

AMENDED PLAINT

**IN THE COURT OF XXI JUNIOR CIVIL JUDGE:
CCC:AT HYDERABAD**

O.S.NO. 2194 OF 2015

Between:

- 1.Smt. Kareemunnisa Begum W/o. Late Syed Hashmi
Aged 85 years
 2. Smt. Waheeda Banu, W/o. Late Syed Naseeruddin Siraj
Aged 48 years
 - 3.Syeda Kamreena Kashifah, D/o. Late Syed Naseeruddin Siraj
Aged 18 years
 4. Syed Abrar Hashim, S/o. Late Syed Naseeruddin Siraj
Aged 11 years, Minor, rep. by natural mother the Pltf.NO.2
- All R/o.16-4-71,Khala, Chanchalguda, Hyderabad - 29.

... Plaintiffs

And

1. The Tahasildar,
Saidabad Mandal, Hyderabad District.

2. All Concerned

... Defendants

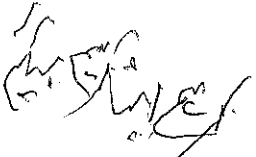
**SUIT FOR DECLARATION OF PLAINTIFFS AS
LEGAL HEIRS OF LATE SRI SYED NASEERUDDIN SIRAJ
PLAINT FILED UNDER SECTION 26 C.P.C.**

I. Description of the Plaintiffs:

The address for service of all notices, summons and process etc. on the Plaintiffs are as mentioned above and of their counsel and Sri.C.Balagopal, and Sri.K.Vijaya Saradhi, Advocates, office at Flat No.103, Suresh Harivillu Apartments, Road No.11, West Marredpally, Secunderabad.

II. Description of the Defendants:

The address for service of all notices, summons and process etc. on the Defendants are as mentioned above.



Waheeda Banu

S. Kashifah

Waheeda Banu

III. Facts of the case:

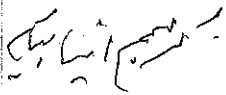
a). The Plaintiffs respectfully submits that Plaintiff No.1 is the mother, Plaintiff No.2 is the wife and Plaintiff No.3 & 4 are the daughter and son of Late Sri Syed Naseeruddin Siraj who died intestate on 10.4.2015 leaving behind the Plaintiffs as his legal heirs. The Plaintiffs are herewith filing the original death certificate, Original Household Card and Original Aadhar Cards for perusal of this Hon'ble Court as proof that they are the legal heirs of late Sri Syed Naseeruddin Siraj.

b). The Plaintiffs submit that after the death of late Sri Syed Naseeruddin Siraj, the Plaintiffs herein approached the Tahaseeldar, Saidabad Mandal, Hyderabad for issue of legal heir certificate, but the same was refused by the Tahaseeldar and directed the plaintiffs to approach the concerned Civil Court for issue of the same. Hence the suit for declaration that the plaintiffs are the Legal Heirs of the Late Sri Syed Naseeruddin Siraj for legal status only.

IV. Cause of action: The cause of action for the suit arose on 10.4.2015 when the Late Sri Syed Naseeruddin Siraj died intestate leaving behind the Plaintiffs herein and when the Plaintiffs approached the D1 for legal heirs certificate.

V. Jurisdiction: The Plaintiffs are residents of Chanchalguda, Saidabad Mandal, Hyderabad which is within the jurisdiction of this Hon'ble Court, hence this Hon'ble court has got jurisdiction to entertain the suit.

VI. Court Fee: The suit is for declaration of the Plaintiffs as legal heirs hence a fixed court fee of Rs. /- paid herewith under A.P.C.F. and S.V.Act.

 Waheeda Bannu

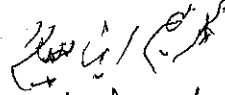
 S. Kashifah

Waheeda Bannu

VII. Prayer: The Plaintiffs therefore prays that this Hon'ble court may be pleased to pass a Judgement and Decree in favour of the Plaintiffs declaring the Plaintiffs as Legal heirs of late Sri Syed Naseeruddin Siraj for legal status and to grant such other relief or reliefs as are just and necessary in the circumstances of the case.

Counsel for Plaintiffs

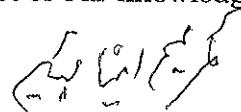
HYDERABAD
Date: 26.10.2015


Waheed Ben
S. Kashifah
Waheed Ben
PLAINTIFFS

VERIFICATION

We, the Plaintiffs above named do hereby declare that the facts stated above are true and correct to the best of our knowledge, hence verified.

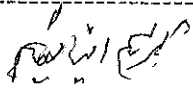
HYDERABAD
Date: 26.10.2015


S. Kashifah
Waheed Ben
PLAINTIFFS

LIST OF DOCUMENTS

Sl.No.	Date	Description of Document
1.	15.06.2012	Death certificate of Late Sri Syed Naseeruddin Siraj. -original
2.		Household Card of Pltfs.1 to 4, Originals
3.	02.03.2011	Aadhar Cards of Pltfs 1 to 4 --Originals

HYDERABAD
Date:26.10.2015


S. Kashifah
Waheed Ben
PLAINTIFFS

-4-

**IN THE COURT OF XXI
JUNIOR CIVIL JUDGE:
CCC:AT HYDERABAD**

O.S.NO. 2194 OF 2015

Between:

Smt. Kareemunnisa Begum &
Others, ... Plaintiffs

And

Tahaseeldar, Saidabad Mandal, &
another Defendants

AMENDED PLAINT

PLAINT FILED UNDER
SECTION 26 C.P.C.

SUIT FOR DECLARATION OF
PLAINTIFFS AS LEGAL HEIRS OF
LATE Sri Syed Naseeruddin
Siraj.

Filed on: 26.10.2015

Filed by:

**C.BALAGOPAL
ADVOCATE**

103, Suresh Harivillu Apartments
Road No.11, West Marredpally,
Secunderabad - 500 026.

COUNSEL FOR PLAINTIFFS

**IN THE COURT OF XXI JUNIOR CIVIL JUDGE:
CCC:AT HYDERABAD**

O.S.NO. 2194 OF 2015

Between:

1. Smt. Kareemunnisa Begum & Others ... Plaintiffs

And

1. The Tahasildar & Others ... Defendants

EVIDENCE AFFIDAVIT OF PW1

I, Smt. Waheeda Banu, W/o. Late Syed Naseeruddin Siraj, aged 48 years r/o. R/o.16-4-71, Khala, Chanchalguda, Hyderabad - 29. do here by solemnly affirm and state on oath as follows:

I am the Plaintiff No.2 and as such well aware of the facts deposed hereunder.

a) I submit that I filed the above suit for declaration that the Plaintiffs are the legal heirs of late Sri Syed Naseeruddin Siraj who died intestate on 10.4.2015 leaving behind the Plaintiffs as his legal heirs. I further submit that the first Plaintiff is my mother-in-law and Plaintiffs 3 is my daughter & 4 is my son as such I am empowered to depose on behalf of the other Plaintiffs.

b) I submit that after the death of my husband late Sri Syed Naseeruddin Siraj, the Plaintiffs herein approached the Tahaseeldar, Saidabad Mandal, Hyderabad for issue of legal heir certificate, but the same was refused by the Tahaseeldar and directed us to approach the concerned Civil Court for issue of the same. Hence the suit for declaration that the plaintiffs are the Legal Heirs of the Late Sri Syed Naseeruddin Siraj for legal status only. I further submit that I have already filed original documents pertains to myself and other Plaintiffs to prove that we are the legal heirs of Late Sri Syed Naseeruddin Siraj.

Waheeda Banu

I am relying on the following documents which may be marked as exhibits A1 to A3.

Sl.No.	Date	Description of Document
1.	15.06.2012	Death certificate of Late Sri Syed Naseeruddin Siraj. -original
2.		Household Card of Pltfs. 1 to 4, -originals
3.	02.03.2011	Aadhar Cards of Pltfs 1 to 4 -originals

I therefore prayed that the suit may be decreed as prayed for.

Waheed Bawa

Hyderabad
Date: 26.10.2015

PLAINTIFF NO.2

**IN THE COURT OF XXI
JUNIOR CIVIL JUDGE:
CCC:AT HYDERABAD**

O.S.NO. 2194 OF 2015

Between:

Smt. Kareemunnisa Begum &
Others, ... Plaintiffs

And

Tahaseeldar, Saidabad Mandal, &
another Defendants

EVIDENCE AFFIDAVIT OF PW1

Filed on: 26.10.2015

Filed by:

**C.BALAGOPAL
ADVOCATE**

103, Suresh Harivillu Apartments
Road No.11, West Marredpally,
Secunderabad - 500 026.

COUNSEL FOR PLAINTIFFS

**IN THE COURT OF XXI JUNIOR CIVIL JUDGE:
CCC:AT HYDERABAD**

IA NO. OF 2015
IN
O.S.NO. 2194 OF 2015

Between:

Smt. Kareemunnisa Begum & Others ...Petitioners/Plaintiffs

And

The Tahasildar & Others ...Respondents/Defendants

AFFIDAVIT

I, Smt. Waheeda Banu, W/o. Late Syed Naseeruddin Siraj, aged 48 years R/o. R/o.16-4-71,Khala, Chanchalguda, Hyderabad - 29. do here by solomnly affirm and state on oath as follows:

I am the Plaintiff No.2 and as such well aware of the facts deposed hereunder.

1. I am the Daughter-in-Law of Petitioner/Plaintiff No.1 and mother of Petitioners/Plaintiffs 3 & 4 in the above suit and as such I am empowered to depose on behalf of other Petitioners/Plaintiffs.

2. I along with other Petitioners/Plaintiffs filed the above suit for a declaration that the Petitioners/Plaintiffs are the Legal Heirs of Late Sri Naseeruddin Siraj who died instate on 10.4.2015 leaving behind me and other Petitioners/Plaintiffs as his legal heirs.

3. I submit that at the time of filing of the suit by oversight the discription of the plaintiff were not correctly mentioned, therefore it has become necessary to amend the plaint inrespect of the cause title and also in Para III a) as follows.

1. in cause title

1.Smt. Kareemunnisa Begum W/o. Late Syed Hashmi

Aged 85 years

2. Smt. Waheeda Banu, W/o. Late Syed Naseeruddin Siraj

Aged 48 years

Waheeda Banu

3. Syeda Kamreena Kashifah, D/o. Late Syed Naseeruddin Siraj
Aged 18 years

Similarly in Para III a) Ist four lines may be permitted to amend as follows:

The Plaintiffs respectfully submits that Plaintiff No.1 is the mother, Plaintiff No.2 is the wife and Plaintiff No.3 & 4 are the daughter and son of Late Sri Syed Naseeruddin Siraj who died intestate on 10.4.2015 leaving behind the Plaintiffs as his legal heirs.

I therefore prayed that this Hon'ble court may be pleased to permit me to amend the plaintas mentioned above as otherwise I will suffer irriparable loss and hardship.

Waheed Bani

Sworn and signed before me
on this the 26TH day of October , 2015
at Hyderabad

DEPONENT

Advocate / Hyderabad