**Defence to Suit for Foreclosure**

1.     The defendant did not execute the mortgage.

2.     The mortgage was not transferred to the plaintiff (if more than one transfer is alleged, say which is denied).

3.     The suit is barred by article of the second schedule to the 2Indian Limitation Act, 1877. 15 of 1877.

4.     The following payments have been made, viz.:-- --

Rs.

(Insert date)-- -- -- -- -- -- -- -- ,.....1,000

(Insert date)-- -- -- -- -- -- -- -- ,..... 500

5.     The plaintiff took possession on ...........the of............, and has received the rents ever since.

6.     That plaintiff released the debt on ...................the of.........

7.     The defendant transferred all his interest to A.B.by a document dated..............