**BEFORE THE HON’BLE DISTRICT CONSUMER DISPUTES REDRESSAL COMMISSION AT [LOCATION]**

**IN RE: COMPLAINT NO. \_/20**

**IN THE MATTER OF:**

Mohd. Irfan,  
S/o Shri Sirajudddin  
H. No. 1376, Bazar Chitli Qabar, Gali Kallu Khawas,  
Jama Masjid, Delhi-110006  
 .....................................................................Complainant

**Versus**

Royal Sundram General Insurance Co. Ltd.  
Through its Managing Director, A-14 Plot no.136,  
Gurgaon, Haryana.  
Also at: Royal Sundram General Insurance Co. Ltd.  
Through its Managing Director, Vishranth Melaram Towers  
No.2/319, Rajiv Gandhi Salai (OMR) Karapakkam,  
Chennai-600097  
 .....................................................................Opp. Party

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

**RESPECTFULLY SHOWETH:**

1. That the Complainant, Mohd. Irfan, son of Shri Sirajudddin, residing at H. No. 1376, Bazar Chitli Qabar, Gali Kallu Khawas, Jama Masjid, Delhi-110006, purchased an e-rickshaw, which was insured with the Opposite Party, Royal Sundram General Insurance Co. Ltd., with an IDV value of Rs.1,06,809/-.
2. That the e-rickshaw was stolen from the service road of Vijay Ghat, Delhi, and despite lodging an FIR, it was not recovered by the police. The Complainant subsequently lodged a theft claim with the Opposite Party but received no favorable response despite furnishing all requisite documents.
3. That the Complainant seeks a claim amount of Rs.1,07,000/-, damages of Rs.50,000/- for harassment & mental agony, and litigation charges of Rs.11,000/- as redressal for the Opposite Party's failure to honor the insurance claim.
4. That the Opposite Party has opposed the complaint on the grounds of a breach of policy conditions, including alleged delays in informing the insurer and the police about the theft, discrepancies in the cause of loss mentioned in the FIR and the claim form, and the non-provision of requisite documents and the second ignition key of the vehicle.
5. That the Complainant refutes these claims, providing explanations for the alleged delays and discrepancies, and asserting that all necessary documents were provided to the Opposite Party.

CAUSE OF ACTION:

1. That the Complainant suffered financial loss and mental anguish due to the Opposite Party's refusal to process the insurance claim for the stolen e-rickshaw, constituting a deficiency in service and an unfair trade practice.

EVIDENCE:

1. The Complainant attaches herewith the insurance policy, FIR, un-trace report, correspondence with the Opposite Party, and other relevant documents to substantiate the claim.

JURISDICTION:

1. The Hon’ble District Consumer Disputes Redressal Commission has jurisdiction as the Opposite Party's office is located in Gurgaon, Haryana, and the incident occurred in Delhi.

LIMITATION:

1. The cause of action arose following the theft of the e-rickshaw and the subsequent denial of the insurance claim by the Opposite Party. The complaint falls within the two-year limitation period specified under Section 69 of the Consumer Protection Act, 2019.

COURT FEE:

1. The Complainant is complying with the Court Fees mandated under Rule 7 of the Consumer Protection (Consumer Dispute Redressal Commission) Rules, 2020.
2. PRAYER: The Complainant seeks the following reliefs from this Hon’ble Commission:-

A. Direct the Opposite Party to pay the claim amount of Rs. 1,07,000/- along with interest;

B. Direct the Opposite Party to pay compensation for mental agony and litigation expenses, the quantum of which will be determined during the proceedings; and

C. To direct any other relief that the Hon’ble Commission deems fit.

**PLACE: [Location] SIGNATURE OF THE COMPLAINANT**

**DATED: [Date]**

**VERIFICATION:-**

I, Mohd. Irfan, S/o Shri Sirajudddin, residing at H. No. 1376, Bazar Chitli Qabar, Gali Kallu Khawas, Jama Masjid, Delhi-110006, do hereby solemnly affirm and declare that the facts stated above in paras 1 to [last para number] are true to the best of my knowledge and based on the records maintained by me, which I believe to be true.

Verified at [Location], on this [Date] day of [Month, Year].

**ANNEXURE OF EVIDENCE**

[List the documents being submitted as evidence]