

IN THE COURT OF THE HON'BLE <sup>DD</sup> JUNIOR CIVIL JUDGE  
RANGA REDDY DIST  
AT: LB NAGAR

O.S No. 75 of 2021

Between:

Smt. Doolmitta Bharathamma, W/o. Late D. Raji Reddy,  
Aged: 60 years, Occ: Business, R/o. Flat No. 405,  
C-Block, Mayflower Heights, Mallapur, Nacharam Post,  
Hyderabad-500076

Rep by her G.P.A holder

Sri. Doolmitta Dayakar Reddy, S/o. Late D. Raji Reddy,  
Aged about: 38 years, Occ: Business ,  
R/o. H.No. 3-4-118/2/7, Annapurna colony East,  
Mallapur Village, Uppal Mandal,  
RR.Dist, Telanagana

....Plaintiff

AND

1. Mayflower Park Apartments,  
Rep. by its President,  
Anjaneyulu,  
R/o.3-4-106,Mallapur, RR Dist- 500076..

2. Janapriya Township Association  
Rep. by its President,  
Srimannarayana,  
Nacharam, Mallapur, RR Dist-500076.

..Defendants

CLAIM: SUIT FOR POSSESSION  
PLAINT FILED UNDER ORDER VII RULE 1 R/W SEC. 26 OF C.P.C

A) Description of the Plaintiff

The description of the plaintiff is as same shown in the cause title.

B) Description of the Defendant

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

C) The address of the Plaintiff for the purpose of service of all notices and process etc., in this suit is that of his Counsel Sri. E. Vishwa Prasad, N.Praveen, E.Mrunalini Advocates, Office at Flat No. 103, Sri Sai Apartment, Anantharam nagar, Amberpet, Hyderabad-500013.

1. It is submitted that, the Plaintiff is the absolute owner and possessor of Plot no. 8, (Part), admeasuring 98.5 Sq. Yards in Sy.no. 169,171,& 172 situated at Annapurna Colony, Mallapur village, Uppal Mandal, RR

*Dejan*



District, having purchased by her under Registered sale deed no. 1116/2015 Registered in the office of SRO, Kapra. Since the date purchase the plaintiff is in possession and enjoyment of said property hereinafter called as suit schedule property.

2. It is submitted that, north side to the suit plot, the Def-1 apartment is existing and in between suit plot and apartment open yard is existing, but the def-1 instead of using its own open yard, also using suit land by attaching with their open land. Likewise at eastern side Def-2 apartment is existing and in between the suit land and Def-2 apartment open yard is existing which is in Sy.N.o. 166,167,168 &174, therefore the def-2 apartments association along with their open yard also claiming the suit land as open yard of Def-2 apartment.
3. It is submitted that, since the suit property is a open land, the northern side apartment association/Def-1 using the open land along with their open yard by claiming it is part of Sy.no.174. likewise the def-2 also claiming eastern side part of suit land. In-fact the plaintiff's property is farms part of Sy.No. 169,171& 172 and the defendants have no right in any party of land n Sy.No.172 in which suit property is existing. Therefore recently about 6 months back the plaintiff applied for demarcation of Survey Numbers and in which the surveyor clearly shown the suit land by demarcating on site, but the defendants by showing their association mob preventing the plaintiff from entering into plaintiff's property, therefore as per legal advice the plaintiff approaching this Honorable for recovery of suit land. Though the plaintiff's title is not in dispute but only identity disputed, therefore for identifying the same, the surveyor demarcated on site in the presence of both the parties, but the defendants still preventing the plaintiff. Hence this suit.

#### CAUSE OF ACTION

The cause of action originally arose on 31-3-2015 when the Plaintiff purchased the property and finally on 20-12-2020 and on 4-1-2021 when the defendants prevented the plaintiff from entering into her land interfering with the possession of the plaintiff in and over the suit property. Hence the cause of action continues for filing this suit.



## JURISDICTION

The Schedule property is situate at Mallapur Village, Uppal Mandal, RR District- Telangana, therefore this Honorable Court is having territorial and pecuniary jurisdiction to entertain the suit and grant relief as prayed for.

## COURT FEE:

The Suit property total value is at Rs. 4,13,700 /- and  $\frac{1}{2}$  of it comes to Rs. 2,06,850 /- and the same is valued Under Section 28 of T.S.C.F and S.V Act and on which an advolarum Court Fee of Rs. 4,526 /- is paid which is proper and sufficient. The Court fee of Rs. /- in lieu of court fee stamps has been paid in cash vide challan No. \_\_\_\_\_ Dated: 18-1-2021 in the bank

of State Bank of India L.B Nagar.

*Handwritten:* This suit is for delivery of land.

## PRAYER:

Therefore the Plaintiff prays that this Honorable Court may be pleased to grant Judgment and decree in favor of the Plaintiff and against the Defendant.

- (i) To pass a decree directing the defendants to deliver the suit land to the plaintiff failing which this Honorable court may please to deliver the same to the plaintiff.
- (ii) To award suit costs.
- (iii) Any other relief or relief's as this Honorable Court may deem fit and proper in the circumstances of the case.

Dated : 18-1-2021

Place : Hyderabad.

*Signature*  
PLAINTIFF  
(per G.P.A)

*E. Vishwanath*  
COUNSEL FOR THE PLAINTIFF



VERIFICATION:

Sri. Doolmitta Dayakar Reddy , S/o Late D. Raji Reddy, G.P.A holder of Plaintiff , the Plaintiff herein do hereby declare and verify that the above stated facts in paras supra and true and correct to the best of our knowledge, belief and information. Hence verified on this the 18<sup>th</sup> day of January , 2021 at Hyderabad.

*Dogan*

PLAINTIFF  
(per G.P.A)

SCHEDULE OF PROPERTY

All that piece and parcel of Plot no. 08 part admeasuring 98.5 Sq. Yards or 82.34 Sq. Mtrs in Sy.no. 169,171 and 172 situated Annapurna Colony, Mallapur Village, Uppal Mandal, RR District Now in Medchal- Malkajgiri District, Telangana State and bounded by :

North : K.C. Pipe Company ( May flower Park)  
South : Plot No. 8 part & 20'  
East : Neighbor's land ( Janapriya Township)  
West : plot no. 8 Part & plot no.7

*Dogan*

PLAINTIFF  
( per G.P.A)

*E. Vishwanath*

COUNSEL FOR THE PLAINTIFF

VERIFICATION:

Sri. Doolmitta Dayakar Reddy , S/o Late D. Raji Reddy, G.P.A holder of Plaintiff , the Plaintiff herein do hereby declare and verify that the above stated facts in paras supra and true and correct to the best of my knowledge, belief and information. Hence verified on this the 18<sup>th</sup> day of January, 2021 at Hyderabad.

*Dogan*

Date: 18-1-2021 .  
Place: Hyderabad.

PLAINTIFF  
( per G.P.A)



LIST OF DOCUMENTS FILED BY PLAINTIFF

| S.NO | Date of Doc | Parties of the Doc                 | Description of the Documents       |
|------|-------------|------------------------------------|------------------------------------|
| 1.   | 31-12-2020  | Plaintiff & G.P A holder           | Original General Power of attorney |
| 2.   | 31-12-2014  | Plaintiff 's Vendor and his Vendor | C.C copy Sale deed No.4449/2014    |
| 3.   | 31-3-2015   | Plaintiff and her Vendor           | C.C copy Sale deed No.1116/2015    |
| 4.   | 11-1-2021   | Plaintiff and Govt                 | Valuation certificate              |
| 5.   | 19-1-2021   | Plaintiff and Govt                 | Xerox copy of E.E                  |

Dated : 18-1-2021  
Place : Hyderabad.

PLAINTIFF  
( per G.P.A)

E.Vishwanath  
COUNSEL FOR THE PLAINTIFF



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JUNIOR CIVIL JUDGE  
RANGA REDDY DIST  
AT: LB NAGAR



O.S No. of 2021

Between:  
Smt. Doolmitta Bharathamma  
Rep by G.P.A Doolmitta Dayakar Reddy  
...Plaintiff

AND

Mayflower Park Apartments  
Rep. by its President, Anjaneyulu  
& another

..Defendants

CLAIM: SUIT FOR POSSESSION

PLAINT FILED UNDER ORDER VII  
RULE 1 R/W SEC. 26 OF C.P.C

Filed on : 19-1-2021

Filed By:

E. Vishwa Prasad (AP/1806/1992)  
N.Praveen &  
E.Mrunalini

Advocates

Counsel for the Plaintiff.