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

O.P NO 86 OF 2023

BETWEEN:- Dudapaka Harish Petitioner

And

Dudapaka@ Janne Manisha Respondent

COUNTER FILED BY THE RESPONDENT

May it please your Honour,

1)It is submitted that the entire allegations made in the petition is totally false except save those are specifically admitted by this respondent in the counter

2)In reply to para no.3 of the petition is that It is true , That the respondent is legally wedded wife of the petitioner. The marriage was performed on 19-12-2021 at the parents' house of the respondent at Madipally village of Jammikunta mandal of Karimnagar district as per Hindu customs and rites prevailing in their community, The petitioner married the respondent without taking any dowry is false and denied

3) That after marriage the respondent joined with the conjugal society of the petitioner and lived together for a period of six months is also false and denied , During their wedlock no children were born to them is true and correct .

4)That after the respondent started disliking the petitioner is also false . She did not treat the petitioner as her husband is also false and denied .She do not routine house works on abused and insulted the petitioner on petty issues is false , She often stated that with the petitioner as she is not interested to live with him She stated with the petitioner that her parents performed her marriage without her will is also false .The petitioner tolerated the harassments of the respondent with a hope that she may change on one day or other day is also false. But the respondent did not change her attitude The respondent did not co-operate with the petitioner to lead marital life happily is also false.

5)That after on 14-04-2022 the respondent voluntarily left the society of the petitioner without the knowledge and consent of the petitioner by taking all her belongings is also false and denied . That after she did not return to the house of the petitioner house ,the petitioner went to the respondents parents house and requested her to come and join with his conjugal society, but the respondent refused to come and join with the conjugal society of the petitioner and demanded the petitioner to give divorce to her is utterly false and denied .

6)That on the request of petitioner the caste and village elders also conducted panchayaths four times at Ellandakunta village and advised, the respondent to come and join with the conjugal society of the petitioner is also false , But the respondent bluntly refused the same Her parents also refused to send the respondent to lead marital life is all false and demanded for the divorce by the parents is also false.

8 That the elders tried to their level best to reunite the petitioner and respondent to live amicably and to lead marital life happily But the respondent is still refusing to lead marital life happily with the petitioner and demanding divorce from the petitioner is also false and denied .

9 That the petitioner is herewith filing (1) Original Wedding Card (2) Wedding photos-2. (3) Original Aadhar Card of the petitioner and (4) Xerox copy adhar Card of the respondent for kind perusal of this Hon'ble Court is true and correct.

10 That the respondent voluntarily left the society of the petitioner and she has been residing at her parents' house Even in spite of several requests the respondent refused to come and join with the conjugal society of the petitioner's is also false . The petitioner took all possible steps to take her back 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 is also false and denied . Hence, the petitioner has filed this petition seeking divorce on the ground of cruelty is nothing but created story .

11 That the cause of action arose on 14-04-2022 when the respondent left the society of the petitioner and since then the respondent has not been coming to the petitioner's house to join with the conjugal society of the petitioner to join with conjugal society of the petitioner is also false and denied . That the parties are Hindus by religion is true.

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

13 That no previous proceedings are initiated by the petitioner in any other court in respect of subject matter of the petition may be true .It is further submitted that in respect of para no.14,15,and 16 is pertainains to Jurisdiction ,Limitation and and court fee paras are the formal paras for every suit as needs no reply

14) It is submitted that the petitioner filed this petition on the basis of all the false grounds as liable to be dismissed as he is not entitled to get the divorce

15)The real facts of the case are that : It is submitted that the petitioner is native of the Akinapally village of the Mogullapally Mandal of Bhupalpally jayashanker dist .The respondent parents belongs to Madipally village of Jammikunta Mandal of Karimnagar dist .The parents of the respondents given in to marriage to the petitioner .The Elderly persons settled the marriage .

16) The marriage solemnized on 19-12-2021 at house of the respondents in the Madipally village of Jammikunta Mandal of Karimnagar dist .At the time of marriage the respondent parents an amount of rs. 2,50,000/- in net cash and worth of House hold articles rs.1,50,000/- is presented to the petitioner those are Double cot beds worth 75000/-, Almarh(Beerva) worth of rs.10,000/- A.C.Cooler wotrth of rs. 10,000/- and dressing Table worth of rs 10,000/- and Chairs worth of rs 2000/- further Gold ring woth of rs. 35,000/-and still other house hold articles worth of rs. 8000/- as total rs 400,000/- given to the petitioner towards all customary and dowry and performed the marriage on 19-12-2021 at Madipally village of Jammikunta as per the prevailing the customs and rites in the caste

17) It is further submitted after the marriage the petitioner taken the respondent in to his society .The respondent also tried to lead happy marital life with petitioner .It is further submitted that after the marriage of the 4 or 5 days the petitioner started harassments by questioning like before the marriage did you love any others .Have you any love experience and further doubted her originate and character on which the respondent tried to convince him but the malafide petitioner used to beat her by doubting her character with so many reasons .

18) It is further submitted that the petitioner used to say like if he married any another women he will get amount of dowry rs.10,00000/- (Ten Lackhs) and further used harass to bring additional dowry amount of rs. 2,00,000/- for which the respondent stated that her parents unable to pay such amount because of already they spend their entire amount for her marriage as they unable to give such amount but the petitioner keeping it in the mind used to beat the respondent, and the petitioner is under intoxication condition used to beat her by saying that to bring the additional dowry amount for which the respondent gave police complainant but the petitioner by managing the police used his influence for not to register the case .It is further submitted that previously 3 or 4 times panchayths were held in every panchayth the elderly persons found fault of the petitioner advised him to lookafter the respondent with safe and sound but the malafide petitioner is a puppet in the hands of his mother .At the instigation of his mother the petitioner used to beat the respondent indiscriminately in private parts of the body as under these un bearable circumstances the respondents approached the elders and concerned police to take criminal action but the malafide petitioner while taking the criminal action came and filed this false petition .It is further submitted that the petitioner is a pshysco and shadist and fickle mentality he sued to suspect her character with out any reason further he is dancing the tunes of his mother as at her instigation the petitioner used harass the respondent .

19) It is submitted that the petitioner with malafide intention to harass the respondent filed this false petition as in any corner if lookinto the case the pletition is liable to be dismissed the petition

PRAYER :- It is therefore prayed that the Hon”ble court may be pleased to dismissed the petition by imposing the costs

Hence the counter

Date 15-3-2024 Respondent

Veryfication :- I the respondent in the above case what I staed in the above paras 1 to 19 are true and correct to the best of my knowledge and read over to me in telugu language through my counsel as verified by me

Respondent

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

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

O.P NO 86 OF 2023

BETWEEN:- Dudapaka Harish Petitioner

And

Dudapaka@ Janne Manisha Respondent

COUNTER FILED BY THE RESPONDENT

Filed by Respondent

Filed on 15-3-2024

Counsel for the respondent

(Nalla Bhoomi Reddy &K.Soumitra Advocates )

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

O.P NO 86 OF 2023

BETWEEN:- Dudapaka Harish Petitioner

And

Dudapaka@ Janne Manisha Respondent

AFFIDAVIT

I Dudapaka Mansha @Janne Manisha w/o Harish and d/o age 24 yrs ocuu. House wife r/o Madipally village of Jammikunts Mandal of Karimnagar dist dohere by state on oath as under

1. I submit that I am the petitioner here in and respondent in the main petition as such I know the facts of the case
2. I submit that I am the legally wedded wife of the respondent/Petitioner in the above case our marriage was solemnized on 19-12-2021 at our parents House Madipally village of Jammikunta Mandal of Karimnagar dist by giving the dowry an amount rs 2,50,000/- in net cash and worth of articles rs.1,50,000/-is presented to the respondent/ petitioner
3. I submit that the respondent is a shadiest mentality he used to harass me by suspecting my origin and my character .I further submitted that the respondent used to beat me by drinking the alcohol in night hours .I further submitted that since the date of marriage he used to harass me to bring the additional dowry an amount of rs 200000/- for which I stated my parents inability but the mollified respondents with the instigation of his mother he used to beat me in discriminately in this connection many times panchayaths were held before the elders but they are in vain .I have waited all those days he may change today or tomorrow but the mollified respondent filed the false petition for the divorce by suppressing the real facts .
4. I further submitted that My parents are the coolie laborers and further I am not doing well and further I have to pay the Advocate fee charges to my counsel and further I have in need the maintenance for myself and the court expenses as I have necessities an amount of rs 10,000/- per month as interim maintenance till disposal of this Main Petition .As the Hon”ble court may be pleased to direct the respondent to pay an amount of rs.10,000/- per month for my monthly urgent needs.Otherwise I will be put irreparable loss and great inconvenience would be caused to me

Hence My Affidavit

Deponent

The Deponent sworned and signed before me on 15th day of March 2024 at Huzurabad of Karimnagar dist

Idetified by Attested by

Advocate Advocate

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

I.A.No. of 2024

IN

O.P NO 86 OF 2023

BETWEEN:- Dudapaka@ Janne Manisha w/o Harish and d/o age28 yrs r/o Madipally village of Jammikunta Mandal of Karimnagar dist Petitioner

And

Dudapaka Harish s/o age 30 yrs r/o Akinapally village of Mogullapally Mandal of Bhupalpally Jayashanker Dist Respondent

PETITION FILED UNDER SECTION 24 OF HINDHU ADOPTION AND MAINTAINENCE ACT

May it please Your Honour

For the reasons and grounds stated in the accompanying affidavit the Hon”ble court may be pleased to allow the Intrem-Maintainence application rs.10,000/-per month by allowing this petition in the intrest of justice and equity

Date 15-3-2024 Counsel for the Petitioner/Respondent