

RAJ KUMAR SINGH DHAM
Rajp. No. - 801773

3 APR 2018



UPME050017021014

ज्यायालय - जल अ. ल. ज. उ. ७१ के. के. १
वा. स. ७५१/१५
कुलदीप कान जसदीप



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O.S. No. 749 of 2014

.... Plaintiff.

Versus

..... Defendant.

The plaintiff states as follows

1. That the defendant is the real daughter-in-law (son's wife) of the plaintiff. The plaintiff is having two sons, namely, Sri Gurvinder Singh Lamba and Sri Devender Pal Singh Lamba. The defendant is the wife of Sri Devender Pal Singh Lamba, the younger son of the plaintiff.

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जिला एवं सत्र
न्यायाधीश बेरत
प्रसाद प्रधान

Kelly St.


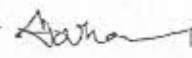
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2. That Sri Devender Pal Singh Lamba son of the plaintiff got married with the defendant about 10 years back.

3. That the plaintiff is a businessman whereas the defendant is a house wife.

4. That due to love and affection and due to the fact that the defendant is the daughter-in-law of the plaintiff, the plaintiff purchased the properties, detailed at the foot of the plaint, in the Benami name of the defendant, although the plaintiff is the actual owner of the said properties, detailed at the foot of the plaint. Entire investment in purchasing the said properties in the Benami name of the defendant was made by the plaintiff from his own independent income.

5. That the plaintiff purchased a plot situated at Takshila Colony, Meerut, detailed in Schedule-A at the foot of the plaint, vide sale deed dated 1/9/2007 from Dr. Gyanendra Singh son of Sri Rohan Singh and Smt. Suman Singh wife of Dr. Gyanendra Singh, residents of village Badhpura, District Bulandshahar, in the Benami

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name of the defendant and the plaintiff paid the sale consideration of the said sale deed from his own income.

6. That similarly the plaintiff purchased the Abadi land, detailed in Schedule-B at the foot of the plaint, in the Benami name of the defendant vide sale deed dated 13/10/2008, executed by its previous owner Sri Noor Ilahi son of Sri Mohammad Yaseen, resident of 189, Ismile Nagar, Meerut. The plaintiff also purchased the Abadi land, detailed in Schedule-C at the foot of the plaint, from the same person Sri Noor Ilahi son of Sri Mohammad Yaseen vide sale deed dated 31/10/2008 in the name of the defendant. Similarly the plaintiff also purchased the Abadi land, detailed in Schedule-D at the foot of the plaint, vide sale deed dated 6/1/2011 from its previous owners Sri Narendra Kumar and others in the Benami name of the defendant and the plaintiff also purchased the Abadi land, detailed in Schedule-E at the foot of the plaint, vide sale deed dated 21/2/2014 in the Benami name of the defendant from Sri Mohammad Iqbal son of Sri Mohammad Umar and others.

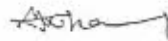
जिला एवं सत्र
न्यायाधीश मेरठ
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7. That the defendant did not invest any single penny in purchasing the said land and as the defendant is the family member of the plaintiff, being his daughter-in-law, as such the said transactions were purely Benami transactions.

8. That the defendant is aware with the fact that the plaintiff is the actual owner and in possession of the said land, detailed at the foot of the plaint, but now since about 1 week the defendant has started claiming that she is the actual owner of the said properties instead of Benami owner and the defendant yesterday has finally refused to refrain from her said illegal act and the defendant is in a hurry to transfer the said properties to others claiming herself as the real owner of the same. As such the plaintiff has no option but to file the present suit.

8. That cause of action for the suit arose when the plaintiff purchased the properties, detailed at the foot of the plaint, in the Benami name of the defendant through various sale deeds and the plaintiff remained the actual



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owner of the said properties and 1 week back and yesterday when the defendant has finally refused to accept the plaintiff as actual owner of the said properties, in District Meerut within the jurisdiction of the learned court..

10. That for the purpose of jurisdiction and payment of court fees, the suit is valued at Rs.1,00,00,000/- (Rs. One Crore) tentatively and a fixed court fees of Rs. 200/- is being paid.

11. That the plaintiff prays for the following reliefs:

- (a) That by a decree of declaration in favour of the plaintiff against the defendant, it be declared that the plaintiff is the actual owner and in possession of the land, detailed at the foot of the plaint, and the transactions in favour of the defendant are only Benami and the defendant is not the actual owner of the said land, detailed at the foot of the plaint.
- (b) That cost of the suit be awarded in favour of the plaintiff against the defendant.
- (c) That any other relief, which the learned court

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South-land of others.

South-281 feet, Chak Road.

Asoka

Pargana, Tehsil and District Meerut.

Verification:

Verified that the contents of para
Numbers 1, 2, 3, 4, 5, 6, 7 & 8 are
true to my personal knowledge and
those of para numbers 9, 10 and 11
are based on legal advise, which I
believe to be true.

Verified at Meerut on 18/7/2014.

Plaintiff,

Through Counsel:

GAJENDRA SINGH DHAMA
Advocate
CIVIL COURTS, MEERUT.
Regn. No. - 851/73

CIVIL COURT, MEERUT

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