

IN THE COURT OF THE HON'BLE DISTRICT JUDGE AT ^{MALKAJGIRI} ~~L.B. NAGAR~~

OS NO. OF 2020

Between:

Mrs. T Anuroopa Reddy
W/o T Shanker Reddy aged 61 years
Occupation House wife
R/o Flat No. 302, Sri Sai Krupa Residency
Opp. Temple Alwal PS,
Secunderabad, 500010, Telangana State.

..... Plaintiff

AND

1. Mogulla Jagan Mohan Reddy,
S/o Late Shankar Reddy,
aged 56 years, Occ: Business,
R/o. 1291/B, Pioneer Bazar,
Bollaram, Secunderabad-500010.

2. Mogulla Madhu Mohan Reddy,
S/o Late Shankar Reddy,
aged 53 years, Occ: Business,
R/o. Plot No. 45, 2-9-57/7/3,
Sai Nagar Colony, Macha Bollaram,
Farzandiguda, Secunderabad-500010

3. Mogulla Indiramma,
W/o Late Shankar Reddy,
Aged 75 years, cc: House Wife,
R/o. 1291/B, Pioneer Bazar,
Bollaram, Secunderabad-500010.

4. Mogulla Sudheer Reddy,
S/o Late M. Narayana Reddy,
Aged 49 years, Occ: Business,
R/o Flat No.308 & 309, Survey No.94
V S S Nandadeep Apartments,
Beside Suraksha Hospital, Jeedimetla,
Qutubullapur, Hyderabad, Telangana-500067

5. Mogulla Sushanth Reddy,
S/o Late Mogulla Narayana Reddy,
Aged 46 years, Occ: Service,
R/o Sy. No.93/P, flat No.504, D-Block, 5th floor,
NCL Sindhu Apartments, Pet Basheerabad,
Near RTA Office, Medchal, Jeedimetla,
Hyderabad, Telangana-500055.

Plaintiff

6. Smt. Musku Sunitha, W/o Ramana Reddy,
Aged 51 years, Occ: House Wife,
R/o Flat No. 505, Laxmi Arcade, Laxmi Enclave Colony,
Near Konark Hospital, Jeedimetla,
Qutubullapur, Hyderabad, Telangana-500055.

7. Smt. Mogulla Kamala, W/o Late Mogulla Narayana Reddy,
Aged 69 years, Occ: House Wife,
R/o Flat No.308, Survey No.94
V S S Nandadeep Apartments,
Beside Suraksha Hospital, Jeedimetla,
Qutubullapur, Hyderabad, Telangana-500067

8. Mogulla Srinivasa Reddy,
S/o late Mogulla Raji Reddy,
Aged 69 years, Occ: Nil,
R/o 2,2,218/22, Ganesh Nagar, Macha Bollaram,
Secunderabad, Telangana - 500010

9. M. Sai Reddy, S/o late M. Narasa Reddy,
Aged 67 years, Occ: Agriculture,
R/o Sai Nilayam, Plot No.26 (SCB), 8-14-029,
Shanti Nagar, Risala Bazar,
Secunderabad-500010.

10. M. Sanjeev Reddy, S/o late M. Narasa Reddy,
Aged 57 years, Occ: Agriculture,
R/o Plot No.38, Opp: building to Plot No.8,
Gummadi Krishna Reddy-Buttonguda, Bollaram,
Secunderabad-500010.

11. M. Srinivas Reddy S/o late M. Narasa Reddy,
Aged 56 years, Occ: Agriculture,
R/o Fortune Avenue, Survey No.198,199, 201
Kowkoo Village, Bollaram,
Secunderabad- 500010.

12. M. Balvanth Reddy S/o late M. Narasa Reddy,
Aged 52 years, Occ: Agriculture,
R/o 2-9-110, Behind Kotwal School,
Beside Hanuman Temple, Buttonguda, Bollaram,
Secunderabad-500010.

13. Mr. Bhaskar K Bhatt,
S/o K R Bhatt, aged 54 years,
Occ: Business,
R/o#114, Arya Samaj Building,
Secunderabad-500003.

14. Karnati Bhaskar,
S/o K Narasimha, aged 54 years,
Occ: Business, R/o 2-44/1,

Plaintiff

Sainagar, Chaitanyapuri,
Dilshukhnagar, Hyderabad-500060.

15. K. Gopinath, S/o K. Bhaskar,
Aged 31 years, Occ: Business,
R/o. R/o 2-44/1,
Sainagar, Chaitanyapuri,
Dilshukhnagar, Hyderabad-500060.

16. A. Purushotham, S/o A. Vittal,
Aged 54 years, Occ: Business,
R/o 1-3-1/C/1, Flat No. 101,
1st Floor, Jaya Mansion,
Kavadiguda, Hyderabad-500080.

17. A. Srinivas S/o A. Vittal,
Aged 46 years, Occ: Business,
R/o 2-44/1, Sainagar,
Chaitanyapuri,
Dilshukhnagar, Hyderabad-500060.

18. Belide Venkatesh, S/o B. Eshwaraiah,
Aged 53 years, Occ: Business,
R/o 1-3-2/C/1, Kisan Nagar,
Bhongiri, Nalgonda-508116.

19. Green Wood Estate,
A registered Partnership Firm,
Rep. by its Partner Mr. Meet B Mehta,
S/o Bharath B Mehta, aged 43 years,
Office at Shop Nos. 1,2 and 3, Ground Floor,
Hari Ganga Complex, Ranigunj, Secunderabad-500003.

20. Shri Meet B. Mehta S/o Bharat U. Mehta,
aged 44 years, Occupation: Business,
R/o Plot No. 21, Bapubagh Colony, P.G.Road,
Secunderabad - 500003

21. Smt. K. Sridevi W/o Sri K.V.S.Reddy,
aged 45 years, R/o flat No.305, Srinilaya Estates,
Ameerpet, Hyderabad-500016.

22. Modi Housing Pvt. Ltd.,
A Company incorporated under the Companies Act, 1956,
Regd. Office at 5-4-187/3 & 4, Soham mansion, II Floor,
M.G.Road, Secunderabad - 500003

23. P. Pradeep Surana, S/o Parasmul Surana,
Aged 47 years, Occ: Business,
R/o H.No. 516, Sadar Bazar,
Bollarum, Secunderabad.-500010

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24. E.B. Nagaraj, s/o E.P. Balraj,
Aged 47 years, Occ: Employee,
R/o 10-83, Temple Alwal,
Bollarum, Secunderabad-500010.

25. P. Suresh Reddy,
S/o P. Sudhakar Reddy,
Aged 51 years, occ: Business,
R/o H.No. 3-5-167/B, Venkateshwara Colony,
Narayanaguda, Hyderabad- 500029.

26. P. Rupa, W/o P. Suresh Reddy,
Aged 48 years, Occ: House Wife,
R/o H.No. 3-5-167/B, Venkateshwara Colony,
Narayanaguda, Hyderabad-500029.

27. P. Surender Reddy, S/o P. Krishna Reddy,
Aged 51 years, Occ: Business,
R/o H.No. 3-5-167/B, Venkateshwara Colony,
Narayanaguda, Hyderabad- 500029.

..... Defendants

**SUIT FILED FOR PARTITION, SEPARATE POSSESSSION AND
FOR MESNE PROFITS**

**PLAINT PRESENTED UNDER ORDER VII Rule 1 READ WITH
SECTION 26 OF CPC**

I. Description of the plaintiff

The Description of the Plaintiff is as mentioned in the above Cause Title being T Anuroopa Reddy, W/o T Shanker Reddy aged 61 years, Occupation House wife, R/o Flat No. 302, Sri Sai Krupa Residency, Opp. Temple Alwal PS, Secunderabad, 500010, Telangana State.

The address for service of all summons, notices and process is that of her counsel **Mr. ERANKI PHANI KUMAR**, Advocate, 1-3-1/14, Kavadiguda, Hyderabad – 500080.

II. Description of the Defendants

The description of the defendants is the same as stated in the cause title above.

Plaintiff

The address for service of all summons, notices and process on the above named defendants is the same as mentioned in the cause title above.

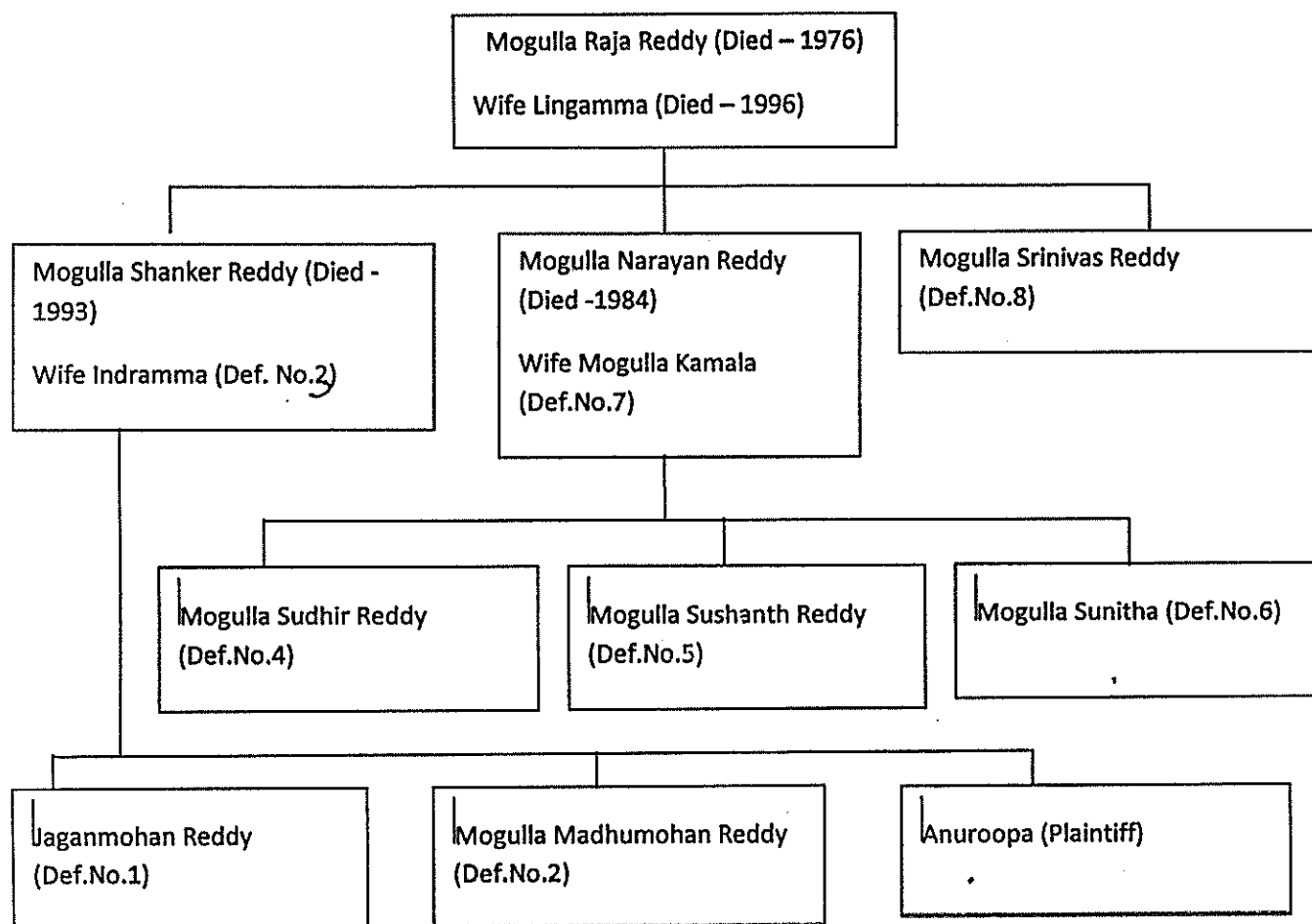
III. Brief facts of the case

- a. The plaintiff is the natural sister of the defendants 1 & 2 and daughter of 3rd defendant. The paternal grandfather of the Plaintiff namely Mogulla Raja Reddy owned land admeasuring Ac. 20-32 guntas covered by survey numbers 202, 205, 206 & 145 of Kowkur village, Cantonment Bollaram, Secunderabad, purchased under a registered sale deed document No.996 of 1358 fasli dt.05-12-1358 fasli as purchased from Mahmood Ali more clearly shown as Plaint 'A' Schedule Property. The Original Registered Sale deed is in the custody of the Defendants 1 & 2 and are directed to produce the same. Late Mogulla Raja Reddy purchased another extent of land admeasuring ac.2-16 guntas in survey no.203 & 204 of Kowkur village, Cantonment Bollaram, Secunderabad under a sale deed dt.29-12-1954 from Mogulla Narsareddy more clearly shown as Plaint 'B' Schedule Property. Mogulla Raja Reddy died intestate in the year 1976 and his wife Lingamma died in the year 1996.

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- b. The family pedigree is herewith mentioned below for a fair and better understanding of the relationship between Plaintiff and Defendants 1 to 8.



Late Mogulla Raja Reddy on his death in the year 1976 was survived by his wife and three sons. His wife died in the year 1996 and eldest son Mogulla Shanker Reddy pre-deceased his mother Lingamma, in the year 1993. Second son Mogulla Narayan Reddy also pre-deceased his mother Lingamma, died in the year 1984 as can be seen in the family pedigree above.

- c. After the death of Plaintiff's father Mogulla Shankar Reddy in the year 1993 and the death of Plaintiff's junior paternal uncle

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Mogulla Narayan Reddy in the year 1984 and Plaintiff's Paternal Grand Mother in the year 1996, the properties left by Plaintiff's Grandfather Mogulla Raja Reddy were being looked after by the Plaintiff's brothers Defendants 1 & 2, first cousins Defendants 4 & 5 and another Junior Paternal uncle Defendant No.8 herein. All the while the Defendants 1, 2, 4, 5 & 8 have assured the Plaintiff that the properties of Plaintiff's grandfather being plaint scheduled properties are being taken care and further assured the Plaintiff that she can receive her share as and when the properties are partitioned. The Plaintiff bonafidely believed Defendants 1, 2, 4 & 5 and trusted them that they would involve the Plaintiff on any decision for division of the plaint schedule properties being Hindu Undivided joint family properties and held by the Plaintiff and Defendants 1 to 8 as joint undivided possessors of the same.

d. That while matters stood above, the Plaintiff reliably learnt in September 2020 through some of her relatives and third defendant being mother as well about fraudulent and clandestine transactions made by defendants 1 to 7 by dealing with the plaint schedule properties with third parties considering steady escalation of the real estate value. The Plaintiff's mother revealed after constant persuasion by the Plaintiff about the extents left by the Plaintiff's paternal grand-father Mogulla Raja Reddy by providing certain land documents and village map and copy of Regd. Sale deed of 1358 Fasli and sale deed of the year

Plaintiff

1954 available in her custody, which include copies of registered partition deed document no.57 of 2007 dt.05-01-2007 as entered between defendants 1, 2, 4 & 5 with 9 to 12 defendants.

- e. On seeking legal advice, the plaintiff was shocked to know the contents of the said partition deed which revealed that part of the plaint "A" schedule property excluding land in survey no. 145 was allegedly shown as joint property between the father of the plaintiff, junior paternal uncle of the plaintiff (father of defendants 4 to 6) and one Mr. Narsa Reddy (father of Defendants 9-12) which are in stark contrast to the purchase documents standing in the name of late Mogulla Raja Reddy. By such manipulative allegations, the sons of Narsa Reddy obtained the said partition deed in the ratio of 1:1:2. It is not known how the defendants 1, 2, 4 & 5 entered into the registered partition deed 57 of 2007 without even looking at the registered sale deed document No.996 of 1358 fasli and admittedly, the defendants 1,2,4 & 5 have no independent exclusive right to execute any documents concerning the schedule properties.
- f. That, the name of Mogulla Narsa Reddy nowhere appeared in the registered sale deed 996/1358 fasli and defendants 9 to 12 with their ulterior motives and evil designs misguided the defendants 1, 2, 4 & 5 in execution of the registered partition deed 57 of 2007 by suppressing the Registered Sale Deed document No.996/1358F and Sale Deed dt.29-12-1954 as executed by the

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father of Defendants 8-12 in respect of Plant 'B' Schedule Property. The Partition Deed was drawn behind the back of the Plaintiff and without any knowledge or her consent. The registered partition deed document No.57 of 2007 is a void document since Narsa Reddy was never the joint owner of plant schedule properties along with Mogulla Raja Reddy and the said partition deed document No. 57 of 2007 does not bind the Plaintiff in any form since the Plaintiff's joint interest, right and title was suppressed. As such, the Defendants 8-12 have to be removed from the possession of the land received by them under a manipulative partition deed and liable to be partitioned as per the shares entitled between Plaintiff and Defendants 1-8.

- g. The defendants 1, 2, 4 & 5 alienated Ac.1-00 guntas in Survey no.202 to 205 of Kowkur village, Malkajigiri mandal, R.R. District in favour of 13th Defendant under registered sale deed doc. No. 62 of 2007 dt.05-01-2007 and Defendants No. 3 & 6 joined as consenting parties.
- h. The defendants 1, 2, 4 & 5 alienated Ac. 3-05 guntas in Survey no.202 to 206 of Kowkur village, Malkajigiri mandal, R.R. District in favour of Defendants 14 to 18 under registered sale deed doc. No. 63 of 2007 dt.05-01-2007 and Defendants No. 3 & 6 joined as consenting parties.
- i. The defendants 1, 2, 4 & 5 alienated Ac.2-00 guntas in survey no.202 to 206 of Kowkur village, Malkajigiri mandal, R.R. District

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in favour of 19th Defendant under registered sale deed doc. No.64 of 2007 and Defendants No. 3 & 6 joined as consenting parties. Defendants 20, 21 & 22 are the partners of the 19th Defendant partnership firm.

- j. The defendants 1, 2, 4 & 5 alienated Ac. 0-10.67 guntas in survey no.202 to 205 of Kowkur village, Malkajigiri mandal, R.R. District in favour of Defendants 23 & 24 under registered sale deed Doc.No.65 of 2007 dt.05-01-2007 and Defendants 3 & 6 joined as consenting parties and 7th Defendant later executed a registered Ratification deed doc. No.182 of 2007 dt.08-01-2007.
- k. The defendants 25 to 27 above named obtained a registered Exchange deed Doc.No.2501 of 2004 dt.03-07-2004 in respect of their land admeasuring Ac.0-29.55 guntas in survey no.198 of Kowkur village, malkajigiri mandal, R.R. district against the land admeasuring ac.0-14.77 guntas in survey no. 202 of Kowkur village, Malkajigiri mandal, R.R. district as executed by defendants 4 & 5.
- l. The 19th defendant which is a registered partnership firm and obtained a sale deed for Ac.2-00 guntas while ignoring the plaintiff's right, title and interest in the joint Hindu undivided family, obtained an approval for construction of residential apartments comprising of Stilt + 5 floors. Besides to the same, the plaintiff also reliably learnt that, the defendants 13 to 18 have entered into various sale deeds/joint development agreements cum GPA. The 13th defendant executed Sale deed

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bearing Doc.Nos.741 of 2007 dt.08-01-2007 in favour of 19th Defendant. Defendants 14-18 entered into Development with 19th Defendant vide Joint Development Agreement Document No.4100 of 2007 dt.13-09-2007, and Joint Development Agreement Cum GPA Document No.4101 of 2007 dt. 13-09-2007, 4102 of 2007 dt.13-09-2007 being part of plaint Scheduled properties herein, in order to deny and deprive the plaintiff's undivided right, title and interest over the same which is deemed to be under the joint possession of the plaintiff being a partible property, entitling the Plaintiff an undivided share therein.

m.The Plaintiff's paternal grandfather who purchased the Plaint A Scheduled property from his vendor Mr. Mahboob sahib s/o of Bandey Ali and that his name can be seen in Sethwar in respect of survey Nos.202,205,206 & 145 as cultivator/Inamdar/Khatadhar. The name of the Plaintiff's paternal grandfather i.e. M Raja reddy s/o Sai Reddy appeared in the the Pahani 1955-56 in respect of survey Nos.202,203,204,205 & 206 in respect of land admeasuring Ac.10-04 guntas, Ac. 2-05 guntas, Ac.0-11 guntas, Ac.3-16 guntas & Ac.0-13 guntas. This continued to appear in the pahani for the year 1960-61, 1973-74, 1976-77, 1980-81, 1985-86, 1990-91. From the years 1995-96, the names of Defendants 1, 2, 4, 5, 8 to 12 appeared in the revenue records and it is surprising and shocking for the Plaintiff to realize now, that the said names got mutated in the revenue records without any

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inquiry or notice on the Plaintiff and without any absolute independent rights in their favour and behind the back of the plaintiff. The names of Defendants 1,2,4,5,8 to 12 continued in pahanies for the years 1999-2000, 2000-01, 2001-02, 2003-04 and also for subsequent years as reliably learnt by Plaintiff. Thus, in effect, such entry of names of Defendants 1, 2, 4, 5, 8 to 12 in the revenue records is contrary to law and without any notice on the Plaintiff being a person having right, title and interest over the Plaintiff A & B schedule properties as a coparcener of undivided Hindu joint family.

- n. That it is very strange and shocking for the Plaintiff to comprehend the method and manner by which the names of Defendants 9 to 12 entered in the revenue records since they are not related to Plaintiff's paternal grandfather Late Mogulla Raja Reddy as a legal heir and the plaintiff schedule properties are the absolute properties of Late Mogulla Raja Reddy and upon his death intestate in the year 1976, devolved on the Plaintiff and Defendants 1 to 8 as Legal heirs by intestate succession.
- o. The evil designs of the Defendants 9 to 12 is glaring and manifest from the fact that they schemed a plan to first gain entry into the revenue records by manipulation and gross violation of procedure in collusion with Defendants 1, 2, 4 & 5 and by showing such revenue records obtained a registered partition deed Doc.No.57 of 2007 dt.05-01-2007 from Defendants 1, 2, 4 & 5, without any right whatsoever and the

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schedule property referred therein was the absolute property of Late Mogulla Raja Reddy. Thus, the registered partition 57 of 2007 as drawn between defendants 1, 2, 4 & 5 as FIRST PARTY and defendants 9 to 12 as SECOND PARTY does not bind the Plaintiff as any amount of misrepresentation and fraud was played contrary to the recitals in Registered Sale deed document no.996/1358F in the name of Mogulla Raja Reddy. The fact that on the same day of registration of Partition deed, a series of registered sale deeds Doc.Nos.62, 63, 64, 65 and ratification deed 182 of 2007 and further sale deeds in favour of 19th Defendant were got executed besides the documents as executed by the purchasers from defendants 1, 2, 4 & 5 as subsequently made or manipulatively drawn demonstrates collusion, connivance and fraudulent acts of defendants to deprive the plaintiff a share in the plaint A & B schedules having real potential in value. As such, all these registered documents referred above as made without the knowledge or consent of the Plaintiff do not bind her beside being invalid documents and they do not convey any title in favour of Defendants 9 to 12 and the purchasers. The plaintiff was deliberately kept out of all these transactions knowing full well about her right in the properties as conveyed. The plaintiff gained knowledge of these documents only when 3rd defendant who is the mother of the Plaintiff disclosed few details and furnished copies of the documents in her custody in September 2020.

p. That on a perusal of the above contents, it is prima-facie clear

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that out of the plaint A schedule property of Ac. 20-32 guntas and Plaint 'B' Schedule of Ac.2-16 guntas, the land in survey no.145 admeasuring Ac.6-39 guntas is intact, while the land in Survey No.202 admeasuring Ac.10-04 guntas, Survey No.203 admeasuring Ac.2-05 guntas, Survey No.204 admeasuring Ac.0-11 guntas, Survey No.205 admeasuring Ac.3-16 guntas and Survey No.206 admeasuring Ac.0-13 guntas was partitioned illegally and without any right. Neither the defendants 1,2,4 & 5 have any independent right to deal with the same nor the defendants 9-12 have any right to receive even an inch of land in the Plaint Schedule properties under the garb of alleged joint ownership. The defendants 1 to 6 have alienated Ac. 6-30 guntas in favour of defendants 13 to 27 without any exclusive right and wrongfully entered into a partition deed with defendants 9 to 12 giving away valuable land of Ac. 8-05 guntas in Survey No. 202 to 206 of Kowkur village, Malkajigiri mandal, R.R. District without any right in favour of defendants 9 to 12 thereby depriving the valuable right of the plaintiff over plaint schedule properties which are highly potential in nature and liable for partition. Unless there is a fair and equitable partition of plaint scheduled properties by metes and bounds taking good and bad qualities into consideration and determination of the plaintiff's share being 1/9th share and allotment and delivery through the present suit, the plaintiff would be put to serious prejudice.

q. The plaintiff on realizing in September 2020 about the wrongful

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and illegal transactions made between the defendants, sent a registered legal notice dt. 06-11-2020 to the defendants by registered post acknowledgement due and the defendants 1 to 16, 18, 19, 22, 23, 25 to 27 acknowledged the legal notice and the notices against the defendants 17, 20, 21 & 24 returned unserved. None of the defendants who acknowledged the legal notice have neither replied nor complied the demand. On the contrary, the defendants are making further wrongful attempts to alienate the Plaintiff Schedule lands and are making wrongful attempts to encumber or alienate the lands or alter the nature of lands with a view to create third party rights by depriving the plaintiff's interest over the same. As such, the plaintiff is now constrained to seek indulgence of this Hon'ble court through this suit for partition and separate possession and for mense profits besides filing an application for temporary injunction against encumbrance or changing the nature of plaintiff scheduled properties, pending the suit.

- r. The Plaintiff Schedule lands are valuable lands and the defendants 1 to 8 were cultivating the lands jointly for the benefit of the plaintiff's family and earned huge profits out of agricultural income and by illegal sale of part of Plaintiff Schedule lands derived wrongful benefits and all those sales and partition deed as drawn previously are liable to be declared invalid as they do not bind the Plaintiff.

Hence this suit.

Plaintiff

IV. CAUSE OF ACTION

Cause of Action for this suit arose when the Plaintiff's paternal grandfather Late Mogulla Raja Reddy purchased land admeasuring Ac.20-32 guntas in survey no.202, 205, 206 & 145 and Ac.2-16 guntas in Survey Nos.203 & 204 situated in Kowkur Village, Cantonment Bollaram, Secunderabad and when he died intestate in the year 1976 leaving behind him his wife and three sons as successors and when his wife Mogulla Lingamma died in the year 1996 and Plaintiff's father Mogulla Shanker Reddy died in the year 1993 and Junior paternal uncle Mogulla Narayan Reddy died in the year 1984 and the lands left by Late Mogulla Raja Reddy being Plaint Schedule lands were being supervised and cultivated by the defendants 1 to 8 on behalf of the entire family and when the defendants 1 to 7 have entered into wrongful transactions including that of a partition deed between defendants 1, 2, 4 & 5 and defendants 9 to 12 without having any exclusive right whatsoever in favour of Defendants 1,2,4 & 5 and when the plaintiff was all along made to believe that her interests in the Hindu Undivided Joint family are being taken care and when the plaintiff recently learnt in September 2020 through relatives and 3rd Defendant about the Partition deed and Sale deeds executed by the defendants 1 to 6 in favour of third parties suppressing the right of the plaintiff and when the plaintiff issued a registered legal notice dt.06-11-2020 to all the defendants and when the defendants failed to reply and on the other hand making wrongful attempts to enter into further

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clandestine transactions to defeat the right of the Plaintiff in the Plaintiff schedule properties and cause of action also arose on all such dates as pleaded in Para 3 above.

V. JURISDICTION

That the Plaintiff schedule properties are situated in Kowkur village, Cantonment Bollaram, Secunderabad, presently Malkajgiri Mandal, R.R.District and as such, this Hon'ble Court has ample territorial and pecuniary jurisdiction to entertain and try this suit.

VI. DECLARATION

The Plaintiff has not filed any other suit or proceedings before any other Court or Tribunal seeking the relief as claimed herein.

VII. LIMITATION

The Plaintiff schedule properties are partible properties and Plaintiff has undivided right, title and interest by virtue of intestate succession of her Paternal Grand Father and since the Plaintiff schedule properties are Undivided Joint Hindu family properties, the present suit as filed is within limitation since her demand to partition the same was not responded by the respondents 1 to 8 and learnt in September 2020 about illegal Partition Deed and Sale Deeds as collusively drawn from the year 2007 onwards in a surreptitious manner.

Plaintiff

VIII. COURT FEES

The Plaintiff valued the suit for the purpose of court fee and jurisdiction as under:

- A. The total value of Plaint A Schedule Property comprising of Ac.20-32 guntas is Rs.40,26,88,000/- as per the valuation certificate dt.07-12-2020 issued by the Sub-Registrar.
- B. The total value of Plaint B Schedule Property comprising of Ac.2-16 guntas is Rs.4,64,64,000/- as per the valuation certificate dt.07-12-2020 issued by the Sub-Registrar.

The total value of Plaint A & B Schedule properties is Rs.44,91,52,000/- of which the Plaintiff's 1/9th share is Rs.4,99,05,777/-. Since the Plaintiff is deemed to be in Joint possession of plaint A & B scheduled properties, the Plaintiff paid a Court Fee of Rs.200/- under Section 34(2) of Telangana Court Fee and

Suit Valuation Act. *For the consequential relief, notionally valued U/s 24(d) of TLF & SV Act @ Rs.10000/- on each document referred in paras IX (A) and on seven documents paid a court fee of Rs.5502/- @ Rs 786/- each*

IX. RELIEFS PRAYED FOR

The Plaintiff therefore prays that this Hon'ble Court may please to pass a Judgment and Decree in favour of the Plaintiff and against the Defendants.

- A. To pass a preliminary decree determining the share of the Plaintiff as 1/9th share entitled in Plaint A & B scheduled properties with a consequential relief that the Registered Partition Deed Document No.57/2007 and Registered Sale Deeds

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62, 63, 64, & 65/2007 and Ratification Deed Document No.182/2007 and Exchange Deed Document No.2501/2004 and all subsequent Sale deeds by the Purchasers as neither valid nor binding on the Plaintiff.

- B. To pass a final decree duly making allotment of Plaintiff's share by metes and bounds and by delivery thereof.
- C. To grant mesne profits to the extent of Plaintiff's share.
- D. To award costs of this suit, and
- E. To grant such other relief or reliefs to which the Plaintiff is entitled under law.

COUNSEL FOR PLAINTIFF

PLAINTIFF

VERIFICATION

I, T Anuroopa Reddy W/o T Shanker Reddy, do hereby verify that what is stated in the above paragraphs is true and correct to the best of my knowledge and belief and believed the same to be true and hence verified and signed on this the ____ day of December 2020 at Hyderabad.

PLAINTIFF

LIST OF DOCUMENTS

Sl. No.	Date of Document	Parties to the Doc.	Description of the Document
01	07-12-2020	Plaintiff	Valuation Certificate of Plaint 'A' Schedule
02	07-12-2020	Plaintiff	Valuation Certificate of Plaint 'B' Schedule
03	21-09-1976	Plaintiff	Original Death Certificate of Late Mogulla Raja Reddy
04	25-10-1993	Plaintiff	Original Death Certificate of Late Mogulla Shanker Reddy
05	04-09-1984	Plaintiff	Original Death Certificate of Late M Narayan Reddy
06	08-11-2017	Plaintiff	Cc of Village Map of Kowkur
07		Plaintiff	Cc of Sethwar in urdu with English Translation
08		Plaintiff	Cc of Kadil register (Form No. 54) in urdu with English translation
09	130-11-1358 F	Plaintiff	Cc of Registered sale deed doc. No.996 Sub Registrar Secunderabad in urdu with English Translation
10	29-12-1954	Plaintiff	Original Sale deed in urdu with English Traslation
11	05-01-2007	Defendants	Cc of Registered Partition Deed 57 of 2007
12	05-01-2007	Defendants	Cc of Registered Sale Deed 62 of 2007
13	05-01-2007	Defendants	Cc of Registered Sale Deed 63 of 2007
14	05-01-2007	Defendants	Cc of Registered Sale Deed 64 of 2007
15	28-12-2006	Defendants	Copy of Firm certificate and Partnership deed of 19 th Defendant
16	20-08-2007	Defendants	Copy of Supplementary deed of partnership of 20 th Defendant
17	05-01-2007	Defendants	Cc of Registered Sale deed 65 of 2007
18	08-01-2007	Defendants	Cc of Ratification Deed 182 of 2007
19	03-07-2004	Defendants	Cc of Deed of Exchange 2501 of 2004
20	03-07-2004	Defendants	Copy of MOU
21	09-07-2007	Defendants	Copy of permit/sanction plan from HMDA
22	08-01-2007	Defendants	Cc of Registered Sale Deed 741 of 2007
23	13-09-2007	Defendants	Cc of Registered Joint Development Agreement cum GPA 4100 of 2007
24	13-09-2007	Defendants	Cc of Registered Joint Development Agreement cum GPA 4101 of 2007
25	13-09-2007	Defendants	Cc of Registered Joint Development Agreement cum GPA 4102 of 2007
26	1955-56	Plaintiff	Cc of Pahani
27	1960-61	Plaintiff	Cc of Pahani
28	1973-74	Plaintiff	Cc of Pahani
29	1976-77	Plaintiff	Cc of Pahani
30	1980-81	Plaintiff	Cc of Pahani

Plaintiff

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31	1985-86	Plaintiff	Cc of Pahani
32	1990-91	Defendants	Cc of Pahani
33	1995-96	Defendants	Cc of Pahani
34	1999-2000	Defendants	Cc of Pahani
35	2000-01	Defendants	Cc of Pahani
36	2001-02	Defendants	Cc of Pahani
37	2003-04	Defendants	Cc of Pahani
38	06-11-2020	Plaintiff	Copy of Legal Notice
39	07-11-2020	D1	Original Acknowledgement
40	10-11-2020	D2	Original Acknowledgement
41	09-11-2020	D3	Track record from Postal Department
42	10-11-2020	D4	Original Acknowledgement
43		D5	Original Acknowledgement
44	10-11-2020	D6	Original Acknowledgement
45	10-11-2020	D7	Original Acknowledgement
46	13-11-2020	D8	Original Acknowledgement
47	12-11-2020	D9	Original Acknowledgement
48	13-11-2020	D10	Original Acknowledgement
49	09-11-2020	D11	Track record from Postal Department
50	13-11-2020	D12	Original Acknowledgement
51	09-11-2020	D13	Original Acknowledgement
52	09-11-2020	D14	Original Acknowledgement
53	09-11-2020	D15	Original Acknowledgement
54	10-11-2020	D16	Original Acknowledgement
55	11-11-2020	D18	Original Acknowledgement
56	09-11-2020	D19	Original Acknowledgement
57	13-11-2020	D22	Original Acknowledgement
58	09-11-2020	D23	Original Acknowledgement
59	09-11-2020	D25	Original Acknowledgement
60	09-11-2020	D26	Original Acknowledgement
61	09-11-2020	D27	Original Acknowledgement
62	10-11-2020	D17	Returned Cover
63	09-11-2020	D20	Returned Cover
64	11-11-2020	D21	Returned Cover
65	10-11-2020	D24	Returned Cover
66	07-11-2020	Plaintiff	Original Postal Receipt 27 nos.

PLAINTIFF

PLAINT SCHEDULE PROPERTIES

PLAINT 'A' SCHEDULE

All that the land admeasuring Ac.20-32 guntas in Survey Nos. 202(Ac.10-04 guntas), 205(Ac.6-39 guntas), 206(Ac.0-13 guntas) and 145(Ac.6-39 guntas) situated at Kowkur Village, Cantonment Bollaram, Secunderabad, presently Malkajgiri Mandal, R.R.District, bounded by

NORTH: Lands in Survey Nos.200,201,196,198

SOUTH: Neighbour's Land of Sai Reddy & others and Yapral Village

EAST: Government/Defense Land and Part of Yapral Village

WEST: Land in Survey Nos.203, 204 (Plaint 'B' Sch) & 207

PLAINT 'B' SCHEDULE PROPERTY

All that the land admeasuring Ac.2-16 guntas in Survey Nos. 203(Ac.2-05 guntas) and 204(Ac.0-11 guntas) situated at Kowkur Village, Cantonment Bollaram, Secunderabad, presently Malkajgiri Mandal, R.R.District, bounded by

NORTH: Land in Survey nos.205 (Plaint 'A' Sch) & 207

SOUTH: Yapral Village

EAST: Land in Survey nos. 202 (Plaint 'A' Schedule)

WEST: Land in survey nos. 212

Plaintiff

::23::

VERIFICATION

I, T Anuroopa Reddy W/o T Shanker Reddy, do hereby verify that what is stated in the above Schedules is true and correct to the best of my knowledge and belief and believed the same to be true and hence verified and signed on this the ____ day of December 2020 at Hyderabad.

PLAINTIFF

4Bragz ML9

Jagade Sh

2-11/1
Venu nilayam
H/Venkat
watchman

IN THE COURT OF THE
HON'BLE DISTRICT
JUDGE AT ~~L.B. NAGAR~~
MALKAJINRI

OS NO. 13 OF 2020

Between:

Mrs.T Anuroopa Reddy

..... Plaintiff

AND

1.Mogulla Jagan Mohan
Reddy & others

.....Defendants

PLAINT PRESENTED
UNDER ORDER VII RULE 1
READ WITH SECTION OF
CPC

SUIT FOR PARTITION,
SEPARATE POSSESSION
AND MESNE PROFITS

FILED ON: Dec., 2020

FILED BY:

ERANKI PHANI KUMAR,
ADVOCATE,

4TH FLOOR, ERANKI
RESIDENCY, 1-3-1/14,
KAVADIGUDA,
HYDERABAD - 500 080

epkassociates@gmail.com

Mobile : 98480 48935

COUNSEL FOR PLAINTIFF