**Probate of Will in Solemn Form**

1.     The said will and codicil of the deceased were not duly executed according to the provisions of the Indian Succession Act, 1865 (10 of 1865) {See now the Indian Succession Act, 1925 (39 of 1925).} [or of the Hindu Wills Act, 1870 (21 of 1870) {See now the Indian Succession Act, 1925 (39 of 1925).} ].

2.     The deceased at the time the said will and codicil respectively purport to have been executed, was not of sound mind, memory and understanding.

3.     The execution of the said will and codicil was obtained by the undue influence of the plaintiff [and others acting with him whose names are at present unknown to the defendant].

4.     The execution of the said will and codicil was obtained by the fraud o f the plaintiff, such fraud so far as is within the defendant's present knowledge, being [state the nature of the fraud].

5.     The deceased at the time of the execution of the said will and codicil did not know and approve of the contents thereof [or of the contents of the residuary clause in the said will, as the case may be].

6.     The deceased made is true last will, dated the 1st January, 1873, and thereby appointed the defendant sole executor thereof.

The defendant claims--

1.     that the Court will pronounce against the said will and codicil propounded by the plaintiff;

2.     that the Court will decree probate of the will of the deceased, dated the 1st January, 1873, in solemn form of law.