

IN THE COURT OF SENIOR CIVIL JUDGE _____
SUIT NO. _____ OF 20..

IN THE MATTER OF:

ABC

.....Plaintiff

Versus

XYZ

.....Defendants

SUIT FOR PERMANENT INJUNCTION

MAY IT PLEASE YOUR HONOUR

1. That the plaintiff is the permanent resident of the above mentioned address in property bearing no. _____ for the last many years and is living with wife and minor children, as a tenant.

2. That the plaintiff is a tenant in respect of the above said property bearing no _____ consisting two rooms, latrine and kitchen in the above said premises of Rent Rs. 150/- (Rs. 150/-) p.m. excluding electricity and water charges under the tenancy of late Sh _____ who died on _____ and late Sh. _____ used to collect the rent from the plaintiff but late Sh. _____ did not issue any rent receipt to the plaintiff even after several demands made by the plaintiff but he always used to postpone the issue of rent receipt.

3. That the plaintiff spent a huge amount on the construction of these two rooms in the above said premises at the request of Late Sh. _____ and Sh. _____ assured the plaintiff to adjust the said rent (the plaintiff is having the necessary documents/proofs of material for construction of rooms in the above said property). It is also pertinent to mention here that the plaintiff looked after late Sh. _____ many times, whenever he fell ill.

4. That at present the plaintiff is having the peaceful possession of premises no. _____ and is having the whole necessary documents/record regarding possession (photocopy of Ration Card, School Card is enclosed herewith) but the above said defendants are intended to disturb the peaceful physical possession of the plaintiff of the above said premises.

5. That the plaintiff is having the whole necessary household goods which are lying/kept in the above said premises and is living peacefully.

6. That the plaintiff has paid the agreed rent @ Rs. 150/- p.m. to late Sh. _____ upto _____. It is also pertinent to mention here that the legal heirs of late Sh. _____ are not in the knowledge of the plaintiff and at present also the plaintiff is ready to tender the rent before the legal heirs of late Sh. _____.

7. That on dt. _____ the above said defendant came to the above said premises of the plaintiff and threatened the plaintiff to vacate the tenanted premises immediately otherwise the plaintiff would have to face dire consequences, when the plaintiff asked about their identity then they did not disclose the same, instead started throwing household goods forcibly and illegally and started to quarrel with the plaintiff when the local residents/neighbours intervened in the matter then the defendants left the spot after threatening for dire consequences and to dispossess the plaintiff forcibly and illegally in the near future with the help of local goondas. The defendants openly stated that the staff of police post Matiala dances at their tune and it is a very easy job for them to dispossess any person or to grab the property of any one with the help of the police staff.

8. That immediately on the same date the plaintiff rushed to the police post Matiala to lodge his report against the defendants regarding such incident but duty officers did not lodge the report of the plaintiff. The plaintiff was surprised to see that both the defendants were already present at the Police Post Matiala.

9. That on _____, the plaintiff sent a Registered Notice to the defendant no. 1 and copy to Chowki Incharge Police Post _____ by Regd. A.D. (copy of the same is enclosed herewith) but P.P. _____ staff has not taken any action against the defendants for reasons best known to them.

10. That on _____, the defendants along with two unknown persons/ whom the plaintiff can recognise by face, came to the above said premises bearing no. _____, _____, and knocked at the door at odd hours and threatened the plaintiff to come out of the room. The plaintiff saw their faces from gaps of the door and the plaintiff got nervous, and therefore did not come out of the two-room apartment. The said persons threatened the plaintiff to vacate the premises immediately. However, then the neighbors gathered there and they restrained the defendants from dispossessing the plaintiff from the above said premises forcibly

and illegally. When the neighbours threatened them, they left the spot with a threat to come after one or two days with heavy force to dispossess the plaintiff from the above said premises forcibly and illegally.

11. That on dt. _____, the plaintiff again went to the police post Matiala to lodge the report against the defendants but no Police Officer of P. Post Matiala is ready to listen against the defendants and they advised the plaintiff to approach to the competent court of law to seek his remedy and to get injunction order against the defendants and the P.S. _____.

12. That the plaintiff has no other efficacious remedy except to approach this Hon'ble court for seeking relief of injunction against the defendants from interfering in the peaceful possession of the premises no. _____.

13. That the cause of action arose on different date when the defendants threatened the plaintiff to vacate the premises no. _____ and threatened the plaintiff of dire consequences and further to dispossess him from the above premises bearing no. _____ forcibly and illegally. The cause of action lastly arose on dt. 11.2.2015 when the defendants again threatened and tried to dispossess the plaintiff from the premises no. _____ forcibly and illegally with the connivance of the Local Police. The cause of action still subsists as the threat of the defendants to dispossess the plaintiff and to create disturbance in the peaceful possession of the premises no. _____ continues.

14. That the parties to the suit for the purpose (s) of court fee and jurisdiction is Rs. 130/- on which the requisite court fee has affixed.

15. This Hon'ble Court has jurisdiction to entertain this suit because the part of the cause of action arose at Delhi and the suit property is situated within the territorial jurisdiction of this Hon'ble Court.

PRAYER:

It is, therefore most respectfully prayed that this Hon'ble Court may be pleased to :-

1. pass the decree for Permanent Injunction in favor of the plaintiff and against the defendants thereby restraining the defendants, their representatives, employees, agents etc. from dispossessing the plaintiff forcibly and illegally from the

tenanted premises bearing no. _____ and also from interfering in the peaceful possession of the above said premises.

2. award cost of the suit in favour of the Plaintiff and against the Defendants;
3. pass such other and further order(s) as may be deemed fit and proper on the facts and in the circumstances of this case.

Place & Date

Plaintiff

Through Counsel

VERIFICATION:

Verified at Delhi on this day of 20... that the contents of paras 1 to .. of the plaint are true to my knowledge derived from the records of the Plaintiff maintained in the ordinary course of its business, those of paras .. to ... are true on information received and believed to be true and last para is the humble prayer to this Hon'ble Court.

...Plaintiff

[NOTE : This plaint has to be supported by an affidavit]