

IN THE COURT OF SENIOR CIVIL JUDGE
ISLAMABAD

- 1. Nabeel Ahmed Khan Raja
- 2. Zubair Alam Bhatti Gujar
- 3. Nabeel Ahmed Raja Javed Gujar (all three sons of Sajid Qureshi Khan Zaman) residents of House No. 47578787, Street No. 887, Gawalmandi, Shah Chan, Rawalpindi

Plaintiffs

Versus

- 1. Zubair Janjua Malik Khan son of name not known
- 2. Farhan Khan Zaman Nabeel Raja son of name not known
Both residents of Mouza Mohra Chappar, Tehsil and District Islamabad.

Defendants

SUIT FOR PERMANENT INJUNCTION

Respectfully Sheweth,

- 1. That the plaintiffs are owner-in-possession of their ancestral land measuring 66 Kanals bearing Khasra Nos. 40000, 4000002 Khewat No. 588771, Mouza Mohra Chappar, Tehsil and District Islamabad
(hereinafter referred as suit land)
- 2. That the plaintiffs have been enjoying peaceful possession of their ancestral land and are cultivating their land since their forefathers.

3. That two days ago, the plaintiffs were ploughing the suit land meanwhile the defendants came there and created hurdles for the plaintiffs and also tried to disposes the plaintiffs from their occupied land. On the résistance of the plaintiffs, the defendants started threatening of dire consequences.
4. That the acts of defendants are illegal, unlawful, unwarranted and against the law.
5. That the plaintiff No. 1 reported the matter to concerned Police Station Mohra Chappar , Islamabad but no action has been taken on the application of plaintiff No.1.
6. That the cause of action accrued few days ago, when defendants started interfering into peaceful possession of the plaintiffs over the suit land and tried to illegally occupy over the suit land which is still continuing.
7. That the cause of action accrued within the territorial jurisdiction of this Honourable Court, suit land is also situated there, therefore this Honourable Court has jurisdiction to adjudicate upon the matter.

8. 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 Permanent Injunction restraining the defendants from interfering into peaceful possession of plaintiffs, dispossessing the plaintiffs from suit land in any manner whatsoever, may kindly be passed in favour of plaintiffs and against the defendants.

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

Plaintiffs

Through

Counsel

VERIFICATION:

Verified on oath at Islamabad on ___day of, _____that the contents of the plaint from Para No. 1 to 5 are true to the best of our knowledge and belief and rest of the paras are believed to be correct as per information received.

Plaintiffs

IN THE COURT OF SENIOR CIVIL JUDGE
ISLAMABAD

Nabeel Ahmed Khan Raja etc. Versus Aslam

SUIT FOR PERMANENT INJUNCTION

APPLICATION UNDER ORDER 39 RULES 1 AND 2
READ WITH SECTION 151 CPC

Respected Sheweth:

1. That the above titled suit has been filed by the applicants in the Honourable Court, the contents whereof may be read as an integral part of instant application.
2. That the applicants have a good prima-facie case and hope to succeed in it.
3. That the balance of convenience lies in favour of the applicants.
4. That in case the stay order is not granted in favour of applicants the applicants would likely to suffer an irreparable loss.

PRAYER:

Under the circumstances, as stated above, it is most respectfully prayed that ad-interim injunction, restraining the respondents/defendants from interfering into peaceful possession of applicants/

plaintiffs, dispossessing the applicant/ plaintiffs from suit land in any manner whatsoever, may kindly be issued in favour of the plaintiffs and against the defendants.

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

Applicants/ Plaintiffs

Through

Counsel

IN THE COURT OF SENIOR CIVIL JUDGE
ISLAMABAD

Nabeel Ahmed Khan Raja etc. Versus Aslam

SUIT FOR PERMANENT INJUNCTION

APPLICATION UNDER ORDER 39 RULES 1 AND 2
READ WITH SECTION 151 CPC

AFFIDAVIT

I, Nabeel Ahmed Khan Raja son of Sajid Qureshi Khan Zaman Raja resident of House No. 47578787, Street No. 887, Gawalmandi, Shah Chan, Rawalpindi do hereby declare as under:

That the contents of the accompanying application are true and correct to the best of my knowledge and belief and nothing has been concealed there from.

Deponent

Verified on oath at Islamabad on this ____day of _____that the contents of the above said affidavit are true and correct.

Deponent