



**IN THE HON'BLE COURT OF CIVIL JUDGE SENIOR  
DIVISION, AT PANVEL  
SPECIAL SUIT NO. 37 OF 2026**

*17.9.23*

**OM FREIGHT FORWARDERS LIMITED ... Plaintiff**  
Versus  
**PREMNATH SITARAM PATIL ...**  
Defendant

**APPLICATION FOR STATUS QUO**

**MAY IT PLEASE YOUR HONOUR**

It is submitted on behalf of the Plaintiff in the above caption matter as under:

*Def appeared  
in the matter  
However not  
filed scj #11  
date. Hence  
no scj order  
passed depend  
therey  
09/10/23*

1. The plaintiff has instituted the above-captioned suit seeking specific performance of the contract entered into between the plaintiff and the defendant pursuant to the Memorandum of Understanding dated 16th October 2023. The contents of the plaint and injunction application are hereby incorporated by reference into the present application to avoid unnecessary repetition of the facts.
2. The plaintiff has a grave apprehension that the defendant is attempting to create third-party rights in the suit property, which is the subject matter of the present suit, thereby intending to frustrate the rights, title, and interest acquired by

the plaintiff in respect of the suit property created under the Memorandum of Understanding dated 16th October 2023.

3. Accordingly, the plaintiff has filed the application for a temporary injunction, seeking directions from this Honourable Court to restrain the defendant from creating third-party rights in the suit property during the pendency of the suit.
4. In the aforementioned suit, this Honorable Court was pleased to issue a writ of summons against the Defendant. The said writ of summons has been duly served upon the Defendant through the bailiff of the concerned court.
5. The above-referenced matter has listed on the board for hearing on 7th March 2026. However, the Plaintiff 27.02.2026 come to know, through reliable sources, that the Defendant has attempted to execute and register an agreement with Mr. Deepak Bhaskar Thakoor, before the Office of the Sub-Registrar of Assurances at Uran, with the intent of creating third-party rights, title, and interest in the subject property. It is further learned that due to a technical issue, Viz. existence of an encumbrance ("boja") on the property amounting to approximately Rupees Ten Lakhs, the Sub-Registrar has deferred the registration of the said agreement until the encumbrance is cleared.

6. The Plaintiff has a grave apprehension that, despite the summons having been duly served upon the Defendant and the matter being listed for hearing on 7th March 2026, the Defendant, in the interim, may proceed to create third-party rights, title, and interest in the subject property, thereby frustrating the Plaintiff's claim in the present suit.

7. Therefore it is respectfully prayed to this Hon'ble Court that, it may please be directed to the Defendant to maintain the status quo in respect of the suit property till pendency of the injunction application.

Place : Panvel

Date : 28/02/2026

*[Signature]*

Plaintiff

Through authorised representative

*[Signature]*  
Advocate for Plaintiff.

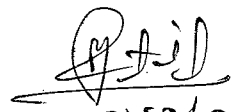
*Handwritten notes:*  
Hearl Adv for p1tff & perused record. He relied upon the agreement dt. 16/10/2023 & the letter filed at the court with 13t Exh 4. It appears that the p1tff has parted with consideration in part payment of Rs 13 lakh, however as per Exh I the son of Def has agreed to refund the part payment as settlement Rs 14 lak. According to Adv for p1tff the p1tff will suffer irreparable loss if the defendant succeed to create third party interest in the suit property. However it appears to me that no loss which cannot be compensated in terms of money will cause to p1tff if the status quo order is not passed. Moreover it appears that the suit summons served on Def & it is necessary to hear him on this application. Hence issue notice to Def as to why the status quo shall

Not be granted agent him on 04/03/26  
S. B. & E.P. allowed.

Vaishali  
28/04/26

~~वादी नाम स्प. वैशाली शर्मा-जी लखनम  
रुपये 9500/- एक हजार (नौसठ) मात्र  
इ-चलना द्वारा शर्मा चलन विन्दित करी.~~

दि० 25/02/2026

  
28/02/2026  
Asst. Supt. (C & F.)  
Civil Court S.D., Panvel

Heard Adv for pty and perused record. It appears that def appeared in the suit however failed to file say to this application. None for def present today. It appears that the apprehension of the pty regarding alienation of suit property by def is having substance. If the interim relief as sought is not granted it appears to me that pty will suffer irreparable loss. Hence I am of the opinion that maintaining the position in respect of suit property as it is, deems necessary. Hence defendant is directed to maintain the status of the suit property as it is till next date & shall not change the position of the suit property till then. Vaishali  
04/03/26.