

// FAIR COPY //

IN THE COURT OF THE HON'BLE DISTRICT JUDGE,
RANGAREDDY DISTRICT AT KUKATPALLY

O.S. NO. OF 2021

BETWEEN:

1. J. Lavanya Prasad Raju S/o J. Jaipal,
Aged about 33 years, Occ: Business,
R/o H.No. 6-8/2/1, Chanda Nagar,
Hyderabad - 500 050.
2. J. Ramchander Raju S/o J. Jaipal,
Aged about 35 years, Occ: Business,
R/o H.No. 6-8/2/1, Chanda Nagar,
Hyderabad - 500 050

....PLAINTIFFS

AND

1. J. Jaipal S/o Late. J. Narsimha,
Aged about 68 years, Occ: Business,
R/o H.No. 6-8/2/1, Chanda Nagar,
Hyderabad - 500 050
2. J. Sharadha W/o J. Jaipal,
Aged about 58, Occ: Housewife,
R/o H.No. 6-8/2/1, Chanda Nagar,
Hyderabad - 500 050
3. J. Sridevi W/o K. Madhu,
D/o J. Jaipal, Aged about 41 years,
Occ: Housewife,
R/o Flat No. 1109, Amethyst Block,
My Home Jewel, Madinaguda,
Hyderabad -
4. J. Srilatha W/o P. Kishore Kumar
Aged about 39 years, Occ: Housewife,
R/o Villa No. 36, Vajram Aster Homes,
Gopanpally Tanda, Tellapur Village,
Serilingampally Mandal, Ranga Reddy District.
5. J. Ramulu Late. S/o J. Narsimha,
Aged about 68 years, Occ: Business,
R/o Villa No. 41, Esmaralda Fortune,
Kondapur, Srilingampally Mandal,
Ranga Reddy District.
6. J. Satyanarayana Raju S/o J. Ramulu,
Aged about 45 years, Occ: Business,
R/o Flat No. 305, B- Wing, Pegasus Block,
Meenakshi Sky Lounge,
Serilingampally Mandal, Ranga Reddy District.

7. J. Chandrakala W/o O. Srinivas Raju
Aged about 48 years, Occ: Housewife,
R/o Villa No. 41, Esmaralda Fortune,
Kondapur, Srilingampally Mandal,
Ranga Reddy District.
8. J. Ravindher Raju S/o J. Ramulu,
Aged about 45 years, Occ: Business,
R/o Flat No. 205, B-Wing, Pegasus Block,
Meenakshi Sky Lounge,
Serilingampally Mandal, Ranga Reddy District.
9. J. Lalitha W/o J. Ramulu,
Aged about 58 years, Occ: Housewife,
R/o Villa No. 41, Esmaralda Fortune,
Kondapur, Srilingampally Mandal,
Ranga Reddy District.
10. J. Laxmikala W/o Nagaraju
Aged about 42 years, Occ: Housewife,
R/o Flat No. 1909, N-Block, Tanzanite,
Rainbow Vistas @ Rock Garden,
Green Hills Road, Moosapet,
Hyderabad - 500 018.
11. J. Shashikala D/o J. Ramulu,
Aged about 40 years, Occ: Housewife,
R/o Flat No. 103 & 203, TrensetSumanjali,
Green Valley, Banjara Hills Road No. 5,
Hyderabad.
12. J. Governadhan Raju S/o J. Ramulu,
Aged about 39 years, Occ: Business,
R/o Flat No. 1808, A-Wing, Polaris,
Meenakshi Sky Lounge,
Serilingampally Mandal, Ranga Reddy District.
13. J. Laxmi W/o Late. J. Krishna,
Aged about years, Occ: Housewife,
R/o H.No. 22-98/2, Kanukunta,
Opp. Gandimaisamma Temple,
RC Puram, RC Puram Mandal,
Sangareddy District
14. J. Rama Raju S/o Late. J. Krishna,
Aged about 35 years, Occ: Business,
R/o H.No. 22-98/2, Kanukunta,
Opp. Gandimaisamma Temple,
RC Puram, RC Puram Mandal,
Sangareddy District
15. J. Uday Raju S/o Late. J. Krishna,
Aged about 32 years, Occ: Business,
R/o H.No. 22-98/2, Kanukunta,
Opp. Gandimaisamma Temple,

RC Puram, RC Puram Mandal,
Sangareddy District

16. J. Vinay Raju S/o Late. J. Krishna,
Aged about 31 years, Occ: Business,
R/o.H.No. 22-98/2, Kanukunta,
Opp. Gandimaisamma Temple,
RC Puram, RC Puram Mandal,
Sangareddy District
17. J. Yadagiri Late. J. Narsimha,
Aged about 55 years, Occ: Business,
R/o Villa No. 1009, Krinss Villas,
Krinss Avenue, Opp Lane to My Home Avatar.
Sy. No. 282 & 283, Pupppalguda Village,
Manikonda Mandal, Hyderabad,
Telangana - 500 075
18. J. Neelima W/o J. Yadagiri,
Aged about 48 years, Occ: Housewife,
R/o Villa No. 1009, Krinss Villas,
Krinss Avenue, Opp Lane to My Home Avatar.
Sy. No. 282 & 283, Pupppalguda Village,
Manikonda Mandal, Hyderabad,
Telangana - 500 075
19. J. Tarun Raju S/o J. Yadagiri,
Aged about 26 years, Occ: Student.
R/o Villa No. 1009, Krinss Villas,
Krinss Avenue, Opp Lane to My Home Avatar.
Sy. No. 282 & 283, Pupppalguda Village,
Manikonda Mandal, Hyderabad,
Telangana - 500 075.
20. J. Varun Raju S/o J. Yadagiri,
Aged about 21 years, Occ: Student,
R/o Villa No. 1009, Krinss Villas,
Krinss Avenue, Opp Lane to My Home Avatar.
Sy. No. 282 & 283, Pupppalguda Village,
Manikonda Mandal, Hyderabad,
Telangana - 500 075.
21. ASIAN MULTIPLEXES PRIVATE LIMITED,
Represented by its director,
Having its office at -
#502 B, Amara Jyothi Building,
Ground Floor, Road No. 31,
Jubilee Hills, Hyderabad - 500033,
Telangana.
E-mail - info@asiancinemas.in

...DEFENDANTS

SUIT FOR PARTITION AND SEPARATE POSSESSION

PLAINT FILED UNDER ORDER 7 RULE 1 & 2 R/W SECTION 26 OF
THE CODE OF CIVIL PROCEDURE

A. DESCRIPTION OF PLAINTIFFS

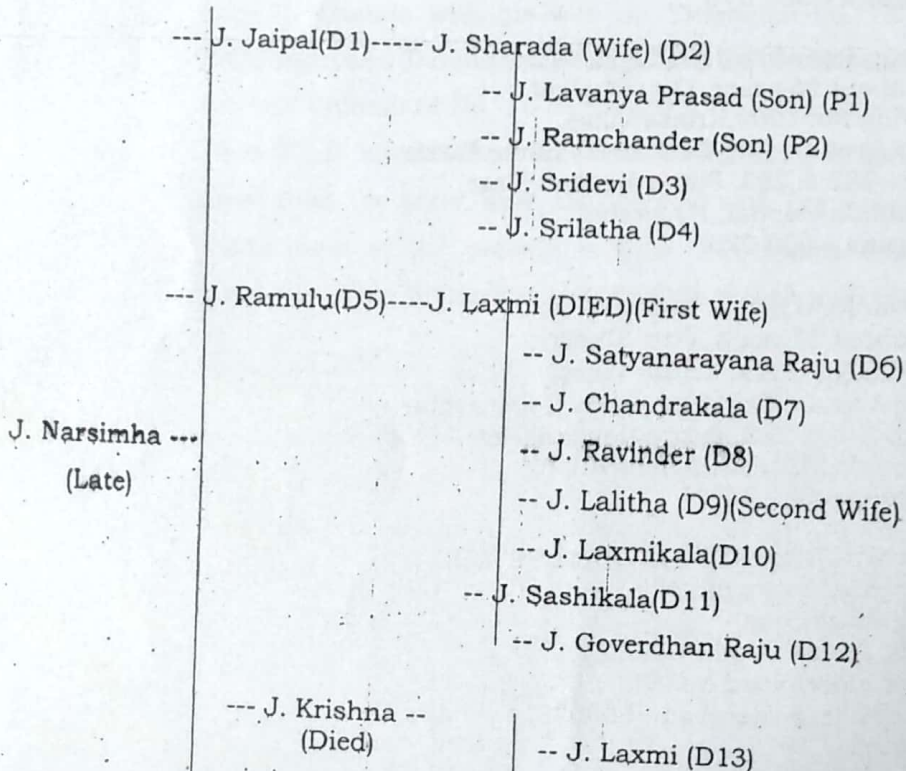
1. The description of the Plaintiff is the same as stated above in the cause title and the address for service of all notice, summons etc., that of the plaintiff is of his counsel Sri S. Nagesh Reddy, Advocate, Flat No. 101 & 102, Saai Priya Apartments, H. No. 6-3-663/7/6, Jaffar Ali Bagh, Somajiguda, Hyderabad.

B. DESCRIPTION OF THE DEFENDANT:

2. The description of the defendant and its address for the service of all notices, summons etc., is the same as stated above in the cause title.

C. BRIEF FACTS

3. Description of the entire family members i.e., the family tree is as follows



-- J. Rama Raju (D14)

-- J. Uday Raju (D15)

-- J. Vinay Raju (D16)

--- J. Yadagiri(D17)-- -- J. Neelima(D18)

| -- J. Tarun Raju (D19)

-- J. Varun Raju (D20)

4. It is submitted that Late. J. Narsimha & Late J. Venkatamma were blessed with 4 sons i.e., Defendant No. 1, 5, Late. J. Krishna & 17. That Defendant No. 1 with his wife i.e., Defendant No. 2 was blessed with two sons and two daughters i.e., Plaintiff No. 1 & 2 and Defendant No. 3 & 4. That Defendant No. 5 with his first wife i.e., Late. J. Laxmi was blessed with two sons and one daughter i.e., Defendant No. 6, 7&8. That Defendant No. 5 with his second wife i.e., Defendant No. 9 was blessed with two daughters and one son i.e., Defendant No. 10, 11& 12. That Late. J. Krishna with his wife i.e., Defendant No. 13 was blessed with three sons i.e., Defendant No. 14, 15& 16. That Defendant No. 17 with his wife Defendant No. 18 was blessed with two sons i.e., Defendant No. 19 & 20. It is submitted that Late. J. Narsimha & Late J. Venkatamma, apart from the sons, were also blessed with five daughters who are not made party to the present suit as their claims over the joint family properties have been settled at the time of their marriage.

Property No.1 – Sy. No 10

5. It is submitted that the Defendant No. 5 along with Late. J. Krishna approached Subordinate Judge, Ranga Reddy District at Begumpet stating that the Schedule A property is purchased by their father J Narasimha out of joint family funds and that the defendants thereto i.e., T Sriramulu, T Venkat Rao and T Raj Kumar sold the property to the father of the plaintiffs.

6. In the said suit, it was also averred that the Plaintiffs thereto i.e., Defendant No. 5 and Late. J. Krishna sought for transfer of patta from the names of the Defendants thereto to the names of the plaintiffs thereto, for which the defendants objected and demanded for additional

monies. As such, basing on the said cause of action, the suit was filed for declaration of title and mutation of their names in the revenue records.

7. It is submitted that it was expressly agreed in the plaint that the property was purchased by the father of the Plaintiffs thereto i.e., J Narasimha and that the family is in possession of the said property for more than 25 years. It is therefore confirmed by way of pleadings that the property covered under the suit i.e., Suit Schedule A Property is joint family property, and nobody holds independent interest in the said property.

8. Basing on the above-mentioned averments, the suit is numbered as OS No. 497 of 1983. The defendants in the said suit offered no express denial and the Plaintiff No.1 i.e., the father of the Plaintiffs hereto presented himself as PW1. As there was no real contest in the said suit, the suit was decreed stating that the plaintiffs thereto are the owners and possessors of Suit Schedule A Property.

9. It is further submitted that it is not the case of the plaintiffs that the plaintiffs purchased the schedule property in OS No. 497 of 1983. However, it was specifically agreed that the father of the plaintiffs thereto purchased the said property. There was no partition that took place between the parties and the same remains to be in joint possession of the parties even as on date, entitling the plaintiffs to seek the relief of partition and to grant an equal share to the plaintiffs.

10. It is submitted that the Defendant No.5 is said to have made an application stating that of the 2 people who purchased the property Late. J. Krishna died issueless and as such, the Defendant No. 5 is the exclusive owner. Basing on such fraudulent representation, a mutation is said to have been ordered solely on the name of the Defendant No. 5 vide Proceeding No. B/1754/2013 Dated 21.10.2013. The said proceedings of Tahasildar, Balanagar is vitiated by fraud. The plaintiffs sought for copies of the said proceedings conducted and copies of affidavits submitted by the Defendant No. 5. The office of the Tahasildar gave a reply stating that the said file is not traceable. For the said actions of the Defendant No. 5, the said defendant is liable to be prosecuted for

various penal offences committed by him and the plaintiffs are initiating appropriate steps against all concerned.

Property No. 2 - Sy. No. 24 - 22 Guntas.

11. It is submitted that the said suit relating to this property is filed by Defendant No. 1, the father of the Plaintiffs, along with J Ravinder, who being the brother of the plaintiffs, Defendant No. 8, J Yadagiri and J Krishna, Late. J. Krishna and Defendant No.19, against V Malamma, Srisailam, V Lingamma and V Venkatesham.

12. It is submitted that the premise of the said suit was that the plaintiffs thereto were the occupants and possessors of the suit land bearing Sy. No. 24, admeasuring Ac. 00-22 Gts situated at MoosapetVollage, RajendranagarTaluq, Ranga Reddy District. That, the plaintiffs thereto are the members of joint family and they are in possession of the suit land jointly having equal shares. That the said land was acquired by the plaintiffs long back and they have also acquired occupancy rights. That the Defendants undertook to get patta in the name of the plaintiffs thereto and lateron avoided the same to create complication in the title of the plaintiff.

13. Basing on the said averments, the suit is numbered as OS NO. 247 of 1982 on the file of the Munsiff Magistrate, West Taluq at Hyderabad. Subsequent upon appearance being made by the Defendants, the suit ended up in a compromise, whereunder all the rights vested in the defendants were given up in favour of the plaintiffs thereto.

14. It is submitted that the fact remains and admitted that the Suit Schedule B Property is the joint family property and that the joint family is in possession of the same. The said property remains unpartitioned even as on date and the property is not divided by metes and bounds.

Property No. 3

15. It is further submitted that out of the joint family funds, various other purchases were also made on the names of the family members, which properties are also in joint possession. It is submitted that ThumuNarasiah and another sold an extent of 284.50 Sq Yds of land in

Sy. No. 25, Plot No. 3, Moosapet Village, to Sri Vellanki Venkata Narasimha Rao vide Sale Deed bearing Document No. 777 of 1968. The said Vellanki Venkata Narasimha Rao in turn sold the property in favour of Smt J Venkatamma W/o J Narasimha vide Sale Deed No. 3652/1979. This property is being described as Schedule C Property.

16. It is submitted that Smt J Venkatamma was a housewife and she had no independent income. The said property is purchased from and out of the joint family funds and registered in the name of J Venkatamma. The said J Venkatamma is none other than grand-mother of the plaintiffs, who died intestate.

Property No. 4

17. Similarly, it is submitted that Thumu Narasiah and another sold an extent of 284.50 Sq Yds of land in Sy. No. 25, Plot No. 4, Moosapet Village, to Smt Dasari Tulasamma vide Sale Deed bearing Document No. 776 of 1968. The said Smt Dasari Tulasamma in turn sold the property in favour of Master J Satyanarayana Raju, S/o J Ramulu, Defendant No. 6, Aged about 6 years, represented by his father and natural guardian Sri J Ramulu vide Document No. 3651/1979. The said J Satyanarayana Raju is none other than the brother of the plaintiffs and his natural guardian i.e., J Ramulu, Defendant No. 5. This property shall be referred to as Schedule D Property.

18. It is needless to mention hereto that the said purchase in the name of Master J Satyanarayana Raju is out of joint family funds and as on the date of purchase, J Satyanarayana Raju is only 6 years old. The said property continues to be in joint possession of all the family members and the same was demanded to be partitioned.

Property No. 5

19. It is submitted that similarly, another land measuring 610 Sq Yds in Sy. No. 25 with Panchayat No. 4-125/2, Moosapet Village was purchased on the names of J Ramulu, Defendant No. 5 and J Krishna, who being the brother of J Ramulu vide registered Sale Deed bearing Document No. 556/1984 from and out of the joint family funds. For ease of reference, the property covered under Sale Deed No. 3652/1979 shall

be referred to as "Schedule C Property" i.e., property admeasuring 284.50 Sq Yds of land in Sy. No. 25, Plot No. 3, Moosapet Village; property covered under Sale Deed No. 3651/1979 shall be referred to as "Schedule D Property" i.e., land admeasuring an extent of 284.50 Sq Yds of land in Sy. No. 25, Plot No. 4, Moosapet Village; property covered under Sale Deed No. 556/1984 shall be referred to as "Schedule E Property" i.e., land admeasuring 610 Sq Yds in Sy. No. 25 with panchayat No. 4-125/2, Moosapet Village.

20. It is submitted that all the properties above stated are contiguous and form one compact block. Subsequent upon acquisition of the above-mentioned properties by the joint family, construction was undertaken and 4 theatres came to be constructed by names Laxmikala 70MM, Shashikala 70MM, Chandrakala 70MM and Lalitha 70MM. The plaintiffs are also informed that the entirety of the property, consolidated into a single piece of parcel of land along with the structures raised thereto was let out on rent in favour of Defendant No. 21 and that the said defendant is paying a rent of Rs. 45 Laks per month. The plaintiffs are not in possession of the lease deed executed in favour of Defendant No. 21 and the plaintiffs claims a share in the rents received so far from the Defendant No.21. Further, the plaintiffs are also filing an application seeking deposit of rents by the Defendant No. 21 in the court to the account of this suit. Further, the Defendant No. 21 is also hereby called upon to produce the ledger of the monies disbursed so far and the details of the accounts to which monies are transferred and the amount of money paid in cash so as to seek share in the total amounts received by any of the defendants.

21. It is submitted that the plaintiffs being the rightful shareholders of the of the Schedule properties, on 12.02.2021 and on again on 18.02.2021, had demanded for partition of all the properties above stated i.e., Schedule A to E properties and no interest is evinced by any of the defendants. Infact, some of the defendants started proclaiming that the said properties are their self-acquired properties and that no partition shall be permitted. The plaintiffs were shocked by the very statement made thereto.

22. It is submitted that upon repeated requests of the plaintiffs, some of the defendants went ahead and stated that the part of the land covered under Schedule Properties were acquired by the Government for expansion of the existing road and that they have availed compensation exclusively for themselves and that they would not pay even a single penny to any of the parties to this suit. Upon enquiries, it was revealed that Defendant No. 9 is said to have made an application claiming that she was the exclusive owner of the land already acquired and that she was entitled for the compensation of Rs. 2,98,87,596/- (Two Crores Ninety-Eight Lakhs Eighty-Seven Thousand Five Hundred and Ninety-Six Only). The said payment was deferred by the acquisition officer stating that there is no proof of title in the name of Defendant No. 9, Wife of Defendant No. 5. In collusion with the concerned authorities, the said Defendant No. 9 obtained an ownership certificate, who is not even a competent authority to issue the same. Basing on the said ownership certificate, the entire amount of Rs. 2,98,87,596/- came to be disbursed in the name of Defendant No. 9. The said seeking of amounts by the Defendant No. 9 is illegal and against the interest of the entire family members and as such, it is just and necessary that the entire amount along with a nominal interest @ 18% per annum needs to be deposited to the account of this suit by the Defendant No. 9. The details of the amount disbursed, interest accrued and the total payment to be made is as under:

Disbursed on 28.09.2013	: 2,98,87,596/-
Interest from 28.09.2013 to 28.01.2021 (88 Months)	: 3,94,51,626/-
Total	: 6,93,39,222/-

Thus, the total amount liable to be deposited by the Defendant No. 10 to the account of this suit is Rs. 6,93,39,222/-. The plaintiffs are also initiating criminal action for the illegalities committed, including cheating, for wrongful loss caused to the plaintiff and thereby gained wrongfully. The said intention to cheat the plaintiffs is from the beginning and the same is also established by the actions of the defendants concerned.

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23. The plaintiffs made further enquiries and came to understand that the property is still in the joint name. However, the plaintiffs were shocked to know that J Ramulu and J Lalitha i.e., Defendants 5 and 9 executed a gift settlement deed bearing Document No. 3512/2016 dated 16.05.2016 in favour of **J Govardhan Raju i.e., Defendant No. 12**. As per the contents of the said gift deed, the Defendant No. 5 claimed to be the exclusive owner of the entire extent of land in Sy. No. 10 of Moosapet Village admeasuring Ac. 00-35 Gts, more specifically delineated in Schedule A. The said statement contained in the gift deed is wrong as per the record and wrong as per the decree basing upon which such title is being claimed by the Defendant No. 5. It is submitted that the said gift deed is a creation of Defendants 5 and 9 in collusion with their son i.e., Defendant No. 12 and the said gift deed is a nullity and the same is not binding on the plaintiffs and as such, the plaintiffs are seeking declaration of the said Gift Deed as null and void and not binding on the plaintiffs.

24. The falsity of the Defendants 5 and 9 and their actions is clear from the recitals in the gift deed where the Defendant No. 5 claims to be the exclusive owner of Schedule A Property for the purpose of execution of gift settlement deed and similarly, the Defendant No. 9 claims to be the owner of very same property for the purpose of receiving monies from land acquisition authorities. As such, the illegalities committed by the Defendants 5 and 9 are borne out of record.

25. It is further submitted that the Defendant No. 1 executed a registered gift settlement deed for an undivided share of 665.6 Sq Yds in Sy. No. 24 in favour of the plaintiffs hereto vide registered gift settlement deed bearing Document No. 551/2021 out of the total extent of 2662 Sq Yds in Sy. No. 24 of Moosapet Village, having acquired the same from a court decree vide OS NO. 247 of 1982 on the file of the Munsiff Magistrate, West Taluq at Hyderabad. The premise of the said document was that the entire extent covered under the said suit was 2662 Sq Yds in Sy. No. 24 and as there were 4 plaintiffs in the suit, the property was divided into 4 shares and one such undivided share is gifted in favour of the plaintiffs hereto. It is submitted that the said gift deed and the transfer of title is also subject to the result of this suit. Further, the mother and sisters of the plaintiffs consented for execution of the said

gift deed and as such, the entire 1/4th share falling to the account of J Jaipal i.e., Defendant No.1 and his family members, including his wife and 2 daughters were gifted to the plaintiffs. The gift was confirmed by the daughters orally and the schedule in the said gift deed specifically states that an undivided share is being gifted, which establishes the fact that the property is not partitioned even as on date.

26. It is submitted that the plaintiffs hereto are advised to state that each of the son of J Narasimha i.e., J Jaipal, J Ramulu, J Krishna (Died) and J Yadagiri and their respective families are entitled to 1/4th share each and out of the said 1/4th share, the plaintiffs being the sons and the Daughters J Srilatha and J Sridevi i.e., Defendants 3 and 4 are entitled to 1/4th Share in the share falling to the account of the father of the plaintiffs. To clarify the same, the plaintiffs are entitled to 1/16th share in the entire schedule of properties each i.e., 1/16th Share to the plaintiff No. 1 and 1/16th share to the Plaintiff No.2, totalling to 1/8th share to the account of the plaintiffs.

27. The plaintiffs, in view of execution of gift settlement deed vide Document No. 551/2021, pertaining to Schedule B Property are constrained to limit the relief being sought to Schedule A, C, D and E Properties only and to seek a decree confirming the extent conferred under Gift Deed No. 551/2021 for Schedule B Property or alternatively to grant 1/8th share in all of Schedule A to E properties to the plaintiffs.

28. It is submitted that the facts above mentioned establish the prima facie case of the plaintiffs and the plaintiffs are entitled for a share in the joint family properties by birth. It is submitted that it is also learnt by the plaintiffs that all the defendants are making fervent efforts to dispose the schedule of properties to third parties and in case the defendants succeed in their efforts, the plaintiffs would be burdened to litigate with third parties also and the same shall lead to multiplicity of litigation.

29. I submit that the fact above mentioned also establish the balance of convenience and in case the interim orders as are being sought along with the relief being sought in the suit are not granted; the plaintiffs shall be put to irreparable loss and injury which cannot be compensated in any other manner.

D. CAUSE OF ACTION

The cause of action of for filing the present suit arose on 12.02.2021 and on 18.02.2021 when the Plaintiffs requested the Defendants to partition the joint family properties and on all other subsequent dates.

E. DECLARATION

The Plaintiffs hereby declare that they have not filed any suit against the said Defendants herein on a similar cause of action before any other court.

F. JURISDICTION

That the joint family properties subjected to partition are located in Moosapet, Ranga Reddy District, which is within the jurisdiction of this Hon'ble Court.

G. LIMITATION

That the suit is filed well within the limitation as prescribed under the Limitation Act, as the cause of action for filing the present suit arose only on 12.02.2021 and on 18.02.2021.

H. SUIT VALUATION AND COURT FEES

The Plaintiffs value the present suit for the purpose of court fee and jurisdiction as follows:

- i. The relief of partition and separate possession is values as follows –
 - a. The value of Suit Schedule A property comes upto Rs. 8,50,00,000/- and the value of 1/8th share of the Plaintiffs comes upto to Rs. 1,06,25,000/- and since the Plaintiffs and the Defendants are in joint possession and enjoyment of the Suit Schedule A property a fixed court fee of Rs. 200 /- is paid under Section 34(2) of A.P. Court Fees and Suit Valuation Act
 - b. The value of Suit Schedule B property comes upto Rs. 5,10,00,000/- and the value of 1/8th share of the Plaintiffs comes upto to Rs. 63,75,000 /- and since the Plaintiffs and the Defendants are in joint possession and enjoyment of the Suit

Schedule B property a fixed court fee of Rs. 200 /- is paid under Section 34(2) of A.P. Court Fees and Suit Valuation Act

- c. The value of Suit Schedule C property comes upto Rs. 2,55,00,000/- and the value of 1/8th share of the Plaintiffs comes upto to Rs. 31,87,500/- and since the Plaintiffs and the Defendants are in joint possession and enjoyment of the Suit Schedule C property a fixed court fee of Rs. 200/- is paid under Section 34(2) of A.P. Court Fees and Suit Valuation Act
- d. The value of Suit Schedule C property comes upto Rs. 2,55,00,000/- and the value of 1/8th share of the Plaintiffs comes upto to Rs. 31,87,500/- and since the Plaintiffs and the Defendants are in joint possession and enjoyment of the Suit Schedule C property a fixed court fee of Rs. 200/- is paid under Section 34(2) of A.P. Court Fees and Suit Valuation Act
- e. The value of Suit Schedule E property comes upto Rs. 2,46,00,000/- and the value of 1/8th share of the Plaintiffs comes upto to Rs. 30,75,000/- and since the Plaintiffs and the Defendants are in joint possession and enjoyment of the Suit Schedule E property a fixed court fee of Rs. 200/- is paid under Section 34(2) of A.P. Court Fees and Suit Valuation Act
- ii. The relief of declaration of Gift Deed bearing Doc. No. 3512/2016 as null and void is notionally valued at Rs. 10,000 /- as the Plaintiffs are not parties to the said document and Rs. 786 /- is paid under Section 24(d) of the A.P. Court Fees and Suit Valuation Act.
- iii. The relief of Injunction is notionally valued at Rs. 10,000/- on which a court fee of Rs. 786/- is paid under Section 26(c) of the A.P. Court Fees and Suit Valuation Act.
- iv. The relief of Injunction is notionally valued at Rs. 10,000/- on which a court fee of Rs. 786/- is paid under Section 26(c) of the A.P. Court Fees and Suit Valuation Act.
- v. The relief of Injunction is notionally valued at Rs. 10,000/- on which a court fee of Rs. 786/- is paid under Section 26(c) of the A.P. Court Fees and Suit Valuation Act.

- vi. The relief of Injunction is notionally valued at Rs. 10,000/- on which a court fee of Rs. 786/- is paid under Section 26(c) of the A.P. Court Fees and Suit Valuation Act.

In all a total court fee of Rs. 4930/- is paid.

I. PRAYER

The Plaintiffs hereby pray this Hon'ble Court -

- i. To grant a Decree of Partition, by passing a preliminary decree declaring that the Plaintiffs herein are entitled for 1/16th share each or 1/8th share jointly.
- ii. To grant a Final Decree for division of the Suit Schedule A to E properties by metes and bounds in terms of the preliminary decree and separate possession thereof be delivered to the Plaintiffs.
- iii. To grant a Decree declaring the Gift Deed bearing Doc. No. 3512 of 2016 dated 16.05.2016 as null and void and not binding on the Plaintiffs.
- iv. To grant a Decree directing the Defendant No. 21 to deposit the monthly rental monies with this Hon'ble Court, into the account of this suit and further apportion the same among the Plaintiffs and the Defendants, pending disposal of the suit.
- v. To grant a Decree of mandatory injunction directing the Defendants not to restrain access of the Plaintiffs to the Suit Schedule A to E properties, pending disposal of the suit.
- vi. To grant a Decree directing the Defendant No. 5 & Defendant No. 9 to deposit the principal amount of Rs. 2,98,87,596/-, disbursed by the Land Acquisition authorities in their favour towards compensation, along with interest accrued thereon @ 18 % per annum from 28.09.2013 to 28.01.2021, amounting to Rs. 3,94,51,626/- i.e., total amount of Rs. 6,93,39,222/-, into the account of the suit, pending disposal of the suit.

- vii. To grant a Decree restraining the Defendants, their agents or any third parties claiming through or under from alienating or creating any manner of interest or right over the Schedule A to E properties, pending disposal of the suit.
- viii. To pass an award as to cost
- ix. To pass any other order or orders as this Hon'ble Court deems fit.

VERIFICATION

We, the plaintiffs, do hereby solemnly affirm on oath and state that the contents from para (1) to (27) are true to the best of our knowledge. Hence verified on this the _____ day of March, 2021

PLAINTIFF NO. 1

PLAINTIFF NO. 2

SCHEDULE A PROPERTY

All that land admeasuring Ac. 00-35 Gts in Sy.No. 10 situated in Moosapet Village, Taluk Rajendernagar (Now Balanagar Mandal), Ranga Reddy District and bounded as follows:-

North : 20" Wide Road
South : Sy. No. 25 & Kalpana Sales Depot & H.No. 12-5-87/3
East : Sasikala&Laxmikala Theatres
West : H.NO. 12-5-69/1 to 12-5-72/1

SCHEDULE B PROPERTY

All that land admeasuring Ac. 00-22 Gts in Sy.No. 24 situated in Moosapet Village, Taluk Rajendernagar (Now Balanagar Mandal), Ranga Reddy District and bounded as follows:-

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North : Sy.No. 10 & New Delhiwala Sweet House
South : Chandrakala Theatre
East : Road
West : Lalitha Theatre

SCHEDULE C PROPERTY

All that Plot No. 3 in Sy.No. 25, admeasuring 284.50 Sq. Yds., situated at Moosapet Village, Taluk West (Now Balanagar Mandal), Ranga Reddy District is under Grampanchayath Moosapet is bounded as:-

North : Land of T. Yenkanna
South : Inam Land of Shankeraiah
East : Plot No. 4
West : Plot No. 2

SCHEDULE D PROPERTY

All that Plot No.4, in Sy.No. 25 admeasuring 284.50 Sq. Yds. situated at Moosapet Village, Taluk West (now Balanagar Mandal), Ranga Reddy District, is under Grampanchayath Moosapet, is bounded as follows-

North : Land of T. Yenkanna
South : Inam Land of Shankeraiah
East : Plot No. 5 of K. Savithri Devi
West : Plot No. 3

SCHEDULE E PROPERTY

All that land bearing panchayath no. 4-125/2 in Sy.No. 25, admeasuring 610 Sq. Yds., Situated at Moosapet Village, Taluk Rajendernagar (Now Balanagar Mandal), Ranga Reddy District and bounded as follows :-

North : Road
South : Land of Neighbours
East : Property of Venkateshwar Rao and Kistaiah.
West : Plot No. 4

VERIFICATION

We, the plaintiffs, do hereby solemnly affirm on oath and state that the contents of the schedule above are true to the best of our knowledge. Hence verified on this the _____ day of March, 2021

PLAINTIFF NO.1

PLAINTIFF NO. 2

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LIST OF DOCUMENTS

S.No.	Date	Parties to Document	Description of Document
1.	24.09.1983	Defendant No 5 & Defendant No. 14	C.C. Copy of Judgement and Decree in O.S. No. 497 of 1983
2.	14.07.1983	Defendant No 5 & Defendant No. 14	C.C. Copy of Plaint in in O.S. No. 497 of 1983
3.	17.09.1983	Defendant No.1, 9, 14 & 19	C.C. Copy of Decree in O.S. No. 247 of 1982
4.	16.07.1983	Defendant No.1, 9, 14 & 19	C.C. Copy of Compromise Memo in O.S. No. 247 of 1982
5.	22.11.1982	Defendant No.1, 9, 14 & 19	C.C. Copy of Plaint in O.S. No. 247 of 1982
6.	21.10.2013	Defendant No. 5	Copy of Proceedings of Tahsildar, Balanagar Mandal vide No. B/1754/2013
7.	13.12.1978	-	C.C. Copy of Sale Deed bearing Doc. No. 3652/1979& Photo Copy of Translation.
8.	13.12.1978	Defendant No. 5 & Defendant No. 7	Copy of Sale Deed bearing Doc. 3651/1979
9.	31.01.1984	Defendant No. 5 & Defendant No. 14	Copy of Sale Deed bearing Doc. No. 556/1984
10.	16.05.2016	Defendant No. 5, 10 & 13	C.C. Copy of Gift Deed bearing Doc. No. 3512/2016
11.	30.01.2021	Plaintiff No. 1 & 2; Defendant No. 1	C.C. Copy of Gift Deed bearing Doc. No. 551/2021
12.	08.02.2021	-	C.C. Copy of Encumbrance Certificate for property in Sy.No. 25
13.	08.02.2021	-	C.C. Copy of Market Value Certificate for property in Sy.No. 25
14.	08.02.2021	-	C.C. Copy of Encumbrance Certificate for property in Sy.No. 10
15.	08.02.2021	-	C.C. Copy of Market Value Certificate for property in Sy.No. 10
16.	17.09.2020	-	C.C. Copies of Encumbrance Certificates
17.	21.09.2020	-	C.C. Copy of Encumbrance Certificate
18.	01.01.2021	Plaintiff No. 2	Original Copy of Representation from Plaintiff No. 2 to Tahsildar, Kukatpally with Acknowledgement
19.	01.03.2021	-	C.C. Copy of Market Value Certificate for property in Sy.No. 24
20.		-	Copy of Death Certificate of Late. J. Krishna

IN THE COURT OF THE
HON'BLE ADDITIONAL
DISTRICT JUDGE, RANGA
REDDY DISTRICT AT
KUKATPALLY

O.S. NO. 2021

BETWEEN:

J. Lavanya Prasad Raju &
another

...PLAINTIFFS

AND

J. Jaipal & Others

...DEFENDANTS

SUIT FOR PARTITION AND
SEPARATE POSSESSION

PLAINT FILED UNDER
ORDER 7 RULE 1 & 2 R/W
26 OF THE CODE OF CIVIL
PROCEDURE

Filed on:

Filed by:

S. NAGESH REDDY
G. VAMSHI KRISHNA
T. SRIDEEP RAO
K. SUYODH REDDY

ADVOCATES

COUNSEL FOR PLAINTIFFS

// FAIR COPY //

IN THE COURT OF THE HON'BLE ADDITIONAL DISTRICT
JUDGE, RANGA REDDY DISTRICT AT KUKATPALLY

I.A. NO. OF 2021

IN

O.S. NO. OF 2021

BETWEEN:

J. Lavanya Prasad Raju & another

...PETITIONERS/PLAINTIFFS

AND

J. Jaipal & Others

...RESPONDENTS/DEFENDANTS

AFFIDAVIT

I, J. Lavanya Prasad Raju S/o J. Jaipal, Aged about 35 years, Occ: Business, R/o H.No. 6-8-/2/1, Chanda Nagar, Hyderabad - 500050, do hereby solemnly affirm on oath and state as follows.

1. I submit that I am Plaintiff No. 1 in the above suit and as such I am well acquainted with the facts of the case to depose as under. I submit that the contents of the Plaint may be read as part and parcel of this Petition.

2. I submit that Late. J. Narsimha & Late J. Venkatamma were blessed with 4 sons i.e., Respondent No. 1, 5, Late J. Krishna & 17. That Respondent No. 1 with his wife i.e., Respondent No. 2 was blessed with two sons and two daughters i.e., Petitioner No. 1 & 2 and Respondent No. 3 & 4. That Respondent No. 5 with his first wife i.e., Late. J. Laxmi was blessed with two sons and one daughter i.e., Respondent No. 6, 7 & 8. That Respondent No. 5 with his second wife i.e., Respondent No. 9 was blessed with two daughters and one son i.e., Respondent No. 10, 11 & 12. That Late. J. Krishna with his wife i.e., Respondent No. 13 was blessed with three sons i.e., Respondent No. 14, 15 & 16. That Respondent No. 17 with his wife Respondent No. 18 was blessed with two sons i.e., Respondent No. 19 & 20. I submit that Late. J. Narsimha & Late J. Venkatamma, apart from the sons, were also blessed with five daughters who are not made party to the present suit as their claims over the joint family properties have been settled at the time of their marriage.

Property No.1 - Sy. No 10

3. I submit that the Respondent No. 5 along with Late. J. Krishna approached Subordinate Judge, Ranga Reddy District at Begumpet stating that the Schedule A property is purchased by their father J Narasimha out of joint family funds and that the Respondents thereto i.e., T Sriramulu, T Venkat Rao and T Raj Kumar sold the property to the father of the petitioners.

4. In the said suit, it was also averred that the Petitioners thereto i.e., Respondent No. 5 and Late. J. Krishna sought for transfer of patta from the names of the Respondents thereto to the names of the petitioners thereto, for which the Respondents objected and demanded for additional monies. As such, basing on the said cause of action, the suit was filed for declaration of title and mutation of their names in the revenue records.

5. I submit that it was expressly agreed in the plaint that the property was purchased by the father of the Petitioners thereto i.e., J Narasimha and that the family is in possession of the said property for more than 25 years. It is therefore confirmed by way of pleadings that the property covered under the suit i.e., suit Schedule A Property is joint family property, and nobody holds independent interest in the said property.

6. Basing on the above-mentioned averments, the suit is numbered as OS No. 497 of 1983. The Respondents in the said suit offered no express denial and the Petitioner No.1 i.e., the father of the Petitioners hereto presented himself as PW1. As there was no real contest in the said suit, the suit was decreed stating that the petitioners thereto are the owners and possessors of Suit Schedule A Property.

7. I further submit that it is not the case of the petitioners that the petitioners purchased the schedule property in OS No. 497 of 1983. However, it was specifically agreed that the father of the petitioners thereto purchased the said property. There was no partition that took place between the parties and the same remains to be in joint possession of the parties even as on date, entitling the petitioners to seek the relief of partition and to grant an equal share to the petitioners.

8. I submit that the Respondent No.5 is said to have made an application stating that of the 2 people who purchased the property Late. J. Krishna died issueless and as such, the Respondent No. 5 is the exclusive owner. Basing on such fraudulent representation, a mutation is said to have been ordered solely on the name of the Respondent No. 5 vide Proceeding No. B/1754/2013 Dated 21.10.2013. The said proceedings of Tahasildar, Balanagar is vitiated by fraud. The petitioners sought for copies of the said proceedings conducted and copies of affidavits submitted by the Respondent No. 5. The office of the Tahasildar gave a reply stating that the said file is not traceable. For the said actions of the Respondent No. 5, the said Respondent is liable to be prosecuted for various penal offences committed by him and the petitioners are initiating appropriate steps against all concerned.

Property No. 2 - Sy. No. 24 - 22 Guntas.

9. I submit that the said suit relating to this property is filed by Respondent No. 1, the father of the Petitioners, along with J Ravinder, who being the brother of the petitioners, Respondent No. 8, Late. J. Krishna and J. Yadagiri, Respondent No.17, against V Malamma, Srisailam, V Lingamma and V Venkatesham.

10. I submit that the premise of the said suit was that the petitioners thereto were the occupants and possessors of the suit land bearing Sy. No. 24, admeasuring Ac. 00-22 Gts situated at MoosapetVollage, RajendranagarTaluq, Ranga Reddy District and hereinafter referred to as suit Schedule B Property. That, the petitioners thereto are the members of joint family and they are in possession of the suit land jointly having equal shares. That the said land was acquired by the petitioners long back and they have also acquired occupancy rights. That the Respondents undertook to get patta in the name of the petitioners thereto and later on avoided the same to create complication in the title of the petitioner.

11. Basing on the said averments, the suit is numbered as O.S. No. 247 of 1982 on the file of the Munsiff Magistrate, West Taluq at Hyderabad. Subsequent upon appearance being made by the Respondents, the suit ended up in a compromise, whereunder all the

rights vested in the Respondents were given up in favour of the petitioners thereto.

12. I submit that the fact remains and admitted that the Suit Schedule B Property is the joint family property and that the joint family is in possession of the same. The said property remains unpartitioned even as on date and the property is not divided by metes and bounds.

Property No. 3

13. I further submit that out of the joint family funds, various other purchases were also made on the names of the family members, which properties are also in joint possession. I submit that ThumuNarasiah and another sold an extent of 284.50 Sq Yds of land in Sy. No. 25, Plot No. 3, Moosapet Village, to Sri Vellanki Venkata Narasimha Rao vide Sale Deed bearing Document No. 777 of 1968. The said Vellanki Venkata Narasimha Rao inturn sold the property in favour Smt J Venkatamma W/o J Narasimha vide Sale Deed No. 3652/1979. This property is being described as Schedule C Property.

14. I submit that Smt J Venkatamma was a housewife and she had no independent income. The said property is purchased from and out of the joint family funds and registered in the name of J Venkatamma. The said J Venkatamma is none other than grand-mother of the petitioners, who died intestate.

Property No. 4

15. Similarly, I submit that ThumuNarasiah and another sold an extent of 284.50 Sq Yds of land in Sy. No. 25, Plot No. 4, Moosapet Village, to Smt. DasariTulasamma vide Sale Deed bearing Document No. 776 of 1968. The said SmtDasariTulasammainturn sold the property in favour Master J Satyanaranyana Raju, S/o J Ramulu, Respondent No.6, Aged about 6 years, represented by his father and natural guardian Sri J Ramulu vide Document No. 3651/1979. The said J Satyanarayana Raju is none other than the brother of the petitioners and his natural guardian i.e., J Ramulu, Respondent No.5. This property shall be referred to as Schedule D Property.

16. It is needless to mention hereto that the said purchase in the name of Master J Satyanarayana Raju is out of joint family funds and as on the date of purchase, J Satyanarayana Raju is only 6 years old. The said property continues to be in joint possession of all the family members and the same was demanded to be partitioned.

Property No. 5

17. I submit that similarly, another land admeasuring 610 Sq Yds in Sy. No. 25 with Panchayat No. 4-125/2, Moosapet Village was purchased on the names of J Ramulu, Respondent No. 5 and J Krishna, who being the brother of J Ramulu vide registered Sale Deed bearing Document No. 556/1984 from and out of the joint family funds. For ease of reference, the property covered under Sale Deed No. 3652/1979 shall be referred to as "Schedule C Property" i.e., property admeasuring 284.50 Sq Yds of land in Sy. No. 25, Plot No. 3, Moosapet Village; property covered under Sale Deed No. 3651/1979 shall be referred to as "Schedule D Property" i.e., land admeasuring an extent of 284.50 Sq Yds of land in Sy. No. 25, Plot No. 4, Moosapet Village; property covered under Sale Deed No. 556/1984 shall be referred to as "Schedule E Property" i.e., land admeasuring 610 Sq Yds in Sy. No. 25 with panchayat No. 4-125/2, Moosapet Village.

18. I submit that all the properties above stated are contiguous and form one compact block. Subsequent upon acquisition of the above-mentioned properties by the joint family, construction was undertaken and 4 theatres came to be constructed by names Laxmikala 70MM, Shashikala 70MM, Chandrakala 70MM and Lalitha 70MM. The petitioners are also informed that the entirety of the property, consolidated into a single piece of parcel of land along with the structures raised thereto was let out on rent in favour of Respondent No. 21 and that the said Respondent is paying a rent of Rs. 45 Laks per month. The petitioners are not in possession of the lease deed executed in favour of Respondent No. 21 and the petitioners claims a share in the rents received so far from the Respondent No. 21. Further, the petitioners are also filing an application seeking deposit of rents by the Respondent No. 21 in the court to the account of this suit. Further, the Respondent No. 21 is also hereby called upon to produce the ledger of

the monies disbursed so far and the details of the accounts to which monies are transferred and the amount of money paid in cash so as to seek share in the total amounts received by any of the Respondents.

19. I submit that the petitioners being the rightful shareholders of the of the Schedule properties, on 12.02.2021 and on again on 18.02.2021, had demanded for partition of all the properties above stated i.e., Schedule A to E properties and no interest is evinced by any of the Respondents. In fact, some of the Respondents started proclaiming that the said properties are their self-acquired properties and that no partition shall be permitted. The petitioners were shocked by the very statement made thereto.

20. I submit that upon repeated requests of the petitioners, some of the Respondents went ahead and stated that the part of the land covered under Schedule Properties were acquired by the Government for expansion of the existing road and that they have availed compensation exclusively for themselves and that they would not pay even a single penny to any of the parties to this suit. Upon enquiries, it was revealed that Respondent No. 9 is said to have made an application claiming that she was the exclusive owner of the land already acquired and that she was entitled for the compensation of Rs. 2,98,87,596/- (Two Crores Ninety-Eight Lakhs Eighty-Seven Thousand Five Hundred and Ninety-Six Only). The said payment was deferred by the acquisition officer stating that there is no proof of title in the name of Respondent No. 9, Wife of Respondent No. 5. In collusion with the concerned authorities, the said Respondent No. 9 obtained an ownership certificate, who is not even a competent authority to issue the same. Basing on the said ownership certificate, the entire amount of Rs. 2,98,87,596/- came to be disbursed in the name of Respondent No. 9. The said seeking of amounts by the Respondent No. 9 is illegal and against the interest of the entire family members and as such, it is just and necessary that the entire amount along with a nominal interest @ 18% per annum needs to be deposited to the account of this suit by the Respondent No. 9. The details of the amount disbursed, interest accrued and the total payment to be made is as under:

Disbursed on 28.09.2013 : 2,98,87,596/-

Interest from
28.09.2013 to 28.01.2021
(88 Months) : 3,94,51,626/-

Total : 6,93,39,222/-

Thus, the total amount liable to be deposited by the Respondent No. 9 to the account of this suit is Rs. 6,93,39,222/-. The petitioners are also initiating criminal action for the illegalities committed, including cheating, for wrongful loss caused to the petitioner and thereby gained wrongfully. The said intention to cheat the petitioners is from the beginning and the same is also established by the actions of the Respondents concerned.

21. The petitioners made further enquiries and came to understand that the property is still in the joint name. However, the petitioners were shocked to know that J Ramulu and J Lalitha i.e., Respondents 5 and 9 executed a gift settlement deed bearing Document No. 3512/2016 dated 16.05.2016 in favour of J Govardhan Raju i.e., Respondent No. 12. As per the contents of the said gift deed, the Respondent No. 5 claimed to be the exclusive owner of the entire extent of land in Sy. No. 10 of Moosapet Village admeasuring Ac. 00-35 Gts, more specifically delineated in Schedule A. **The said statement contained in the gift deed is wrong as per the record and wrong as per the decree basing upon which such title is being claimed by the Respondent No. 5. I submit that the said gift deed is a creation of Respondents 5 and 9 in collusion with their son i.e., Respondent No. 12 and the said gift deed is a nullity and the same is not binding on the petitioners and as such, the petitioners are seeking declaration of the said Gift Deed as null and void and not binding on the petitioners.**

22. The falsity of the Respondents 5 and 9 and their actions is clear from the recitals in the gift deed where the Respondent No. 5 claims to be the exclusive owner of Schedule A Property for the purpose of execution of gift settlement deed and similarly, the Respondent No. 9 claims to be the owner of **very same property for the purpose of receiving monies from land acquisition authorities. As such, the illegalities committed by the Respondents 5 and 9 are borne out of record.**

23. I further submit that the Respondent No. 1 executed a registered gift settlement deed for an undivided share of 665.6 Sq Yds in Sy. No. 24 in favour of the petitioners hereto vide registered gift settlement deed bearing Document No. 551/2021 out of the total extent of 2662 Sq Yds in Sy. No. 24 of Moosapet Village, having acquired the same from a court decree vide OS NO. 247 of 1982 on the file of the Munsiff Magistrate, West Taluq at Hyderabad. The premise of the said document was that the entire extent covered under the said suit was 2662 Sq Yds in Sy. No. 24 and as there were 4 petitioners in the suit, the property was divided into 4 shares and one such undivided share is gifted in favour of the petitioners hereto. I submit that the said gift deed and the transfer of title is also subject to the result of this suit. Further, the mother and sisters of the petitioners consented for execution of the said gift deed and as such, the entire 1/4th share falling to the account of J Jaipal i.e., Respondent No.1 and his family members, including his wife and 2 daughters were gifted to the petitioners. The gift was confirmed by the daughters orally and the schedule in the said gift deed specifically states that an undivided share is being gifted, which establishes the fact that the property is not partitioned even as on date.

24. I submit that the petitioners hereto are advised to state that each of the son of J Narasimha i.e., J Jaipal, J Ramulu, J Krishna (Died) and J Yadagiri and their respective families are entitled to 1/4th share each and out of the said 1/4th share, the petitioners being the sons and the Daughters J Srilatha and J Sridevi i.e., Respondents 3 and 4 are entitled to 1/4th Share in the share falling to the account of the father of the petitioners. To clarify the same, the petitioners are entitled to 1/16th share in the entire schedule of properties each i.e., 1/16th Share to the petitioner No. 1 and 1/16th share to the Petitioner No.2, totalling to 1/8th share to the account of the petitioners.

25. The petitioners, in view of execution of gift settlement deed vide Document No. 551/2021, pertaining to Schedule B Property are constrained to limit the relief being sought to Schedule A, C, D and E Properties only and to seek a decree confirming the extent conferred under Gift Deed No. 551/2021 for Schedule B Property or alternatively to grant 1/8th share in all of Schedule A to E properties to the petitioners.

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26. I submit that the facts above mentioned establish the prima facie case of the petitioners and the petitioners are entitled for a share in the joint family properties by birth. I submit that it is also learnt by the petitioners that all the Respondents are making fervent efforts to dispose the schedule of properties to third parties and in case the Respondents succeed in their efforts, the petitioners would be burdened to litigate with third parties also and the same shall lead to multiplicity of litigation.

27. I submit that the fact above mentioned also establish the balance of convenience and in case the interim orders as are being sought along with the relief being sought in the suit are not granted; the petitioners shall be put to irreparable loss and injury which cannot be compensated in any other manner.

In view of the foregoing facts, it is prayed that this Hon'ble Court may be pleased pass an order restraining the Defendants, their agents or any third parties claiming through or under from alienating or creating any manner of interest or right over the Schedule A to E properties and pass such other order or orders as this Hon'ble Court deems fit and proper in the circumstances of the case.

Solemnly sworn and signed
Before me on this the ____
Day of March, 2021 at Kukatpally.

DEPONENT

ADVOCATE :: HYDERABAD