



Lakshmi Bose

By
T. Saha

Advocate
Nabadwip Court

23/05/2025

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

TITLE SUIT NO. 98 /2025

Plaintiff: Lakshmi Bose, aged about 75 years, W/o. Late Shyam Krishna Bose, permanent resident of Rajgram, Purba Bazar, P.O. & P.S. Murarai, Dist.- Birbhum, Pin.- 731222. Presently residing at Agameshwari para road, P.O. & P.S. Nabadwip, Dist.- Nadia, pin.- 741302.

Vs.

Defendant: 1) Nitai Chand Ghosh, S/o. Kartick Chandra Ghosh.

2) **Sobhan Banerjee**, S/o. Unknown.

3) **Sarbani Banerjee**, W/o. Sobhan Banerjee,

4) **Kumari Jagat Mohini Ghosh**, D/o. Late Balai Chand Ghosh.

all defendants are resident of Agameshwari para road, P.O. & P.S. Nabadwip, Dist.- Nadia, pin.- 741302

Suit for Declaration and permanent Injunction.

Suit Valued at Rs. 100/-.

Most Respectfully Sheweth: -

1. That the Plaintiff of this instant suit are law abiding senior citizen.
2. That the scheduled property is under P.S. and A.D.S.R. Nabadwip which is under the jurisdiction of your Honour's Court.
3. That originally the scheduled property belonged one Hrisikesh Mitra of Nabadwip, thereafter Gour Chand Ghosh, S/o. Late Kartick Chandra Ghosh, Nitai Chand Ghosh, S/o. Late Kartick Chandra Ghosh, Kanai Chand Ghosh, S/o. Late Kartick Chandra Ghosh and Balai Chand Ghosh, S/o. Late Kartick Chandra Ghosh got the exclusive Right, Title and interest over the schedule property jointly by virtue of sale deed being no. 1769/1962 dated 23/05/62 registered at A.D.S.R. Nabadwip and the same was undivided and unpartitioned.

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B. J. Sanyal

Advocate
Nabadwip Court
Date - 23/05/2025

4. That the said Gour Chand Ghosh, S/o. Late Kartick Chandra Ghosh, Nitai Chand Ghosh, S/o. Late Kartick Chandra Ghosh i.e. the defendant no.01, Kanai Chand Ghosh, S/o. Late Kartick Chandra Ghosh and Balai Chand Ghosh, S/o. Late Kartick Chandra Ghosh executed one deed of partition among themselves to partition the schedule property with metes and bounds being deed of partition no.885/1986, dated 23/04/86 registered at 2nd Joint Sub-registrar of Krishnagar at Nabadwip and said Kanai Chand Ghosh, S/o. Late Kartick Chandra Ghosh got the exclusive Right, Title, Interest and possession over the scheduled property virtue of said partition deed being no. 885/1986, dated 23/04/86 registered at 2nd Joint Sub-registrar of Krishnagar at Nabadwip.
5. That said Kanai Chand Ghosh, S/o. Late Kartick Chandra Ghosh gifted the scheduled property in favour of one Jagat Mohini Ghosh, D/o. Late Balai Chand Ghosh by way of registered gift deed being no. 1307/2017, dated 14th June, 2017 registered at A.D.S.R. Nabadwip and Jagat Mohini Ghosh, D/o. Late Balai Chand Ghosh became the exclusive owner and possessor of the scheduled property.
6. That the instant plaintiff got the exclusive Right, Title, Interest and possession over the scheduled property by virtue of deed of sale being no. 3714/2023, dated 11/10/2023 registered at A.D.S.R. Nabadwip and plaintiff is enjoying possession over the scheduled 'B' property.
7. That plaintiff duly recorded her name in B.L. & L.R.O. settlement and in Nabadwip Municipality.
8. That the defendants have no Right, Title and Interest over the scheduled property.
9. That the defendant is a greedy person and nurtures an evil intent to grab the scheduled property.
10. That the defendants firstly on 25/12/2024 along with their henchmen entered into the scheduled property and tried to oust the plaintiff from the schedule property and disturbed the peaceful possession of this instant plaintiffs over the scheduled property but the plaintiff with the help of local people any how manage to resist the defendants and their henchmen.
11. That the defendants are influential persons and have a close nexus with local political leader.
12. That the defendants along with politically influenced henchmen on 18/01/2025 had tried to oust the plaintiff from the scheduled property and disturbed the peaceful possession of the plaintiff over the schedule property.
13. That the cause of action of this instant suit arose firstly on 25/02/2024, secondly on 18/01/2025 and continuing till date.
14. That the Value of this instant suit is ascertained under W.B.C.F. Act is fixed at Rs. 100/-.

Lakshmi Bose

by
P. Suman

Advocate
Nabadwip Court
Date - 23/05/2025

Under the aforesaid facts and circumstances your Honor be graciously pleased to pass a decree:

- Restraining the defendants from ousting the plaintiff from scheduled property.
- Restraining the defendants from entering into the scheduled property.
- Costs.
- Any other relief and/ or reliefs as the court deem fit and proper.

And as in duty bound your petitioner shall ever pray.

SCHEDULE

Under district Nadia, P.S. Nabadwip, Mauza- Nabadwip (20) Holding no. 6/1/A in the ward no.02 under Nabadwip Municipality, R.S.R.O.R. No. 10175, L.R. R.O.R. no. 30972, Hal L.R.R.O.R. no. 35953. R.S. plot no. 4476. L.R. Plot no.- 7097. Classification- Bari, Area- 1.84 Decimals.

Affidavit

I, Lakshmi Bose, aged about 75 years, W/o. Late Shyam Krishna Bose, by faith Hindu, By occupation house wife permanent resident of Rajgram, Purba Bazar, P.O. & P.S. Murarai, Dist.- Birbhum, Pin.-731222. Presently residing at Agameshwari para road, P.O. & P.S. Nabadwip, Dist.- Nadia, pin.-741302.; do hereby solemnly affirm and declare as follows:

- That I am the sole plaintiff of this instant suit.
- That I am well acquainted with the averments made in the foregoing paragraphs.
- That all the averments made in the foregoing paragraphs are true to the best of my knowledge and belief.

Lakshmi Bose

Read over and explained in vernacular to the

Deponent,

Identified by me,

P. Suman

Advocate
Nabadwip Court

Date - 08/05/2025

Civil Judge, (Jr. Divn.) Nabadwip, Nadia

This 8th day of May 2025

at 11:00 AM before me the declarant
personally known to me and identified

Who is known to me at Nabadwip

Sheristader
Civil Judge's Court Junior Division
Nabadwip, Nadia



311
8/5/25
at 01:15 PM

8/5/25



Lakshmi Bose

BB
P. Sana

Advocate
Nabadwip Court
23/05/2025

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

TITLE SUIT NO. _____/2024

Plaintiff: Lakshmi Bose,

Vs.

Defendant: 1) Nitai Chand Ghosh and others.

**Petition under order 39 rule 1 &
2 read with section 151 of
C.P.C.**

Most Respectfully Sheweth: -

1. That the Plaintiff of this instant suit are law abiding senior citizen.
2. That the scheduled property is under P.S. and A.D.S.R. Nabadwip which is under the jurisdiction of your Honour's Court.
3. That originally the scheduled property belonged one Hrisikesh Mitra of Nabadwip, thereafter Gour Chand Ghosh, S/o. Late Kartick Chandra Ghosh, Nitai Chand Ghosh, S/o. Late Kartick Chandra Ghosh, Kanai Chand Ghosh, S/o. Late Kartick Chandra Ghosh and Balai Chand Ghosh, S/o. Late Kartick Chandra Ghosh got the exclusive Right, Title and interest over the 'A' schedule property jointly by virtue of sale deed being no. 1769/1962 dated 23/05/62 registered at A.D.S.R. Nabadwip and the same was undivided and unpartitioned.
4. That the said Gour Chand Ghosh, S/o. Late Kartick Chandra Ghosh, Nitai Chand Ghosh, S/o. Late Kartick Chandra Ghosh i.e. the defendant no.01, Kanai Chand Ghosh, S/o. Late Kartick Chandra Ghosh and Balai Chand Ghosh, S/o. Late Kartick Chandra Ghosh executed one deed of partition among themselves to partition the schedule property with metes and bounds being deed of partition no.885/1986, dated 23/04/86 registered at 2nd Joint Sub-registrar of Krishnagar at Nabadwip and said Kanai Chand Ghosh, S/o. Late Kartick Chandra Ghosh got the exclusive Right, Title, Interest and possession over the scheduled property virtue of said partition deed being no. 885/1986, dated 23/04/86 registered at 2nd Joint Sub-registrar of Krishnagar at Nabadwip.
5. That said Kanai Chand Ghosh, S/o. Late Kartick Chandra Ghosh gifted the scheduled property in favour of one Jagat Mohini Ghosh, D/o. Late Balai Chand Ghosh by way of registered gift deed being no. 1307/2017, dated 14th June, 2017 registered at A.D.S.R. Nabadwip and Jagat Mohini Ghosh, D/o. Late Balai Chand Ghosh became the exclusive owner and possessor of the scheduled property.
6. That the instant plaintiff got the exclusive Right, Title, Interest and possession over the scheduled property by virtue of deed of sale being no.

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B. J.
P. Sarna

Advocate
Nabadwip Court
Date - 23/05/2025

- 3714/2023, dated 11/10/2023 registered at A.D.S.R. Nabadwip and plaintiff is enjoying possession over the scheduled 'B' property.
7. That plaintiff duly recorded her name in B.L. & L.R.O. settlement and in Nabadwip Municipality.
 8. That the defendants have no Right, Title and Interest over the scheduled property.
 9. That the defendant is a greedy person and nurtures an evil intent to grab the scheduled property.
 10. That the defendants firstly on 25/12/2024 along with their henchmen entered into the scheduled property and tried to oust the plaintiff from the schedule property and disturbed the peaceful possession of this instant plaintiffs over the scheduled property but the plaintiff with the help of local people any how manage to resist the defendants and their henchmen.
 11. That the defendants are influential persons and have a close nexus with local political leader.
 12. That the defendants along with politically influenced henchmen on 18/01/2025 had tried to oust the plaintiff from the scheduled property and disturbed the peaceful possession of the plaintiff over the schedule property.
 13. That the cause of action of this instant suit arose firstly on 25/02/2024, secondly on 18/01/2025 and continuing till date.
 14. That the plaintiff has a very good prima-facie case.
 15. The paradigm of balance of convenience and inconvenience it tilts in the favour of plaintiff.
 16. That the plaintiff shall suffer irreparable lose and injury which can't be compensated by pecuniary means. If an order of ad interim / temporary injunction is not passed in favour of plaintiffs.

Under the aforesaid facts and circumstances your Honor be graciously pleased to pass an ad-interim/Temporary injunction by Restraining the defendants from disturbing the peaceful possession of the plaintiff over the schedule property and/or restraining the defendants from disturbing the peaceful possession of the plaintiff over the schedule property and/or restraining the defendant from ousting the plaintiff from schedule property

And as in duty bound your petitioner shall ever pray.

Lakshmi Bose

by
T. Saha

Advocate
Nabadwip Court

Decn - 23/05/2025

SCHEDULE

Under district Nadia, P.S. Nabadwip, Mauza- Nabadwip (20) Holding no. 6/1/A in the ward no.02 under Nabadwip Municipality, R.S.R.O.R. No. 10175, L.R. R.O.R. no. 30972, Hal L.R.R.O.R. no. 35953. R.S. plot no. 4476. L.R. Plot no.- 7097. Classification- Bari, Area- 1.84 Decimals.



Affidavit

I, Lakshmi Bose, aged about 75 years, W/o. Late ShyamKrishna Bose, by faith Hindu, By occupation house wife permanent resident of Rajgram, Purba Bazar, P.O. & P.S. Murarai, Dist.- Birbhum, Pin.-731222. Presently residing at Agameshwari para road, P.O. & P.S. Nabadwip, Dist.- Nadia, pin.-741302.; do hereby solemnly affirm and declare as follows:

1. That I am the sole plaintiff of this instant suit.
2. That I am well acquainted with the averments made in the foregoing paragraphs.
3. That all the averments made in the foregoing paragraphs are true to the best of my knowledge and belief.

Lakshmi Bose

Read over and explained in vernacular to the

Deponent,

Identified by me,

Tin Saha

Advocate
Nabadwip Court

Decn - 08/05/2025

Solemnly affirmed at the Office of
Civil Judge, (Jr. Divn.) Nabadwip, Nadia

This 23rd day of May 2025
at 1:20 PM before me the declarant
& personally known to me and identified
by Tin Saha

Who is known to me at Nabadwip

Sheristader
Civil Judge's Court Junior Division
Nabadwip, Nadia

8/5/25

Lakshmi Bose.

By
P. Saha

Advocate
Nabadwip Court
Dt. 08-05-2025

REGISTERED ADDRESS

**IN THE COURT OF LD. CIVIL JUDGE (JR. DIVISION) AT
NABADWIP, NADIA.**

TITLE SUIT NO. _____/2025

Plaintiff: Lakshmi Bose, aged about 75 years, W/o. Late Shyam Krishna Bose, permanent resident of Rajgram, Purba Bazar, P.O. & P.S. Murarai, Dist.- Birbhum, Pin.-731222. Presently residing at Agameshwari para road, P.O. & P.S. Nabadwip, Dist.- Nadia, pin.-741302.

Vs.

Defendant: 1) Nitai Chand Ghosh, S/o. Kartick Chandra Ghosh.

2) **Sobhan Banerjee**, S/o. Unknown.

3) **Sarbani Banerjee**, W/o. Sobhan Banerjee,

4) **Kumari Jagat Mohini Ghosh**, D/o. Late Balai Chand Ghosh.

all defendants are resident of Agameshwari para road, P.O. & P.S. Nabadwip, Dist.- Nadia, pin.-741302.

Verification.

Being the plaintiff of this instant suit hereby I am verifying that, all the statements made above are true to the best of my knowledge and belief.

Lakshmi Bose

Identified by

Identified by me

P. Saha

(Advocate)

Nabadwip Court

Dt. 08-05-2025