**Specific Performance (No. 2)**

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 plaintiff and defendant entered into an agreement, in writing, and the original document is hereto annexed.

The defendant was absolutely entitled to the immovable property described in the agreement.

2. On the .................... day of..................... /………….…….. , the plaintiff Tendered rupees to the defendant, and demanded a transfer of the said property by a sufficient instrument.

3. On the ........................ day of…………...... /…………………... , the plaintiff again demanded such transfer. [Or the defendant refused to transfer the same to the plaintiff.]

4. The defendant has not executed any instrument of transfer.

5. The plaintiff is still ready and willing to pay the purchase-money of the said property to the defendant.

[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.]

6. The plaintiff claims-

(1) that the defendant transfers the said property to the plaintiff by a sufficient instrument [following the terms of the agreement};

(2) ………………………………...... rupees compensation for withholding the same.

Dated :

Plaintiff / Defendant

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 / Defendant