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

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

Between:-Yara Lalitha @Neella Lalitha Petitioner

And

1)Neela Saikiran and another Respondent

PETITION FILED U/SEC 13 (1) (ia) OF HINDU MARRIAGE ACT

May it please your Honour,

That the above named petitioner begs to submit as under

1 Description of the Petitioner

Yara Lalitha @ Neella Lalitha w/o Sai Kiran age 27 yrs occu. House wife r/o H.No. 11-20 Ramakrishnapoor 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 Advocate ,Huzurabad town and Mandal of Karimnagar dist

2 Description of the Respondent:

1)Neela Sai Kiran s/o Beeraiah age 30 yrs occu.Employ in polytechnic college r/o H.No. 1-66 Veenavanka Proper and Mandal of Karimnagar dist

2)Neela Ramya second wife of the Neela sai Kiran age 30 yrs occu.House wife r/o H.No. 1-66 of Veenavanka mandal and village of Karimnagar. The address of the respondents for the purpose of service of notices process etc., is as shown supra

3) The petitioner submitted that she is the legally weded wife of the respondent no.1. The responde.nt no .2 is the second and illegal wife of the respondentno.1.The Respondent no.1 is the native of Veenavaka village and Mandal of Karimnagar dist. The petitioner parents village is Ramakrishnapoor village is the Hamlet village of Veenavanka village and Mandal as they are the abutting villagers and belongs to same caste .

4)The petitioner and the respondent is fell in to love each other they both are convinced their parents as the parents of the paetitioner performed the marriage of the petitioner with respondent no.1 on 16-11-2-020 at venkateshwara Temple Veenavanka .At the time of marriage the parents of the petitioner presented 50 grams gold and rs 2,00,000/- dowry and presented all the utensils ,Double cot beds ,cooler, dressing table and dining table and a Motor cycle bike were presented Its worth of rs.about 1,75,000/- in total the parents of the petitioner gave an amount of rs rs.3,75,000/- apart from the gold and other utensils and formalities ,and sent her to lead happy marital ife .As the petitioner joined in the society of the respondent no.1 and lead happy marital life only for two months at her in laws house .After that the respondent no.1 used to start the harassments over the petitioner by insulting her beautifulness and color complex and further harassing her to bring the additional dowry amount of rs 20,00,000/- and used to come to house in late nights in intoxication condition and used beat the petitioner in discriminately .How ever the petitioner got pregnancy and gave birth to male child on 15-7-2023 at karimnagar Hospital

5) It is further submitted the petitioner begotten a male child on 15-7-2023 at Karimnagar Hospital after she discharged from the Karimnagar Hospital she came to Veenavanka village to at her in-laws House then the respondent indiscriminately beat the petitioner on the neck and head for which she lost her consciousness then respondent no.1 immediately shifted to her parents house. The respondent no.1 forcefully by taking the custody of 12 days male child. when she recovered from the unconsciousness she went and requested to return the male infant who is just 15 days child but the adamant respondent no.1 rudely beat and threaten her with dire consequences, on which she approached the police concerned but the respondent no.1 is a very intelligent and managed the police concerned, till today the infant child is with respondent no.1 who is sucking child but unfortunately since his birth he could not get the mother milk due to cruel mentality of the respondent no.1 .

6)It is further submitted that the respondent no.1 having illegal intimacy with the respondent no2.The petitioner came to know that in recent short the respondent no.1 got married the respondent no.2 .in this issue the petitioner gave a police complaint but the police concerned registered a crime vide crime no.310/20223 on the complaint given by the petitioner on 10-12-2023 the police concerned did not take any action .Lastly the petitioner vexed with the attitude of the respondentno.1 and 2

6) It is further submitted that the petitioner waited all those days he may change to-day or tomorrow or when and then but her expectation are in vain lastly the respondent threatening the petitioner with dire consequences and further warned the petitioner as if she gave any police complaint against him or the respondent no.2 then he will see the end of the petitioner under these circumstances the petitioner has no other go except approach the Hon”ble court by seeking the divorce .The petitioner is the legally wedded wife of the respondent no.1.

7 That on the request of petitioner the caste and village elders also conducted panchayaths four times at Veenavanka village and advised, and take back the petitioner and look after her welfare but the mollified respondent is not care the elder words and resolutions and necked out her and beat her indiscriminately

9 That the petitioner is herewith filing (1) joint photo graph of the petitioner and respondent no.1 in two sets (2)Xerox copies of F.I.R VIDE Crime No. 310/2023 3) Hospital Maternity certificate 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 necked out the petitioner by beat her as she sustained into unconsciousness as she brought to hospital by the parents of the petitioner in the month of Agust 1st 2023 since then she is residing at her parents since then as she has been residing at her parents of the petitioner and she has been residing at her parents' house Even in spite of several requests the respondent no.1 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 harrassments

11. That the cause of action arose on 16-11-2020 when the respondent got married the petitioner .The respondent no.1 beat the petitioner and necked out her from his society on 1-8-2023 and further the respondent no.1 got the illegal marriage on which the petitioner gave apolice complaint on 8-12-2023 on which the police concerned registered a criminal case vide crime no.304 of 2023 at veenavanka police station and further since the date of marriage the respondent no.1 is use to harass the petitioner in many ways ,and further the respondent no.1 got the illegal marriage with the respondent no.2 are the above all the dates and places are the cause of action to file the petition for dissolution of the marriage which is performed 16-11-2020 .

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.

14. That the marriage of the petitioner and respondent was performed at Veenavanka village and 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 Arucle 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 between the petitioner and respondent no.1 dated 16-11-2020

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 19-2-2024

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 day of August 2023 at Huzurabad.

petitioner

Filed throughs : Nalla Bhoomi Reddy

counsel for the Petitioners

IN THE COURT OF THEHON”BLE SENIOR CIVIL JUDGE AT HUZURABAD

O.P.NO. of 2023 HUZURABAD

Between:-Yara Lalitha @Neella Lalitha

Petitioner

And

1)Neela Saikiran and another

Respondent

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

Filed on

Filed on

Counsel for the petitioner

Sri Nalla Bhoomi Reddy ,Advocate

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**

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And

1)Neela Saikiran and another Respondent

**LIST OF DOCUMENTS**

1) Xerox copy Adhar bearing no.5016 2385 7631 of the petitioner

2 Xerox copy Adhar bearing no.4762 4518 6742 of the Respondent no.1

3Xerox copy of F.I.R.Vide Crime No.310 of 2023 against the respondent no.

4) Joint photographs of the petitioner and respondent no.1

Date: 3-11-2023 Counsel for plaintiff

**PROCESS PAYMENT FROM**

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

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And

1)Neela Saikiran and another 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 2023 HUZURABAD**

Between:-Yara Lalitha @Neella Lalitha Petitioner

And

1)Neela Saikiran and another Respondent

## To

1)Neela Sai Kiran s/o Beeraiah age 30 yrs occu.Employ in polytechnic college r/o H.No. 1-66 Veenavanka Proper and Mandal of Karimnagar dist

2)Neela Ramya second wife of the Neela sai Kiran age 30 yrs occu.House wife r/o H.No. 1-66 of Veenavanka mandal and village of Karimnagar.

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)

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

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

Between:- Yara Lalitha @ Neella Lalitha w/o Sai Kiran age 27 yrs occu. House wife r/o H.No. 11-20 Ramakrishnapoor village of Veenavanka Mandal of Karimnagar dist

Petitioner

And

1)Neela Sai Kiran s/o Beeraiah age 30 yrs occu.Employ in polytechnic college r/o H.No. 1-66 Veenavanka Proper and Mandal of Karimnagar dist

2)Neela Ramya second wife of the Neela sai Kiran age 30 yrs occu.House wife r/o H.No. 1-66 of Veenavanka mandal and village of Karimnagar.

Respondents

PARTICULERS REQUIRED UNDER RULE 6 OF HINDHU MARRIAGE ACT

|  |  |  |  |
| --- | --- | --- | --- |
| 1 | a) | The place and the date of the marriage | 16-112020 At Veenavanka village of veenavanka Mandal of karimnagar district. |
|  | b) | The name of the parties and their occupation | IYara Lalitha W/o Sai Kiran Anil, Aged about 27 years, Occ: Household, |
|  | c) | The place and address where the parties last Resided together with the jurisdiction of the court | Marriage was performed at the parents house at Venkateshwara temple Veenavanka village of Veenavanka Mandal of Karimnage District |
|  | 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 15-7-2023  Male child (Yet not named ) |
|  | 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 | -NO- |
|  | 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 | -NO- |
|  | 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 | With the respondent no.2 having illegal intimacy and got Illegal and void marriage the criminal case is registered vide crime no.310/2023 on Veenavanka Police station |
|  | 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 no.1 is having the illegal intimacy with the respondent no.2 |
|  | 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. | With the respondent no.2 .at Veenavanka village and Veenavanka Mandal of Karimnagar dist |
|  | 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 under section 131of H.M Act for divorce on mutual consent. |
|  | i) | Custody, care and maintenance of children | -Nil- |
|  | ii) | Permanent alimony and maintenance |  |
|  | iii) | Costs |  |
| PETITIONER  VERIFICATION: We, 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 o6.2023 at Huzurabad  PETITIONER | | | |

FILED THROUGH

Nalla Bhoomi Reddy

Counsel for the petitioner No.1 and 2