**IN THE COURT OF THE HON’BLE SENIOR CIVIL JUDGE AT HUZURABAD**

**O.P.NO. of 2024**

Between:-Edavelly Ravinder Reddy Petitioner

And

1)Edelli @Gottemukkula Pavani @Sony Respondent

PETITION FILED U/SEC 13 (1) (ia) OF HINDU MARRIAGE ACT TO DISSOLVE THE MARRIAGE PERFORMED IN BETWEEN THE PETITIONER AND RESPONDENT DT 6-4-2018

May it please your Honour,

**That the above named petitioner begs to submit as under**

1 Description of the Petitioner

Edelli Ravinder reddy s/o Late Adhi Reddy age 34 yrs occu.RTC Employee r/o H.NO.1-11/8,Deshaipally village of Veenavanka Mandal of Karimnagar dist

The address of the petitioner for the purpose of service of notices, process etc, is that of her / his Counsel Sri Nalla Bhoomi Reddy & K.Soumitra Advocates , cell 9948551706 Huzurabad town and Mandal of Karimnagar dist

2 Description of the Respondent:

1)Edelli@Gottumukala Pavani @Sony w/o Ravinder Reddy and D/O Devender Reddy age 23 yrs occu.House wife and private Job r/o at her Grand Parents House at Utoor village of Manakonoor Mandal of Karimnagar dist.The address of the respondents for the purpose of service of notices process etc., is as shown supra

3) The petitioner submitted that the respondent is the legally wedded wife of the Petitioner. The marriage of the petitioner and respondent performed at Deshaipally village of Veenavanka Mandal of Karimnagar dist on 6-4-2018.As the marriage is solemnized and the respondent also joined in the society of the petitioner and lead happy marital life due to their wedlock they blessed with one male child, he was born on 29-7-2021 by name Advaith Reddy .

4) It is further submitted that the marriage of the petitioner and respondent performed in the year of 2018 at Deshaipalli village of Veenavanka Mandal of Karimnagar district. The petitioner and respondent got love each other, as such at the time of marriage, no dowry was presented to the petitioner. In fact, the respondent presented 12 tulas of gold ornaments to the petitioner at the time of marriage. After the marriage, both lived happily for some period only. During their wedlock, they were blessed with one male child namely Edelli Advaith Reddy on 29.07.2021. Thus respondent and the petitioner lived for some period only, during this period also respondent used to pickup quarrels with petitioner and his parents for petty matters without any reason. Even though petitioner patiently bear respondent attitude with a hope that one day or the other day she can change and lead the conjugal society with petitioner. But respondent refused to join the conjugal society of petitioner and she openly stated that she is not interested to join the society of the petitioner and demanded the petitioner to give divorce to her. Thus there were several times negotiations / efforts made by petitioner to take respondent into his marital fold, but they were made in vain,

6) It is further submitted that the petitioner waited all those days she may change to-day or tomorrow or when and then but his expectations are in vain lastly the respondent is not attending her conjugal duties as she neglected her house hold duties and used to picked up quarrel with his mother .Even though the petitioner bear all the torture and harassments made by the respondent and continued his marital life .But the respondent frequently used go to her parents house without any reason and without giving any information to the petitioner .The petitioner went to respondent parents house and requested her to come to join in to his society to lead the conjugal life.But the respondent refused to join the conjugal society of the petitioner and she openly stated that she is not interested to join the society of the petitioner and demanded the petitioner to give divorce to her .Thus there were several times negotiations/efforts made by the petitioner to take respondent in to his manifold but all his tries are in vain .It is further submitted that the respondent after the marriage most of time stayed at her grandparents and parents house by leaving her son at the petitioner in this connection many times the petitioner explained about his son and try to convince her to lead marital life by looking after their son but the adamant respondent did not mend her mind and further the respondent attitude is intolerable and the requests made by the petitioner are in vain.

7)It is further submitted that in the second week of Agust 2022 the respondent went to her parents house to Mamidalapally village and from there she went to her grandparents village at Uttoor village of Manakondoor Mandal of Karimnagar dist and since then she is staying at her grandparents house .The petitioner lastly vexed with the attitude of the respondent and approached his counsel and filed a petition under sec .9 of HINDHU MARRIAGE ACT vide O.P. No. 72 of 2023 on the file of the Senior Civil Judge Huzurabad.In which the notices duly served to the respondent but she did not proceed with the case as the Hon”ble court made ex-parte and passed the decree on 5-1-2024 .It is further submitted that after passing the decree the petitioner sent a legal notice on - - 2024 to her by demand ding to join in to his society but she refused to receive the same she managed the postal authorities and tried not to return the acknowledge card as till today the acknowledgement card is not returned to the petitioner or to his counsel .The postal receipt and copy of legal notice is filed herewith for the kind perusual of the Hon”ble court .

9)It is further submitted That the petitioner is herewith filing (1) The postal receipt (2) copy of legal notice (3)Certified Copy of Judgement dt 5-1-2024 in O.P.No.72of 2023 decreed by this Hon”ble Court 4) Adhar proof of the petitioner and respondent no.1 in Xerox copies for kind perusal of this Hon'ble Court .

10 That the respondent left the society of the petitioner by leaving her son in the second week of Agust 2022 from the Deshaipally village of Veenavanka Mandal of Karimnagar dist since then she residing at her parents and close relatives house and further though the petitioner filed the petition for leading the conjugal life which is also decreed on 5-1-2024, after that the petitioner also sent a legal notice to the respondent although she did not responded as in the circumstances the petitioner has no other go except filing the divorce for cruelty and harassments made by the respondents over the petitioner and on his son and she has been residing at her parents' house Even inspite of several requests to the respondent refused to come and join with the conjugal society of the petitioner' The petitioner took all possible steps to join in to his society, but in vain. Now there is no other chance to lead marital life as husband and wife there is no chance or source of their reunion. Hence, the petitioner has filed this petition seeking divorce on the ground of cruelty and harassments

8. The respondent after the marriage most of the time stayed with her parents' house and short period stayed with the petitioner even that period also, her behavior is not good. The petitioner beard all these torture with a hope that the respondent will amend her attitude one day or the other. But, she did not change her attitude moreover, it became worst the respondent for all these years and still the petitioner is ready to take respondent in to his marital fold but for which she bluntly refused

9. That there are no other petitions are pending under H.M Act for the divorce .The petitioner filed the petition U/S 9 of Hindu Marriage Act by demanding the respondent to provide conjugal life but her denied to come over in to society of the petitioner .Under these circumstances the petitioner has filed this petition for the divorce . Except the present petition There is no other petition in any court except this petition .

10. That there is no collusion between the parties in filing this petition.

11.CAUSE OF ACTION: The cause of action arose at Deshaipalli village of Veenavanka Mandal when on 6-4-20218 the marriage performed in between the petitioner and respondent and when the respondent left the society of the petitioner in the month of August 2022 and further the petitioner filed the ORIGINAL PETITION NO.72 of 2023 and the same is decreed on 5-1-2024 after the decree the petitioner got issued a legal notice to the respondent on - -2024 as all the above dates and places are cause of action to file the petition for divorce

12. That there is no collusion in between the parties to file this petition.

13. That no previous proceedings are initiated by the petitioner in any other court in respect of subject matter of the petition except the petition filed under sec.9 of Hindhu Marriage Act vide O.P.No.72 of 2023

14. That the marriage of the petitioner and respondent was performed at Deshaipally village of Veenavanka mandal of karimnagar dist which is within the territorial jurisdiction of this Hon'ble Court Hence this Hon'ble Court has got territorial jurisdiction to entertain the petition

15 .That the petition is filed within the period of limitation

16. That a court fee of Rs.10/- paid on petition U/Sec 19, Sch II Artcle I (vu) of TS.CF & SV Act which is sufficient.

PRAYER. It is therefore prayed that this Hon'ble Court may be pleased to pass a decree by the following reliefs.

1. To pass a decree of divorce dissolving the marriage in between the petitioner and respondent dated 6-4-2018 at Deshaipally village of Veenavanka Mandal of Karimnagar dist .

b) Cost of the petition may be awarded.

c) Any such other relief or reliefs to which the petitioner is entitled in the circumstances of the case

Date 9-4-2024

Petitioner

VERIFICATIONI, the above named petitioner do hereby solemnly affirm and state that the contents of the petition are true and correct to the best of my knowledge and belief The same is read over and explained to me in Telugu and I signed on this the 9th day of April 2024 at Huzurabad.

petitioner

Filed through : Nalla Bhoomi Reddy and K.Soumitra

Advocates

counsel for the Petitioners

**IN THE COURT OF THE HON’BLE SENIOR CIVIL JUDGE AT HUZURABAD**

**O.P.NO. of 2024**

Between:-Edavelly Ravinder Reddy Petitioner

And

1)Edelli @Gottemukkula Pavani @Sony

Respondent

PETITION FILED U/SEC 13 (1) (ia) OF HIND MARRIAGE ACT1955

Filed on

Filed Through :-

Counsel for the petitioner

Sri Nalla Bhoomi Reddy , &K.SoumitraAdvocate

Cell:9948551706

Huzurabad

**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 HON’BLE SENIOR CIVIL JUDGE AT HUZURABAD**

**O.P.NO. of 2024**

Between:-Edavelly Ravinder Reddy Petitioner

And

1)Edelli @Gottemukkula Pavani @Sony Respondent

**LIST OF DOCUMENTS**

1) Xerox copy Adhar proof of the petitioner

2 Xerox copy Adhar proof of Respondent

3 C.C OF Judgement in O.P.NO.72 OF 2023

4) Office copy of Legal demand notice dt. Along with postal receipts

Date: 9-4-2024 Counsel for petitioner/plaintiff

**PROCESS PAYMENT FROM**

**IN THE COURT OF THE HON’BLE SENIOR CIVIL JUDGE AT HUZURABAD**

**O.P.NO. of 2024**

Between:-Edavelly Ravinder Reddy Petitioner

And

1)Edelli @Gottemukkula Pavani @Sony Respondent

…DEFENDANT/RESPONDENT

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

COUNSEL FOR PLAINTIFF

**GENERAL NOTICE (SHOW CAUSE)**

**IN THE COURT OF THE HON’BLE SENIOR CIVIL JUDGE AT HUZURABAD**

**O.P.NO. of 2024**

Between:-Edavelly Ravinder Reddy Petitioner

And

1)Edelli @Gottemukkula Pavani @Sony Respondent

## To

1)Edelli@Gottumukala Pavani @Sony w/o Ravinder Reddy and D/O Devender Reddy age 23 yrs occu.House wife and private Job r/o at her Grand Parents House at Utoor village of Manakonoor Mandal of Karimnagar dist.

Whereas the above named Petitioner 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)

**IN THE COURT OF THE HON’BLE SENIOR CIVIL JUDGE AT HUZURABAD**

**O.P.NO. of 2023 HUZURABAD**

Between:- Edelli Ravinder reddy s/o Late Adhi Reddy age 34 yrs occu.RTC Employee r/o H.NO.1-11/8,Deshaipally village of Veenavanka Mandal of Karimnagar dist

Petitioner

And

1)Edelli@Gottumukala Pavani @Sony w/o Ravinder Reddy and D/O Devender Reddy age 23 yrs occu.House wife and private Job r/o at her Grand Parents House at Utoor village of Manakonoor Mandal of Karimnagar dist. Respondents

PARTICULERS REQUIRED UNDER RULE 6 OF HINDHU MARRIAGE ACT

|  |  |  |  |
| --- | --- | --- | --- |
| 1 | a) | The place and the date of the marriage | 6-4-2018 At Deshaipally village of veenavanka Mandal of karimnagar district. |
|  | b) | The name of the parties and their occupation | Edelli Ravinder reddy s/o Late Adhi Reddy age 34 yrs occu.RTC Employee r/o H.NO.1-11/8,Deshaipally village of Veenavanka Mandal of Karimnagar dist 1)Edelli@Gottumukala Pavani @Sony w/o Ravinder Reddy and D/O Devender Reddy age 23 yrs occu.House wife and private Job r/o at her Grand Parents House at Utoor village of Manakonoor Mandal |
|  | c) | The place and address where the parties last Resided together with the jurisdiction of the court | The parties last resided and Marriage was performed at Deshaipally village of Veenavanka Mandal of Karimnagar dist t |
|  | d) | The name of the children if any , of the marriage together with their date of birth or ages | Date of Birth of the child 29-7-2021  Male child by name Advaith Reddy |
|  | e) | If prior to date of the petition there had been any proceedings under Act. Between the parties to the petition the full particulars thereof | The petition has been filed by the petitioner U/S 9 of Hindu Marriage Act vide O.P.No.72of 2023 on the file of this Hon”ble Court |
|  | f) | If the petition is for restitution of conjugal rights, the date on or from which the circumstances under which the respondent withdraw from the society of the petitioner | 5-1-2024 the decree is passed since then the respondent never turned her to join in to society of the petitioner . |
|  | g) | If the petition is for judicial separation, the matrimonial offences alleged or other grounds upon which the relief is sought, together with full particulars are known to the petitioner etc., | -NO- |
|  | I) | In the case of alleged desertion, the date and the circumstances under which it began | -NO- |
|  | II) | In case of cruelty or sexual intercourse with any person other than his/her spouse, the specific acts of cruelty occasion when and the places where such acts were committed together with name and address of the petitioner or persons with whom the respondent had sexual intercourse | -No- |
|  | III) | In the case of virulent from, of disease when such ailment began to manifest itself, the nature and the period of the curative steps taken together with the name and address of the person who treated for such ailment and in the case of venereal disease the it was not contracted from the petitioner. | -Nil- |
|  | IV) | In the case of un-soundness of mind, the time when such un-soundness began to manifest itself, the nature and period of any curative steps taken together with the name and address of the person who treated for such un-soundness of mind. | -Nil- |
|  | V) | If the petition is for divorce, the matrimonial offence alleged or other grounds upon which the relief is sought together with the full particulars are known to the petitioner | The Respondent used to harass without attending the conjugal duties |
|  | vi) | In the case adultery, the specific acts of adultery and the occasion when the place where such acts were committed together with the name and address of the person with whom such adultery was committed. | -No- |
|  | vii) | In the case of incurable unsoundness of mind, the time when such unsoundness began to manifest itself, the nature and period of any curative steps taken together with the name and address of the person who treated for such unsoundness of mind | -Nil- |
|  | viii) | In the case of virulent and incurable from leprosy or venereal diseases in a communicable form, when such ailment began to manifest itself the nature and the period of any curable steps taken together with name and address of the person who treated for such ailment. | -Nil- |
|  | ix) | In the case of presumption of death, the last place where the parties lived together, date when and the place where the respondent was last seen steps if any taken to ascertain his or her whereabouts. | -Nil- |
|  | x) | If the petition for decree of nullity of marriage on the grounds specified in col.(c) or Cl.(d) of sub section 1 of sec.12 of the Act. The time when the facts relied on where discovered or not material intercourse with the consent of the petitioner took place after the discovery of the said fact. | -Nil- |
| 2 |  | The petition shall set out at the end the relief of reliefs sought including any claim for | The petitioner petition filed u/sec 13 (1) (ia) of hindu marriage act |
|  | i) | Custody, care and maintenance of children | Male Child Advaith Reddy Under the cusdody of the Petitioner |
|  | ii) | Permanent alimony and maintenance |  |
|  | iii) | Costs |  |
| PETITIONER  VERIFICATION: I, the above named petitioner do here by declare that the particulars furnished in the above original petition are true and correct to the best of our knowledge and belief, hence verified and signed on this 9th day of April 2024 at Huzurabad  PETITIONER | | | |

FILED THROUGH

Nalla Bhoomi Reddy

Counsel for the petitioner No.1 and 2