

IN THE SUPREME COURT OF INDIA
CIVIL ORIGINAL JURISDICTION
I.A. NO. OF 2021

IN
W.P. (CIVIL) NO(s) 188 OF 2004

IN THE MATTER OF

M/S RAIGANJ CONSUMER FORUM

... Petitioner

VERSUS

Union of India And others

.... Respondents

AND IN THE MATTER OF

Gadde Mangamma

... Applicant

WITH

I A NO OF 2021
AN APPLICATION FOR DIRECTIONS

ADVOCATE FOR APPLICANT

SRIRAM P

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M/S RAIGANJ CONSUMER FORUM

... Petitioner

VERSUS

Union of India And others

....Respondents

AND IN THE MATTER OF

Gadde Mangamma W/o Suresh,
Aged about 49 years, Occ: Housewife,
R/o H.No. 3-9-204/2, MadireddyKunta,
Reddy Colony, Hanumakonda Town and Mandal,
Warangal District. State of Telangana

Applicant

To

The Hon'ble Chief Justice of India
And his Companion Justices of
Hon'ble Supreme Court of India

The humble application of above
Named applicant

AN APPLICATION FOR DIRECTIONS

MOST RESPECTFULLY SHOWEST:-

- 1 That the petition under Article 32 of the Constitution of India for a writ in the nature of mandamus and / or any other appropriate writ or writs order or direction directing the respondent no. 3 (Golden Forest India Ltd.) not to dispose of and / or alienate any of their properties

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and assets and / or create any third party right in respect of the aforesaid assets and / or properties and / or operate any of its Bank Accounts maintained all over India pending the disposal of the instant writ petition in this Hon'ble court.

2 That the applicant submits that respondents deliberately and fraudulently purchased the properties which belongs to applicant herein from fictitious purchaser and got registered the same in their favour. True copy of sale deed dated 12.01.1994 is annexed herewith as ANNEXURE A-1. [pg 12-19]

True copy of sale deed dated 02.02.1996 is annexed herewith as ANNEXURE A-2. [pg 20-26]

True copy of sale deed dated 15.04.1997 is annexed herewith as ANNEXURE A-3. [pg 27-32]

True copy of sale deed dated 27.03.1997 is annexed herewith as ANNEXURE A-4. [pg 33-52]

True copy of sale deed dated 11.09.2006 is annexed herewith as ANNEXURE A-5. [pg 53-71]

3 The applicant submits that after death of B. Rajaiah, the petitioner approach the Mandal Revenue Office for getting Virasath, mutation, pattadar pass books and title deeds to incorporate their names in record of rights, the Mandal Revenue Officer suggested to get the legal heir certificate

3

from competent civil court. Therefore, the applicant along with her family members filed the suit OS No. 90/2008 before the Hon'ble V Addl. Prl. Civil Judge, Bhongir for seeking the declaration of legal heirs of deceased B. Rajaiah, the Hon'ble court passed the judgment and decree on 23-09-2008, in favour of B. Goramma, G. Balamani, B. Suvarna, G. Mangamma, P. Padma, B. Mallesh, B. Santosh declared by the court as class – I legal heirs of B. Rajaiah which is evident from the judgement and decree passed in OS No. 90/2008 by the Hon'ble Prl. Civil Judge, Bhongir. True copy of judgment dated 23.09.2008 passed by Id Principal Junior Civil Judge, Bhongir along with revenue sketch is annexed herewith as ANNEXURE A-

6. [pg 72-76

4 The applicant submits that the applicant as an absolute owner and possessor of the land in Sy. No. 19 an extent of Ac 05-24 gts, in Sy. No. 20 an extent of Ac 07-12 gts, in Sy. No. 21 an extent of Ac 16-04 gts, in Sy. No. 44 an extent of Ac 05-20 gts, in total admeasuring AC 34-20 gts, situated at Raghavapuram Village, Bibi Nagar Mandal, Yadadri-Bhongiri District (previously Nalgonda District), State of Telangana, acquired through court judgment and preliminary decree passed in OS No. 136/2016, dated 25-06-2018, by the Hon'ble V Addl. District Judge, Bhongir in the partition suit filed petition against the defendants no. 1 to 8. True copy of

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judgment and decree dated 25.06.2018 passed by V Addl. District Judge,

Bhongir in OS No.136/2016 is annexed herewith as ANNEXURE A-7. [pg 77-8]

That **Item No. 1** allotted to the applicant/plaintiff – G. Mangamma, the land in Sy. No. 19 an extent of Ac 05-14, and in Sy. No. 20 an extent of Ac 05-30 gts out of AC 34-20 gts bounded by :-

East : land in Sy. No. 20 allotted to G. Balamani acquired an extent of Ac 05-30 gts

West : 100 feet road Pochampally to Bibinagar

North : Neighbour land in Sy. No. 41

South : Neighbour land in Sy. No. 18

5 That originally land belongs to B. Rajaiah father of the petitioner, the said B. Rajaiah died on 23-05-1982 leaving behind class 1 legal heirs one of the applicant is also legal heir, in result plaintiff suit declared with cost by passing preliminary decree, the plaintiff entitled to 1/6th share, D1 to D5 are each entitled to 1/6th share in plaint schedule properties, will be decided at the time of final decree, documents executed by D1 to D5 in favour A1 to A11 and these documents are liable to be cancel.

6 The applicant submits that Golden Forest (India) Private limited rep. by its Manager, created fake registered sale deed on the name of B. Mallesh therefore the Hon'ble court declared as null and void, the sale deed nos. 169/1994, 554/1996, 1231/1997, 2633/1997, 4643/1997, 9014/2006 and

5

10356/2006 as null and void the Hon'ble court issued the summons and notices to the M/s. Golden Forest (India) Private Limited and M/s. Golden Tourist Resorts & Development Private Limited received the court summons and notices and failed to appear before the court, they have issued ex-parte, the Hon'ble court passed judgment and preliminary decree partition in suit OS No. 136/2016. True copy of Pahani for the year 1956-57, 1983-84, 1994-95 and 2010-11 is annexed herewith as ANNEXURE A-8. [pg 88-91]

7 The applicant submits subsequently, the Hon'ble Court appointed the Advocate commissioner in IA No. 526/2018 in OS No. 136/2016 issued warrant and proceeding of advocate commissioner in pursuance by the Hon'ble court on 22-05-2019 the advocate commissioner issued notices to the advocate and plaintiff and defendants in the said suit on 09-08-2019 and Mandal Surveyor, Bibi Nagar Mandal on 24-08-2019 fixed date of warrant at 11 am; notices which is evidence from the proceeding issued by the Advocate Commissioner allotted item no. 1 to the plaintiff - G. Mangamma in Sy. No. 19, an extent of Ac 05-14 gts and in Sy. No 20 an extent of Ac 00-16 gts in total admeasuring AC 05-30 gts, item no. 2 to the defendant no. 3 - G. Balamma in Sy. No. 20, an extent of Ac 05-30gts; item no. 3 to the defendant no. 4 - B. Suvarna in Sy. No. 20, an extent of Ac 01-06 gts and Sy. No. 21 an extent of Ac 04-24 gts in total admeasuring AC 05-30 gts,

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item no. 4 to the defendant no. 5 – P. Padma in Sy. No. 21, an extent of Ac 05-30 gts, item no. 5 to the defendant no. 2 – B. Santosh in Sy. No. 21, an extent of Ac 05-30 gts, and item no. 6 to the defendant no. 1 – B. Mallesh in Sy. No. 21, an extent of Ac 00-10 gts, and in Sy. No. 44 an extent of Ac 05-20 gts in total admeasuring AC 05-30 gts, which is evidence from the proceedings of advocate commissioner in IA No. 526/2018 in OS No. 136/2016, notices received by the parties of the above said suit.

8 The applicant submits that the present petition filed by the petitioner before this Hon'ble court the above said respondents M/s. Golden Forest (India) Private Limited and M/s. Golden Tourist Resorts & Development Private Limited suppressed real facts on receipt of the notices and summons received by them through court and misrepresenting before this Hon'ble court parties allotted by the Hon'ble court. Therefore, compelled to file the present petition for impleading and relief of reliving the above said parties details of the land of M/s. Golden Forest (India) Private Limited and M/s. Golden Tourist Resorts & Development Private Limited annexure – A shown in Serial No. 6 in Sy. No. 19 an extent of Ac 05-24 gts Annexure A link documents shown in the list of sale deed doc. No. 2436/1997, dated 07-04-1997 by Mohan Raj and others, in Serial No. 7 in Sy. No. 20 an extent of Ac 07-12 gts Annexure A link documents shown in the list of sale deed doc. No. 2236/1997, dated 07-04-1997 by Vijaya Lakshmi and others, in Serial

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No. 8 in Sy. No. 21 an extent of Ac 16-04 gts Annexure A link documents shown in the list of sale deed doc. No. 169/1994, dated 01-09-1994 by Salla Ram Reddy document no. 964/1994, dated 15-03-1994 on name of Salla Ram Reddy who are no way connected with the applicant. True copy of notice given by Advocate Commissioner to the parties in IA No. 526/2018 in OS No. 136/2016 dated 09.08.2019 before V Addl. District Judge, Bhongir is annexed herewith as ANNEXURE A-9. [pg 92-94]

True copy of proceedings dated 27.11.2019 of Advocate Commissioner in IA No.526/2018 in OS No.136/2016 before V Addl. District Judge, Bhongir is annexed herewith as ANNEXURE A-10. [pg 95-98]

9 The applicant submits that therefore, the documents created by them without knowledge of the applicant intending to grab the land of B. Rajaiah after death of B. Rajaiah the applicant compelled to approach the Mandal Revenue authorities for creating proceedings under grievance of Virasath as class – I legal heir under section 8 – Hindu Succession Act, this Hon'ble court rendered land mark judgment by birth the daughter are entitled to equal share in compliance of the Hon'ble Supreme Court judgment, the trial court and Hon'ble V Prl. Civil Judge, Bhongir passed judgment and preliminary decree in favour of the petitioner allotted one such share in

8

decision reported 2020 5 ALT 1 SC equal rights to daughter under coparcenary property.

"Chapter II-A Succession by Survivorship - Objects & Reasons held that - The Hindu Succession Act, 1956 governs the property rights of Hindus and provides for devolution of property. Women are not members of the coparcenary under the Hindu Mitakshara Law and therefore, they are not entitled to claim partition in coparcenary property, and such exclusion of daughters has led to the creation of socially pernicious dowry system with its attendant social ills. In order to eradicate this ill by positive means which will simultaneously ameliorate the conditions of women in Hindu Society. It is proposed to confer equal rights on Hindu Women along with the male members so as to achieve the constitutional mandate of equality by suitably amending the said Act. (Vide I-A Bill No. 26 of 1985 published in AP Gazette Part IV-A (E.O) dated 05-09-1985).

10 The applicant submits that the Government of A.P. amended section A.P. Act no. 13/1986 with effect from 05-09-1985, subsequently, the Hindu Succession Act, 2005, Act No. 39/2005, dated 05-09-2005 came into force by birth become same as son in coparcenary in property, the petitioner acquired right over property.

11 The applicant submits that the respondent M/s. Golden Forest (India) Private Limited and M/s. Golden Tourist Resorts & Development Private Limited created fake document with collusion of one Mohan Raj and others and Vijaya Lakshmi and others and Salla Ram Reddy created fake registered sale deed, therefore, the applicant and their family members compelled to filed the partition suit before the Hon'ble V Prl. Civil Judge, Bhongir, the same was declared by the Hon'ble court and delivered physical possession by the Advocate Commissioner fixed boundaries with support of the Mandal Surveyor drafted the location sketch this evidence issued by the Mandal Surveyor allotted one such share to the petitioner land an extent of Ac 05-30 gts out of AC 34-20 gts acquired under coparcenary rights.

12 The applicant submits that from the date of delivered of physical possession by the Advocate Commissioner, the applicant cultivating the land as absolute owner and lawful possessor of the land due to the Covid-19, the Hon'ble Supreme Court suspended court works followed by the Hon'ble High Court of Telangana and sub-ordinate judiciary. Therefore, final decree is not yet passed by the Hon'ble V Prl. Civil Judge, Bhongir though the Advocate Commissioner submitted the report and conducted the matter and final decree may be passed as early as possible.

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13. The applicant submits that applicant is compelled to file the impleadment petition seeking the deletion of item no. 6,7,8 from M/s. Golden Forest (India) Private Limited and M/s. Golden Tourist Resorts & Development Private Limited, the land acquired by the plaintiff through court judgment and decree. Therefore, the present petition filed before this Hon'ble court appropriate direction for passing orders on above said land details are not binding on the applicant.

PRAYER

It is therefore prayed that this Hon'ble court may be pleased to

(a). direct the respondents to remove/delete the item no.1, 6,7,8 from M/s. Golden Forest (India) Private Limited and M/s. Golden Tourist Resorts & Development Private Limited which belongs to applicant herein; and/or

(b). pass any other order which the Hon'ble court may deem fit and proper in the interest of justice.

DRAWN BY

FILED BY

A USHI REDDY &
DEEPAK K SINGH.

SRIRAM P.
Advocate for applicant

Filed on

Place- New Delhi

11

IN THE MATTER OF

... Petitioner

Union of India And others

....Respondents

Gadde Mangamma

Applicant

I, Gadde Mangamma W/o Suresh, Aged about 49 years, Occ: Housewife, R/o H.No. 3-9-204/2, Madireddy Kunta, Reddy Colony, Hanumakonda Town and Mandal, Warangal District. State of Telangana on solemn affirmation as follows

- 1 That I am the applicant herein and as such well acquainted with the facts and circumstances of the case.
- 2 That I have perused the contents of accompanying IA in vernacular which has been drafted by my counsel under my instructions and the averments made therein are true and correct.
- 3 That the annexures produced along with IA are true copies of its respective originals.
- ~~06 OCT 2021~~ *Dr. Anand*



nals. 06 OCT 2021
 DEPTT-SETL DEPONENT
RAGINI DEVADAS
 B.A., LL.B (Osm)
 ADVOCATE & NOTARY
 Appointed by the Govt. of Telangana
 H.No 111 150/2, Snyamlar Building
 Begumpet Hyd-500 016

DEPONENT

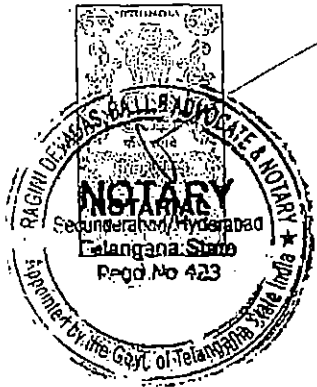
10 6 OCT 1941

VERIFICATION

Verified at 6 day of October 2021 that the contents of accompanying affidavit are true and correct to the best of my knowledge and belief and nothing material has been concealed therein.

11A
G. Devadas

DEPONENT



ATTEST
RAGINI DEVDAS
B.A., L.B. (Osm)
ADVOCATE & NOTARY
Appointed by the Govt. of Telangana/
H.No 1 11 150/2, Shyamla Building
Begumpet Hyd-500 016
TELANGANA STATE INDIA

IN THE SUPREME COURT OF INDIA

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... Applicant

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... Petitioner

VERSUS

Union of India And others

....Respondents

AND IN THE MATTER OF

Bheemagowni Mallesh S/o Late.Rajaiah,
Aged about: 62 Years, Occ: Retd. Employee,
R/o Raghavapuram Village, Bibinagar Mandal,
Nalgonda District. Telangana

... Petitioner
Applicant

To

The Hon'ble Chief Justice of India
And his Companion Justices of
Hon'ble Supreme Court of India

The humble application of above
Named applicant

AN APPLICATION FOR DIRECTIONS

MOST RESPECTFULLY SHOWEST:-

1 That this is a petition under Article 32 of the Constitution of India for a writ in the nature of mandamus and / or any other appropriate writ or writs order or direction directing the respondent no. 3 (Golden Forest India Ltd.) not to

2

dispose of and / or alienate any of their properties and assets and / or create any third party right in respect of the aforesaid assets and / or properties and / or operate any of its Bank Accounts maintained all over India pending the disposal of the instant writ petition in this Hon'ble court.

2 That the applicant submits that respondents deliberately and fraudulently purchased the properties which belongs to applicant herein from fictitious purchaser and got registered the same in their favour. True copy of sale deed dated 12.01.1994 is annexed herewith as ANNEXURE A-1. [pg 12-19]

True copy of sale deed dated 02.02.1996 is annexed herewith as ANNEXURE A-2. [pg 20-26]

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3 The applicant submits that after death of B. Rajaiah, the applicant approach the Mandal Revenue Office for getting Virasath, mutation, pattadar pass books and title deeds to incorporate their names in record of rights, the Mandal Revenue Officer suggested to get the legal heir certificate from competent civil court. Therefore, the applicant along with her family members filed the suit OS No. 90/2008 before the Hon'ble V Addl. Prl. Civil Judge, Bhongir for seeking the declaration of legal heirs of deceased B. Rajaiah, the Hon'ble court passed

3

the judgment and decree on 23-09-2008, in favour of B. Goramma, G. Balamani, B. Suvarna, G. Mangamma, P. Padma, B. Mallesh, B. Santosh declared by the court as class – I legal heirs of B. Rajaiah which is evident from the judgement and decree passed in OS No. 90/2008 by the Hon'ble Prl. Civil Judge, Bhongir. True copy of judgment dated 23.09.2008 passed by Id Principal Junior Civil Judge, Bhongir along with revenue sketch is annexed herewith as ANNEXURE A-6. [pg 72-76]

4 The applicant submits that the applicant as an absolute owner and possessor of the land in Sy. No. 19 an extent of Ac 05-24 gts, in Sy. No. 20 an extent of Ac 07-12 gts, in Sy. No. 21 an extent of Ac 16-04 gts, in Sy. No. 44 an extent of Ac 05-20 gts, in total admeasuring AC 34-20 gts, situated at Raghavapuram Village, Bibi Nagar Mandal, Yadadri-Bhongiri District (previously Nalgonda District), State of Telangana, acquired through court judgment and preliminary decree passed in OS No. 136/2016, dated 25-06-2018, by the Hon'ble V Addl. District Judge, Bhongir in the partition suit filed petition against the defendants no. 1 to 8.

5 That originally land belongs to B. Rajaiah father of the applicant, the said B. Rajaiah died on 23-05-1982 leaving behind class 1 legal heirs one of the applicant is also legal heir, in result plaintiff suit declared with cost by passing preliminary decree, the plaintiff entitled to 1/6th share, D1 to D5 are each entitled to 1/6th share in plaint schedule properties, will be decided at the time of

4a

final decree, documents executed by D1 to D5 in favour A1 to A11 and these documents are liable to be cancel.

That **Item No. 6** B. Mallesh/applicant, the defendant no. 1 the land allotted by court through Advocate Commissioner and delivered the physical possession by the Mandal Surveyor in Sy. No. 44 an extent of Ac 05-30 gts and in Sy. No. 21 an extent of Ac 00-10 gts in total AC 05-40 gts out of Ac 34-20 gts situated at Raghavapuram Village, Bibinagar Mandal, Yadadri-Bhongiri District bounded by :-

East : Neighbour land in Sy. No. 45 and 49

West : Neighbour land in Sy. No. 43 and 52

North : Boondigari Kaluva

South : Neighbour land in Sy. No. 40

True copy of judgment and decree dated 25.06.2018 passed by V Addl.

District Judge, Bhongir in OS No.136/2016 is annexed herewith as

ANNEXURE A-7. [pg 77-87]

6 The applicant submits that Golden Forest (India) Private limited rep. by its Manager, created fake registered sale deed on the name of B. Mallesh therefore the Hon'ble court declared as null and void, the sale deed nos. 169/1994, 554/1996, 1231/1997, 2633/1997, 4643/1997, 9014/2006 and 10356/2006 as null and void the Hon'ble court issued the summons and notices to the M/s. Golden Forest (India) Private Limited and M/s. Golden Tourist Resorts & Development Private Limited received the court summons and notices and failed to appear before the court, they have issued exparte, the Hon'ble court

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7 The applicant submits subsequently, the Hon'ble court appointed the advocate commissioner in IA No. 526/2018 in OS No. 136/2016 issued warrant and proceeding of advocate commissioner in pursuance by the Hon'ble court on 22-05-2019 the advocate commissioner issued notices to the advocate and plaintiff and defendants in the said suit on 09-08-2019 and Mandal Surveyor, Bibi Nagar Mandal on 24-08-2019 fixed date of warrant at 11 am, notices which is evidence from the proceeding issued by the Advocate Commissioner allotted item no. 1 to the plaintiff - G. Mangamma in Sy. No. 19, an extent of Ac 05-14 gts and in Sy. No 20 an extent of Ac 00-16 gts in total admeasuring AC 05-30 gts, item no. 2 to the defendant no. 3 - G. Balamma in Sy. No. 20, an extent of Ac 05-30gts, item no. 3 to the defendant no. 4 - B. Suvarna in Sy. No. 20, an extent of Ac 01-06 gts and Sy. No. 21 an extent of Ac 04-24 gts in total admeasuring AC 05-30 gts, item no. 4 to the defendant no. 5 - P. Padma in Sy. No. 21, an extent of Ac 05-30 gts, item no. 5 to the defendant no. 2 - B. Santosh in Sy. No. 21, an extent of Ac 05-30 gts, and item no. 6 to the defendant no. 1 - B. Mallesh in Sy. No. 21, an extent of Ac 00-10 gts, and in Sy. No. 44 an extent of Ac 05-20 gts in total admeasuring AC 05-30 gts, which is evidence from the proceedings of advocate commissioner in IA No. 526/2018 in OS No. 136/2016, notices received by the parties of the above said suit. True copy of notice given

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by Advocate Commissioner to the parties in IA No. 526/2018 in OS No. 136/2016 dated 09.08.2019 before V Addl. District Judge, Bhongir is annexed herewith as ANNEXURE A-9. [pg 92-94]

True copy of proceedings dated 27.11.2019 of Advocate Commissioner in IA No.526/2018 in OS No.136/2016 before V Addl. District Judge, Bhongir is annexed herewith as ANNEXURE A-10. [pg 95-98]

8 The applicant submits that therefore, the documents created by them without knowledge of the applicant intending to grab the land of B. Rajaiah after death of B. Rajaiah the applicant compelled to approach the Mandal Revenue authorities for creating proceedings under grievance of Virasath as class - I legal heir under section 8 - Hindu Succession Act, this Hon'ble court rendered land mark judgment by birth the daughter are entitled to equal share in compliance of the Hon'ble Supreme Court judgment, the trial court and Hon'ble V Prl. Civil Judge, Bhongir passed judgment and preliminary decree in favour of the petitioner allotted one such share in *decision reported 2020 5 ALT 1 SC* equal rights to daughter under co-parcenary property.

"Chapter II-A Succession by Survivorship - Objects & Reasons held that - The Hindu Succession Act, 1956 governs the property rights of Hindus and provides for devolution of property. Women are not members of the coparcenary under the Hindu Mitakshara Law and therefore, they are not entitled to claim partition in coparcenary property, and such exclusion of daughters has led to the creation of socially pernicious dowry system with its attendant social ills. In order to eradicate this ill by positive

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means which will simultaneously ameliorate the conditions of women in Hindu Society. It is proposed to confer equal rights on Hindu Women along with the male members so as to achieve the constitutional mandate of equality by suitably amending the said Act. (Vide I-A Bill No. 26 of 1985 published in AP Gazette Part IV-A (E.O) dated 05-09-1985).

9 The applicant submits that the Government of A.P. amended section A.P. Act no. 13/1986 with effect from 05-09-1985, subsequently, the Hindu Succession Act, 2005, Act No. 39/2005, dated 05-09-2005 came into force by birth become same as son in coparcenary in property, the petitioner acquired right over property.

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11 The applicant submits that from the date of delivered of physical possession by the Advocate Commissioner, the petitioner cultivating the land as

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absolute owner and lawful possessor of the land due to the Covid-19, this Hon'ble Court suspended court works followed by the Hon'ble High Court of Telangana and sub-ordinate judiciary. Therefore, final decree is not yet passed by the Hon'ble V Prl. Civil Judge, Bhongir though the Advocate Commissioner submitted the report and conducted the matter and final decree may be passed as early as possible.

12 The applicant submits that applicant is compelled to file the implead petition for seeking the deletion of item no. 6,7,8 from M/s. Golden Forest (India) Private Limited and M/s. Golden Tourist Resorts & Development Private Limited, the land acquired by the plaintiff through court judgment and decree. Therefore, the petition filed before this Hon'ble court appropriate direction for passing orders on above said land details are not binding on the applicant.

PRAYER

It is therefore prayed that this Hon'ble court may be pleased to

(a). direct the respondents to remove/delete the item no. 6,7,8 from M/s. Golden Forest (India) Private Limited and M/s. Golden Tourist Resorts & Development Private Limited which belongs to applicant herein; and/or

(b). pass any other order which the Hon'ble court may deem fit and proper in the interest of justice.

DRAWN BY

A USHI REDDY &
DEEPAK K SINGH

FILED BY

SRIRAM P.
Advocate for applicant

Filed on

Place- New Delhi

IN THE SUPREME COURT OF INDIA
CIVIL ORIGINAL JURISDICTION

I.A. NO. OF 2021
IN
W.P. (CIVIL) NO(s) 188 OF 2004

IN THE MATTER OF

M/S RAIGANJ CONSUMER FORUM

... Petitioner

VERSUS

Union of India And others

....Respondents

AND IN THE MATTER OF

Polagoni Padma

Applicant

AFFIDAVIT

I, Bhcemagowni Mallesh S/o Late. Rajaiah, Aged about: 62 Years, Occ: Retd. Employee, R/o Raghavapuram Village, Bibinagar Mandal, Nalgonda District, Telangana, do hereby state on solemn affirmation as follows

- 1 That I am the applicant herein and as such well acquainted with the facts and circumstances of the case.
- 2 That I have perused the contents of accompanying IA in vernacular which has been drafted by my counsel under my instructions and the averments made therein are true and correct.
- 3 That the annexures produced along with IA are true copies of its respective originals.





DEPONENT

VERIFICATION

10-11

Verified at _____ day of October 2021 that the contents of accompanying affidavit are true and correct to the best of my knowledge and belief and nothing material has been concealed therein.


DEPONENT

 DTDC Express Limited Regd. Office: No-3, Victoria Road Bengaluru - 560047				ORIGIN	DEST:
				POUCH NO.	DATE:
Prattis refer to all the terms & conditions printed overleaf of this consignment note before tendering a consignment to DTDC					
Sender's (Consignor) Name: _____ Ph: _____			Recipient's (Consignee) Name: _____ Ph: _____		
Company Name & Address: _____			Company Name & Address: _____		
City: _____ State: _____ PIN Code: _____			City: _____ State: _____ PIN Code: _____		
Sender's GSTIN*: _____			Recipient's GSTIN*: _____		
Nature of consignment			Description of Content		
D.M.I. <input type="checkbox"/> Non-Doz <input type="checkbox"/> Total Num Pcs: _____			Value of Goods		
D.M.I. <input type="checkbox"/> cm X _____ Pcs Actual Wt: _____ kg					
D.M.I. <input type="checkbox"/> cm X _____ Pcs Volumetric Wt: _____ kg					
D.M.I. <input type="checkbox"/> cm X _____ Pcs Chargeable Wt: _____ kg					
Paper Work Enclosures			The Total Value of consignment for carriage / E-Way bill: ₹ _____		
10. I/We declare that this consignment does not contain personal mail, cash, jewellery, contraband, illegal drugs, any prohibited items and commodities which can cause safety hazards while transporting			Type of consignment (Please ✓) <input checked="" type="checkbox"/> 7 Value Added Services - Not Available CN Expiry Dt: _____		
9. Charges Amount(₹)			Mode: Surface <input type="checkbox"/> Air cargo <input type="checkbox"/> Express <input type="checkbox"/>		
a) Tariff Incl. Of FSC + Taxes			Consignment Number:  T50955896		
b) Risk Surcharge					
c) Total amount to be					
Above charges are inclusive of GST & other taxes if applicable					
Mode of Payment: Cash <input type="checkbox"/> Card <input type="checkbox"/> Wallet <input type="checkbox"/>					
11. Booking Branch / Franchisee Code			12. Risk Surcharge		
Date: _____ Time: AM/PM			Owner _____		
I/We read and understood terms & conditions of carriage mentioned on backside of consignment note and I agree to the same			Carrier _____		
Courier Signature					
www.dtdc.in customersupport@dtdc.com +91-7305770577 ACCOUNTS COPY May 2022					

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Union of India And others

.... Respondents

AND IN THE MATTER OF

Bheemagowni Santosh

... Applicant

WITH

I A NO OF 2021

AN APPLICATION FOR DIRECTIONS

ADVOCATE FOR APPLICANT

SRIRAM P

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IN THE MATTER OF

M/S RAIGANJ CONSUMER FORUM

... Petitioner

VERSUS

Union of India And others

.... Respondents

AND IN THE MATTER OF

Bheemagowni Santosh, S/o Late. Rajaiah,
Aged about: 56 Years; Occ: Agriculture,
R/o Raghavapuram Village, Bibinagar Mandal,
Nalgonda District. Telangana State

.... Petitioner
Applicant

To

The Hon'ble Chief Justice of India
And his Companion Justices of
Hon'ble Supreme Court of India

The humble application of above
Named applicant

AN APPLICATION FOR DIRECTIONS

MOST RESPECTFULLY SHOWEST:-

1 That this is a petition under Article 32 of the Constitution of India for a writ in the nature of mandamus and / or any other appropriate writ or writs order or direction directing the respondent no. 3 (Golden Forest India Ltd.) not to dispose of and / or alienate any of their properties and assets and / or create any third party right in respect

2

of the aforesaid assets and / or properties and / or operate any of its Bank Accounts maintained all over India pending the disposal of the instant writ petition in this Hon'ble court.

2 That the applicant submits that respondents deliberately and fraudulently purchased the properties which belongs to applicant herein from fictitious purchaser and got registered the same in their favour. True copy of sale deed dated 12.01.1994 is annexed herewith as ANNEXURE A-1. [pg 12-15]

True copy of sale deed dated 02.02.1996 is annexed herewith as ANNEXURE A-2. [pg 26-26]

True copy of sale deed dated 15.04.1997 is annexed herewith as ANNEXURE A-3. [pg 27-32]

True copy of sale deed dated 27.03.1997 is annexed herewith as ANNEXURE A-4. [pg 33-52]

True copy of sale deed dated 11.09.2006 is annexed herewith as ANNEXURE A-5. [pg 53-71]

3 The applicant submits that after death of B. Rajaiah, the applicant approach the Mandal Revenue Office for getting Virasath, mutation, pattadar pass books and title deeds to incorporate their names in record of rights, the Mandal Revenue Officer suggested to get the legal heir certificate from competent civil court. Therefore, the applicant along with her family members filed the suit OS No. 90/2008 before the Hon'ble V Addl. Prl. Civil Judge, Bhongir for seeking the declaration of legal heirs of deceased B. Rajaiah, the Hon'ble court passed the judgment and decree on 23-09-2008, in favour of B. Goramma, G. Balamani, B. Suvana, G. Mangamma, P. Padma, B. Mallesh, B. Santosh declared by the court as class - I legal heirs of B. Rajaiah

3

which is evident from the judgement and decree passed in OS No. 90/2008 by the Hon'ble Prl. Civil Judge, Bhongir. True copy of judgment dated 23.09.2008 passed by Id Principal Junior Civil Judge, Bhongir along with revenue sketch is annexed herewith as ANNEXURE A-6. [pg 72-76]

4 The applicant submits that the applicant as an absolute owner and possessor of the land in Sy. No. 19 an extent of Ac 05-24 gts, in Sy. No. 20 an extent of Ac 07-12 gts, in Sy. No. 21 an extent of Ac 16-04 gts, in Sy. No. 44 an extent of Ac 05-20 gts, in total admeasuring AC 34-20 gts, situated at Raghavapuram Village, Bibi Nagar Mandal, Yadadri-Bhongiri District (previously Nalgonda District), State of Telangana, acquired through court judgment and preliminary decree passed in OS No. 136/2016, dated 25-06-2018, by the Hon'ble V Addl. District Judge, Bhongir in the partition suit filed petition against the defendants no. 1 to 8. True copy of judgment and decree dated 25.06.2018 passed by V Addl. District Judge, Bhongir in OS No.136/2016 is annexed herewith as ANNEXURE A-7. [pg 77-87]

That Item No. 5 B. Santosh, the land allotted by court through Advocate Commissioner and delivered the physical possession by the Mandal Surveyor in Sy. No. 21 an extent of Ac 05-30 gts out of Ac 34-20 gts situated at Raghavapuram Village, Bibinagar Mandal, Yadadri-Bhongiri District bounded by :-

East : Neighbour land in Sy. No. 22

West : land of P Padma defendant no. 5 in Sy. No. 21

North : Neighbour land in Sy. No. 37

South : Neighbour land in Sy. No. 15

4

5 That originally land belongs to B. Rajaiah father of the applicant, the said B. Rajaiah died on 23-05-1982 leaving behind class 1 legal heirs one of the applicant is also legal heir, in result plaintiff suit declared with cost by passing preliminary decree, the plaintiff entitled to 1/6th share, D1 to D5 are each entitled to 1/6th share in plaintiff schedule properties, will be decided at the time of final decree, documents executed by D1 to D5 in favour A1 to A11 and these documents are liable to be cancel. True copy of Pahani for the year 1956-57, 1983-84, 1994-95 and 2010-11 is annexed herewith as ANNEXURE A-8. [pg 88 - 91]

6 The applicant submits that Golden Forest (India) Private limited rep. by its Manager, created fake registered sale deed on the name of B. Mallesh therefore the Hon'ble court declared as null and void, the sale deed nos. 169/1994, 554/1996, 1231/1997, 2633/1997, 4643/1997, 9014/2006 and 10356/2006 as null and void the Hon'ble court issued the summons and notices to the M/s. Golden Forest (India) Private Limited and M/s. Golden Tourist Resorts & Development Private Limited received the court summons and notices and failed to appear before the court, they have issued ex parte, the Hon'ble court passed judgment and preliminary decree partition in suit OS No. 136/2016.

7 The applicant submits subsequently, the Hon'ble court appointed the advocate commissioner in IA No. 526/2018 in OS No. 136/2016 issued warrant and proceeding of advocate commissioner in pursuance by the Hon'ble court on 22-05-2019 the advocate commissioner issued notices to the advocate and plaintiff and defendants in the said suit on 09-08-2019 and Mandal Surveyor, Bibi Nagar Mandal on 24-08-2019

5

fixed date of warrant at 11 am, notices which is evidence from the proceeding issued by the Advocate Commissioner allotted item no. 1 to the plaintiff - G. Mangamma in Sy. No. 19, an extent of Ac 05-14 gts and in Sy. No 20 an extent of Ac 00-16 gts in total admeasuring AC 05-30 gts, item no. 2 to the defendant no. 3 - G. Balamma in Sy. No. 20, an extent of Ac 05-30gts, item no. 3 to the defendant no. 4 - B. Suvarna in Sy. No. 20, an extent of Ac 01-06 gts and Sy. No. 21 an extent of Ac 04-24 gts in total admeasuring AC 05-30 gts, item no. 4 to the defendant no. 5 - P. Padma in Sy. No. 21, an extent of Ac 05-30 gts; item no. 5 to the defendant no. 2 - B. Santosh in Sy. No. 21, an extent of Ac 05-30 gts, and item no. 6 to the defendant no. 1 - B. Mallesh in Sy. No. 21, an extent of Ac 00-10 gts, and in Sy. No. 44 an extent of Ac 05-20 gts in total admeasuring AC 05-30 gts, which is evidence from the proceedings of advocate commissioner in IA No. 526/2018 in OS No. 136/2016, notices received by the parties of the above said suit. True copy of notice given by Advocate Commissioner to the parties in IA No. 526/2018 in OS No. 136/2016 dated 09.08.2019 before V Addl. District Judge, Bhongir is annexed herewith as ANNEXURE A-9. [pg 92-94]

True copy of proceedings dated 27.11.2019 of Advocate Commissioner in IA No.526/2018 in OS No.136/2016 before V Addl. District Judge, Bhongir is annexed herewith as ANNEXURE A-10. [pg 95-98]

8 The applicant submits that therefore, the documents created by them without knowledge of the applicant intending to grab the land of B. Rajaiah after death of B. Rajaiah the applicant compelled to approach the Mandal Revenue authorities for creating proceedings under grievance of Virasath as class - I legal heir under section 8

6

– Hindu Succession Act, this Hon'ble court rendered land mark judgment by birth the daughter are entitled to equal share in compliance of the Hon'ble Supreme Court judgment, the trial court and Hon'ble V Prl. Civil Judge, Bhongir passed judgment and preliminary decree in favour of the petitioner allotted one such share in *decision reported 2020 5 ALT 1 SC* equal rights to daughter under co-parcenary property.

"Chapter II-A Succession by Survivorship - Objects & Reasons held that – The Hindu Succession Act, 1956 governs the property rights of Hindus and provides for devolution of property. Women are not members of the coparcenary under the Hindu Mitakshara Law and therefore, they are not entitled to claim partition in coparcenary property, and such exclusion of daughters has led to the creation of socially pernicious dowry system with its attendant social ills. In order to eradicate this ill by positive means which will simultaneously ameliorate the conditions of women in Hindu Society. It is proposed to confer equal rights on Hindu Women along with the male members so as to achieve the constitutional mandate of equality by suitably amending the said Act. (Vide I-A Bill No. 26 of 1985 published in AP Gazette Part IV-A (E.O.) dated 05-09-1985).

9 The applicant submits that the Government of A.P. amended section A.P. Act no. 13/1986 with effect from 05-09-1985, subsequently, the Hindu Succession Act, 2005, Act No. 39/2005, dated 05-09-2005 came into force by birth become same as son in coparcenary in property, the petitioner acquired right over property.

10 The applicant submits that the respondent M/s. Golden Forest (India) Private Limited and M/s. Golden Tourist Resorts & Development Private Limited created fake document with collusion of one Mohan Raj and others and Vijaya Lakshmi and others and Salla Ram Reddy created fake registered sale deed therefore, the applicant

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and their family members compelled to filed the partition suit before the Hon'ble V
Prl. Civil Judge, Bhongir, the same was declared by the Hon'ble court and delivered
physical possession by the Advocate Commissioner fixed boundaries with support of
the Mandal Surveyor drafted the location sketch this evidence issued by the Mandal
Surveyor allotted one such share to the petitioner land an extent of Ac 05-30 gts out of
AC 34-20 gts acquired under coparcenary rights.

11 The applicant submits that from the date of delivered of physical possession by
the Advocate Commissioner, the petitioner cultivating the land as absolute owner and
lawful possessor of the land due to the Covid-19, this Hon'ble Court suspended court
works followed by the Hon'ble High Court of Telangana and sub-ordinate judiciary.
Therefore, final decree is not yet passed by the Hon'ble V Prl. Civil Judge, Bhongir
though the Advocate Commissioner submitted the report and conducted the matter
and final decree may be passed as early as possible.

12 The applicant submits that applicant is compelled to file the implead petition
for seeking the deletion of item no. 6,7,8 from M/s. Golden Forest (India) Private
Limited and M/s. Golden Tourist Resorts & Development Private Limited, the land
acquired by the plaintiff through court judgment and decree. Therefore, the petition
filed before this Hon'ble court appropriate direction for passing orders on above said
land details are not binding on the applicant.

PRAYER

It is therefore prayed that this Hon'ble court may be pleased to

8

(a). direct the respondents to remove/delete the item no.5, 6,7,8 from M/s. Golden Forest (India) Private Limited and M/s. Golden Tourist Resorts & Development Private Limited which belongs to applicant herein; and/or

(b). pass any other order which the Hon'ble court may deem fit and proper in the interest of justice.

DRAWN BY

FILED BY

A USHI REDDY &
DEEPAK K SINGH

SRIRAM P.
Advocate for applicant

Filed on
Place- New Delhi

IN THE SUPREME COURT OF INDIA
CIVIL ORIGINAL JURISDICTION

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....Respondents

AND IN THE MATTER OF

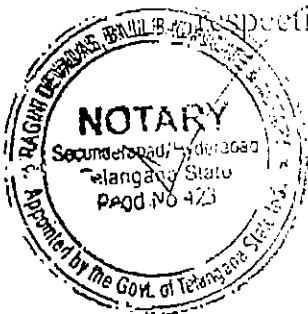
Bheemagowni Santosh

Applicant

AFFIDAVIT

I, Bheemagowni Santosh, S/o Late. Rajaiah, Aged about: 56 Years, Occ: Agriculture, R/o Raghavapuram Village, Bibinagar Mandal, Nalgonda District. Telangana State do hereby state on solemn affirmation as follows

- 1 That I am the applicant herein and as such well acquainted with the facts and circumstances of the case.
- 2 That I have perused the contents of accompanying IA in vernacular which has been drafted by my counsel under my instructions and the averments made therein are true and correct.
- 3 That the annexures produced along with IA are true copies of its respective originals.



[Signature]
RAGINI DEVADAS
B.A.L.I.B (Osm)
ADVOCATE & NOTARY
Appointed by the Govt. of Telangana
H.No 1 11 150/2, Sriyamtai Building
Begumpet Hyd-500 016
TELANGANA STATE INDIA

[Signature]

DEPONENT

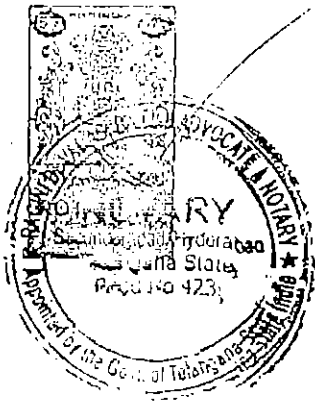
10 6 OCT 2021

10 6 OCT 2021

VERIFICATION

(0-11)

Verified on 6 day of October 2021 that the contents of accompanying affidavit are true and correct to the best of my knowledge and belief and nothing material has been concealed therein.



RAGINI DEVADAS
B.A., LL.B. (Osm)
ADVOCATE & NOTARY
Appointed by the Govt. of Telangana
H.No 1 11 150/2, Snyamlai Building
Begumpet. Hyd-500 016
TELANGANA STATE INDIA

BSM

DEPONENT

06 OCT 2021

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Gunuguntla Balamani

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WITH

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... Petitioner

VERSUS

Union of India And others

.... Respondents

AND IN THE MATTER OF

Gunuguntla Balamani, W/o. Yadagiri,
Aged about 60 years, Occ. Housewife,
R/o. Anajipur Village, BhongirMandal,
Nalgonda District. Telangana

Applicant

To

The Hon'ble Chief Justice of India
And his Companion Justices of
Hon'ble Supreme Court of India

The humble application of above
Named applicant

AN APPLICATION FOR DIRECTIONS

MOST RESPECTFULLY SHOWEST:-

1 That this is a petition under Article 32 of the Constitution of India for a writ in the nature of mandamus and / or any other appropriate writ or writs order or direction directing the respondent no. 3 (Golden Forest India Ltd.) not to dispose of and / or alienate any of their properties and assets and / or create any third party right in respect of the aforesaid assets and / or properties and / or

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operate any of its Bank Accounts maintained all over India pending the disposal of the instant writ petition in this Hon'ble court.

2 That the applicant submits that respondents deliberately and fraudulently purchased the properties which belongs to applicant herein from fictitious purchaser and got registered the same in their favour. True copy of sale deed dated 12.01.1994 is annexed herewith as ANNEXURE A-1. [pg 12-19]

True copy of sale deed dated 02.02.1996 is annexed herewith as ANNEXURE A-2. [pg 20-26]

True copy of sale deed dated 15.04.1997 is annexed herewith as ANNEXURE A-3. [pg 27-32]

True copy of sale deed dated 27.03.1997 is annexed herewith as ANNEXURE A-4. [pg 33-52]

True copy of sale deed dated 11.09.2006 is annexed herewith as ANNEXURE A-5. [pg 53-71]

3 The applicant submits that after death of B. Rajaiah, the petitioner approach Mandal Revenue Office for getting Virasath, mutation, pattadar pass books and title deeds to incorporate their names in record of rights, the Mandal Revenue Officer suggested to get the legal heir certificate from competent civil court. Therefore, the petitioner along with her family members filed the suit OS No. 90/2008 before the Hon'ble V Addl. Prl. Civil Judge, Bhongir for seeking the declaration of legal heirs of deceased B. Rajaiah, the Hon'ble court passed the judgment and decree on 23-09-2008, in favour of B. Goramma, G. Balamani, B. Suvarna, G. Mangamma, P. Padma, B. Mallesh, B. Santosh declared by the court as class - I legal heirs of B. Rajaiah which is evident from

3

the judgement and decree passed in OS No. 90/2008 by the Hon'ble Prl. Civil Judge, Bhongir. True copy of judgment dated 23.09.2008 passed by 1d Principal Junior Civil Judge, Bhongir along with revenue sketch is annexed herewith as ANNEXURE A-6. [pg 72-76)

4 The applicant submits that the applicant is as an absolute owner and possessor of the land in Sy. No. 19 an extent of Ac 05-24 gts, in Sy. No. 20 an extent of Ac 07-12 gts, in Sy. No. 21 an extent of Ac 16-04 gts, in Sy. No. 44 an extent of Ac 05-20 gts, in total admeasuring AC 34-20 gts, situated at Raghavapuram Village, Bibi Nagar Mandal, Yadadri-Bhongiri District (previously Nalgonda District), State of Telangana, acquired through court judgment and preliminary decree passed in OS No. 136/2016, dated 25-06-2018, by the Hon'ble V Addl. District Judge, Bhongir in the partition suit filed petition against the defendants no. 1 to 8. True copy of judgment and decree dated 25.06.2018 passed by V Addl. District Judge, Bhongir in OS No.136/2016 is annexed herewith as ANNEXURE A-7. [pg 77-87)

That **Item No. 2** G. Balamani the land allotted by court through Advocate Commissioner delivered the physical possession democrated by Mandal Surveyor in Sy. No. 20 an extent of Ac 05-30 gts out of AC 34-20 gts situated at Raghavapuram Village, Bibinagar Mandal, Yadadri-Bhongiri District to defendant no. 3 – G. Balamani, bounded by :-

East : land in Sy. No. 20 allotted to defendant no.4 Smt. B. Suvarna

West : land in Sy. No. 20 allotted to plaintiff G. Mangamma

North : Neighbour land in Sy. No. 40

4

South : Neighbour land in Sy. No. 18

5 That originally land belongs to B. Rajaiah father of the petitioner, the said B. Rajaiah died on 23-05-1982 leaving behind class 1 legal heirs one of the petitioner is also legal heir, in result plaintiff suit declared with cost by passing preliminary decree, the plaintiff entitled to 1/6th share; D1 to D5 are each entitled to 1/6th share in plaint schedule properties, will be decided at the time of final decree, documents executed by D1 to D5 in favour A1 to A11 and these documents are liable to be cancel. True copy of Pahani for the year 1956-57, 1983-84, 1994-95 and 2010-11 is annexed herewith as ANNEXURE A-8. [pg 8-9]

6 The applicant submits that Golden Forest (India) Private limited rep. by its Manager, created fake registered sale deed on the name of B. Mallesh therefore the Hon'ble court declared as null and void, the sale deed nos. 169/1994, 554/1996, 1231/1997, 2633/1997, 4643/1997, 9014/2006 and 10356/2006 as null and void the Hon'ble court issued the summons and notices to the M/s. Golden Forest (India) Private Limited and M/s. Golden Tourist Resorts & Development Private Limited received the court summons and notices and failed to appear before the court, they have issued ex-parte, the Hon'ble court passed judgment and preliminary decree partition in suit OS No. 136/2016.

7 The applicant submits subsequently, the Hon'ble court appointed the advocate commissioner in IA No. 526/2018 in OS No. 136/2016 issued warrant and proceeding of advocate commissioner in pursuance by the Hon'ble court on 22-05-2019 the advocate commissioner issued notices to the advocate and

5

plaintiff and defendants in the said suit on 09-08-2019 and Mandal Surveyor, Bibi Nagar Mandal on 24-08-2019 fixed date of warrant at 11 am, notices which is evidence from the proceeding issued by the Advocate Commissioner allotted item no. 1 to the plaintiff - G. Mangamma in Sy. No. 19, an extent of Ac 05-14 gts and in Sy. No 20 an extent of Ac 00-16 gts in total admeasuring AC 05-30 gts, item no. 2 to the defendant no. 3 - G. Balamma in Sy. No. 20, an extent of Ac 05-30gts, item no. 3 to the defendant no. 4 - B. Suvarna in Sy. No. 20, an extent of Ac 01-06 gts and Sy. No. 21 an extent of Ac 04-24 gts in total admeasuring AC 05-30 gts, item no. 4 to the defendant no. 5 - P. Padma in Sy. No. 21, an extent of Ac 05-30 gts, item no. 5 to the defendant no. 2 - B. Santosh in Sy. No. 21, an extent of Ac 05-30 gts, and item no. 6 to the defendant no. 1 - B. Mallesh in Sy. No. 21, an extent of Ac 00-10 gts, and in Sy. No. 44 an extent of Ac 05-20 gts in total admeasuring AC 05-30 gts, which is evidence from the proceedings of advocate commissioner in IA No. 526/2018 in OS No. 136/2016, notices received by the parties of the above said suit. True copy of notice given by Advocate Commissioner to the parties in IA No. 526/2018 in OS No. 136/2016 dated 09.08.2019 before V Addl. District Judge, Bhongir is annexed herewith as ANNEXURE A-9. [pg 92-94]

True copy of proceedings dated 27.11.2019 of Advocate Commissioner in IA No.526/2018 in OS No.136/2016 before V Addl. District Judge, Bhongir is annexed herewith as ANNEXURE A-10. [pg 95-98]

6

8 The applicant submits that therefore, the documents created by them without knowledge of the petitioner intending to grab the land of B. Rajaiah after death of B. Rajaiah the petitioner compelled to approach the Mandal Revenue authorities for creating proceedings under grievance of Virasath as class - I legal heir under section 8 - Hindu Succession Act, this Hon'ble court rendered land mark judgment by birth the daughter are entitled to equal share in compliance of the Hon'ble Supreme Court judgment, the trial court and Hon'ble V Prl. Civil Judge, Bhongir passed judgment and preliminary decree in favour of the petitioner allotted one such share in *decision reported 2020 5 ALT 1 SC* equal rights to daughter under co-parcenary property.

"Chapter II-A Succession by Survivorship - Objects & Reasons held that - The Hindu Succession Act, 1956 governs the property rights of Hindus and provides for devolution of property. Women are not members of the coparcenary under the Hindu Mitakshara Law and therefore, they are not entitled to claim partition in coparcenary property, and such exclusion of daughters has led to the creation of socially pernicious dowry system with its attendant social ills. In order to eradicate this ill by positive means which will simultaneously ameliorate the conditions of women in Hindu Society. It is proposed to confer equal rights on Hindu Women along with the male members so as to achieve the constitutional mandate of equality by suitably amending the said Act. (Vide I-A Bill No. 26 of 1985 published in AP Gazette Part IV-A (E.O) dated 05-09-1985).

9 The applicant submits that the Government of A.P. amended section A.P. Act no. 13/1986 with effect from 05-09-1985, subsequently, the Hindu Succession Act, 2005, Act No. 39/2005, dated 05-09-2005 came into force by

7

birth become same as son in coparcenary in property, the petitioner acquired right over property.

10 The applicant submits that the respondent M/s. Golden Forest (India) Private Limited and M/s. Golden Tourist Resorts & Development Private Limited created fake document with collusion of one Mohan Raj and others and Vijaya Lakshmi and others and Salla Ram Reddy created fake registered sale deed therefore, the petitioner and their family members compelled to filed the partition suit before the Hon'ble V Prl. Civil Judge, Bhongir, the same was declared by the Hon'ble court and delivered physical possession by the Advocate Commissioner fixed boundaries with support of the Mandal Surveyor drafted the location sketch this evidence issued by the Mandal Surveyor allotted one such share to the petitioner land an extent of Ac 05-30 gts out of AC 34-20 gts acquired under coparcenary rights.

11 The applicant submits that from the date of delivered of physical possession by the Advocate Commissioner, the petitioner cultivating the land as absolute owner and lawful possessor of the land due to the Covid-19, the Hon'ble Supreme Court suspended court works followed by the Hon'ble High Court of Telangana and sub-ordinate judiciary. Therefore, final decree is not yet passed by the Hon'ble V Prl. Civil Judge, Bhongir though the Advocate Commissioner submitted the report and conducted the matter and final decree may be passed as early as possible.

8✓

12 The applicant submits that applicant is compelled to file the implead petition for seeking the deletion of item no. 6,7,8 from M/s. Golden Forest (India) Private Limited and M/s. Golden Tourist Resorts & Development Private Limited, the land acquired by the plaintiff through court judgment and decree. Therefore, the petition filed before this Hon'ble court appropriate direction for passing orders on above said land details are not binding on the applicant.

PRAYER

It is therefore prayed that this Hon'ble court may be pleased to

(a). direct the respondents to remove/delete the item no. 2, 6,7,8 from M/s. Golden Forest (India) Private Limited and M/s. Golden Tourist Resorts & Development Private Limited which belongs to applicant herein; and/or

(b). pass any other order which the Hon'ble court may deem fit and proper in the interest of justice.

DRAWN BY

**A USHI REDDY &
DEEPAK K SINGH**

Filed on
Place- New Delhi

FILED BY

SRIRAM P.
Advocate for applicant

9

**IN THE SUPREME COURT OF INDIA
CIVIL ORIGINAL JURISDICTION**

I.A. NO. OF 2021
IN
W.P. (CIVIL) NO(s) 188 OF 2004

IN THE MATTER OF

M/S RAIGANJ CONSUMER FORUM

... Petitioner

VERSUS

Union of India And others

....Respondents

AND IN THE MATTER OF

Gunuguntla Balamani

Applicant

AFFIDAVIT

I, Gunuguntla Balamani, W/o. Yadagiri, Aged about 60 years, Occ. Housewife, R/o. Anajipur Village, BhongirMandal, Nalgonda District. Telangana, do hereby state on solemn affirmation as follows

- 1 That I am the applicant herein and as such well acquainted with the facts and circumstances of the case.
- 2 That I have perused the contents of accompanying IA in vernacular which has been drafted by my counsel under my instructions and the averments made therein are true and correct.
- 3 That the annexures produced along with IA are true copies of its respective originals.



RAGINI DEVADAS

B.A.L.B (Osm)

ADVOCATE & NOTARY

Appointed by the Govt. of Telangana

U.No 111 150-2, Shyamla Building

Begumot, Hyd-500 916

TELANGANA STATE INDIA

↑ 
DEPONENT

06 OCT 2021

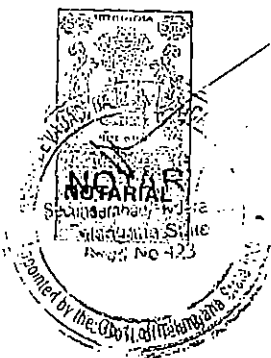
VERIFICATION

10-11

Verified at 6 day of October 2021 that the contents of accompanying affidavit are true and correct to the best of my knowledge and belief and nothing material has been concealed therein.



DEPONENT



ATTN: SETL
RAGINI DEVADAS
B.A., L.I.B. (Osm)
ADVOCATE & NOTARY
Appointed by the Court of Telangana
H No 11, 150/2, Saiyanta Building
Begumpet Hyd-500 016
TELANGANA STATE INDIA

06 OCT 2021

IN THE SUPREME COURT OF INDIA
CIVIL ORIGINAL JURISDICTION

I.A. NO. OF 2021

IN

W.P. (CIVIL) NO(s) 188 OF 2004

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M/S RAIGANJ CONSUMER FORUM

... Petitioner

VERSUS

Union of India And others

... Respondents

AND IN THE MATTER OF

Bathini Suvarna

... Applicant

WITH

I A NO OF 2021

AN APPLICATION FOR DIRECTIONS

ADVOCATE FOR APPLICANT

SRIRAMP

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IN THE SUPREME COURT OF INDIA
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I.A. NO. OF 2021
IN
W.P. (CIVIL) NO(s) 188 OF 2004

IN THE MATTER OF

M/S RAIGANJ CONSUMER FORUM

... Petitioner

VERSUS

Union of India And others

....Respondents

AND IN THE MATTER OF

Bathini Suvarna, W/o. Venkatesham,
Aged about 56 years, Occ. Housewife,
R/o. Abdullapurmet Village, Hayathnagar Mandal,
Ranga Reddy District, State of Telangana.

Applicant

To

The Hon'ble Chief Justice of India
And his Companion Justices of
Hon'ble Supreme Court of India

The humble application of above
Named applicant

AN APPLICATION FOR DIRECTIONS

MOST RESPECTFULLY SHOWEST:-

1 That this is a petition under Article 32 of the Constitution of India for a writ in the nature of mandamus and / or any other appropriate writ or writs order or direction directing the respondent no. 3 (Golden Forest India Ltd.) not to dispose of and / or alienate any of their properties and assets and / or create any third party right in respect of the aforesaid assets and / or properties and / or operate any of its Bank Accounts

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maintained all over India pending the disposal of the instant writ petition in this Hon'ble court.

2 That the applicant submits that respondents deliberately and fraudulently purchased the properties which belongs to applicant herein from fictitious purchaser and got registered the same in their favour. True copy of sale deed dated 12.01.1994 is annexed herewith as ANNEXURE A-1. [pg 12-19]

True copy of sale deed dated 02.02.1996 is annexed herewith as ANNEXURE A-2. [pg 20-26]

True copy of sale deed dated 15.04.1997 is annexed herewith as ANNEXURE A-3. [pg 27-32]

True copy of sale deed dated 27.03.1997 is annexed herewith as ANNEXURE A-4. [pg 33-52]

True copy of sale deed dated 11.09.2006 is annexed herewith as ANNEXURE A-5. [pg 53-71]

3 The applicant submits that after death of B. Rajaiah, the petitioner approach the Mandal Revenue Office for getting Virasath, mutation, pattadar pass books and title deeds to incorporate their names in record of rights, the Mandal Revenue Officer suggested to get the legal heir certificate from competent civil court. Therefore, the petitioner along with her family members filed the suit OS No. 90/2008 before the Hon'ble V Addl. Prl. Civil Judge, Bhongir for seeking the declaration of legal heirs of deceased B. Rajaiah, the Hon'ble court passed the judgment and decree on 23-09-2008, in favour of B. Goramma, G. Balamani, B. Suvarna, G. Mangamma, P. Padma, B. Mallesh, B. Santosh declared by the court as class - I legal heirs of B. Rajaiah which is

3

evident from the judgement and decree passed in OS No. 90/2008 by the Hon'ble Prl. Civil Judge, Bhongir. True copy of judgment dated 23.09.2008 passed by Id Principal Junior Civil Judge, Bhongir along with revenue sketch is annexed herewith as ANNEXURE A-6. [pg 72-76]

4 The applicant submits that the applicant as an absolute owner and possessor of the land in Sy. No. 19 an extent of Ac 05-24 gts, in Sy. No. 20 an extent of Ac 07-12 gts, in Sy. No. 21 an extent of Ac 16-04 gts, in Sy. No. 44 an extent of Ac 05-20 gts, in total admeasuring AC 34-20 gts, situated at Raghavapuram Village, Bibi Nagar Mandal, Yadadri-Bhongiri District (previously Nalgonda District), State of Telangana, acquired through court judgment and preliminary decree passed in OS No. 136/2016, dated 25-06-2018, by the Hon'ble V Addl. District Judge, Bhongir in the partition suit filed petition against the defendants no. 1 to 8. True copy of judgment and decree dated 25.06.2018 passed by V Addl. District Judge, Bhongir in OS No.136/2016 is annexed herewith as ANNEXURE A-7. [pg 77-87]

That Item No. 3 applicant/B. Suvarna, the land allotted by Hon'ble court division of property, delivered the physical possession through advocate commissioner by the Mandal Surveyor in Sy. No. 20 an extent of Ac 01-06 gts and in Sy. No. 21 an extent of Ac 04-21 gts in total AC 05-20 gts out of AC 34-20 gts situated at Raghavapuram Village, Bibinagar Mandal, Yadadri-Bhongiri District bounded by :-

East : land of P Padma defendant no. 5 in Sy. No. 21

West : land of G. Balamani defendant no. 3 in Sy. No. 20

4

North : Neighbour land in Sy. No. 38

South : Neighbour land in Sy. No. 16

5 That originally land belongs to B. Rajaiah father of the petitioner, the said B. Rajaiah died on 23-05-1982 leaving behind class 1 legal heirs one of the petitioner is also legal heir, in result plaintiff suit declared with cost by passing preliminary decree, the plaintiff entitled to 1/6th share, D1 to D5 are each entitled to 1/6th share in plaint schedule properties, will be decided at the time of final decree, documents executed by D1 to D5 in favour A1 to A11 and these documents are liable to be cancel. True copy of Pahani for the year 1956-57, 1983-84, 1994-95 and 2010-11 is annexed herewith as ANNEXURE A-8. [pg 88-91)

6 The applicant submits that Golden Forest (India) Private limited rep. by its Manager, created fake registered sale deed on the name of B. Mallesh therefore the Hon'ble court declared as null and void, the sale deed nos. 169/1994, 554/1996, 1231/1997, 2633/1997, 4643/1997, 9014/2006 and 10356/2006 as null and void the Hon'ble court issued the summons and notices to M/s. Golden Forest (India) Private Limited and M/s. Golden Tourist Resorts & Development Private Limited received the court summons and notices and failed to appear before the court, they have issued exparte, the Hon'ble court passed judgment and preliminary decree partition in suit OS No. 136/2016.

7 The applicant submits subsequently, the Hon'ble court appointed the advocate commissioner in IA No. 526/2018 in OS No. 136/2016 issued warrant and proceeding of advocate commissioner in pursuance by the Hon'ble court on

22-05-2019 the advocate commissioner issued notices to the advocate and plaintiff and defendants in the said suit on 09-08-2019 and Mandal Surveyor, Bibi Nagar Mandal on 24-08-2019 fixed date of warrant at 11 am, notices which is evidence from the proceeding issued by the Advocate Commissioner allotted item no. 1 to the plaintiff - G. Mangamma in Sy. No. 19, an extent of Ac 05-14 gts and in Sy. No 20 an extent of Ac 00-16 gts in total admeasuring AC 05-30 gts, item no. 2 to the defendant no. 3 - G. Balamma in Sy. No. 20, an extent of Ac 05-30gts, item no. 3 to the defendant no. 4 - B. Suvarna in Sy. No. 20, an extent of Ac 01-06 gts and Sy. No. 21 an extent of Ac 04-24 gts in total admeasuring AC 05-30 gts, item no. 4 to the defendant no. 5 - P. Padma in Sy. No. 21, an extent of Ac 05-30 gts, item no. 5 to the defendant no. 2 - B. Santosh in Sy. No. 21, an extent of Ac 05-30 gts, and item no. 6 to the defendant no. 1 - B. Mallesh in Sy. No. 21, an extent of Ac 00-10 gts, and in Sy. No. 44 an extent of Ac 05-20 gts in total admeasuring AC 05-30 gts, which is evidence from the proceedings of advocate commissioner in IA No. 526/2018 in OS No. 136/2016, notices received by the parties of the above said suit. True copy of notice given by Advocate Commissioner to the parties in IA No. 526/2018 in OS No. 136/2016 dated 09.08.2019 before V Addl. District Judge, Bhongir is annexed herewith as ANNEXURE A-9. [pg 92-94]

True copy of proceedings dated 27.11.2019 of Advocate Commissioner in IA No.526/2018 in OS No.136/2016 before V Addl. District Judge, Bhongir is annexed herewith as ANNEXURE A-10. [pg 95-98]

8 The applicant submits that therefore, the documents created by them without knowledge of the applicant intending to grab the land of B. Rajaiah after death of B. Rajaiah the applicant compelled to approach the Mandal Revenue authorities for creating proceedings under grievance of Virasath as class – I legal heir under section 8 – Hindu Succession Act, this Hon'ble court rendered land mark judgment by birth the daughter are entitled to equal share in compliance of the Hon'ble Supreme Court judgment, the trial court and Hon'ble V Prl. Civil Judge, Bhongir passed judgment and preliminary decree in favour of the petitioner allotted one such share in *decision reported 2020 5 ALT 1 SC* equal rights to daughter under co-parcenary property.

"Chapter II-A Succession by Survivorship - Objects & Reasons held that – The Hindu Succession Act, 1956 governs the property rights of Hindus and provides for devolution of property. Women are not members of the coparcenary under the Hindu Mitakshara Law and therefore, they are not entitled to claim partition in coparcenary property, and such exclusion of daughters has led to the creation of socially pernicious dowry system with its attendant social ills. In order to eradicate this ill by positive means which will simultaneously ameliorate the conditions of women in Hindu Society. It is proposed to confer equal rights on Hindu Women along with the male members so as to achieve the constitutional mandate of equality by suitably amending the said Act. (Vide I-A Bill No. 26 of 1985 published in AP Gazette Part IV-A (E.O) dated 05-09-1985).

9 The applicant submits that the Government of A.P. amended section A.P. Act no. 13/1986 with effect from 05-09-1985, subsequently, the Hindu Succession Act, 2005, Act No. 39/2005, dated 05-09-2005 came into force by birth become same as son in coparcenary in property, the petitioner acquired right over property.

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10 The applicant submits that the respondent M/s. Golden Forest (India) Private Limited and M/s. Golden Tourist Resorts & Development Private Limited created fake document with collusion of one Mohan Raj and others and Vijaya Lakshmi and others and Salla Ram Reddy created fake registered sale deed therefore, the petitioner and their family members compelled to filed the partition suit before the Hon'ble V Prl. Civil Judge, Bhongir, the same was declared by the Hon'ble court and delivered physical possession by the Advocate Commissioner fixed boundaries with support of the Mandal Surveyor drafted the location sketch this evidence issued by the Mandal Surveyor allotted one such share to the petitioner land an extent of Ac 05-30 gts out of AC 34-20 gts acquired under coparcenary rights.

11 The applicant submits that from the date of delivered of physical possession by the Advocate Commissioner, the petitioner cultivating the land as absolute owner and lawful possessor of the land due to the Covid-19, the Hon'ble Supreme Court suspended court works followed by the Hon'ble High Court of Telangana and subordinate judiciary. Therefore, final decree is not yet passed by the Hon'ble V Prl. Civil Judge, Bhongir though the Advocate Commissioner submitted the report and conducted the matter and final decree may be passed as early as possible.

12 The applicant submits that applicant is compelled to file the implead petition for seeking the deletion of item no. 6,7,8 from M/s. Golden Forest (India) Private Limited and M/s. Golden Tourist Resorts & Development Private Limited, the land acquired by the plaintiff through court judgment and decree. Therefore, the petition

8
filed before this Hon'ble court appropriate direction for passing orders on above said land details are not binding on the petitioner.

PRAYER

It is therefore prayed that this Hon'ble court may be pleased to

(a). direct the respondents to remove/delete the item no. 3, 4, 6,7,8 from M/s. Golden Forest (India) Private Limited and M/s. Golden Tourist Resorts & Development Priyate Limited which belongs to applicant herein; and/or

(b). pass any other order which the Hon'ble court may deem fit and proper in the interest of justice.

DRAWN BY

A USHI REDDY &
DEEPAK K SINGH

Filed on
Place- New Delhi

FILED BY

SRIRAM P.
Advocate for applicant

IN THE SUPREME COURT OF INDIA
CIVIL ORIGINAL JURISDICTION

9

I.A. NO. OF 2021
IN
W.P. (CIVIL) NO(s) 188 OF 2004

IN THE MATTER OF

M/S RAIGANJ CONSUMER FORUM

... Petitioner

VERSUS

Union of India And others

....Respondents

AND IN THE MATTER OF

Bathini Suvarna

...Applicant

AFFIDAVIT

I, Bathini Suvarna, W/o. Venkatesham, Aged about 56 years, Occ. Housewife, R/o. Abdullapurmet Village, Hayathnagar Mandal, Ranga Reddy District, State of Telangana, do hereby state on solemn affirmation as follows

- 1 That I am the applicant herein and as such well acquainted with the facts and circumstances of the case.
- 2 That I have perused the contents of accompanying IA in vernacular which has been drafted by my counsel under my instructions and the averments made therein are true and correct.
- 3 That the annexures produced along with IA are true copies of its respective originals.



DEPONENT

4

IN THE COURT OF THE HON'BLE VTH ADDL. DISTRICT JUDGE AT::BHONGIR

I.A.NO. 526 of 2018

In

O.S.No. 136 of 2016

95

Between:

Gadde Mangamma

...Petitioner/Plaintiff

AND

Bheemagowni Mallesh & Others

...Respondents/Defendants

NOTICE

Take notice that in the above case I have been appointed as an Advocate/commissioner for partition of the petition schedule property with the help of Surveyor & V.R.A (M.R.O Bibinagar Mandal) by dividing the petition and D-2 to D-5 each schedule properties and to allot the 1/6th share of the plaintiff as per the preliminary decree and I am going to execute my commissioner warrant on 24-08-2019 at 10:30 A.M. in respect of the above schedule property and I therefore request the both the plaintiff and defendants along with counsel to be present on the above said date and time without fail.

Hence, this Notice.



Dt:9-8-2019

To:

1.Sri.P.LINGA Reddy,
Counsel for the plaintiff

Rhp
An

B.HARINATH
ADVOCATE/COMMISSIONER
BHONGIR

NO. OF COPIES: 10
EXAMINER: J.W.
COPY: 1

certified as to be Photo Copy

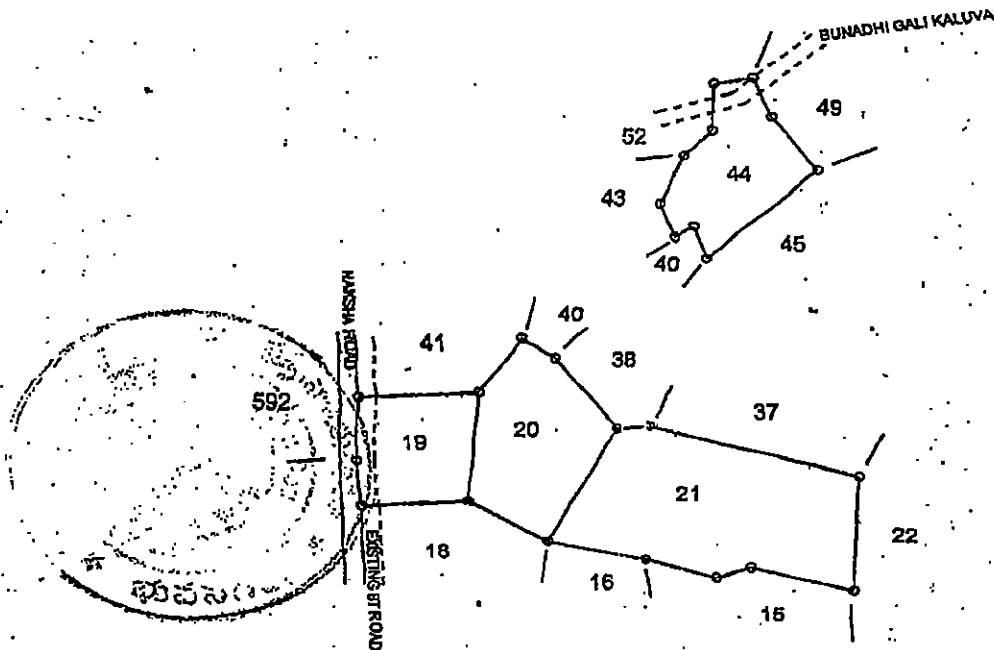
HONGIR
V. Adm. Dist. & Sessions Court
BHONGIR

REVENUE SKETCH OF SURVEY NO 19,20,21&44 IN RAGHAVAPUR VILLAGE OF BIBINAGAR MANDAL YADADRI BHONGIR DISTRICT.

NOTE : THIS SURVEY DONE AS PER ORDERS OF ADVOCATE COMMISSIONER SH.B HARINATH Garu

FILE NO :- 1). I.A.NO.528 OF 2018 IN O.S. NO.136 OF 2016

2) B/928/2019 TAHASIL OFFICE



INDEX

Sl.No	Sy.No	Total Area (AC - GTS)
1	19	05-24
2	20	07-12
3	21	16-04
4	44	05-20
TOTAL		34-20

PREPARED BY

[Signature]

SURVEYOR BIBINAGAR
MANDAL SURVEYOR
(Mdl) Bibinagar.

Dist. Yadadri Bhongir



VILLAGE : RAGHAVAPUR

MANDAL : BIBINAGAR

Certified as to be Photo Copy

[Signature]
Head Clerk
V. Addl. Dist. & Sessions Court
BHONGIR

EXAMINER
COPY

Office of the Committee – Golden Forest India Ltd.

(Appointed By The Hon'ble Supreme Court)

Chandigarh – Ambala NH-22, Via-Lalru, Village Jharmari

Tehsil Dera Bassi, District Mohali (Punjab) Pin -140501

97

COM/RES/3/2020

11-03-2020

Resolution No. 3 of 2020

CERTIFIED TRUE COPY OF THE RESOLUTION PASSED AT THE MEETING OF THE MEMBERS & CHAIRMAN OF THE COMMITTEE – GOLDEN FOREST INDIA LTD APPOINTED BY THE HONBLE SUPREME COURT OF INDIA HELD AT THE REGISTERED OFFICE OF THE COMMITTEE AT MOHALI DISTRICT, PUNJAB, INDIA ON 11TH MARCH 2020 AT 3:30 PM.

A proposal was placed before Chairman Committee – Golden Forest India Ltd. to auction certain properties of M/s Golden Forest India Ltd. Situated in Ragavapur Village, Mandal Bibinagar, District Yadadri-Bhuvangir, Telangana State Mentioned in-detail in Annexure – (A). After discussions, the Committee unanimously:

“RESOLVED THAT, to Auction & conduct the sale of all the Mentioned Properties in Annexure – (A), Situated in Ragavapur Village, Mandal Bibinagar, District Yadadri-Bhuvangir, Telangana State, Further the Committee has unanimously resolved to appoint Shri Rakesh B Rajput S/o Bachittar Singh Rajput as “Authorised Signatory” to Auction, conduct the sale & execute the sale deeds on behalf of the committee.

Further the Committee unanimously resolved & instructed the Authorised Signatory Shri Rakesh B Rajput to make appropriate publication regarding the sale through auction and sufficient notices be issued to the prospective purchasers by publishing the same in the local newspapers having wide circulation in the area where the property is situated. Any sale conducted by the Authorised Signatory shall be based on market valuation. Any sale conducted by the Committee shall be executed by the authorised signatory on behalf of the Chairman, Committee GFIL

(1) Member - Committee GFIL

(2) Member - Committee GFIL

Chairman - Committee-GFIL

14. On behalf of the investors, it has been pointed out that they have been waiting for their money for the last 14 years. It is submitted that the Court/Committee may take steps at the earliest to sell the properties and distribute the sale proceeds to the investors without further delay. On behalf of some of the intending purchasers who would like to participate in the auction, it was submitted that they did not get sufficient time to verify the particulars of the properties from the case records as well as from the Committee. The GIFL Committee under the resolution No. 03/2020 dated 11.03.2020 has unanimously resolved to auction certain properties in Ragavapur Villag, Mandal Bibinagar, District Nalgonda, Telangana State mentioned in detail in Annexure-A, , All those who intend to participate in the auction may deposit of amount of 25% or equivalent bank guarantee to the committee or before the registry of Hon'ble Supreme court and the balance amount of 75% of the total sale consideration shall be paid in the shape of demand draft in favour of "The Chairman, Committee GFIL" A/c 55024544491 with 15 days from the date of auction in the above manner, failing which the deposit of amount of 25% or equivalent bank guarantee to the committee, shall be forfeited to the government. Any sale conducted by the Committee shall be executed by the authorised signatory on behalf of the Chairman, Committee GFIL, As soon as the sale is over, the details including the purchase price and all the details shall be informed to the Hon'ble Supreme Court, If there is any difficulty in getting the possession of any property owned by the Golden Forests (India) Ltd, the matter shall be reported to Hon'ble Supreme Court /or the Committee through its authorised signatory can also itself request for police aid or any other assistance from the governmental authorities as per the Hon'ble Supreme Court order dated 15/10/2008.

R. N. Aggarwal
Chairman

H. L. Randev
Member

IN THE SUPREME COURT OF INDIA
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... Petitioner

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....Respondents

AND IN THE MATTER OF

Polagoni Padma W/o. Anand,
Aged about: 46 Years, Occ: Housewife,
R/o Pogulagudem Village, Ghatkesar Mandal,
Ranga Reddy District, State of Telangana.

... Applicant

To

The Hon'ble Chief Justice of India
And his Companion Justices of
Hon'ble Supreme Court of India

The humble application of above
Named applicant

AN APPLICATION FOR DIRECTIONS

MOST RESPECTFULLY SHOWEST:-

1 That the above said petition is filed under Article 32 of the Constitution of India for a writ in the nature of mandamus and / or any other appropriate writ or writs order or direction directing the respondent no. 3 (Golden Forest India Ltd.) not to dispose of and / or alienate any of their properties and assets and / or create any third party right in respect of the aforesaid assets and / or properties

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and / or operate any of its Bank Accounts maintained all over India pending the disposal of the instant writ petition in this Hon'ble court.

2 That the applicant submits that respondents deliberately and fraudulently purchased the properties which belongs to applicant herein from fictitious purchaser and got registered the same in their favour. True copy of sale deed dated 12.01.1994 is annexed herewith as ANNEXURE A-1. [pg 12-13]

True copy of sale deed dated 02.02.1996 is annexed herewith as ANNEXURE A-2. [pg 20-26]

True copy of sale deed dated 15.04.1997 is annexed herewith as ANNEXURE A-3. [pg 27-32]

True copy of sale deed dated 27.03.1997 is annexed herewith as ANNEXURE A-4. [pg 33-52]

True copy of sale deed dated 11.09.2006 is annexed herewith as ANNEXURE A-5. [pg 53-71]

3 The applicant submits that after death of B. Rajaiah, the applicant approach the Mandal Revenue Office for getting Virasath, mutation, pattadar pass books and title deeds to incorporate their names in record of rights, the Mandal Revenue Officer suggested to got the legal heir certificate from competent civil court. Therefore, the applicant along with her family members filed the suit OS No. 90/2008 before the Hon'ble V Addl. Prl. Civil Judge, Bhongir for seeking the declaration of legal heirs of deceased B. Rajaiah, the Hon'ble court passed the judgment and decree on 23-09-2008, in favour of B. Goramma, G. Balamani, B. Suvama, G. Mangamma, P. Padma, B. Mallesh, B. Santosh

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declared by the court as class -- I legal heirs of B. Rajaiah which is evident from the judgement and decree passed in OS No. 90/2008 by the Hon'ble Prl. Civil Judge, Bhongir. True copy of judgment dated 23.09.2008 passed by Id Principal Junior Civil Judge, Bhongir along with revenue sketch is annexed herewith as ANNEXURE A-6. [pg

4 The applicant submits that the applicant as an absolute owner and possessor of land in Sy. No. 19 an extent of Ac 05-24 gts, in Sy. No. 20 an extent of Ac 07-12 gts, in Sy. No. 21 an extent of Ac 16-04 gts, in Sy. No. 44 an extent of Ac 05-20 gts, in total admeasuring AC 34-20 gts, situated at Raghavapuram Village, Bibi Nagar Mandal, Yadadri-Bhongiri District (previously Nalgonda District), State of Telangana, acquired through court judgment and preliminary decree passed in OS No. 136/2016, dated 25-06-2018, by the Hon'ble V Addl. District Judge, Bhongir in the partition suit filed petition against the defendants no. 1 to 8. True copy of judgment and decree dated 25.06.2018 passed by V Addl. District Judge, Bhongir in OS No.136/2016 is annexed herewith as ANNEXURE A-7. [pg

That Item No. 4 land was allotted to applicant /P Padma/ defendant no. 5, by court through Advocate Commissioner and delivered the physical possession by the Mandal Surveyor in Sy. No. 21 an extent of Ac 05-30 gts out of AC 34-20 gts situated at Raghavapuram Village, Bibinagar Mandal, Yadadri-Bhongiri District bounded by :-

East : land of B Santosh defendant no. 2 in Sy. No. 21

West : land of B Suvarna defendant no. 4 in Sy. No. 20 and 21

North : Neighbour land in Sy. No. 37

South : Neighbour land in Sy. No. 15

5 That originally land belongs to B. Rajaiah father of the applicant, the said B. Rajaiah died on 23-05-1982 leaving behind class 1 legal heirs one of the applicant is legal heir, in result applicant/plaintiff suit declared with cost by passing preliminary decree, the applicant/plaintiff entitled to 1/6th share, D1 to D5 are each entitled to 1/6th share in plaint schedule properties, will be decided at the time of final decree, documents executed by D1 to D5 in favour A1 to A11 and these documents are liable to be cancelled. True copy of Pahani for the year 1956-57, 1983-84, 1994-95 and 2010-11 is annexed herewith as

ANNEXURE A-8. [pg

6 The applicant submits that Golden Forest (India) Private limited rep. by its Manager, created fake registered sale deed on the name of B. Mallesh therefore the Hon'ble court declared as null and void, the sale deed nos. 169/1994, 554/1996, 1231/1997, 2633/1997, 4643/1997, 9014/2006 and 10356/2006 as null and void the Hon'ble court issued the summons and notices to the M/s. Golden Forest (India) Private Limited and M/s. Golden Tourist Resorts & Development Private Limited received the court summons and notices and failed to appear before the court, they have issued exparte, the Hon'ble court passed judgment and preliminary decree partition in suit OS No. 136/2016.

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7 The applicant submits subsequently, the Hon'ble court appointed the advocate commissioner in IA No. 526/2018 in OS No. 136/2016 issued warrant and proceeding of advocate commissioner in pursuance by the Hon'ble court on 22-05-2019 the advocate commissioner issued notices to the advocate and plaintiff and defendants in the said suit on 09-08-2019 and Mandal Surveyor, Bibi Nagar Mandal on 24-08-2019 fixed date of warrant at 11 am, notices which is evidence from the proceeding issued by the Advocate Commissioner allotted item no. 1 to the plaintiff - G. Mangamma in Sy. No. 19, an extent of Ac 05-14 gts and in Sy. No 20 an extent of Ac 00-16 gts in total admeasuring AC 05-30 gts, item no. 2 to the defendant no. 3 - G. Balamma in Sy. No. 20, an extent of Ac 05-30gts, item no. 3 to the defendant no. 4 - B. Suvarna in Sy. No. 20, an extent of Ac 01-06 gts and Sy. No. 21 an extent of Ac 04-24 gts in total admeasuring AC 05-30 gts, item no. 4 to the defendant no. 5 - P. Padma in Sy. No. 21, an extent of Ac 05-30 gts, item no. 5 to the defendant no. 2 - B. Santosh in Sy. No. 21, an extent of Ac 05-30 gts, and item no. 6 to the defendant no. 1 - B. Mallesh in Sy. No. 21, an extent of Ac 00-10 gts, and in Sy. No. 44 an extent of Ac 05-20 gts in total admeasuring AC 05-30 gts, which is evidence from the proceedings of advocate commissioner in IA No. 526/2018 in OS No. 136/2016, notices received by the parties of the above said suit. True copy of notice given by Advocate Commissioner to the parties in IA No. 526/2018 in OS No.

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136/2016 dated 09.08.2019 before V Addl. District Judge, Bhongir is annexed herewith as ANNEXURE A-9. [pg 92-94]

True copy of proceedings dated 27.11.2019 of Advocate Commissioner in IA No.526/2018 in OS No.136/2016 before V Addl. District Judge, Bhongir is annexed herewith as ANNEXURE A-10. [pg 95-98]

8 The applicant submits that therefore, the documents created by them without knowledge of the applicant intending to grab the land of B. Rajaiah after death of B. Rajaiah the applicant compelled to approach the Mandal Revenue authorities for creating proceedings under grievance of Virasath as class – I legal heir under section 8 – Hindu Succession Act, this Hon'ble court rendered land mark judgment by birth the daughter are entitled to equal share in compliance of the Hon'ble Supreme Court judgment, the trial court and Hon'ble V Prl. Civil Judge, Bhongir passed judgment and preliminary decree in favour of the petitioner allotted one such share in *decision reported 2020 5 ALT 1 SC* equal rights to daughter under co-parcenary property.

"Chapter II-A Succession by Survivorship - Objects & Reasons held that – The Hindu Succession Act, 1956 governs the property rights of Hindus and provides for devolution of property. Women are not members of the coparcenary under the Hindu Mitakshara Law and therefore, they are not entitled to claim partition in coparcenary property, and such exclusion of daughters has led to the creation of socially pernicious dowry system with its attendant social ills. In order to eradicate this ill by positive

means which will simultaneously ameliorate the conditions of women in Hindu Society. It is proposed to confer equal rights on Hindu Women along with the male members so as to achieve the constitutional mandate of equality by suitably amending the said Act. (Vide I-A Bill No. 26 of 1985 published in AP Gazette Part IV-A (E.O) dated 05-09-1985).

9 The applicant submits that the Government of A.P. amended section A.P. Act no. 13/1986 with effect from 05-09-1985, subsequently, the Hindu Succession Act, 2005, Act No. 39/2005, dated 05-09-2005 came into force by birth become same as son in coparcenary in property, the petitioner acquired right over property.

10 The applicant submits that the respondent M/s. Golden Forest (India) Private Limited and M/s. Golden Tourist Resorts & Development Private Limited created fake document with collusion of one Mohan Raj and others and Vijaya Lakshmi and others and Salla Ram Reddy created fake registered sale deed therefore, the applicant and their family members compelled to filed the partition suit before the Hon'ble V Prl. Civil Judge, Bhongir, the same was declared by the Hon'ble court and delivered physical possession by the Advocate Commissioner fixed boundaries with support of the Mandal Surveyor drafted the location sketch this evidence issued by the Mandal Surveyor allotted one such share to the petitioner land an extent of Ac 05-30 gts out of AC 34-20 gts acquired under coparcenary rights.

11 The applicant submits that from the date of delivered of physical possession by the Advocate Commissioner, the petitioner cultivating the land as absolute owner and lawful possessor of the land due to the Covid-19, this Hon'ble Court suspended court works followed by the Hon'ble High Court of Telangana and sub-ordinate judiciary. Therefore, final decree is not yet passed by the Hon'ble V Prl. Civil Judge, Bhongir though the Advocate Commissioner submitted the report and conducted the matter and final decree may be passed as early as possible.

12 The applicant submits that applicant is compelled to file the implead petition for seeking the deletion of item no. 6,7,8 from M/s. Golden Forest (India) Private Limited and M/s. Golden Tourist Resorts & Development Private Limited, the land acquired by the plaintiff through court judgment and decree. Therefore, the petition filed before this Hon'ble court appropriate direction for passing orders on above said land details are not binding on the applicant.

PRAYER

It is therefore prayed that this Hon'ble court may be pleased to

- (a). direct the respondents to remove/delete the item no. 4, 6,7,8 from M/s. Golden Forest (India) Private Limited and M/s. Golden Tourist Resorts & Development Private Limited which belongs to applicant herein; and/or

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(b). pass any other order which the Hon'ble court may deem fit and proper in the interest of justice.

DRAWN BY

A USHI REDDY &
DEEPAK K SINGH

Filed on
Place- New Delhi

FILED BY

SRIRAM P.
Advocate for applicant

IN THE SUPREME COURT OF INDIA
CIVIL ORIGINAL JURISDICTION

I.A. NO. OF 2021
IN
W.P. (CIVIL) NO(s) 188 OF 2004

IN THE MATTER OF

M/S RAIGANI CONSUMER FORUM

... Petitioner

VERSUS

Union of India And others

....Respondents

AND IN THE MATTER OF

Polagoni Padma

Applicant

AFFIDAVIT

I, Bheemagowni Mallesh S/o Late.Rajaiah, Aged about: 62 Years, Occ: Retd. Employee, R/o Raghavapuram Village, Bibinagar Mandal, Nalgonda District, Telangana, do hereby state on solemn affirmation as follows

- 1 That I am the applicant herein and as such well acquainted with the facts and circumstances of the case.
- 2 That I have perused the contents of accompanying IA in vernacular which has been drafted by my counsel under my instructions and the averments made therein are true and correct.
- 3 That the annexures produced along with IA are true copies of its

respective originals.
ATT-SETC

RAGINI DEVADAS

B.A.L.B (Osm)

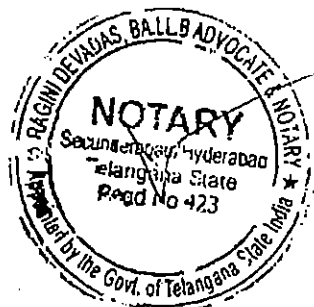
ADVOCATE & NOTARY

Appointed by the Govt. of Telangan

H.No 111 150/2, Snyamlai Building

Begumpet Hyd-500 016

TELANGANA STATE INDIA



DEPONENT

06 OCT 2021

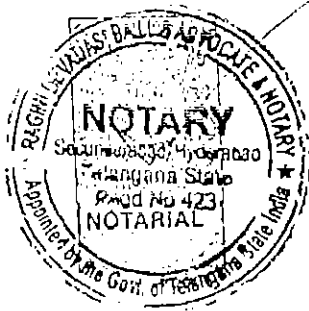
VERIFICATION

Verified at 6 day of October 2021 that the contents of accompanying affidavit are true and correct to the best of my knowledge and belief and nothing material has been concealed therein.

P. W. S.

DEPONENT

06 OCT 2021



[Signature]
RAGINI DEVADAS
B.A., L.B. (O&M)
ADVOCATE & NOTARY
appointed by the Govt. of Telangana
H No 111 150/2, Snyamlai Building
Begumpet Hyd-500 016
TELANGANA STATE INDIA