

IN THE COURT OF CIVIL JUDGE/VACATION JUDGE,

\_\_\_\_\_

Versus

State of Haryana

**Suit for declaration with consequential relief of mandatory and permanent injunction**

**Application for entertaining the suit in summer vacation**

Sir,

That the applicants/plaintiffs humbly submits as under:-

1. That the plaintiff has filed the present suit before their Hon'ble Court and the contents of the plaint may kindly be read as part and parcel of this application for the sake of brevity.
2. That the defendants without adopting the due process of law are adamant to interface in the peaceful possession of the plaintiffs and want to oust them illegal and unlawfully and without any right title and interest. In case defendants succeed in their ulterior motive the plaintiffs would suffer irreparable loss and injury which cannot be compensated in terms of money and in case if the present suit could not entertain during the summer vacation than the purpose of filing the suit would become in-fractious.

It is, therefore, prayed that the present suit may kindly be entertained during summer vacations in the interest of justice.

Dt.

Applicant/Plaintiffs

Through Counsel

IN THE COURT OF CIVIL JUDGE, SENIOR DIVISION

\_\_\_\_\_

Versus

State of Haryana

**Suit for declaration with consequential relief of mandatory and permanent injunction**

**Application under sub-section 2 of section 80 of CPC**

Sir,

That applicants/plaintiffs humbly submits as under:-

1. That the applicants/plaintiffs has filed the above titled suit, in which defendant no. 1 to 4 are state functionary and consequently relief is also sought against it.
2. That the suit is of very urgent and emergent nature, which needs adjudication, as very serious question of law is involved, if condition of advance notice is being followed, in that eventuality, the very purpose for filing this suit will be frustrated and defendants will take undue benefit therefrom, due to technicalities of law.
3. That the courts of law are to protect the interest of the public at large, in the instant case, relief which is essential for the survival of the plaintiffs, would be granted, in that event applicants/plaintiffs will suffer irreparable loss and injury which cannot be compensated in terms of money or otherwise.
4. That the instant application in hand is imperative to be filed alongwith suit.

It is therefore humbly prayed that, the condition of the advance notice may kindly be condoned or dispensed with to meet and advance the cause of justice.

Dated:

Applicant/ Plaintiffs

Through Counsel:

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IN THE COURT OF CIVIL JUDGE/VACATION JUDGE,

\_\_\_\_\_

Versus

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**Suit for declaration with consequential relief of mandatory and permanent injunction**

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**AFFIDAVIT**

I \_\_\_\_\_ age about 70 years S/o Sh. \_\_\_\_\_ R/o  
Village- \_\_\_\_\_-, do hereby solemnly  
affirm and declare as under:-

1. That the deponent is the plaintiff No.1 and well versed with the facts and circumstances of the case.
2. That the accompanying application has been drafted as per my instructions and information derived from the office record and it contains true statement of facts and the same may kindly be treated as part and parcel of this affidavit.

Deponent

Verification:-

Verified that the contents of the above affidavit are true and correct to the best of my knowledge and belief and nothing has been concealed therein.

Deponent