

IN THE COURT OF SENIOR CIVIL JUDGE, RAWALPINDI

Shakeela Khatoon wife of Sagheer Hussain (**daughter** of
late Mehmood Alam) resident of House No. 3, Street No. 12,
Mohallah Tehmasapabad, Rawalpindi.

Plaintiff

Versus

1. Sajid Mehmood
2. Arslan Ali
3. Zafran Ali *(all three sons of late Mehmood
Alam)*
4. Mst. Shaista Parveen *(widow of late Mehmood Alam)*
House No. 3, Street No. 12, Mohallah Tehmasapabad,
Rawalpindi.
5. Sub Registrar, Rawalpindi

Defendants

SUIT FOR SEPARATE POSSESSION THROUGH PARTITION
AND FOR PERMANENT AND MANDATORY INJUNCTION

Respectfully Sheweth:

1. That late Mehmood Alam son of Said Alam was the father of plaintiff & defendants No. 1 to 3 and **husband** of defendant No. 4, who was owner in possession of House No. 3, measuring 05 Marlas, Street No. 12, Mohallah Tehmasapabad, Rawalpindi through registered Sale Deed No. 1212 dated 10-03-1980 registered with Sub registrar, Rawalpindi.
2. That the father of plaintiff late Mehmood Alam has died on 30-02-2001 leaving behind the plaintiffs and defendants as legal heirs.
3. That the above suit property is still joint amongst the plaintiff and the defendants No. 1 to 4 and has not been partitioned by its metes and bonds.
4. That the plaintiff does not want to keep the property joint with defendants No. 1 to 4 and want to get their share separated.

5. That the defendants No. 1 to 4 were asked to partition the property and to give due share to the plaintiff out of the house but they have not acceded the genuine request of the plaintiff
6. That the cause of action accrued firstly on 30-01-2001 at the time of death of late Mehmood Alam, and lastly when the request of plaintiff to partition the suit was not acceded by the defendants No.1 to 4 which is still continuing day by day.
7. That the suit property is situated at Rawalpindi, parties to the suit are also residing in Rawalpindi hence this honourable court has jurisdiction and adjudicate upon the matter.
8. That the value of the suit property for the purpose of court fees is fixed as Rs. 20,000/- (Rupees twenty thousand only) and for the purpose of jurisdiction is fixed as Rs. 15,00,000/- being value of the shares of

the plaintiff, upon which prescribed court fee has been affixed upon the plaint.

PRAYER:

It is, therefore, prayed that a decree for separate possession through partition of the House No. 3, measuring 05 Marlas, Street No. 12, Mohallah Tehmasapabad, Rawalpindi, giving due share to the plaintiffs out of it, and for permanent injunction & mandatory restraining the defendants from onward selling, transferring, creating any third party interest, or changing the nature of the suit property in any manner whatsoever, may be passed in favour of the plaintiff and against the defendants with cost.

Any relief which this honourable court may deem fit and proper also be awarded to the plaintiffs.

Plaintiff

Through

VERIFICATION:

Verified on oath at Rawalpindi on 06t day of February, 2021 that the contents of the plaint from Para No. 1 to 5 above are true and correct to the best of my knowledge while rest of the paras are believed to be correct as per information received.

Plaintiff