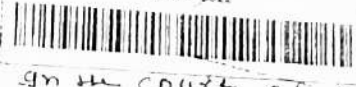


₹2

BIHAR COURT FEE
BRG 2224367J22 22
14 NOV 2022

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BIHAR COURT FEE
BRG 2224367J22 22
14 NOV 2022BIHAR COURT FEE
BRG 2224367J22 22
14 NOV 2022

In.

in the court of sub-judge Udakishunganj
Sachchidanand Singh vs Kanhaiya Singh & others

The Court of Civil Judge. TS- 203/2022.

Senior Division

Civil Court, Udakishunganj.

Madhepura.

68-11
22-11-2022

Title Suit No.-- 203/2022

U/S- 26 C.P.C.Sachchidanand Singh S/o- Late Chandeshwari Singh. Age 60.
65 years, resident of Kunjouri ward no.- 13, P.S.- Alamnagar,

Dist.- Madhepura.....Plaintiff

Mob. No.- 9771797002

Vrs.

1- Kanhaiya Singh S/o- Prashuram Singh age-45 yrs,

R/o- Uday Chand Marg. Kotla, Mubarakpur, New deihi-2

2- Dhananjay Singh S/o- Rajeshwar Singh age 40yrs.

R/o Steel Bazar, Durgapur. West Bengal.

R/o- Inayatpur, Baewa Khurd, Chhapra, Saran

BIHAR COURT FEE

₹5

शुल्क.....
₹10 न्या. उदाकिशुनगंज

5.6.22

BRG 2224367J22 22
27 Dec 2022

BIHAR COURT FEE

₹1

Sachchidanand Singh S/o- Late Chandeshwari Singh. Age 60.
65 years, resident of Kunjouri ward no.- 13, P.S.- Alamnagar,

Dist.- Madhepura.....Plaintiff

Mob. No.- 9771797002

Vrs.

1- Kanhaiya Singh S/o- Prashuram Singh age-45 yrs,

R/o- Uday Chand Marg. Kotla, Mubarakpur, New deihi-2

2- Dhananjay Singh S/o- Rajeshwar Singh age 40yrs.

R/o Steel Bazar, Durgapur. West Bengal.

R/o- Inayatpur, Baewa Khurd, Chhapra, Saran

BIHAR COURT FEE

₹1

BRG 2224367J22 22
23 Dec 2022

BIHAR COURT FEE

₹1

BRG 2224367J22 22
23 Dec 2022

BIHAR COURT FEE

₹1

BRG 2224367J22 22
23 Dec 202268/15
5.6

T.S. 200/8-83

वादी ने महारदार भी 42 अपनें स्वर. अधिकार
 वं द्रवम को खोजि करने लहा कोवाना सं. 7572 दिनांक
 08-09-2022 वा रहु वारेनं स्वं अंचलाधिकार आत्मनगर
 वा. वादी के नाम से जमावदी वासन करने का आदेश पादि
 गारने हेतु दामर किमा हो वार का मूल्यंकन मो. 10,00,000/-
 रु. दर्ज हो जिलपर मो. 12,320/- रु. वा एडमोवम कोटि
 कोष देन हो वार पर शोध पर से समर्थ हो वार का
 आचार व्यमा प्रति संतन हो अतः मूल वार का आचार
 एवं देम नमान शुल्क दक्षिण होने के पश्चात् वार माला
 के विन्दु पर सुनवाई करी जा सक्ती है।



प्राप्त
 संतोष
 सिद्धिदत्त
 30-9-23

presently R/o- Kunjouri P.S-Alamnagar, Distt.-Madhepura.

3-Shushil Kumar Singh S/o- Amaldeo Singh age-30 yrs.

R/o-Inayatpur, Barwa, Khurd, Chhapra, Saran

presently R/o- Kunjouri PS- Alamnagar, Distt.-Madhepura.

4-Shailendra Kumar Yadav S/o- Late Muneshwar Yadav age-50yrs.

R/o-Kunjour Tola- Louka, PS-Alamanagar,

Distt.- Madhepura.....Defendants.



The plaintiff above named file this
plaint and begs to state as follows:-

- 1- That, the land detail description of which mentioned in
Schedule-'A' of this plaint is subject matter of present suit
hereinafter referred to as suit land.
- 2- That, the suit land is under right, title and possession of the
plaintiff. Plaintiff is the karta & head of his family, and other
co-sharers of his family living under his jurisdiction. Hence,
plaintiff filing this suit with consent and knowledge of his
co-sharers.

3- That, the suit land is the ancestral property of plaintiff and defendant no. 1 to 3, R.S. khatyan recorded in tehname of Grand father of plaintiff and defendant no. 1 to 3 namely Late Saryug Singh and Late Sukhdeo Singh s/o- Late Wanwari Singh.



4- That, Saryug Singh had two sons , one was Nagina Singh, who dead issuleless hence other son Chandeshwari Singh, who has five sons, became full owner of property of Saryug Singh.

5- That, Sukhdeo Singh and Chandeshwari Singh made seettlement of their ancestral property through two panchanama cum Ikrarmana on non judicial stamp of 500/- each. Sukhdeo singh taken all ancestral properties of Chhapra and Chandeshwari Singh taken all ancestral properties of Kunjouri, Alamnagar, they made panchnama cum Ikrarnama on 7.5.1986 in presence of witnesses and they Signed over panchnama cum Irkarnama.

- 6- That, Chandeshwari Singh got 04 acre 17 decimals land under khata 905 and 93 decimal land in khata 906 at Alamnagar. He mutated his land in his name on the basis of panchanama cum Ikrarnama and taken rent receipt.
- 7- That, chandeshwari Singh continuously cultivating a land of his share without any disturbances.
- 8- That, the plaintiff saled 10 decimal of land from khata 905 and khesra 2412 to the Smt. Manju Devi w/c Sri Shambhu Singh to fulfill the requirement of his family.
- 9- That, defendants have no right over the share of plaintiff because their grandfather executed panchnama cum Ikrarnama for the partition of ancestral land and he taken land properties at Chhapra.
- 10- That, the defendants no. 1 to 03 saled the land of Alamnagar illegally to the defendant no. 4 form khata 905 khesra 2412 area 4 decimal 200 squire kari and taken consideration money.



11- That, the defendants have not any type of document regarding the sold land, they knowingly executed sale deed no.- 7577 dt.02.9.22 to cheat and caused loss to the plaintiff.

12- That, whenever plaintiff got this knowledge he contacted to the defendants, and requested to them to return his share, because, it is illegal.



13- That, the plaintiff arranged village panchayat on 12.10.22 with sarpanch and other village but defendant did not turn up in panchayat.

14- That, the defendant no. 04, who knowingly purchased the land of plaintiff, only made the way to enter into the valuable land of plaintiff and capture the land with muscle power.

15- That, the sold land of defendant no. 01 to 03 to defendant no. 04 is under possession of plaintiff, but then trying to capture forcibly with muscle power and money power.

- 16- That, the plaintiff approached to the Alamnagar police for the peaceful settlement of land dispute, but Alamnagar Police did not taken proper step for the settlement.
- 17- That, the plaintiff has given protest petition to C.O., Alamnagar and requested to reject the mutation petition of defendant no. 04 because executed sale deed is illegal and voidable in eye of law.
- 18- That, the cancellation of illegal sale deed executed by defendant is necessary for the plaintiff, hence cause of action arisen to file this suit in this court.
- 19- That, the suit land falls within the jurisdiction of this court, hence this suit is being filed in this court.
- 20- That, the suit land is valued Rs.-10,00,000/-(Ten Lacs) but as per relief, declaratory court fee Rs.-250/-00 and ad-valorem court fee Rs.-20/-00 on the valuation total court fee Rs.-270/-00 in being paid.
- 21- That, the plaintiff prays for the following reliefs :-



i) That, right, title and possession over the suit be declared in favour of plaintiff against the defendant.

ii) That, order to cancelled the sale deed no. 7677 dtd. 02.09.2022 in favour of plaintiff against the defendant be decreed.



iii) That, order to C.O., Alamnagar to creat the fresh jamabandi of the suit land in the name of the plaintiff, be decreed.

iv) That, the cost of the suit be decreed in favour of plaintiff against the defendants.

v) That, any other relief or reliefs for which the plaintiff found entitled be decreed in favour of plaintiff against the defendants.

Schedule-'A'

Descriptions of suit land under mouza-Kunjouri, Thana-139,
P.S. + Anchal-Alamnagar, Distt.-Madhepura

<u>Khata</u>	<u>Khesra</u>	<u>Area</u>
		A-D
905	2412	01-96
	2413	00-24
	2414	00-63
	2435	00-61
	2450	00-13
	2605	00-50
		Total 04-17

Fourteen Acre & seventeen decimals

906	2036	00-93
-----	------	-------



Signature of Plaintiff

Plaintiff

through

Signature of Advocate
Advocate

21-11-202

Signature of Court Clerk
Court Clerk

Verification

I, Sachchidanand Singh S/o- Late Chandeshwari Singh
 Distt.- Madhepura, do hereby solemnly affirm, verify & declare
 that this instant suit plaint which has been prepared & drafted in
 English has been made & understood to me in Hindi & the same
 having been found true & correct, I assigned my signature on this
 plaint on 21.11.22 day of NOVEMBER 2022 within the
 premises of the Sub-Divisional Civil Court, Uda Kishunganj &
 Distt.-Madhepura.



सचिदानन्द सिंह

Deponent

Advocate 21.11.2022

Om Prakash Gupta
 Advocate
 En. No. 17937/2003

Certified to be a true copy

Head Clerk

Compared by
 N.P.
 05/11/24
 Comparing Clerk



In, *In the Court of Sub-Judge, Udakishunganj.*
Sachchidanand Singh vs Kanhaiya Singh & ORS

The Court of Civil Judge,
Senior Division
Civil Court, Udakishunganj.
Madhepura.

T-5-203/2022.

CP 2A
22-11-2022

न्यायाधिकार
शुल्क...
न्याय, उदाकिशुनगंज

Title Suit No.-- 203/2022

U/S- 26 C.P.C.

Sachchidanand Singh ----- Plaintiff

Vrs.

Kanhaiya Singh & ors. ----- Defendants

AFFDAVIT

I, Sachchidanand Singh, age-about 65 years, S/o- Late Chandeshwari Singh, resident of Kunjouri ward no.- 13, P.S- Alamnagar, Distt.- Madhepura do hereby solemnly affirm and declare as under :-

1. That, I am the sole plaintiff of the concerned title suit.
2. That, by the capacity of sole plaintiff I am executing this affidavit before the Court of your honour.
3. That, the contents of the title suit as well as the present affidavit are true, correct to the best of my knowledge.

Verified and signed on 21st day of NOVEMBER month 2022.



सचिदानंद सिंह
कोम प्रताप सिंह

सचिदानंद सिंह

Deponent
through

[Signature]
21.11.2022

Om Prakash Singh
Advocate

Certified to be a true copy of the original.

Head Civil Court, Udakishunganj

Compared by
N.P.
05/06/24
Comparing Officer



आक्षेप 000-05
 फातिरी 000-05
 प्रपत्र
 प्रमाणित करना
 कुल राशि
 तुलना किया ।

प्रमाणित किया दिनांक 1/11/11
 गीतिका-1-11/11/11