents 1 to 5/defendants 1 to 5.It is further submitted that the Respondents 1 to 5/defendants 1 to 5 are having majority peoples in the village further they have money and muscle power and further they are having the political and police influence in the village as without aid and assistance of the Hon”ble court I could not able to resist them in the circumstances I have no othergo except approach the Hon”ble court for the equitable relief of Temparary Ad-Intrem Injection l order over the suit land

7) 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 SUTHANABAD

IA No OF 2023

IN

OS.NO.

Between:- Bolli Sadanadam s/o Samuel age 45 yrs occu. Agri.coolie Native village Rupunarayanpet of Odela Mandal of Karimanagar dist Petitionrer/Plaintiff

And

1)Erra Rayamallu s/o Rayalingu age 70 yrs occu Agriculture

2)Erra Saraiah s/o Rayalingu age 50 yrs occu.Agri.

3)Erra Kanakaiah s/o Rayalingu age 55 yrs occu.Agri. 4)Erra Odelu s/o Rayalingu age 51 yrs occu.Meckanic

4)Erra Kanakaiah s/oRaya Lingu age 51 yrs occu. Mechanic

5)Erra Sammaiah s/o Rayalingu age 45 yrs working as a cmompounder in the hospital all r/o Supunarayanapet village of Odela Mandal of Karimnagar dist

Respondents/Defendants

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 respondents theire agents ,workmen ,laiboures ,and their kith and kin over the schedule property in the interest of the justice and equity

Date

Counsel for the Petitioner

IN THE COURT OF THE PRL JUNIOR CIVIL JUDGE AT SUTHANABAD

IA No OF 2023

IN

OS.NO.

Between:- Bolli Sadanandam Petitionrer/plaintiff

And

1. Erra Rayamallu and others Respondent/Defendant

AFFIDAVIT FILED UNDER 26 OF C.P.C

I Bolli Sadanadam s/o Samuel age 45 yrs occu. Agri.coolie Native village Rupunarayanpet of Odela Mandal of Karimanagar dist dohere by state on oath as under

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

3) That I am the the owner and possessor of the land in respect of sy.no. 554 an extent area 0-20 gts situated at Shanagonda revenue shivar of Rupunarayanpet of Odela mandal of Peddapally dist which is specifically mentioned in the schedule appended to the plaint which is herein after called as suit schedule land

4) It is further submitted that I got the above land from the government under the scheme of land less poor persons of the then governments .It is further submitted that infact long back my father got the land after his death in heridietry I got the suit land from the revenue officials as I got the suit land since long time 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 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 SUTHANABAD

IA No OF 2023

IN

OS.NO.

Between:- Bolli Sadanandam Petitionrer/plaintiff

And

1. Erra Rayamallu and others

Respondent/Defendant

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

I Bolli Sadanadam s/o Samuel age 45 yrs occu. Agri.coolie Native village Rupunarayanpet of Odela Mandal of Karimanagar dist dohere by state on oath as under

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

3) That I am the the owner and possessor of the land in respect of sy.no. 554 an extent area 0-20 gts situated at Shanagonda revenue shivar of Rupunarayanpet of Odela mandal of Peddapally dist which is specifically mentioned in the schedule appended to the plaint which is herein after called as suit schedule land

4) It is further submitted that I got the above land from the government under the scheme of land less poor persons of the then governments .It is further submitted that infact long back my father got the land after his death in heridietry I got the suit land from the revenue officials as I got the suit land since long time 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 and correct to the best of my knowledge the documents filed me are true and correct as the Hon”ble court register the suit

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 SUTHANABAD

IA No OF 2023

IN

OS.NO.

Between:- Bolli Sadanadam

Petitionrer/Plaintiff

And

1)Erra Rayamallu and others

Respondents/Defendants

MEMO OF THE ADRESSEESS OF THE PARTIES

1. DESCRIPTION OF THE PLAINTIFF :-Bolli Sadanadam s/o Samuel age 45 yrs occu. Agri.coolie Native village Rupunarayanpet of Odela Mandal of Karimanagar dist
2. DESCRIPTION OF THE DEFENDANTS:-

1)Erra Rayamallu s/o Rayalingu age 70 yrs occu Agriculture

2)Erra Saraiah s/o Rayalingu age 50 yrs occu.Agri.

3)Erra Kanakaiah s/o Rayalingu age 55 yrs occu.Agri. 4)Erra Odelu s/o Rayalingu age 51 yrs occu.Meckanic

4)Erra Kanakaiah s/oRaya Lingu age 51 yrs occu. Mechanic

5)Erra Sammaiah s/o Rayalingu age 45 yrs working as a cmompounder in the hospital all r/o Supunarayanapet village of Odela Mandal of Karimnagar dist

Date Counsel for the Plaintiff

IN THE COURT OF THE PRL JUNIOR CIVIL JUDGE AT SUTHANABAD

O.S.NO. 2023

Between:- Bolli Sadanandam

Plaintiff/Petitionrer

And

1)Erra Rayamallu and 4 others

Defendants

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 HON’BLE JUNIOR CIVIL JUDGE AT HUZURABAD**

IN THE COURT OF THE PRL JUNIOR CIVIL JUDGE AT SUTHANABAD

OS .NO. 2023

Between:- Bolli Sadanandam plaintiff/Petitionrer

And

1. Erra Rayamallu
2. Erra Saraiah
3. Erra Kanakaiah
4. Erra Odelu
5. Erra Sammaiah

**…Defendant**

**LIST OF DOCUMENTS**

1)Assignment proceeding issued by the Mandal Thasildhar (Previously known as Mandal Revenue Officer)

Date: 3-11-2023 Counsel for plaintiff

PROCESS PAYMENT FROM

IN THE COURT OF THE PRL JUNIOR CIVIL JUDGE AT SUTHANABAD

OS .NO. 2023

Between:- Bolli Sadanandam Petitionrer/Plaintiff

And

1. Erra Rayamallu and others

**Respondent/…Defendant**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Deposit | Name of the party applying | Purpose for deposit | value | Place of affixing process and for cancellation |
| 3-9-2019 | PLAINTIFF | RESPONDENT | RS.33/- |  |
|  |

COUNSEL FOR PLAINTIFF

GENERAL NOTICE (SHOW CAUSE)

IN THE COURT OF THE PRL JUNIOR CIVIL JUDGE AT SUTHANABAD

IA No OF 2023 IN OS.NO. of 2023

Between:- Bolli Sadanadam Petitionrer/Plaintiff

And

1)Erra Rayamallu and others Respondents/Defendants

To,

1)Erra Rayamallu s/o Rayalingu age 70 yrs occu Agriculture

2)Erra Saraiah s/o Rayalingu age 50 yrs occu.Agri.

3)Erra Kanakaiah s/o Rayalingu age 55 yrs occu.Agri. 4)Erra Odelu s/o Rayalingu age 51 yrs occu.Meckanic

4)Erra Kanakaiah s/oRaya Lingu age 51 yrs occu. Mechanic

5)Erra Sammaiah s/o Rayalingu age 45 yrs working as a cmompounder in the hospital all r/o Supunarayanapet village of Odela Mandal of Karimnagar dist

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 SUTHANABAD

OS.NO. of 2023

Between:- Bolli Sadanadam Plaintiff

And

1)Erra Rayamallu and others Defendants

To,

1)Erra Rayamallu s/o Rayalingu age 70 yrs occu Agriculture

2)Erra Saraiah s/o Rayalingu age 50 yrs occu.Agri.

3)Erra Kanakaiah s/o Rayalingu age 55 yrs occu.Agri. 4)Erra Odelu s/o Rayalingu age 51 yrs occu.Meckanic

4)Erra Kanakaiah s/oRaya Lingu age 51 yrs occu. Mechanic

5)Erra Sammaiah s/o Rayalingu age 45 yrs working as a cmompounder in the hospital all r/o Supunarayanapet village of Odela Mandal of Karimnagar dist

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