**BEFORE THE CONSUMER DISPUTES REDRESSAL DISTRICT FORUM AT SONEPAT**

**CC.No.\_\_\_\_\_\_\_\_\_\_\_\_\_\_/20\_\_**

MAMTA VERMA W/O DEVENDER KUMAR

Villa No 46, Omaxe City, A-Block, Sonepat

………COMPLAINANT

VS

STATE BANK OF INDIA

Lehrara Branch, Rathdhana road, Sonepat

………OPPOSITE PARTY

**COMPLAINT UNDER SECTION 35 OF THE CONSUMER PROTECTION ACT, 2019**

RESPECTFULLY SHOWETH:

1. That the Complainants herein, Mamta Verma and Devender Kumar Verma, are residents of [Provide Address Details]. The Opposite Parties herein, [Bank Name] (hereinafter referred to as "the OPs"), are a banking institution registered under [Relevant Banking Regulations], engaged in the business of providing housing loans.
2. That the Complainants availed a housing loan of Rs.39,80,000/- from [Bank Name] with account no. 34744731078 by mortgaging their property, namely Villa No.46, Omaxe City, A-Block, Sonepat, in the year 2015. The Complainants, as a security measure, submitted the original documents related to the property with [Bank Name] in April 2015, and a receipt for the original documents was duly issued to them.
3. It is averred that the OPs closed the aforementioned loan account after receiving the entire dues from the Complainants, and a closure letter dated 31.8.2018 was issued by the OPs. Subsequently, in the year 2018, the Complainants approached both Bank of Baroda, Railway Road, Sonepat, and [Bank Name] for the transfer of their loan account. To their shock, upon requesting the return of their original documents, the Complainants discovered that all the original documents submitted to [Bank Name] were damaged and spoiled.
4. This act on the part of the OPs is deemed as deficient in service, causing immense mental agony and harassment to the Complainants. Hence, the Complainants have approached this Commission seeking redressal.
5. **CAUSE OF ACTION:** The Complainants, relying on the commitment of proper handling and preservation of their original documents, suffered a deficiency in service when they discovered the damage to the documents. This has caused considerable mental agony and harassment, warranting legal intervention.
6. EVIDENCE: The Complainants attach herewith the loan agreement, closure letter, receipt of original documents, communication with Bank of Baroda, and evidence showcasing the damaged state of the original documents. This includes photographs and any written communication with [Bank Name].
7. JURISDICTION: This Hon’ble Commission has territorial jurisdiction to conduct an inquiry and adjudicate the present dispute as the Complainants reside within its jurisdiction, and the cause of action has arisen within the specified limits under the Consumer Protection Act, 2019.
8. LIMITATION: The cause of action arose when the Complainants discovered the damage to their original documents in the year 2018. The filing of this complaint falls well within the two-year limitation period specified under Section 69 of the Consumer Protection Act, 2019.
9. COURT FEE: The Complainants are in compliance with the Court Fees Mandated under Rule 7 of the Consumer Protection (Consumer Dispute Redressal Commission) Rules, 2020.
10. PRAYER: The Complainants seek the following reliefs from this Hon’ble Commission:

A. Direct the OPs to return all original documents/title deeds deposited by the Complainants in their original form.

B. Compensate the Complainants for causing mental agony and harassment during the handling and preservation of the original documents.

PLACE: [Location]

DATED: [Date]

SIGNATURE OF THE COMPLAINANTS

VERIFICATION: