**SUIT FOR PERMANENT INJUCTION**

IN THE COURT OF

SH.\_\_\_\_\_\_\_\_\_\_\_\_\_.

\_\_\_\_\_\_\_\_\_ Versus

\_\_\_\_\_\_\_\_\_\_\_\_\_

**SUIT FOR PERMANENT INJUCTION**

AFFIDAVIT

I, \_\_\_\_\_\_\_\_\_\_ son of Sh. \_\_\_\_\_\_\_\_\_\_\_,

R/o \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_,

 do hereby solemnly affirm and declare as under:
1 That the deponent along with his \_\_\_\_\_\_\_\_\_\_\_ son of Sh. \_\_\_\_\_\_\_\_\_\_\_\_ purchased a site consisting of a house and a shop situated at \_\_\_\_\_\_\_\_\_\_\_\_\_ formerly \_\_\_\_\_\_\_\_, forming part of \_\_\_\_\_\_\_\_\_\_- measuring \_\_\_ Sq. yards admeasuring \_\_ x \_\_ show in \_\_\_ colour in the site attached with the plaint from \_\_\_\_\_\_\_\_\_\_\_ S/o Sh. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ vide registered sale deed dated \_\_\_\_\_\_\_\_\_. The Photo Copy the sale Deed is EX-P-1. The said shop is bounded as under :-

North - \_\_\_\_\_\_\_\_\_\_\_\_
South - \_\_\_\_\_\_\_\_\_\_\_\_
East - \_\_\_\_\_\_\_\_\_\_\_\_
West - \_\_\_\_\_\_\_\_\_\_\_\_

2- That the afore-said \_\_\_\_\_\_\_\_\_\_\_\_\_ had purchased the above mentioned site from \_\_\_\_\_\_\_\_\_\_\_\_ of \_\_\_\_\_\_\_\_\_\_\_\_\_ vide registered sale Deed dated \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ in which \_\_\_\_ room \_\_\_\_\_ and \_\_\_\_\_ were existing. Water and electricity connections were also therein the site. The photocopy of sale Deed dated \_\_\_\_\_\_ is EXP-2.

3- That at the time of purchase of the said site by the deponent and his \_\_\_\_\_\_ from \_\_\_\_\_\_\_\_\_ aforesaid , \_\_\_\_\_ room \_\_\_\_\_\_ ,\_\_\_\_\_\_ and \_\_\_\_\_\_ were there at the site and the electric and water connections were also there. The property in question is subject to house tax by the defendants and the same is being paid by the deponent from time to time.

4- That the construction mentioned in Para No.2 above is existing at the site for the last more than \_\_ years as is evident from the Photocopy of the conveyance Deed attached with the plaint. The photocopy of the House Tax receipt is EXP-3 and the copy of the site plan is EXP-4.

5- That the defendants illegally and unlawfully issued show cause notice dated \_\_\_\_\_\_\_\_\_\_ under Section \_\_\_ of the \_\_\_\_\_\_\_\_\_\_\_\_\_ Act and order of demolition dated \_\_\_\_\_\_\_\_\_\_\_ in the name off Shri \_\_\_\_ father of the deponent on receipt of which the deponent visited the office of the defendants and apprised them that the construction regarding which notices has been issued by the defendants was an old one having been raised in the premises in question for the last more than \_\_ years and documents in the support there of were also shown to them. On seeing the same they were satisfied and told that the deponent that no action thereon shall be taken by the defendants.

6- That the defendants through their employees now on \_\_\_\_\_\_\_\_\_\_ came to the suit premises and tried to demolish the construction rose thereon illegally and unlawfully. However, their attempt to do so was failed with the help of the respectables of the area. They left the spot but held out threats to demolish the same. The deponent apprehends that in case they succeed in their illegal designs, in that event he would suffer irreparable loss and injury. This is the final date of cause of action and hence this suit.

Deponent

VERIFICATION
Verified that the contents of my above affidavit are true to best of my knowledge and belief and nothing concealed therein.
Verified at \_\_\_\_\_\_\_\_\_\_ on \_\_\_\_\_\_\_\_\_

Deponent