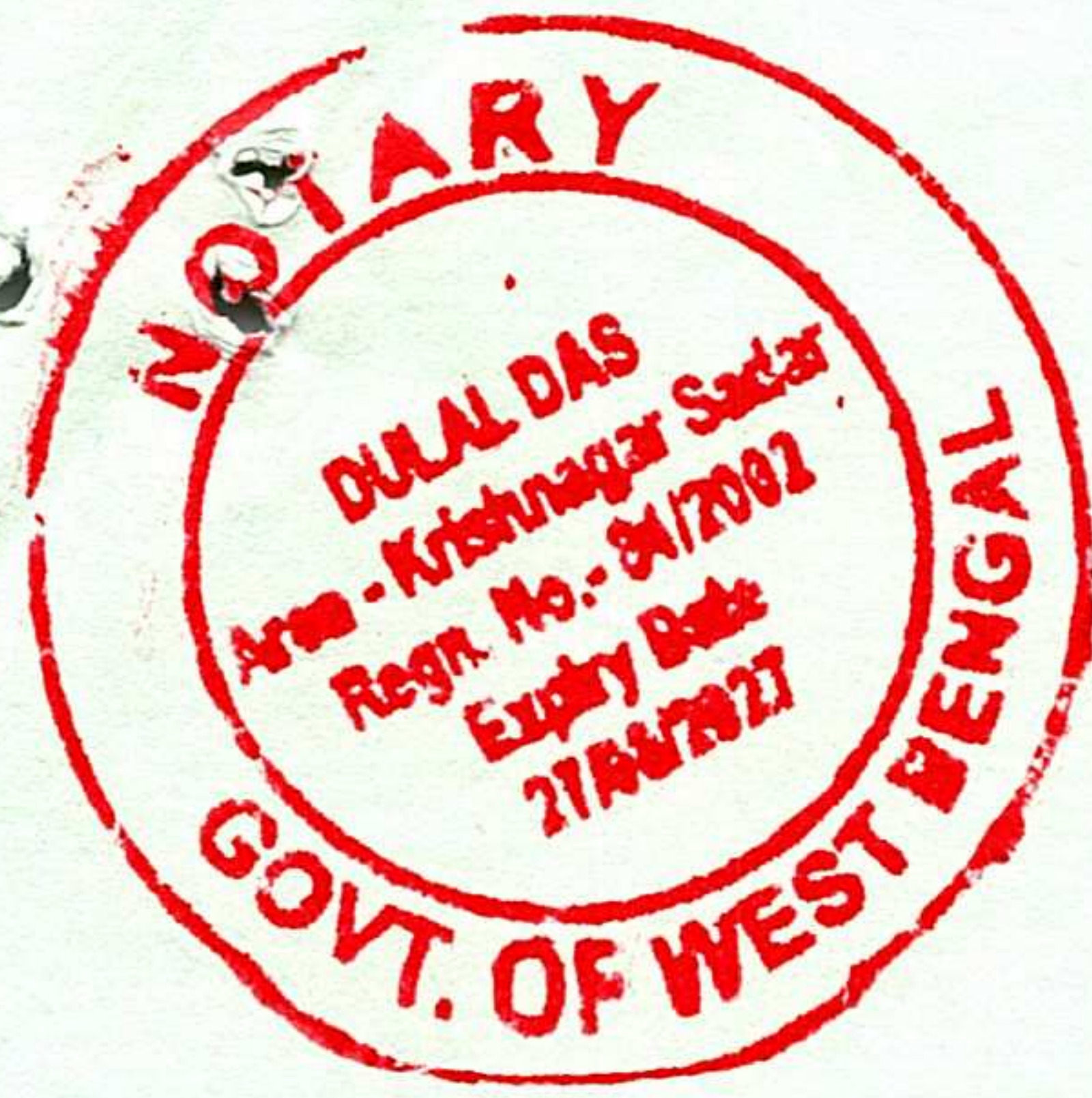




BRABU GHOSH

Handwritten signature and initials.

IN THE COURT OF THE LD. CIVIL JUDGE (JR. DIV.) -
AT NABADWIP, NADIA.

TITLE SUIT NO. 72 / 2025

PLAINTIFF

: Bablu Ghosh, aged about - 60 years,
S/o - Late Bipad Bhanjan Ghosh
of Vill. Srinathpur, P.O. Sree Mayapur,
P.S. Nabadwip, Dist. Nadia.

- VERSUS -

DEFENDANTS

: Satya Gour Das,
S/o. Late Harimohan Das
of Vill. Gournagar, P.O. Sree Mayapur,
P.S. Nabadwip, Dist. Nadia.

**PRO- FORMA
DEFENDANT**

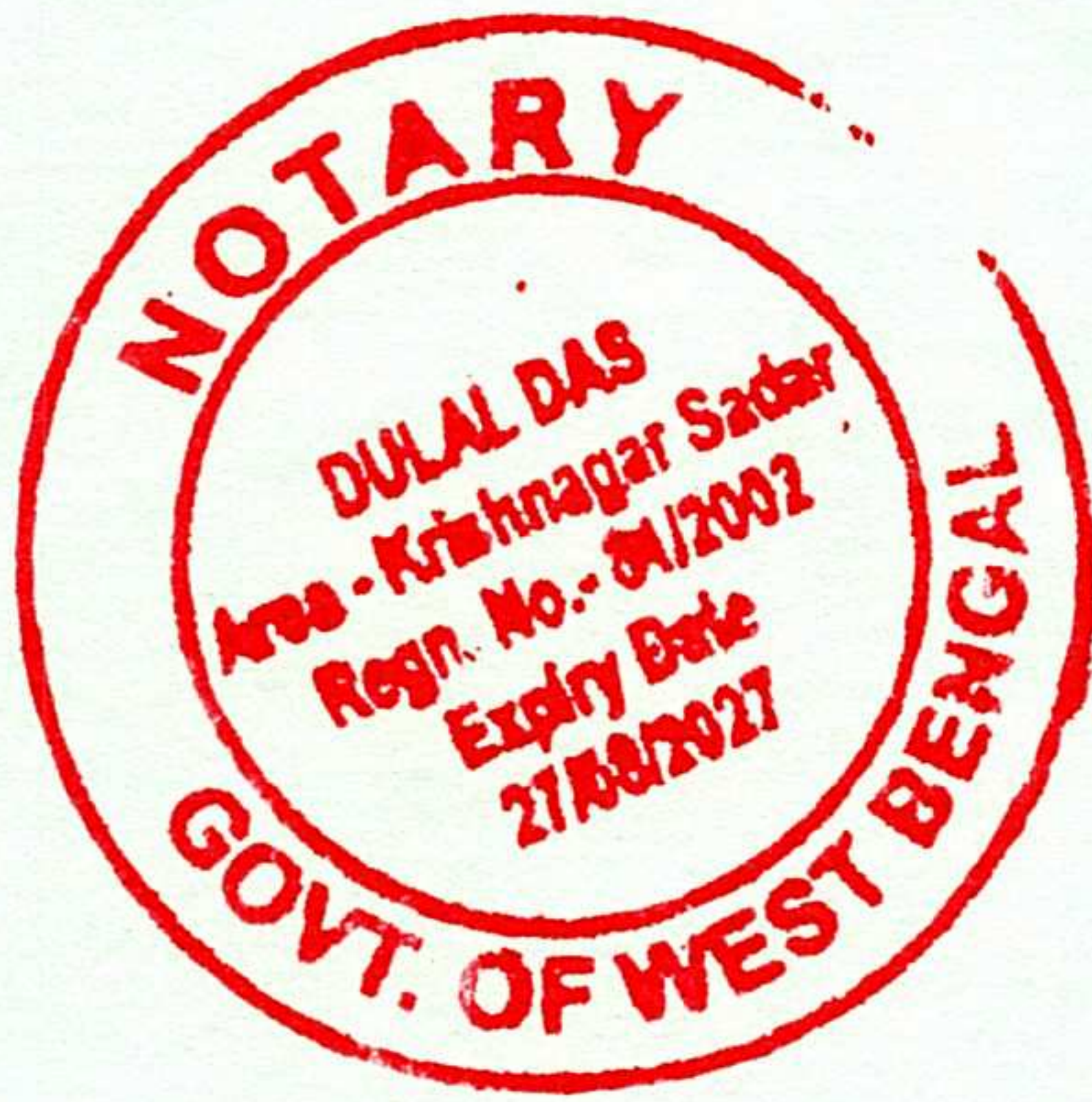
: The B.L. & L.R.O.
Nabadwip, Nadia.

Suit for permanent injunction u/s. 38 of the Specific
Relief Act, 1963.

Suit valued at Rs. 50/-

The plaintiff, above named, most respectfully SHEWETH :

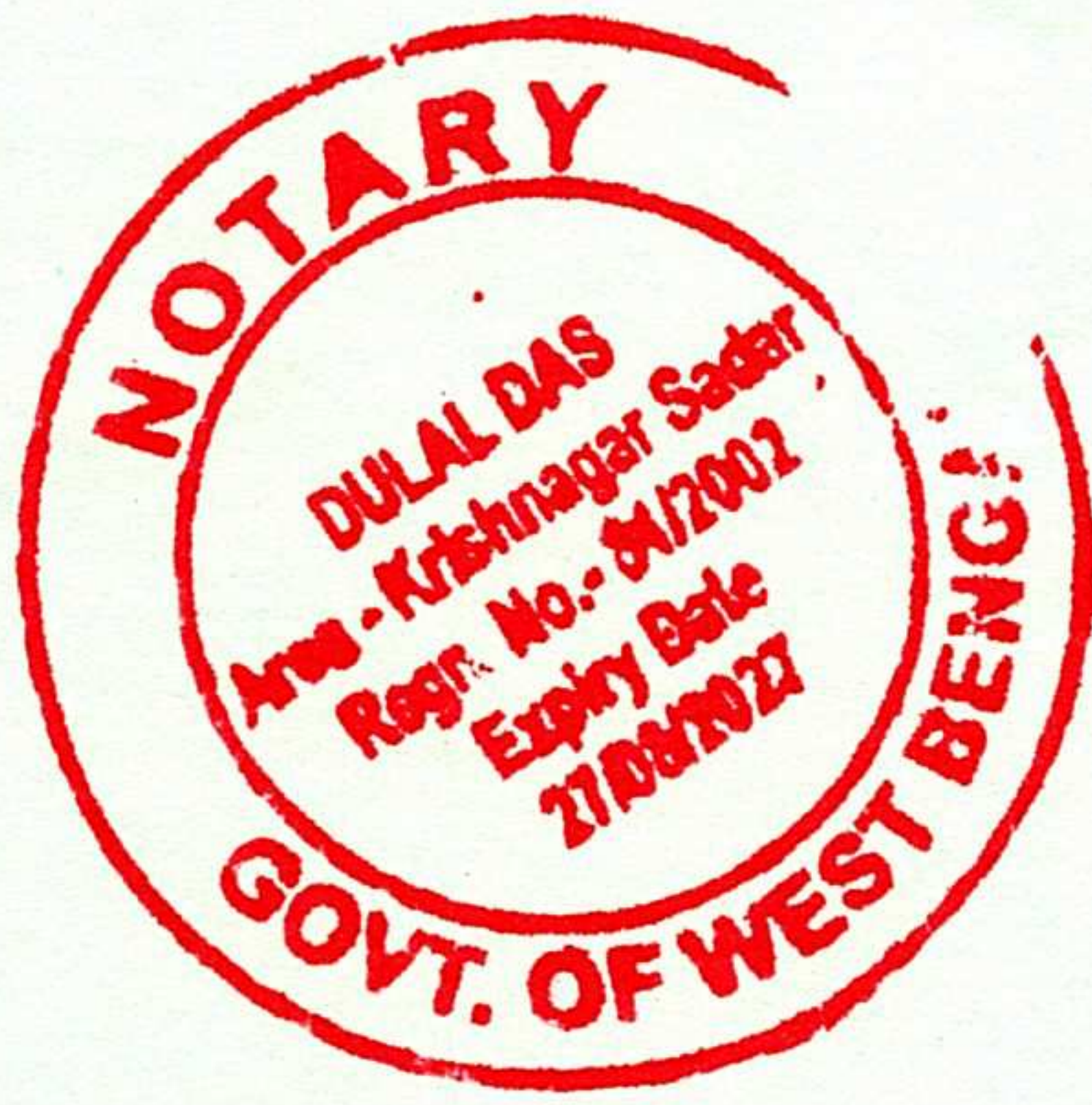
1. That the property-in-question in this suit is situated in the district of Nadia, under P.S. Nabadwip within mouja - 9 No. Bamanpukur which is well within the territorial jurisdiction of this Ld. Court and the same have been described in-detail in the schedule, provided hereunder. Also, for the sake of convenience and brevity, the property-in-question have been hereinafter referred to as the "suit property".



Handwritten notes and signatures in blue ink at the top right corner of the page.

[2]

2. That the property in the suit Plot No. R.S. & L.R. 1368 measuring about - 03 decimal was originally belonged to Hazrat Mondal, Golam Mondal, Salam Mondal, Muktar Mondal and their name was properly been recorded in L.R.R.O.R. 738,2262, 1838 while enjoying and possessing over the suit plot the said Hazrat Mondal and others made an agreement with the plaintiff in lieu of money of Rs. 2,00,000/- orally measuring area 01 decimal and handed over possession over suit plot measuring area 01 decimal on 30.06.1999 and since then your plaintiff used to possess over suit schedule plot by making a Tin Shed Room with bamboo structure without interruption of others. *with specific demarcation.*
3. That thereafter since the year of 1999 your plaintiff requested severally to the said Hazrat Mondal and others to execute register instrument in favour of plaintiff over the suit plot measuring area 01 decimals of land then with the interence of the local people finally the said Hazrat Mondal and others executed a regd. deed of sale being No. 854/2004 regd. before A.D.S.R. Nabadwip and finally the said deed was assessed by the A.D.S.R. Nabadwip being No. I-2717/2006 and thereafter the name of plaintiff was properly been recorded in L.R. record being Khatian No 1486 and paid rent to the Govt. of West Bengal and rest 02 dec. of land defendant No. 1 is the owner of the suit plot.
4. That the defendant is very much dangerous and turbulent of the locality and they are trying to dispossess the plaintiff from the suit property illegally and forcefully and the plaintiff is very sick and needy person of the locality and he could not resist the ill act of the defendant. That subsequently plaintiff informed the matter to the local Police Station by they did not take any action regarding this matter.



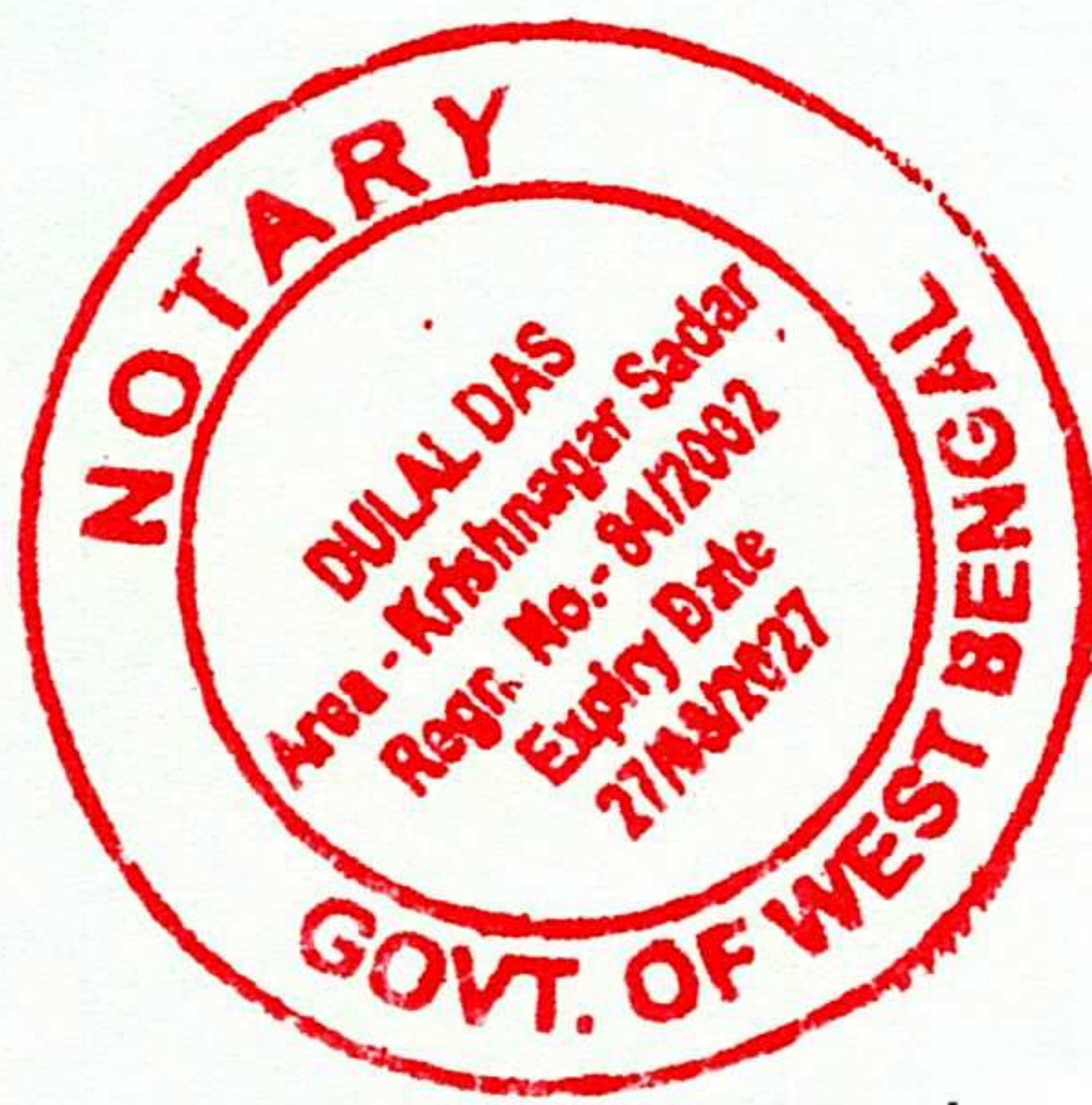
(Sd/-) [Signature]
[Signature]

[3]

5. That the plaintiff and the defendant are the owner / possessor of the suit property as per their respective share and though the plaintiff does not claim any relief against the pro-defendant but for proper adjudication and their proper present is required for which pro-defendant has made party to the suit.
6. That the defendants are trying to alter the L.R.R.O.R. the B.L. & L.R.O. Nabadwip is made party to this suit as proforma defendant though the plaintiff has not direct claim against him.
7. That the cause of action of this suit aroused on and from 31.01.2024 and finally on 04.02.2024 when with an ulterior motive, the defendants came to the suit property and tried to make some illegal obstruction therein, encroaching a major portion thereof and upon dispossessing the plaintiff therefrom and lastly on 04.02.2024 when the defendants tried to fulfill their unlawful design at Vill. Srinathpur, P.O. Sree Mayapur, P.S. Nabadwip, Dist. Nadia which is well within Your Honour's jurisdiction.
8. That for the purpose of Court fees, the suit is valued at Rs. 50/- for the purpose injunction, and the plaintiff has paid required Court fees thereon, as per the provisions of the W.B.C.F. (Amendment) Act.
9. That this application is made bona fide for the ends of justice.

Under the above facts and circumstances, it is prayed that Your Honour would graciously be pleased to pass the following reliefs :-

- a) An order of injunction be passed against the defendant, thereby permanently restraining them from creating troubles/ obstructions, in the matter of the peaceful possession and



Handwritten signature and initials in blue ink.

[4]

enjoyment of the plaintiff over the suit property or cannot dispossess the plaintiff from the therefrom.

b) An order of all the costs of the suit in favour of the plaintiff, and

c) Such other or further reliefs, as the Ld. Court deems fit and proper in the premises.

And for this act of kindness, your plaintiff, as in duty bound shall ever pray.

SCHEDULE

In the district of Nadia, under P.S. Nabadwip, within mouza - 9 No. Bamanpukur the following property :-

<u>KHATIAN NO.</u>	<u>PLOT NO.</u>	<u>CLASS</u>	<u>AREA</u>
L.R. 1486	R.S. & L.R. 1368	Viti	01 decimals out of 03 decimals

BUTTED AND BOUNDED BY -

In the North :- Doba land of Astucharan Das.

In the South :- P.W.D. Road,

In the East :- 10ft wide kancha Road of Hazrat Mondal and others

In the West :- Sarkari Khal.



[5]

AFFIDAVIT

I, Bablu Ghosh, aged about - 60 years, S/o - Late Bipad Bhanjan Ghosh, resident of Vill. Srinathpur, P.O. Sree Mayapur, P.S. Nabadwip, Dist. Nadia. by faith - Hindu, by occupation - Business, do hereby solemnly affirm and state as follows -

- (a). That the contents of this plaint are all true and correct to the best of my knowledge and belief.
- (b). That I, being the plaintiff and tadbirkarak herein, am well conversant with the facts and circumstances of this cause and stands competent to swear this affidavit.
- (c). That the contents of this plaint have been read over and explained to me in Bengali and finding the same as to be correctly written as per my instructions, I put my signature on this affidavit - It is true to my knowledge and belief.

বাবলু গোস্বামী

Deponent

Identified by me.

Shubhanshu Chatterjee

Advocate

8/02/24

F-420/396/2002

SI. No. 09
Solemnly affirmed before me on the
identification of Advocate/Clerk
- 9 FEB 2024
D. Das, Notary, Govt. of W.B.
Criminal Court, Krishnagar, Nadia