

IN THE COURT Ms. XXXX, XXXXXX, XXXX

CASE No. XXXX

IN THE MATTER OF:-

XXXX V/S XXXXX

APPLICTION UNDER SEC 91 CRPC FILED BY THE RESPONDENT

MOST RESPECTFULLY SHOWETH:

1. That the abovesaid case is pending before this Hon'ble Court and the same is fixed for XXXX
2. That the petitioner has filed the petition XXXX for maintenance/Divorce/custody before this Hon'ble court and the contents of the same may kindly be read as part and parcel of this para and the same has not been repeated herein for the sake of brevity.
3. That the petitioner has been mis stating XXXX and by stating so, she has not come to the court with clean hands and is trying to mislead the court so that she can avoid her responsibilities towards the Respondent.
4. That the petitioner in the above stated matter has concealed the fact from the Hon'ble Court that the petitioner {Add the facts not revealed by Petitioner, and your own version of facts} and the information of the same has been concealed by the petitioner.
5. That to avoid confusion and unnecessary delay the respondent seeks {State what is needed by you for putting up the correct facts in front of the court, summons to school principal/ bank clerk/ telecom provider for CDR/ email provider/ Govt. institution etc}
6. That the petitioner undertakes to pay the diet money on the spot before the Hon'ble Court.

Prayer

It is, therefore most respectfully prayed that this Hon’ble Court may kindly be pleased to allow the present application of the respondent under the facts and circumstances of the case in the interest of Justice and {Put your request for summons to school principal/ bank clerk/ telecom provider for CDR/ email provider/ Govt. institution etc}

Pass any other order, direction or relief which this Hon’ble Court deem fit in the favor of the respondent and against the petitioner in the interest of justice.

It is prayed accordingly.

Delhi Respondent

Dated Through

{Name of the Advocate}

IN THE COURT OF XXXXX, XXXX, XXX.

CASE No. XXXX

IN THE MATTER OF:-

XXX

V/S

XXX

AFFIDAVIT

I, XXXXX, s/o XXXX r/o XX, do hereby solemnly affirm and declare as under:

1. That I am the petitioner in the above noted matter and am well conversant with the facts and circumstances of the case and also competent to file the present affidavit.
2. That the accompanying application has been drafted by my counsel under my instructions, I have gone through contents of the same and the same are explained in vernacular and are true and correct to the best of my knowledge and belief. The same may be read as part and parcel of this affidavit.

DEPONENT

VERIFICATION:-

Verified at XXX on this ____ day of XXX, 2015, that the contents of above affidavit are true and correct to my knowledge and nothing material has been concealed therefrom.

DEPONENT