In the High Court of Judicature at #courtvenue

(Ordinary Original Civil Jurisdiction)

O.P. NO. #casenumber OF #caseyear

(In the matter of Juvenile Justice (Care and Protection of Children) Act, 2015 and

(In the matter of Minor child #childname, born on #childdob,

#childgender, #childreligion)

1. #petitionerfathername

Son of #petitionerparentnameoffather

1. #petitionermothername

Wife of #petitionerfathername

Both residing at

#petitioneraddress …Petitioners

-Versus-

1. #respondentfathername

Son of #respondentparentnameoffather

1. G. Dhanalakshmi

Wife of #respondentfathername

Both residing at

#respondentaddress …Respondents

**Petition under sec. 56(2) of the Juvenile Justice (Care and Protection of Children) Act 2015 (as amended by Act 2 of 2016)**

The above named Petitioners respectfully state as follows:

1. The First Petitioner is #petitionerfathername Son of #petitionerparentnameoffather, Indian #petitioner1religion, aged about #petitioner1age years, #petitioneraddress.
2. The Second Petitioner is #petitionermothername Wife of #petitionerfathername, Indian #petitioner2religion, aged about #petitioner2age years, #petitioneraddress.
3. The Address for service of all notices and processes on the Petitioners is that of their counsel #advocatename (#advocateenrollment) Advocate, having their office at #advocateoffice (Mobile: #advocatenumber).
4. The First Respondent is #respondentfathername Son of #respondentparentnameoffather, #respondent1religion, aged about #respondent1age years, residing at #respondentaddress. …2…

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1. The Second Respondent is #respondentmothername Wife of #respondentfathername, #respondent2religion, aged about #respondent2age years, residing at #respondentaddress.
2. The Address for service of all notices and processes on the Respondents is as same as stated above.
3. The First Petitioner and the Second Petitioner are the husband and wife. Likewise the First Respondent and the Second Respondent are the husband and wife.
4. The Respondents gave birth of a #childgender child out of their legal wedlock on #respondentmarriagedate and christened the said #childgender child as “#childname”. The said minor #childgender child was born at #childhospitaladdress and the same was registered in Registration No.#childregistrationnumber dated #registrationdate, on the file of Corporation of Greater Chennai. A Birth Certificate has been issued by the City Health Officer (i/c), Greater Chennai Corporation to that effect.
5. The Petitioners have no children and the possibility of them having any children in future does not exist given their age and medical history.
6. The Petitioners are desirous of adopting a child and approached the Respondents herein seeking to adopt their minor #childgender child “#childname” as their daughter.
7. The Respondents, taking into consideration of the friendship between the Petitioners and the Respondents had consented and expressed their agreement to give their minor #childgender child “#childname” in adoption to the Petitioners herein.
8. The Respondents herein had handed over the minor #childgender child “#childname” to the Petitioners on #handoverdate and the Petitioners had also adopted the said minor #childgender child in the presence of witnesses, friends and relatives.
9. The Petitioners and the Respondents herein had entered into an Adoption Deed dated #adoptiondate to that effect and through which the Respondents herein had admitted, accepted and acknowledged the Adoption of Minor #childgender Child “#childname” by the Petitioners herein. Thus the Minor #childgender Child “#childname” was handed over by the Respondents herein to the Petitioners herein and the Petitioners herein had adopted the Minor #childgender Child “#childname” on #adoptiondate and taken care of the said Minor #childgender Child from that day onwards.
10. The Petitioners are wealthy and have sufficient source of income and properties, both movables and immovable to take care of the adopted minor child “#childname” in a good manner. …3…

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The paramount welfare of the adopted child “#childname” will be well considered by the Petitioners herein. The Petitioners are Indian Christians and the Respondents are Hindus and the Petitioners are having capacity to adopt the child and they are willing to take the child on adoptions. They are having sufficient means to bring up and maintain the minor #childgender child “#childname”. They are having every means to give proper and high education and favorable upbringing with the full right of succession and inheritance.

1. The Respondents state that the Adoption is only for the welfare of the Minor #childgender Child “#childname” for which they have not received any payment or any consideration. From the birth of the said Minor #childgender Child “#childname”, the Petitioners are nurturing the said Minor #childgender Child “#childname” as the guardian of the child.
2. The Petitioners state that the said Minor #childgender Child “#childname” is with the Petitioners from the date of adoption of the said child viz., #adoptiondate and the Petitioners are very affectionate and cordial towards the child and vice versa. The child is also very much attached with them and moves with them as father and mother. From the date of Adoption i.e., #adoptiondate, the Petitioners had been bringing up the said minor #childgender child “#childname”, as their own bestowing the parental affection.
3. The Petitioners state that they are hale and healthy and do not suffer any diseases or infirmity. Further to that, the parents of the said minor #childgender child #childname, the Respondents herein had already expressed their willingness to give adoption of the minor #childgender child “#childname” to the petitioners and executed a Deed of Adoption dated #adoptiondate to that effect.
4. The Petitioners state that they do not have any adverse interest against the minor #childgender child “#childname”.
5. The Petitioners state that the minor #childgender child “#childname” has not been adopted by any court. The Petitioners state that the said minor #childgender Child “#childname” does not possess any property in her name.
6. The Petitioners state that they required Adoption through Court of Law as all Schools and other Educational Institutions, Banks and other Financial Institutions, Government officials & Departments, Passport Authorities demanded Adoption through Court of Law and for which these Petitioners have no other option but to approach this Hon’ble Court for the same.
7. The Petitioners state that the cause of action for the petition to seeking permission for adoptions arose at Chennai on #permissiondate, when the minor #childgender child “ #childname” born at #childhospitaladdress to the Respondents herein and on #adoptiondate, when the

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Petitioners and the Respondents entered into a Deed of Adoption and thereby confirming the Adoption given by the Respondents to the Petitioners and admitting, accepting & acknowledging the Adoption by the Petitioners from the date of adoption of minor #childgender child “#childname” viz., #adoptiondate and, when the Petitioners adopted the above said minor #childgender child “#childname” from the Respondents and nurture the child as guardian and on all these days commencing from #residingdate, when the child is living with the Petitioners at #petitioneraddress from the date of adoption i.e., #adoptiondate and still living thereon as on date and subsequently, all falls within the jurisdiction of this Hon’ble Court.

1. The Petitioners state that this Hon’ble Court has jurisdiction to entertain the Petition since the above said minor #childgender child “#childname” resides at #petitioneraddress with the Petitioners from #residingdate, which falls within the jurisdiction of this Hon’ble Court.
2. The Petitioners pay a court fee of Rs.50/- under Article 11(l), Schedule – II of Tamil Nadu Court Fees and Suit Valuation Act, 1955.
3. The Petitioners respectfully pray that this Hon’ble court may be pleased to:-
   * 1. Appoint the Petitioners as Parents of the person of the minor #childgender child “#childname” born on #permissiondate; and
     2. That the said minor #childgender child “#childname” shall be entitled for all the legal rights including the right of inheritance and succession as a natural born biological child shall have and render justice.

Dated at #place on this #todaydate

1)

2)

Counsel for Petitioners. Petitioners

**VERIFICATION**

We (1) #petitionerfathername (2) #petitionermothername, the Petitioners herein do hereby verify that what has been stated above Paragraphs 1 to 25 are true and correct to the best of our knowledge and belief and nothing has been concealed.

Verified at #place on this #datetoday

1)

2)

Petitioners

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**LIST OF DOCUMENTS FILED ALONG WITH THIS PETITION:-**

1. Voter Identity Card of the First Petitioner (Xerox).
2. Family Card of the Petitioners 2005 – 2009 (Xerox)
3. Aadhar Card of the First Petitioner (Xerox)
4. Aadhar Card of the Second Petitioner (Xerox)
5. Birth Certificate of the minor #childgender child “#childname” dated #childdob (Computer Generated Copy)
6. Deed of Adoption entered between the Petitioners and the Respondents dated #adoptiondate (Original)

Dated at #place on this #datetoday

Counsel for petitioners