

**IN THE COURT OF SENIOR CIVIL JUDGE**  
**RAWALPINDI**

Habib Butt Raja son of Nabeel Butt Gujar resident of House No. 1,  
Street No. 4, Mohallah Shah Chan Chiragh, Rawalpindi

...Plaintiff

**Versus**

1. \_\_\_\_\_
2. District Collector, Rawalpindi

...Defendant

**SUIT FOR DECLARATION AND PERMANENT INJUNCTION**  
**AND MANDATORY INJUNCTION**

Respectfully Sheweth,

1. That the plaintiff is owner in possession of land **measuring 1 Kanal 8 Marlas** bearing Khata No. 1000/1121, Khasra No. 12121 measuring 1 Kanal 19 Marla, situated at Mouza Maira Kallan, Tehsil and district Rawalpindi vide Registered Sale Deed No. 120000 dated 21-08-1986, Sub Registrar, Rural, Rawalpindi.
2. That currently there is a Water tank constructed on four Marlas of the suit land. The said Water Tank was constructed illegally by defendant No.1, for which neither acquisition process has been adopted by the department of defendants, nor the defendants have any proof of ownership. Furthermore, the plaintiff has never given any permission with regard to construction of water tank.
3. That the defendants are trying to occupy extra land without the permission of the plaintiff.
4. That the cause of action accrued few days ago, which is still continuing

5. That the cause of action accrued at Rawalpindi, therefore this Honourable court has jurisdiction to adjudicate upon the matter.
6. That the proper court fee has been affixed on the plaint.

**PRAYER:**

Under the circumstances, as stated above, it is most respectfully prayed that a decree for the following may kindly be passed in favour of plaintiff and against the defendants. -

1. Declaration to the effect that the water tank which is constructed on the land of the plaintiff is illegal and unlawful
2. Permanent injunction restraining the defendant from further encroaching over the land of plaintiff.
3. Mandatory injunction directing the defendant to demolish the water tank constructed over the land of plaintiff or in alternate to pay the price of land whereupon the water tank is constructed.

Any other relief which this Honourable court, may deem fit and proper, may also be awarded to the plaintiff.

Plaintiff

Through

**Counsel**  
Advocate High Court

**VERIFICATION:**

Verified on oath at Rawalpindi on \_\_\_ day of \_\_\_, \_\_\_ that the contents of the plaint from Para No. 1 to 3 are true to the best of my knowledge and belief and rest of the paras are believed to be correct as per information received.

Plaintiff