

In the Court of the _____

AT _____
No, _____ of 200

Between :

Plaintiff
Petitioner

Appellant
Complainant

A N D

Defendent
Respondent
Accused

VAKALAT
ACCEPTED

Filed on :

Filed by :

Advocate for :

Address for Service :

Crescent
STATIONERS

: 22-B-508, City Grill Court Road,
Chaita Bazar, Hyderabad-500 002.
Phone : 2462 6912.

In the Court of the _____

AT.....

No.

of 200

Between :

Plaintiff
Petitioner

Appellant
Complainant

A N D

Defendent
Respondent

Accused

I / We

do hereby appoint and retain

Advocate/s to appear for me/us in the above Suit/Appeal/Petition/Case and to Conduct and prosecute and defend the same and all proceedings that may be taken in respect of any application for execution of any decree or order passed therein. I / We empower my/our Advocate/s to appear in all miscellaneous proceedings in the above suit or matter till all decrees or order are fully satisfied, or adjusted to compromise and obtain the return of documents and draw any money that might be payable to me/us in the said suit or matter and I/We do further empower my/our Advocate/s to accept on my/our behalf service of notice of all or any appeal or petition filed in any Court or appeal Reference or Revision with regard to the said suit or matter before disposal of the same in this Honourable Court.

5) 

2) శ్రీ శ్రీ నాథులు

3) 



Identified that the executant who is well acquainted with English, read this Vakalatnama that the contents of this Vakalatnama were read out and explained in Urdu/Hindi/Telugu to the executant he/she/they being unacquainted with English, who appeared perfectly to understand the same and signed or put his/her/their name or mark in my presence.

Identified by : Sri _____

Executed on this the _____ day of _____ 200

ADVOCATE

IN THE COURT OF THE HON'BLE JUNIOR CIVIL JUDGE,
R.R.DISTRICT AT : L.B. NAGAR

O.S.NO: OF 2008

Between:

1. E. Sathaiah
S/o Late Pentudu
Age 65 yrs Occ :Agriculture
2. E. Sailu
S/o Late Pentudu
Age 55yrs Occ Agriculture
3. E. Yadaiaha
S/o Late Pentudu
Age:45 yrs Occ Agriculture\

All are resident of Cherllapalli village, Ghatkesar Mandal, R.R.Dist.

4. Sukkamma
D/o Late Pentudu
Age: yrs Occ : Agriculture
5. Anjamma
D/o Late Pentudu
Age yrs Occ: Agriculture.

.....Plaintiffs

AND

All others Concerned

.....Defendants


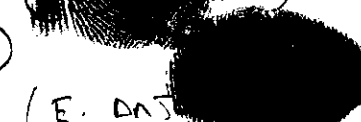
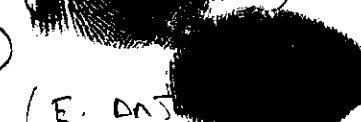
**PLAINT FILED UNDER SECTION 26, ORDER VII, RULE 1&2
OF CIVIL PROCEDURE CODE SUIT FOR DECLARATION**

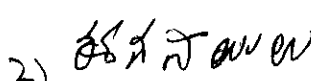
DESCRIPTION OF THE PLAINTIFF:

The Description of the Plaintiff and the address for Service of notices, processes, summons, etc., is that of his counsel Ch Mohan and Associates Advocates O/o 16-11-20/2/E, Opp : Farhat Hospital, Saleem nagar Colony, Malakpet, Hyderabad-60.

DESCRIPTION OF THE DEFENDANT:

The Description of the Defendant and the address for service of notices, processes, summons, etc., is the same as mentioned above in the cause title

1) 
2) 
5) 
(E. DNT)

2) 
(E. Sailu)

3) 
(E. Yadaiah)


(E. Chukamma)

Brief Facts

The above named plaintiffs humbly submit as under.

1. The above plaintiffs submit that the father of the plaintiffs Late Pentudu had three sons and two daughters namely E. Sathaiah, E. Sailu, E. Yadaiaha, Sukkama & Anjamma and the said Pentudu who hailed from Cherllapalli village Ghatakesar Mandal RR. District. The plaintiffs are the sons and daughters of the late Sri. Pentudu . The plaintiffs submit that the said Late Pentudu used to cultivate the land in the said village.
2. The plaintiffs further submit that the said Pentudu was doing agriculture as the protected tenant in old Sy No. 102 (New No 11,12,14 & 18) in Cherlla palli village, Ghatkesar Mandal R R. District. The Tahasildar Ghatkesar had entered the name of Late Pentudu as the protected tenant of the above said land and has issued a Certified copy of the same P.T records showing Late Pentudu as Protected Tenant.
3. The Plaintiff submits that the father of the plaintiff was the protected tenant in the suit scheduled property and was cultivating the land during his life time. The plaintiff submits that after the death of the their father the plaintiff never cultivated the land nor had been in position in the suit scheduled property.
4. The plaintiff further submits that on 26-03-08 the plaintiffs along with the land owners approached concerned Tahasildar and gave application to surrender the protected tenancy rights and to change in the Revenue rights but the said tahasildar refused to take the application and instead advice the plaintiff to get the declaration as legal heirs of the original Protect Tenant i.e., Pentudu from the Hon'ble Civil Court.
5. The plaintiffs further submit that the plaintiffs having no other alternative have approached this Hon'ble Court and filed the present suit for declaration to declare the plaintiffs as the legal heirs of Late Sri Pentudu.
6. The plaintiffs submit that Late Sri Pentudu died about 20 years back.
7. The plaintiffs submit that the cause of action to file the present suit arose when the plaintiffs approached the Tahasildar and requested the Tahasildar to surrender the Protected Tenancy Rights of the Late Sri Pentudu and when the Tahasildar directed the plaintiffs to approach the Hon'ble Civil Court for the said orders and on all such date and incidents as mentioned supra.



1)



2) *Handwritten signature*

3)



4)

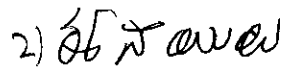


8. The plaintiffs submit that they have not filed any suit as regard the subject matter of this suit against the defendant herein before any Court of Law nor any suit as regards the subject matter of this suit is pending in any Court between the parties hereto.
9. JURISDICTION: The Plaintiffs are the residents of Cherllapalli village, Ghatkesar Mandal, R R. District, Hence, this Hon'ble Court has territorial and pecuniary jurisdiction to try this suit.
10. COURT FEE: The suit is filed for Declaration declaring the plaintiffs as the legal heirs of Late Sri Pentudu as such the same is valued at Rs and a court fee of Rs in lieu of court fee stamps has been paid in the bank under section 24 () of the Andhra Pradesh Court Fee and Suit Valuation Act, 1956.

Therefore it is prayed that this Hon'ble Court may be pleased to Decree this suit in favour of the plaintiff as follows:

- i) Declaring the Plaintiffs as the Legal Heirs of Late Sri Pentudu.
- ii) Costs of the suit may be awarded.
- iii) Any other relief or relief's may be awarded to which the plaintiff is entitled to.

1)  PLAINTIFF

2) 
PLAINTIFF

3)  PLAINTIFF

4)  PLAINTIFF


PLAINTIFF

VERIFICATION

We the above named plaintiffs, do hereby declare that the contents of the above plaint are true and correct to the best of my knowledge, information and belief. Hence verified at L.B. Nagar on this the day of Jan , 2008.

1)  PLAINTIFF


2) PLAINTIFF

3)  PLAINTIFF

4)  PLAINTIFF

5)  PLAINTIFF

Counsel For Plaintiff

LIST OF DOCUMENTS

Sl.No.	Date of Documents	Parties to Documents	Description of Document
1		Plaintiffs	Death certificate of the late Sri. Pentudu
2		Plaintiffs	Xerox copy of the P.T. Certificate

IN THE COURT OF THE HON'BLE JUNIOR CIVIL JUDGE,
R.R.DISTRICT AT : L.B.NAGAR

O.S.NO: OF 2008

Between:

E. Sathaiha and others

.....Plaintiffs

AND

All others Concerned

.....Defendants

AFFIDAVIT FILED UNDER ODER 18 RULE 15(4) OF C.P.C

I, E. Sathaiah S/o Pentudu Age 65 yrs Occ Agriculture R/o Cherllapalli Village, Ghatkesar Mandal, R.R. District, do hereby solemnly affirm and state on oath as under.

Handwritten note:
Mentioned in the affidavit
(Sathaiha)

1. That I am the deponent herein and Plaintiff No 1 in the main suit as such I am well aware of the facts of the case and I am able to depose as under. I submit that I am authorised to depose on behalf of other plaintiffs also.
2. That the above suit is filed by me and other plaintiffs for declaration to declare us as the legal heirs of Late Pentudu.
3. I submit that the averments made in the plaint is true and correct to the best of my knowledge and belief, hence verified the same on this the day of of 2008 at L.B.Nagar.

Handwritten signature:
E. Sathaiah

Deponent

Adv/ L.B.Nagar

(Sathaiha)

**IN THE COURT OF THE HON'BLE
JUNIOR CIVIL JUDGE,
R.R.DISTRICT**

AT :L.B. Nagar.

O.S.NO: OF 2008

Between:

E. Sathaiha & Others

.....Plaintiffs

AND

All others Concerned

.....Defendants

SUIT FOR DECLARATION

Filed on: 03-2008

Filed By

Address:

Ch. Mohan

Advocate

H.No.16-11-20/2/E,
SaleemNagar, Malakpaet,
Hyde-60