**Against a Fraudulent Purchaser and**

 **His Transferee with Notice**

In the Court of ......................................

KK ……………………….resI……………….. ...................... Plaintiff

against

GM…………………………... resi………….. .................... Defendant

KK……………………………………………………….., the above-named plaintiff, states as follows:-

1. On the ………………………………………..... day of....................... ..... , the defendant …………………….…GM…………………………………………………., for the purpose of including the plaintiff to sell him certain goods, represented to the plaintiff that [he was solvent, and worth ……………………..... rupees over all his liabilities].

2. The plaintiff was thereby induced to sell and deliver to GM……………………………….….. […………. boxes of ………], the estimated value of which is ...... rupees. ……………………………….

3. The said representations were false, and were then known by……………………..…. GM……………………... to be so [or at the time of making the said representations,……………………….…. GM…………………………… was insolvent, and knew himself to be so].

4. GM……………………….…………. afterwards transferred the said goods to the defendant…………………….. KM…………………………………... without consideration [or who had notice of the falsity of the representation].

[i. Facts showing when the cause of action arose and that the Court has jurisdiction. ]

ii. The value of the subject-matter of the suit for the purpose of jurisdiction is …………................rupees and for the purpose of court-fees is ...................................rupees.

5. The plaintiff claims-

(1) delivery of the said goods, or.......................................... rupees, in case delivery cannot be had;

(2) ……………………………..... rupees compensation for the detention thereof.

Dated :

Plaintiff

Through, Advocate

Verification:

I, …………………………\_\_\_\_\_\_, do hereby verify that the contents from paras 1 to \_......................\_\_\_\_\_ are correct and true to the best of my knowledge and personal belief and no part of it is false and nothing material has been concealed therein.

Affirmed at KALYAN this \_\_\_\_\_\_.

Plaintiff