|  |  |  |
| --- | --- | --- |
| Restoration of Movable Property Threatened with Destruction and for an Injunction  In the Court of ......................................  KK………………………………………………. Resi……………….. ...................... Plaintiff  against  GM………………………………………………..Resi …................................... Defendant   KK……………………………………………....., the above-named plaintiff, states as follows:-   1. Plaintiff is, and at all times hereinafter mentioned was, the owner of [a portrait of his …………………. which was executed by an eminent …………..……], and of which no duplicate exists [or state any facts showing that the property is of a kind that cannot be replaced by money].   2. On the ............ day of……...... /…….... , he deposited the same for safe-keeping with the defendant.   3. On the ……...... day of........... /…........... , he demanded the same from the defendant and offered to pay all reasonable charges for the storage of the same.   4. The defendant refuses to deliver the same to the plaintiff and threatens to conceal, dispose of, cut or injure the same if required to deliver it up.   5. No pecuniary compensation would be an adequate compensation to the plaintiff for the loss of the [painting];   [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., and Relief claimed.] 6. The plaintiff claims-   (1) that the defendant be restrained by injunction from disposing of, injuring or concealing the said [painting];   (2) That he be compelled to deliver the same to the plaintiff.   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 ……………………… this \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_.   Plaintiff | |  | | --- | |  | |