

**IN THE COURT OF THE HON'BLE ADDITIONAL SENIOR CIVIL
JUDGE,**

MEDCHAL-MALKAJGIRI,

AT MEDCHAL

I.A. No. ____ of 2023

IN

O.S. No. 535 OF 2015

Between:

Mrs. Deepthi

Petitioner/Defendant 3

AND

B. Chakradhari & Ors.

Respondents/Plaintiff/Defendants 1 & 2

AFFIDAVIT

I, Smt. Deepthi Balagiri D/o. Late Mr. Sreekakulam Radhaswamy, W/o. Balagiri, aged about 50 years, R/o: R/o. H. No. 13/70, Savitha Bldg, Pestom Sagar Road No. 2, Chembur, Mumbai, Maharashtra - 400089, do hereby solemnly affirm and state on oath as follows: I state that I am the deponent herein and the Defendant 3 in the main case and as such I am well acquainted with the facts of the case.

1. The Plaintiff has filed the instant suit against me by stating untrue and incorrect facts and are attempting to misrepresent and mislead this Hon'ble Court.
2. I submit that I have filed a Written Statement bringing on record the true facts of the instant case. In the complaint, the Plaintiff has raised several baseless allegations pertaining to me signing an Agreement of Sale, dated 24.01.2015, for sale of the Suit Schedule Property, belonging to my children Defendants 1 & 2.
3. It is most humbly submitted that the alleged Agreement of Sale is a product of collusion between my ex-husband Mr. C. Rajesh and the Plaintiff to knock away the Suit Schedule Property belonging to Defendants 1 & 2.

Deepthi

4. As such, to prove my contentions and the gross misrepresentation and fraud of the Plaintiff and C. Rajesh and to further substantiate my pleadings in the written statement, I am filing the following documents:

1. Certified copy of the decree, dated 24.06.2015 passed in FCOP No. 261 of 2015, by the Hon'ble Court of the Family Judge, City Civil Court, at Secunderabad,

2. Memorandum of Understanding filed in in FCOP No. 261 of 2015, by the Hon'ble Court of the Family Judge, City Civil Court, at Secunderabad,

5. I submit that the above documents are crucial and important documents necessary to bring on record the true facts in relation to the instant case and to substantiate my contentions and pleadings. In view of the same, this Hon'ble Court may be pleased to receive the above documents, failing which I will be put to irreparable loss and injury.

I therefore pray that this Hon'ble Court may be pleased to receive the documents i.e, (i) Certified copy of the decree, dated 24.06.2015 passed in FCOP No. 261 of 2015, by the Hon'ble Court of the Family Judge, City Civil Court, at Secunderabad, and (ii) Memorandum of Understanding filed in in FCOP No. 261 of 2015, by the Hon'ble Court of the Family Judge, City Civil Court, at Secunderabad as documentary proof and also to mark the same for adjudication of the instant case, or else I would stand to suffer irreparable loss and hardship and to pass such other order or orders this Hon'ble Court may deem fit in the circumstances of the case and in the interest of justice.


DEPONENT

Sworn and signed before me on
this the ___ day of July 2023.

Advocate::

**IN THE COURT OF THE HON'BLE ADDITIONAL SENIOR CIVIL
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MEDCHAL-MALKAJGIRI,

AT MEDCHAL

I.A. No. ____ of 2023

IN

O.S. No. 535 OF 2015

BETWEEN:

Mrs. Deepthi
D/o. Radhaswamy
Aged about 49 years,
R/o. Mumbai

Petitioner/Defendant 3

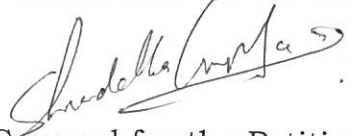
AND

1. Mr. B. Chakradhari,
S/o. B. Seetharama Sarma,
Aged about 47 years,
R/o. Plot No. 16, RK Housing Society,
ECIL Post, Hyderabad-500062
2. Mr. C. Shashir
S/o. C. Rajesh
Aged about 18 years,
R/o. United Kingdom
3. Mrs. C. Vithica
D/o. C. Rajesh
Aged about 22 years,
R/o. United Kingdom

Respondents/Plaintiff/Defendant 1 & 2

**PETITION FILED UNDER ORDER VII RULE 14(3) R/W S. 151
OF CPC**

For the reasons stated in the accompanying affidavit, the Petitioner prays that this Hon'ble Court may be pleased to receive the documents i.e, (i) Certified copy of the decree, dated 24.06.2015 passed in FCOP No. 261 of 2015, by the Hon'ble Court of the Family Judge, City Civil Court, at Secunderabad, and (ii) Memorandum of Understanding filed in in FCOP No. 261 of 2015, by the Hon'ble Court of the Family Judge, City Civil Court, at Secunderabad as documentary proof and also to mark the same for adjudication of the instant case, or else I would stand to suffer irreparable loss and hardship and to pass such other order or orders this Hon'ble Court may deem fit in the circumstances of the case and in the interest of justice.


Counsel for the Petitioner

Date: .07.2023
Place: Hyderabad