**SUIT FOR DAMAGES FOR WRONGFUL DISTURBANCE CAUSED BY LANDLORD**

IN THE COURT OF THE....................

Suit No..................... of 19....................

C. D.................................................................... Plaintiff

*versus*

C. F................................................................. Defendant

The abovenamed plaintiff most respectfully submits as under: —

1. That the plaintiff took a Building No..................... situate at.................... in town.................... the boundaries of which are given below, on.................... 19 .................... through a registered lease deed for ten years on a monthly rent of Rs. .................... to run a.................... School therein.

2. That the defendant has set up some machines of Printing Press in the adjacent building No..................... in the month of.................... 19.................... in the same locality, the working of which machines and the personnel of the defendant create great noise and disturbance in the teachings and studies of the teachers and students of the institution of the plaintiff.

3. That the plaintiff gave registered notice to the defendant to stop the nuisance forthwith and for damages caused thereby upto date at the rate of Rs. .................... per month, which notice was received by the defendant on.................... 19.................... The defendant has denied his liability through his reply received by the plaintiff on.................... and has asserted his right to do so.

4. That cause of action arose on.................... 19.................... when the defendant began to work on the printing machines in the adjacent building, and lastly on.................... when the plaintiff received the reply of the defendant denying his duty to stop the nuisance and to pay damages claimed by the plaintiff. This Court has jurisdiction to try the suit.

5. That the suit is valued at Rs..................... for the purpose of jurisdiction, and Rs..................... for the purpose of payment of court fee and court fee is paid according to the reliefs claimed.

RELIEFS CLAIMED:

The plaintiff claims the following reliefs:

(1) the defendant may be restrained by issue of a permanent mandatory injunction for ten years the period of tenancy of the plaintiff

restraining the defendant from committing or continuing any nuisance as the present one which disturbs the teachers and students of the institution of the plaintiff.

(2) payment of damages at the rate of Rs..................... per month caused by the defendant to the plaintiff upto date.

Plaintiff

Through Advocate

**VERIFICATION**

I, abovenamed plaintiff, do hereby verify that the contents of paras .................... to.................... of the plaint are true to my personal knowledge and those of paras.................... and.................... thereof are based on legal advice which I believe to be true.

Verified on this................. day of.................... 19................... at....................

Plaintiff