IN THE COURT OF THE PRL JUNIOR CIVIL JUDGE AT HUZURABAD

OS.NO. of 2024

Between:-Kondaboina Manga and another plaintiff/Petitionrer

And

1)Kondaboina Rajamallu

2)Kondaboina Srinivas

3)Kondaboina Rama Devi

4)Kondaboina Ashok

5)Kondaboina Anil

6) Kondaboina Aravindh

Defendant/Respondent

SUIT CLAIM:- SUIT FOR PERPETUAL INJECTION IN RESPECT OF SY.NO. 686/A,B,C,D,E,G AN EXTENT AREA 0-12GTS, 0-13 GTS,0-24GTS,0-16 GTS AND 0-06-1/2 GTS ,0-14 GTS. IN TOTAL ACRES 2-05-1/2 GTS.ALL THE SURVEY NUMBERS ARE THE ABUTTING EACH OTHER AS HAVING COMMON BOUNDARIES WHICH IS SPECIFICALLY SHOWN IN AS ITEM NO.1 SITUATED AT GANGARAM VILLAGE OF VEENAVANKA MANDAL OF KARIMNAGAR DIST AND IN SY.NO. 8/17 AN EXTENT ARE 0-15GTS WHICH IS SPECIFICALLY SHOWN AS ITEN NO.2 SITUATED AT ARKANDLA SHIVAR OF SHANKARAPATNAM MANDAL OF KARIMNAGAR DIST WHICH SPECIFICALL 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

## Description of the Plaintiff

1)Kondaboina Manga w/o Anjaneyulu @Anjaiah age 55 yrs occu.House wife

2)Kondaboina Anjaneyulu s/o Late Rajaiah age 64 yrs occu.Agri. Both are r/o Gangaram village of Veenavanka 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

**Description of the defendants**

1)Kondaboina Rajamallu @Rayamallu s/o Late Rajaiah age 70 yrs occu.Agri.

2)KondaboinaSrinivas s/o Rajamallu @Rayamallu age 45 yrs occu.Agri both are r/o Devampally village Manakondur Mandal of Karimnagar dist

3)Kondaboina Rama Devi @Samudrala Ramadevi d/o Late Ramchandram age 40 yrs occu. House wife

4)Kondaboina Ashok s/o s/o Late Rajaiah age 55 yrs occu.Agri.

5) Kondaboina Anils/o Ashok age 29 yrs occu. Agri. And Business

6)Kondaboina Aravindh s/oAshok age 22yrs. Occu. Agri. The Adress 4 to6 r/o Gangaram Village of Veenavanka Mandal of Karimnagar dist

3) The plaintiff No.1 is the wife of the Plaintiff no.2 .The defendant no.1 is Elder brother of the Plaintiff no.2 .The Defendant no.2 is the son of the defendant no.1 .The Defendant no.3 is daughter of the own brother of the Plaintiff no.2 who was died .The defendant no.4 is the younger brother of the plaintiff no.2.The defendant no.5and 6 are the sons of the defendant no.4.As the The Plaintiff no.2 and Defendant no.1and father of the defendant no.3 who was the Late Ramchander and defendant no.4 are the sons of the Late Kondaboina Rajaiah .Thus all the Plaintiffs and defendants are belongs to the same family .

THE PEDIGREE SHOWN FOR BETTER UNDERSTANDING

Kondaboina Rajaiah

Rajamallu (D1) Ramchandram(Died) Anjaneyulu( P2) Shankaramma Ashok(D4)

Srinivas(D2) Ramadevi (D3) K.Manga(P1)

Anil (D5) Aravind(D6)

4)The plaintiff no.1 is owner and possessor of the land in respect of sy.no. 686/A,B,C,D,E,G an extent area 0-12gts, 0-13 gts,0-24gts,0-16 gts and 0-06-1/2 gts ,0-14 gts.respectively in total acres 2-05-1/2 gts.all the survey numbers are the abutting each other as having common boundaries which is specifically shown in as item no.1 situated at Gngaram village of veenavanka mandal of Karimnagar dist and the plaintiff no.2 is the absolute owner and exclusive possessor of the sy.no. 8/17 an extent are 0-15gts which is specifically shown as item no.2 situated at Arkandla shivar of Shankarapatnam mandal of Karimnagar dist which is specifically shown in the schedule appended to the plaint.The Plaintiff no.1 is the owner and possessor of the Item no.1 and the plaintiff no.2 is the owner and possessor of the item no.2 shown in the schedule appended to the plaint .

5) The plaintiffs submitted that the Item no.1 property is an extent area Acres2-5-1/2 Gts.out of which the plaintiff no.2 got an extent area about 0-20gts fell to his share out of his joint family partition, and an extent area Acre1-03 gts purchased by the plaintiff no.2 from his father, and further an extent area 0- about 0-22gts also purchased by the plaintiff no.2 which is belongs to his father .Infact during the life time of the father of the plaintiff no.2 defendant no1 and 4 which was allotted for his maintenance, but very later the elderly parsons made resolution to cultivate the same by the plaintiff no.2 and even though after the demise of the father of the plaintiff no.2 the land shall be allotted to the plaintiff no.2 which is settled in the year of 2004 .Since then the Plaintiffs is cultivating the same till to date .In fact the father of the plaintiff no.2 executed the Gift settlement deed in fever of the plaintiff no.2 for the extent of Acre 1-21-1/2 gts by mentioning the entire land boundariesof Item no.1 schedule. Furthermore during his life time his father could have executed the registered deed in fever of the plaintiff no.2 , for the remaining of the land ,but at that time there is no revenue record available on the name of the father of the plaintiff no.2 .It continues till today, the land though in the possession of the plaintiff no1and 2 the revenue record is not in fever of the plaintiff no.2 or his father as it is keeping in the mind the father of the plaintiff executed the gift deed in fever of the plaintiff no.2 by mentioning the entire land boundaries of schedule Item No.1 through the gift registered deed vide document 2721 of 2002 subsequently in the year of 2004 settled the matter before the elders and reduced in to writing the same and the original family settlement is with the defendant no.1 , the Xerox copy of the same is filed here with because of he is the elder brother of the plaintiff no. 2. And elder son in the house of the of late Kondaboina Rajaiah as the elderly persons handed over the same to the defendant no.1 . As per the family settlement the plaintiff no.2 obeyed and cultivating the itme no.1 till to date .Only non availability of the revenue records the father of the plaintiff no.2 could not have executed the registered deed in fever of the plaintiff no.2.It is taking advantage the defendant no.1 to 6 joined hands to each other and furthermore ,in recent short the land rates of the schedule Item no.1 is hiked in manifold it is become eyesore to the defendant no1 to 6 and started the illegal activities and creating troubles to the plaintiff no1 and 2 .At present the schedule Item no 1 property is gifted by the plaintiff no.2 in fever of the plaintiff no.1 as Item no.1 property stands on the name of the plaintiff no.1 .It is further submitted that the Item no.2 property is on the name of the Plaintiff no.2 which is acquired by the plaintiff no.2 through Governament but infact it is Governament land on the name of the plaintiff no.2 .

6) The plaintiffs further submitted that in support of their contention they have filed the fallowing documents they are

i)On-line Darani portal pahanies generated from onlinein 5sheets

ii)I-B specimen copy23-1-2024 in respect of Item no.1

iii) I-B specimen copy23-1-2024 in respect of Item no.2

iv) On-line Darani portal pahanies generated from onlinein in respect of Item no.2

v) Bank authorization letter by certifying the Bank Manager of Union Bank of India Challuralong with the Degital pass book of the Plaintiff no.1

vi) Bank authorization letter by certifying the Bank Manager of Union Bank of India Challuralong with the Degital pass book of the Plaintiff no.2

vii) Xerox copy of GDEntry of Police Veenavanka

viii)Original Registered Gift deed executed by the plaintiff no.2in fever of the plaintiff no.1 vide docu.184/2023

viii) Original Registered Gift deed executed by the father of the plaintiff no.2in fever of the plaintiff no.2 vide document no.2721/2002

viiii) Original simple sale deed dt 30-9-2001 executed by the father of the plaintiff no.2

x)Xerox Family settlement dt3-3-2004

xi)Original Proceeding issued by the Mandal Revenue Officers dt3-4-1993

xi) Original Proceeding issued by the Mandal Revenue Officers dt-4-2004

xii) Old Pattedhar Pass Book vide patta 1861 and bearing pass book no.268511

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

6)The plaintiff no.1 and 2 having the daughters only they have no male issues further the plaintiff no.1 being a lady the plaintiff no.2 is the innocent and old aged person it is taking advantage the all the defendants joined hands and interfering with peaceful possession of the properties of the plaintiffs over the schedule Item no.1 .and 2 .It is further submitted that in fact over the property of Item no.2 there is no such any dispute but all the defendants showing the reason that to clear up the dispute of the Item no.1 though there is no dispute over all properties of the plaintiffs as they openly declaring that they would not allow the plaintiffs over the schedule properties, and on 16-1 2024 when the plaintiffs cultivating the suit schedule Item no.1 and 2 properties the all defendants interfered and further the defendant no 5and 6 tried to beat the plaintiff no1but the plaintiff no1 and 2 gave a police complaint against the all the defendants on which the police concerned made G.D.entry and replied that it is being a nature of civil dispute as advised to get the appropriate orders from the competent civil court 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 declaration of title for the extent of 0-25 gts which is part and parcel of the suit land Item No.1.

7)It is further submitted that the defendants 1 to 6 are joined hands they all with evil intention with eyesore that the rate of the lands of the plaintiffs is having more value keeping in the mind they all together tried to encroach in to the land of the plaintiffs furthermore the all the defendants are having large group of persons and they are having the money 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 declaration of title for the extent of 0-24 gts .Hence the suit

4) CAUSE OF ACTION -:The cause of action arose on 16-1-2024 when the plaintiffs working Agriculture operation in the field which is the suit land the all the defendants visited the suit land and warned the plaintiff with dire consequences at suit land and created some galata which is situated at Gangaram shivar of Veenavanka Mandal and Arkandla shivar of Shankarapatnam Mandal of Karimnagar dist are above date and place of the casue of action to file the suit

5)JURISDICTION -:The suit land situated at Gangaram shivar of Veenavanka Mandal and Arkandla shivar of Shankarapatnam Mandal of Karimnagar dist 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.11,30,625/- out of which the suit for declaration title and injection for the extent of 0-24 gts which is part and parcel of the Item no.1 propety as it market value comes rs.2,70,000/-on which the plaintiff valued the relief under sec 24 (b) one half of the market value which comes rs 1,35,000/- on which rs 3826 /- is paid for the declaration title and for consequential relief of injection and further the remaining land value comes rs. 8,60,625 comes on which the plaintiff notionally valued the relief on rs 86,062/-- on which the amount of rs 3186/- /- is paid under section 24 (c) of court fee and suit valuation act in total amount of rs.7012 is paid and affixed to the plaint .

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

i) Declare the Plaintiff no.1and 2 as owner of the land an extent area 0-24 gts which is part and parcel of the schedule item no.1

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

iii) Costs of the suit may be awarded

date 5-11-2023 Plaintiff no.1 Plaintiff no.2

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 no.1 Plaintiff no.2

Filed through -: Nalla Bhoomi Reddy

Advocate ,Huzurabad

IN THE COURT OF THE PRL JUNIOR CIVIL JUDGE AT HUZURABAD

OS.NO. of 2024

Between:-Kondaboina Manga and another plaintiff/Petitionrer

And

1)Kondaboina Rajamallu and others

Defendant/Respondent AFFIDAVIT

I Kondaboina Manga w/o Anjeneyulau age 56yrs occu.House wife r/o Gangaram village of Veenavanka Mandal of Karimnagar dist dist dohere by state on oath as under

1) I am the petitioner herein and plaintiff no.1 of the suit as such I have fully acquainted with the facts of the case.Further I am deposing for myself and on behalf of the plaintiff no.2 also

3) That I am the wife of the Petitionerno.2 .The Rrespondent no.1 is Elder brother of the Petitioner no.2/Plaintiff no.2 .The Respondent no.2 is the son of the respondent no.1 .The Respondent no.3 is daughter of the own brother of the Petitionerno.2 who was died .The respondent no.4 is the younger brother of the petitionerno.2.The respondent no.5and 6 are the sons of the respondent no.4.As the The Petitionerno.2 and Respondent no.1and father of the respondent no.3 who was the Late Ramchander and respondent no.4 are the sons of the Late Kondaboina Rajaiah .Thus all the Petitioner/Plaintiffs and respondents are belongs to the same family .

THE PEDIGREE SHOWN FOR BETTER UNDERSTANDING

Kondaboina Rajaiah

Rajamallu (D1) Ramchandram(Died) Anjaneyulu( P2) Shankaramma Ashok(D4)

Srinivas(D2) Ramadevi (D3) K.Manga(P1)

Anil (D5) Aravind(D6)

4)The petitionerno.1 is owner and possessor of the land in respect of sy.no. 686/A,B,C,D,E,G an extent area 0-12gts, 0-13 gts,0-24gts,0-16 gts and 0-06-1/2 gts ,0-14 gts.respectively in total acres 2-05-1/2 gts.all the survey numbers are the abutting each other as having common boundaries which is specifically shown in as item no.1 situated at Gngaram village of veenavanka mandal of Karimnagar dist and the Petitioner no.2 is the absolute owner and exclusive possessor of the sy.no. 8/17 an extent are 0-15gts which is specifically shown as item no.2 situated at Arkandla shivar of Shankarapatnam mandal of Karimnagar dist which is specifically shown in the schedule appended to the plaint.The Petitionerno.1 is the owner and possessor of the Item no.1 and the petitionerno.2 is the owner and possessor of the item no.2 shown in the schedule appended to the plaint .

5) The Petitioners/plaintiffs submitted that the Item no.1 property is an extent area Acres2-5-1/2 Gts.out of which the petitionerno.2 got an extent area about 0-20gts fell to his share out of his joint family partition, and an extent area Acre1-03 gts purchased by the petitionerno.2 from his father, and further an extent area about 0-22gts also purchased by the petitionerno.2 which is belongs to his father .Infact during the life time of the father of the petitionerno.2 and respondent no1 and 4 which was allotted for his maintenance, but very later the elderly parsons made resolution to cultivate the same by the petitionerno.2 and even though after the demise of the father of the petitionerno.2 the land shall be allotted to the petitionerno.2 which is settled in the year of 2004 .Since then the we the petitioner/Plaintiffs is cultivating the same till to date .In fact the father of the petitionerno.2 executed the Gift settlement deed in fever of the petitionerno.2 for the extent of Acre 1-21-1/2 gts by mentioning the entire land boundaries of Item no.1 schedule. Furthermore during his life time his father could have executed the registered deed in fever of the petitionerno.2 , for the remaining of the land ,but at that time there is no revenue record available on the name of the father of the petitionerno.2 .It continues till today, the land though in the possession of the petitionerno1and 2 the revenue record is not in fever of the petitionerno.2 or his father as it is keeping in the mind the father of the petitionerno.2 executed the gift deed in fever of the petitionerno.2 by mentioning the entire land boundaries of schedule Item No.1 through the gift registered deed vide document 2721 of 2002 subsequently in the year of 2004 settled the matter before the elders and reduced in to writing the same and the original family settlement is with the respondent no.1 , the Xerox copy of the same is filed here with because of he is the elder brother of the petitionerno. 2. And elder son in the house of the of late Kondaboina Rajaiah as the elderly persons handed over the same to the respondent no.1 . As per the family settlement the petitionerno.2 obeyed and cultivating the itme no.1 till to date .Only non availability of the revenue records the father of the petitionerno.2 could not have executed the registered deed in fever of the petitionerno.2.It is taking advantage the respondent no.1 to 6 joined hands to each other and furthermore ,in recent short the land rates of the schedule Item no.1 is hiked in manifold it is become eyesore to the respondent no1 to 6 and started the illegal activities and creating troubles to the petitionerno1 and 2 .At present the schedule Item no 1 property is gifted by the petitionerno.2 in fever of the me/petitionerno.1 as Item no.1 property stands on my name .It is further submitted that the Item no.2 property is on the name of the Petitionerno.2 which is acquired by the petitionerno.2 through Governament but infact it is Governament land on the name of the petitionerno.2 .

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

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

7)I further submitted I and The petitionerno. 2 having the daughters only we have no male issues further the I am being a lady the petitionerno.2 is the innocent and old aged person it is taking advantage the all the respondents joined hands and interfering with peaceful possession of the properties of the us over the schedule Item no.1 .and 2 .It is further submitted that in fact over the property of Item no.2 there is no such any dispute but all the respondents showing the reason that to clear up the dispute of the Item no.1 though there is no dispute over all of our properties as they openly declaring that they would not allow me and the petitioner no.2 over the schedule properties, and on 16-1 2024 when the I am cultivating the suit schedule Item no.1 and 2 properties the all respondents interfered and further the respondent no 5and 6 tried to beat me/ petitionerno1 and I also gave a police complaint against the all the respondents on which the police concerned made G.D.entry and replied that it is being a nature of civil dispute as advised to get the appropriate orders from the competent civil court in the circumstances the I have no other go except approach the Hon”ble court for the equitable relief of perpetual injection orders over the suit lands and for declaration of title for the extent of 0-25 gts which is part and parcel of the suit land Item No.1.

8)It is further submitted that the respondents 1 to 6 are joined hands they all with evil intention with eyesore that the rate of the lands of us/ the plaintiffs is having more value keeping in the mind they all together tried to encroach in to the land of us/ the plaintiffs furthermore the all the respondents are having large group of persons and they are having the money and 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 Ad-Intrem injection order over the suit lands , When I am cultivating the suit lands on 16-1-2024 when I am working Agriculture operation in the field which is the suit land the all the respondents visited the suit land and warned me with dire consequences at suit land and created some galata on which I gave a police complaint .it is taking advantage the Respondents 1 to 6 in collusion hatched a plan to grab suit land with out any valid title or possession 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 there is every apprehension of danger in the hands of the Respondents 1 to 6.It is further submitted that the Respondents 1 to 6 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

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 SUTHANABAD

IA No OF 2023

IN

OS.NO. of 2024

Between:- 1)Kondaboina Manga w/o Anjaneyulu @Anjaiah age 55 yrs occu.House wife

2)Kondaboina Anjaneyulu s/o Late Rajaiah age 64 yrs occu.Agri. Both are r/o Gangaram village of Veenavanka Mandal of Karimnagar dist Kondaboina Manga and another Petitionrer/Plaintiff

And

1)Kondaboina Rajamallu @Rayamallu s/o Late Rajaiah age 70 yrs occu.Agri.

2)KondaboinaSrinivas s/o Rajamallu @Rayamallu age 45 yrs occu.Agri both are r/o Devampally village Manakondur Mandal of Karimnagar dist

3)Kondaboina Rama Devi @Samudrala Ramadevi d/o Late Ramchandram age 40 yrs occu. House wife

4)Kondaboina Ashok s/o s/o Late Rajaiah age 55 yrs occu.Agri.

5) Kondaboina Anils/o Ashok age 29 yrs occu. Agri. And Business

6)Kondaboina Aravindh s/oAshok age 22yrs. Occu. Agri. The Adress 4 to6 r/o Gangaram Village of Veenavanka Mandal of Karimnagar dist Respondent/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 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 SUTHANABAD

IA No OF 2023

IN

OS.NO. of 2024

Between:- 1)Kondaboina Manga and another

plaintiff/Petitionrer

And

1)Kondaboina Rajamallu @Rayamallu and others

AFFIDAVIT FILED UNDER 26 OF C.P.C

I Kondaboina Manga w/o Anjaneyulu age 55 yrs r/o Gangaram village of Veenavanka Mandal of Karimnagar dist dohere by 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) That I am the the owner and possessor of the land in respect of sy.no. 686/A,B,C,D,E,G an extent area 0-12gts, 0-13 gts,0-24gts,0-16 gts and 0-06-1/2 gts ,0-14 gts.respectively in total acres 2-05-1/2 gts.all the survey numbers are the abutting each other as having common boundaries which is specifically shown in as item no.1 situated at Gngaram village of veenavanka mandal of Karimnagar dist and the Petitioner no.2 is the absolute owner and exclusive possessor of the sy.no. 8/17 an extent are 0-15gts which is specifically shown as item no.2 situated at Arkandla shivar of Shankarapatnam mandal of Karimnagar dist which is specifically shown in the schedule appended to the plaint. 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 lands out of the family partition and purchase of some extent 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 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 SUTHANABAD

IA No OF 2023

IN

OS.NO. of 2024

Between:- 1)Kondaboina Manga and another

plaintiff/Petitionrer

And

1)Kondaboina Rajamallu @Rayamallu and others Respondents

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

I Kondaboina Manga w/o Anjaneyulu age 55 yrs r/o Gangaram village of Veenavanka Mandal of Karimnagar dist dohere by 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) That I am the the owner and possessor of the land in respect of sy.no. 686/A,B,C,D,E,G an extent area 0-12gts, 0-13 gts,0-24gts,0-16 gts and 0-06-1/2 gts ,0-14 gts.respectively in total acres 2-05-1/2 gts.all the survey numbers are the abutting each other as having common boundaries which is specifically shown in as item no.1 situated at Gngaram village of veenavanka mandal of Karimnagar dist and the Petitioner no.2 is the absolute owner and exclusive possessor of the sy.no. 8/17 an extent are 0-15gts which is specifically shown as item no.2 situated at Arkandla shivar of Shankarapatnam mandal of Karimnagar dist which is specifically shown in the schedule appended to the plaint. 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 lands out of the family partition and purchase of some extent 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 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 SUTHANABAD

IA No OF 2023

IN

OS.NO. of 2024

Between:- 1)Kondaboina Manga and other plaintiff/Petitionrer

And

1)Kondaboina Rajamallu @Rayamallu and others

Respondents/Defendants

MEMO OF THE ADRESSEESS OF THE PARTIES

1)DESCRIPTION OF THE PLAINTIFF

1)Kondaboina Manga w/o Anjaneyulu @Anjaiah age 55 yrs occu.House wife

2)Kondaboina Anjaneyulu s/o Late Rajaiah age 64 yrs occu.Agri. Both are r/o Gangaram village of Veenavanka Mandal of Karimnagar dist Kondaboina Manga and another

2)DESCRIPTION OF THE DEFENDANTS:- 1)Kondaboina Rajamallu @Rayamallu s/o Late Rajaiah age 70 yrs occu.Agri.

2)KondaboinaSrinivas s/o Rajamallu @Rayamallu age 45 yrs occu.Agri both are r/o Devampally village Manakondur Mandal of Karimnagar dist

3)Kondaboina Rama Devi @Samudrala Ramadevi d/o Late Ramchandram age 40 yrs occu. House wife

4)Kondaboina Ashok s/o s/o Late Rajaiah age 55 yrs occu.Agri.

5) Kondaboina Anils/o Ashok age 29 yrs occu. Agri. And Business

6)Kondaboina Aravindh s/oAshok age 22yrs. Occu. Agri. The Adress 4 to6 r/o Gangaram Village of Veenavanka Mandal of Karimnagar dist

Date

Counsel for the Plaintiff

IN THE COURT OF THE PRL JUNIOR CIVIL JUDGE AT HUZURABAD

O.S.NO. 2024

Between:- Kondaboina Manga and another

Plaintiff/Petitionrer

And

1)Kondaboina Rajamallu and others

Respondents/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

OS .NO. 2023

Between:- Kondaboina Manga and another Petitionrer/Plaintiff

And

Kondaboina Rajamallu @Rayamallu and others

Respondent/Defendant

LIST OF DOCUMENTS FILED BY THE PLAINTIFFS

i)On-line Darani portal pahanies generated from onlinein 5sheets

ii)I-B specimen copy23-1-2024 in respect of Item no.1

iii) I-B specimen copy23-1-2024 in respect of Item no.2

iv) On-line Darani portal pahanies generated from onlinein in respect of Item no.2

v) Bank authorization letter by certifying the Bank Manager of Union Bank of India Challuralong with the Degital pass book of the Plaintiff no.1

vi) Bank authorization letter by certifying the Bank Manager of Union Bank of India Challuralong with the Degital pass book of the Plaintiff no.2

vii) Xerox copy of GDEntry of Police Veenavanka

viii)Original Registered Gift deed executed by the plaintiff no.2in fever of the plaintiff no.1 vide docu.184/2023

viii) Original Registered Gift deed executed by the father of the plaintiff no.2in fever of the plaintiff no.2 vide document no.2721/2002

viiii) Original simple sale deed dt 30-9-2001 executed by the father of the plaintiff no.2

x)Xerox Family settlement dt3-3-2004

xi)Original Proceeding issued by the Mandal Revenue Officers dt3-4-1993

xi) Original Proceeding issued by the Mandal Revenue Officers dt-4-2004

xii) Old Pattedhar Pass Book vide patta 1861 and bearing pass book no.268511

Date: 26-2-2024 Counsel for plaintiff

PROCESS PAYMENT FROM

IN THE COURT OF THE PRL JUNIOR CIVIL JUDGE AT SUTHANABAD

OS .NO. 2023

Between:- Kondaboina Manga and another Petitionrer/Plaintiff

And

1. Kondaboina Rajamallu @Rayamallu and others

**Respondent/…Defendant**

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

COUNSEL FOR PLAINTIFF

GENRAL NOTICE (SHOW CAUSE)

IN THE COURT OF THE PRL JUNIOR CIVIL JUDGE AT SUTHANABAD

IA No OF 2023 IN OS.NO. of 2023

Between:-Kondaboina Manga and another Petitionrer/Plaintiff

And

1)Kondaboina Rayamallu @Rajamallu and others Respondents/Defendants

To,

1)Kondaboina Rajamallu @Rayamallu s/o Late Rajaiah age 70 yrs occu.Agri.

2)KondaboinaSrinivas s/o Rajamallu @Rayamallu age 45 yrs occu.Agri both are r/o Devampally village Manakondur Mandal of Karimnagar dist

3)Kondaboina Rama Devi @Samudrala Ramadevi d/o Late Ramchandram age 40 yrs occu. House wife

4)Kondaboina Ashok s/o s/o Late Rajaiah age 55 yrs occu.Agri.

5) Kondaboina Anils/o Ashok age 29 yrs occu. Agri. And Business

6)Kondaboina Aravindh s/oAshok age 22yrs. Occu. Agri. The Adress 4 to6 r/o Gangaram Village of Veenavanka 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:- Kondaboina Manga and another Plaintiff

And

1)Kondaboina Rajamallu @Rayamallu and others Defendants

To,

1)Kondaboina Rajamallu @Rayamallu s/o Late Rajaiah age 70 yrs occu.Agri.

2)KondaboinaSrinivas s/o Rajamallu @Rayamallu age 45 yrs occu.Agri both are r/o Devampally village Manakondur Mandal of Karimnagar dist

3)Kondaboina Rama Devi @Samudrala Ramadevi d/o Late Ramchandram age 40 yrs occu. House wife

4)Kondaboina Ashok s/o s/o Late Rajaiah age 55 yrs occu.Agri.

5) Kondaboina Anils/o Ashok age 29 yrs occu. Agri. And Business

6)Kondaboina Aravindh s/oAshok age 22yrs. Occu. Agri. The Adress 4 to6 r/o Gangaram Village of Veenavanka 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

IN THE COURT OF THE PRL JUNIOR CIVIL JUDGE AT SUTHANABAD

OS.NO. of 2023

Between:- Kondaboina Manga and another Plaintiff

And

1)Kondaboina Rajamallu @Rayamallu and others Defendants

PETITION SCHEDULE PROPERTY ITEM NO.1

|  |  |  |  |
| --- | --- | --- | --- |
| SL.NO | SY.NO. | EXTENT AREA | BOUNDARIES |
| 1 | 686/A,B,  C,D,E,G | 0-12gts,0-13gts,0-24 gts,0-16 gts,0-6-1/2 gtsand 0-14 gts respectively in total Acre 2-5-1/2gts | East: Constructed tin shed of the Plaintiff s and R&Broad leading to Challure  West:Cart way and Land of Gujjula Nagi Reddy  North:-Land of Kondaboina Laxmaiah and Houses of others (P.Venkat reddy ,K.sambareddy)  South:-Land of Thippireddy and Koyya Sampath |

The above schedule situated at Gangaram village of Veenavanka Mandal of Karimnagar dist

PETITION SCHEDULE PROPERTY ITEM NO.2

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| |  |  |  |  | | --- | --- | --- | --- | | Sl.no. | Sy.no. | EXTENT | BOUNDARIES | | 1 | 8/17 | 0-15 GTS | EAST:Road leading to CHALLURE  West:Land of Kondaboina Rayamallu  North:Land of Kondaboina rama @Samudrala Rama  South:Land of Kondaboina Rajamallu | |

The schedule property Item no2 situated at Arkandla shivar of Shankarapatnam Mandal of Karimnagar dist Date Plaintiff no1 Plaintiff No.2

Verification :we the plaintiffs stated the above schedules true and correct and verified by usto the best our knowledge and belief ,hence verified

Date Plaintiff no1 Plaintiff No.2

FORM NO.8

IN THE COURT OF THE PRL JUNIOR CIVIL JUDGE AT SUTHANABAD

OS.NO. of 2023

Between:- Kondaboina Manga and another Plaintiff

And

1)Kondaboina Rajamallu @Rayamallu and others Defendants

VALUATION OF THE IMMOVEABLE PROPERTY

1)Market Valuation of the schedule property :

2)The property situated in which village: of Karimnagar dist

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

4) The sub- Registrar office and Talaq :Joint-Sub Registrar cum Mandal Thasildhar Jammikunta and

Huzurabad

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