

**BEFORE THE NATIONAL GREEN TRIBUNAL, SOUTHERN ZONE, CHENNAI**

**O.A. No. 193 of 2021 (SZ)**

IN THE MATTER OF:

D. Rajavardhan Reddy and anr.

...Applicants

Versus

The State of Andhra Pradesh and 10 ors.

...Respondents

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Dated on this 11<sup>th</sup> day of April 2022.

**COUNSEL FOR THE RESPONDENT  
NOS. 7 TO 11**

## BEFORE THE NATIONAL GREEN TRIBUNAL, SOUTHERN ZONE, CHENNAI

O.A. No. 193 of 2021 (SZ)

IN THE MATTER OF:

1. D. Rajavardhan Reddy
2. Perapogu Kishore

...Applicants

Versus

1. The State of Andhra Pradesh,  
Revenue Department, A.P. Secretariat
2. The Engineer-in-Chief, Irrigation Department  
Vijayawada
3. The Superintending Engineer  
Irrigation (Medium & Minor) Circle, Kurnool  
Kurnool District
4. The District Collector  
Kurnool District
5. The Revenue Divisional Officer  
Kurnool Revenue Division, Kurnool
6. The Executive Engineer  
Water Resource Department  
Minor Irrigation Water Division, Kurnool
7. Dhulipalla Koti Swamy
8. Araveti Babaiah
9. Duddempudi Kiran Kumar
10. Saperu Rajasekharappa
11. Dhulipalla Venkata Rao

...Respondents

## REPLY STATEMENT ON BEHALF OF THE RESPONDENT NOS. 7 TO 11

The Respondent Nos. 7 to 11 most humbly submit as follows:

- I. The address for service of all notices and process on the Respondent Nos. 7 to 11 is that of their counsel M/s. Arun Karthik Mohan and Suhrith Parthasarathy at No. 7, Jagadambal Colony 2<sup>nd</sup> Street, Royapettah, Chennai – 600 014.

7. *[Signature]*  
 8. A. Babaiah  
 9. *[Signature]*  
 10. S. Arithu  
 11. *[Signature]*

ATTESTED

*[Signature]*  
 Y. PRAKASH REDDY B.A.L., B.L.  
 ADVOCATE & NOTARY  
 Appointed by GOVT. of A.P.  
 Off: D.No: 64/103, Eswar Complex,  
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II. It is submitted that the captioned Application is riddled with wholly false, concocted and misleading statements and contentions that are, in fact, patently contrary to the records. Accordingly, at the very outset, nothing stated in the captioned Application may be deemed admitted by the Answering Respondents herein, unless such admission is expressly borne out from the contents of the present Reply.

### III. Preliminary Objections

The Applicants, while seeking to invoke the jurisdiction of this Hon'ble Tribunal under Section 14 of the National Green Tribunal Act, 2010 (NGT Act), have failed to even plead, leave alone prove, that the question(s) sought to be raised in the present case arise out of implementation of any of the enactments specified in Schedule I of the NGT Act. The present Application is therefore ex-facie not maintainable and liable to be dismissed in limine on this count alone.

### IV. Preliminary Submissions:

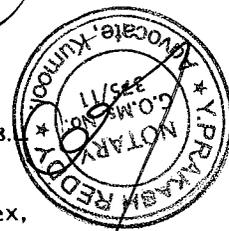
1. Without prejudice to the Preliminary Objections above, the captioned Original Application is premised upon an allegation of encroachment by certain 'private persons' in levelling of land by filling soil in Sy No. 81/1 and Sy No. 299 in B. Thandrapadu Village, Kurnool Rural Mandal, Kurnool District. In doing so, the Applicants have sought to mislead this Hon'ble Tribunal by conveniently suppressing the fact that these private persons are none other than the owners of land in Sy No. 81/1 and Sy No. 299, being Respondent 7 to 11/Answering Respondents, who also hold valid patta over the said parcels of land. In this regard, the Answering Respondents have obtained permission/approval from the authorities to convert their land, including the land in Survey Nos. 81/1 and 299, from agricultural to non-agricultural use by paying the applicable conversion fee. The copy of meesava of land conversion (NEW) G.O. Ms. No. 98 dated 10.03.2020 and the receipt for fee paid for

7 *[Signature]*  
8 A. Babai  
9 *[Signature]*

10 S. Aridh  
11 *[Signature]*

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conversion are annexed herewith and marked as **Annexure R-1**. Pursuant thereto, in June 2021, with a view to put the lands to use, the Answering Respondents decided to level the land, which was also undertaken with the knowledge and approval of the authorities inasmuch as the murrum/soil for the purposes of levelling the land was obtained from the area near AVR HNSS Main Canal Spoil Bank Km 28.000 to 32.000, with the permission of the Executive Engineer, AVR HNSS Division -2 on cost basis. The permission letter of the Executive Engineer, AVR HNSS Division-2, Kurnool and the costs receipts for lifting of murrum/soil are annexed herewith and marked as **Annexure R-2**. The question therefore, of any encroachment or violation on the part of the Answering Respondent, as alleged by the Applicants, does not even arise.

2. In fact, it is undisputed that as per the Revenue Record (i.e. RSR) of B. Thandrapadu Village, and more particularly in respect of lands in Sy No. 81/1 and Sy No. 299, there is no extent for any Cheruvu/Tank, as alleged by the Applicants. In fact, all the Survey Nos. in B. Thandrapadu Village, except land in Survey No. 78 to an extent of 0.83 acres, are patta lands and no acquisition of land has taken place and/or no assignment has been made for the purposes of the purported Gangamma Cheruvu.
3. The sequence of events leading upto the institution of the captioned Original Application would demonstrate that the present Application is nothing but an abuse of legal process at the instance of certain vested interests and with the motive of usurping/undermining the proprietary rights of the Answering Respondents. In fact, the filing of the present Application was preceded by attempts on the part of anti-social elements to disturb the Answering Respondents' possession and enjoyment of their property by obstructing work therein. The Answering Respondents were therefore constrained to prefer a police complaint before the Kurnool Taluk Police, registered as Crime No. 469/2021 and subsequently also institute a civil suit against interference with possession, bearing O.S. No. 46/2021 before the Additional Senior Civil Judge, Kurnool. A copy of the plaint in O.S. 46/2021 and application for interim injunction in I.A. No. 332 of 2021 are annexed herewith and marked as **Annexure R-**

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A. Babai  
*[Handwritten signature]*

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*[Handwritten signature]*  
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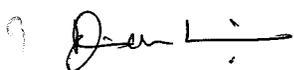


3. The Hon'ble Court, being prima facie satisfied with the case made out, was pleased to grant an interim injunction against interference with the possession of the Answering Respondents.

A petition thereafter appears to have been lodged with the Hon'ble Andhra Pradesh State Human Rights Commission (APSHRC) seeking reliefs similar to those forming subject matter of the present Application. In the said proceedings, the Hon'ble APSHRC was pleased to direct inspection/survey of the subject tank at B. Thandrapadu Village and submission of a report. The District Collector, Kurnool accordingly constituted a team of officers comprising (1) Revenue Divisional Officer, Kurnool; (2) Superintending Engineer, Irrigation, Kurnool; (3) Asst. Director, S & LR, Kurnool and (4) Tahsildar, Kurnool to inspect the Tank. The aforesaid Team, on inspection, noted that as per the Village Map, the land in Sy. No. 76 to an extent of 20.25 Acres alone had been notified as Cheruvu land. The remaining Survey Nos. in B. Thandrapadu Village are Patta Lands with sale transactions dating back to pre-independence, with sale transaction in respect of Survey Nos. 81 and 299 dating to as far back as the year 1932. Such lands further fall within the Kurnool Urban Development Authority (KUDA) area as notified by the State Government, based on which which many of them have been legally converted to Non-agricultural use and real estate. However, owing to the fact that water comes to be stored in such Patta lands during the rainy season, the Team, based on the representation of certain villagers, have requested submission of proposals for acquisition of land in Sy Nos. 76, 77, 78, 79, 80, 81, 299, 309 and 310 of B. Thandrapadu Village. The findings of the Committee/Team have been duly placed before the APSHRC by the District Collector, who has also addressed a communication to the Superintending Engineer Irrigation Circle, Kurnool informing the latter that if they are in need of the lands covered by the Tank and the water storage area, appropriate requisition be filed and consent be provided for taking action under the Land Acquisition Act. A copy of the

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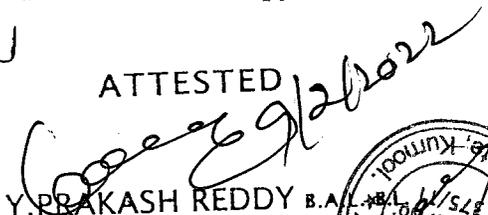
8. A. Babu

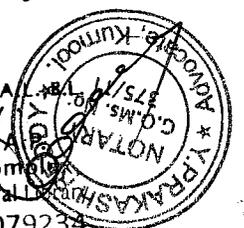
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10. S. Aridh

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communication addressed by the District Collector, Kurnool to the APSHRC is annexed herewith and marked as **Annexure R-4**.

Notwithstanding the above Report and the recommendation therein, the present Application appears to be yet another desperate attempt to defeat the Answering Respondents' valuable property rights without due process of law by misleading this Hon'ble Tribunal, for purely ancillary and ulterior motives. The lack of bona fides on the part of the Applicants is further borne out by the fact that the present Application has been filed only targeting the property of the Respondents 7 to 11 in Survey Nos. 81/1 and 299, to the exclusion of several other similarly placed patta lands in B. Thandrapadu Village. Furthermore, despite raising pointed allegations against the Answering Respondents 7 to 11 and their property, the said parties were conveniently not impleaded in the Application, once again with a view to hide the true and correct facts from this Hon'ble Tribunal. It is only at the instance of the Answering Respondents, that this Hon'ble Tribunal was pleased to implead them as Respondents 7 to 11 vide order dated 08.12.2021 in I.A. No. 169 of 2021.

4. In light of the above, it is clear that the captioned Original Application is wholly bereft of merit and lacks bona fide, having been premised on patent falsities and suppression of material facts and documents. Accordingly, it is humbly submitted that present Application under reply is a gross abuse of legal process filed with mala fide and ulterior motives best known to the Applicants and is accordingly liable to be dismissed with exemplary costs.

**Para-wise Submissions:**

5. In furtherance of the Preliminary Submissions, the para-wise response of the Answering Respondents to the captioned Application is as follows:
6. The contents of Para 1 and 2, to the extent matters of record, merit no response.

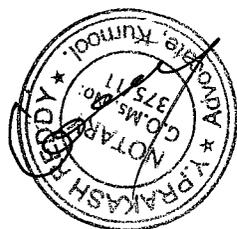
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7. The contents of Para 3 are denied. It is specifically denied that there has been any inaction on the part of the Respondents 1 to 6, let alone any illegality or arbitrariness, as alleged or at all. For the reasons stated in the Preliminary Submissions above, the present Application is not maintainable and wholly devoid of merits and accordingly liable to be dismissed as an abuse of process, with exemplary costs.

**Para-wise reply with respect to Facts of the Case:**

8. The contents of Para 1 are denied for want of knowledge and the Applicants are put to strict proof of the averments therein. It is specifically denied that the present Application has been instituted purely in public interest as alleged or at all. The mala fide and motivated character of the present Application is demonstrable from the Preliminary Submissions above, which are duly re-iterated herein.

9. The contents of Paras 2 and 3 are denied for want of knowledge and the Applicants are put to strict proof in the said regard. It is specifically denied that the Gangamma Cheruvu (Lake) has been in usage for more than 100 years as alleged. The salient features of the Tank as contended in Para 3 are also specifically denied for want to knowledge. It is further denied that the Survey Nos. 81/1 and 299 are falling within the submersible area of Gamngamma Cheruvu or within the FTL boundary.

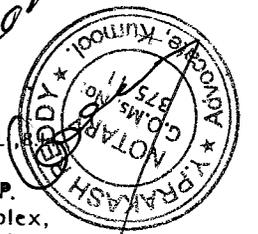
10. The contents of Paras 4 to 6 are replete with false and misleading averments and hence denied. As highlighted in the Preliminary Submissions above, the so called 'private persons' referred to by the Applicants in Para 4 are none other than the owners of the property, being the Answering Respondents 7 to 11 to the present Application, who also hold valid patta in respect of lands in Survey Nos. 81/1 and 299 and in furtherance of the said rights have been undertaking the activity of levelling the land for use. In as much as there is no extent of Cheruvu/Tank in existence over these lands belonging to the Respondents 7 to 11, the question of levelling of the land reducing the tank storage capacity or decreasing the ayacut does not arise. For this reason also, the various provisions of the Constitution and enactments/rules referred to by the

7 *[Signature]*  
8 A Babu  
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10 S. Aridh  
11 *[Signature]*

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*[Signature]* 9/2/2022  
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Applicants in Paras 4 to 6 have no bearing on the case at hand. In fact, under the guise of the present Application, the Applicants are effectively seeking expropriation of the Answering Respondents, which is contrary to law and in particular, grossly violative of the mandate of Article 300-A of the Constitution of India.

11. The contents of Paras 7 and 8 are vehemently denied. In light of the submissions above, the contentions of the Applicants being clearly devoid of merits, the question of the Respondents 1 to 6 acting on the basis of their representations does not arise. It is accordingly denied that there was any failure to act on the part of the Government/Respondents 1 to 6 on account of political pressure, as alleged or at all. To the contrary, it is evident that the Applicants have sought to resort to undue coercion and harassment with a view to prejudice the rights and interests of the Answering Respondents. It is further denied that there is any imminent threat to safety of persons and properties by the actions of the Answering Respondents on their private lands. Further, the reference and reliance on G.O. Ms. 168 and decisions of the Hon'ble Supreme Court are thoroughly misplaced. In fact, in the case of *Susetha v. State of Tamilnadu*, the Hon'ble Supreme Court, taking note of the fact that the area pertaining to the Tank for which resurrection was sought could only store rainwater and had demonstrably fallen into disuse over a long period of time, ultimately held that it was not a fit case to direct resurrection. Applying the said principles to the present case, even assuming without admitting that a Tank was ever in existence, no case has been made out by the Applicants for grant of the reliefs claimed.

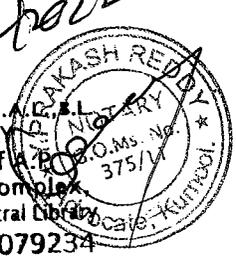
12. The contents of Paras 9 and 10 are false, baseless and misleading and hence denied.

As highlighted in the Preliminary Submissions above, as regards the lands of the Answering Respondents in Survey Nos. 81/1 and 299 of Thandrapadu Village, the land conversion to non-agricultural use has already been approved by the Government authorities taking into account the nature, classification and usage of the lands and all contentions/speculation on the part of the Applicants to be contrary are strongly denied. It is therefore denied that the action of the Respondents 1 to 6 in granting land

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conversion is at the instance of local politicians or in any manner illegal, irregular, arbitrary, unjustified, unreasonable or unsustainable, as alleged or at all. No case for interference by this Hon'ble Tribunal is therefore made out.

#### Reply to Para on Limitation

13. In line with the submissions in the paras hereinabove, the contents of the Para on limitation are denied. It is specifically denied that the present Application is within the time of limitation prescribed under the NGT Act and the Applicants are put to strict proof of their assertion in this regard.

#### Reply to Main Prayer and Interim Relief clauses

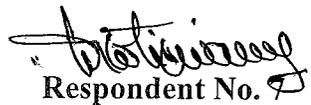
14. In light of the reasons and submissions contained in the Paras hereinabove, the Main Prayer(s) as well as Interim Relief(s) sought for in the captioned Original Application are wholly unsustainable and liable to be rejected.

15. For reasons stated above, the Respondents 7 to 11 most humbly prayed that this Hon'ble Tribunal be pleased to dismiss the Original Application No. 193 of 2021 (SZ) and reject the reliefs sought for in the said Application, with cost, and thus render justice.

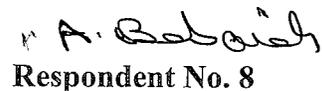
Dated at Kurnool on this 9<sup>th</sup> day of February 2022.



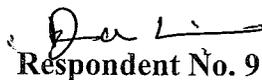
Counsel for the  
Respondent Nos. 7 to 11



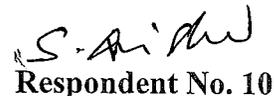
Respondent No. 7



Respondent No. 8



Respondent No. 9



Respondent No. 10



Respondent No. 11

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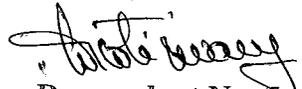
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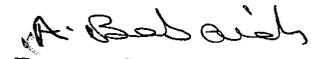
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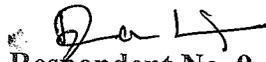
VERIFICATION

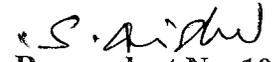
We, (1) Dhulipalla Koti Swamy, son of D. Veeraiah, aged about 65 years, residing at H.No. 45-203-2-4-401, Sai Padmaja Enclave, Ashok Nagar, Kurnool city, (2) Araveti Babaiah, son of Araveti Subbaiah, aged about 63 years, residing at H.No. 15-9C-10/9C, Saibaba Peta, Nandikotkur, Kurnool District, (3) Duddempudi Kiran Kumar, son of D. Venkateswarlu, aged about 50 years, residing at H.No. 46-1M-DE-501, Sapthagiri Nagar, Kurnool city, (4) Sapuru Rajasekharappa, son of Sapuru Kumarappa, aged about 48 years, residing at H.No. 23/23-123B, Rajaveedhi, Nandikotkur, Kurnool District, and (5) Dhilipalla Venkata Rao, son of Dhupalla Veeraiah, aged about 60 years, residing at D.No. 8-2-293/82/BE/20, Navanirman Nagar, Near Jubilee Hills Public School, Jubilee Hills, Hyderabad, do hereby verify and state that the contents of Paras 1 to 15 of the above Reply Statement are true to the best of our knowledge, belief and information and based on legal advice.

Dated at Kurnool on this 9<sup>th</sup> day of February, 2022.

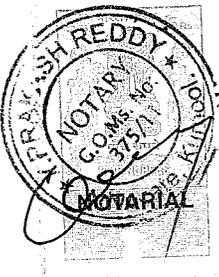
  
Respondent No. 7

  
Respondent No. 8

  
Respondent No. 9

  
Respondent No. 10

  
Respondent No. 11

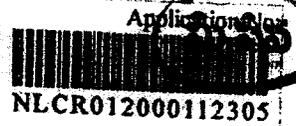
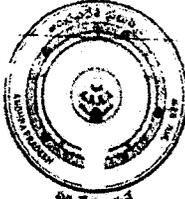
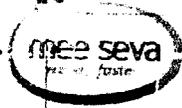


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ADVOCATE & NOTARY

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Receipt for 'Intimation of Payment for Land Conversion'

AP19 45/18167 Date: 10/03/2020

Date of Generation of Receipt :10/03/2020  
 Transaction Id : TANLCR012000112305  
 Applicant Name : DHULIPALLA KOTISWAMY  
 Service Name : LAND CONVERSION (NEW)-GO MS NO 98  
 Document Mandal: ಕದ್ರೂಲ  
 Aadhaar No. : XXXX-XXXX-7707  
 Application No. : NLCR012000112305  
 Document District : ಕದ್ರೂಲ  
 Document Village : ದಿ.ಶಾಂತ್ನಿ

Schedule Of Conversion : (As per 'Annexure A' submitted by Applicant as per G.O. Ms.No.98 Revenue(DA&LR) Dept Dated 19.02.2018)

S No.	District	Mandal	Village	Sy.No.	Katha No	Katha Extent	Land Nature	Land Classification	Total Extent in Web Land	Area (in Units)	Extent Proposed for Conversion	Area (in Units)	Amount Paid	Remarks
1	ಕದ್ರೂಲ	ಕದ್ರೂಲ	ದಿ.ಶಾಂತ್ನಿ	299	992	1.2000	ವಜ್ರ	ವಜ್ರ	2.38	acre-cents	1.2000	acre-cents	74865	Residential
				81-1		0.9750		8.12	0.9750					
Total									10.5		2.175	74865		

The applicant filed Challans No 30164780322019 dated 20/02/2020 as a proof of payment of Conversion Tax (which is subject to realisation of the amount to Government).

Note: The receipt is issued on the declaration given by the land owner/applicant assuring that the land mentioned above are not covered by any litigation/court cases/encroachment and that lands are not assigned lands/ULC Surplus land/agriculture ceiling surplus land/Tank bed lands/Govt lands/forest lands/Endowment lands and that the land applied is as per the master plan and as per such other land use restrictions by local bodies / authorities. This receipt is subject to government guidelines mentioned in Land Conversion (OTC) Amendment Act/G.O. Ms.No.98 Revenue (DA&LR) Department 19.02.2018.

*B. Venkatesulu*

Name of the RDO: B.K. VENKATESULU  
 Mandal:Kurnool  
 Division:Kurnool  
 District:Kurnool

Note: This is electronically generated receipt subject to conditions given under G.O.MS No 98 Revenue (DA&LR) Department Dated: 19.02.2018

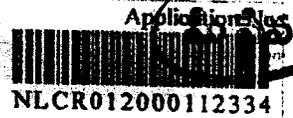
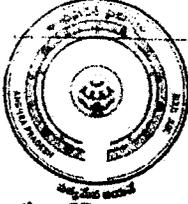
Note: This is a Digitally Signed Certificate does not require physical stamp. Signature certificate can be verified by furnishing the application number mentioned in the certificate.



## Mee Seva Integrated Service Delivery Gateway

### Transaction Details

Transaction Id:	TANLCR012000112305	Application No:	NLCR012000112305
Name:	DHULIPALLA KOTISWAMY	Service Name:	LAND CONVERSION (NEW)- GO MS NO 98
Transaction Date :	10/03/2020	Amount:	35
Status:	Approved	Remarks:	
Approved / Rejected Date:		Print Date:	10/03/2020
Printed By:	ESEVA-FKL138	Franchisee Id/ VLE Id:	ESEVA-FKL138
District:	కర్నూలు	Mandal:	కర్నూలు
SLA (In days):			
Note :	As per G.O. MS No 17, dated 6th March, 2019, the scanning charges beyond 4 pages have been revised to Rs. 5/- per page for uploading documents. The scanning charges up to 4 pages is free of cost.		



Receipt for 'Intimation of Payment for Land Conversion'

AP19 45718185 Date: 19/03/2020

Date of Generation of Receipt : 10/03/2020

Transaction Id : TANLCR012000112334

Aadhaar No. : XXXX-XXXX-8649

Applicant Name : ARVETI BABALAH

Application No. : NLCR012000112334

Service Name : LAND CONVERSION (NEW)-GO MS NO 98

Document District : ಕರ್ನಾಟಕ

Document Mandal : ಕರ್ನಾಟಕ

Document Village : ದಿ.ಕಾಂಟಿಪಾಟ

Schedule Of Conversion : (As per 'Annexure A' submitted by Applicant as per G.O. Ms.No.98 Revenue(DA&LR) Dept Dated 19.02.2018)

S No.	District	Mandal	Village	Sp.No.	Katha No	Katha Extent	Land Nature	Land Classification	Total Extent in Hectare	Area (in Units)	Extent Proposed for Conversion	Area (in Units)	Amount Paid	Remarks
1	ಕರ್ನಾಟಕ	ಕರ್ನಾಟಕ	ದಿ.ಕಾಂಟಿಪಾಟ	81	993	0.9750	ವ್ಯಕ್ತ	ವ್ಯಕ್ತ	8.12	acre-cents	0.6450	acre-cents	100	Residential
Total									8.12		0.645	100		

The applicant filed Challans No 31371253632019 dated 20/02/2020 as a proof of payment of Conversion Tax (which is subject to realisation of the amount to Government).

**Note:** The receipt is issued on the declaration given by the land owner/applicant assuring that the land mentioned above are not covered by any litigation/court cases/encroachment and that lands are not assigned lands/ULC Surplus land/agriculture ceiling surplus land/Tank bed lands/Govt lands/forest lands/Endowment lands and that the land applied is as per the master plan and as per such other land use restrictions by local bodies / authorities. This receipt is subject to government guidelines mentioned in Land Conversion (OTC) Amendment Act/G.O. Ms.No.98 Revenue (DA&LR) Department 19.02.2018.

*B. Venkatesulu*

Name of the RDO: B.K.VENKATESULU  
Mandal:Kurnool  
Division:Kurnool  
District:Kurnool

**Note:** This is electronically generated receipt subject to conditions given under G.O.MS No 98 Revenue (DA&LR) Department Dated: 19.02.2018

Note: This is a Digitally Signed Certificate, does not require physical signature and this certificate can be verified by clicking on the QR code or by clicking on the URL mentioned in the certificate.



## Mee Seva

Integrated Service Delivery Gateway

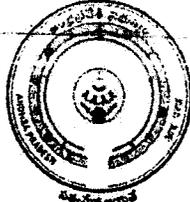
### Transaction Details

Transaction Id:	TANLCR012000112334	Application No:	NLCR012000112334
Name:	ARVETI BABAIAH	Service Name:	LAND CONVERSION (NEW)- GO MS NO 98
Transaction Date :	10/03/2020	Amount:	35
Status:	Approved	Remarks:	
Approved / Rejected Date:		Print Date:	10/03/2020
Printed By:	ESEVA-FKL138	Franchisee Id/ VLE Id:	ESEVA-FKL138
District:	కర్నూలు	Mandal:	కర్నూలు
SLA (In days):			

Note :

As per G.O. MS No 17, dated 6th March, 2019, the scanning charges beyond 4 pages have been revised to Rs. 5/- per page for uploading documents. The scanning charges up to 4 pages is free of cost.

seva



Application No.

NLCR012000112331

Receipt for 'Intimation of Payment for Land Conversion'

Date: 10/03/2020  
AP19 45718177

Date of Generation of Receipt : 10/03/2020

Transaction Id : TANLCR012000112331

Aadhaar No. : XXXX-XXXX-5932

Applicant Name : DUDDEM PUDI KIRAN KUMAR

Application No. : NLCR012000112331

Service Name : LAND CONVERSION (NEW)-GO MS NO 98

Document District : ಕರ್ನಾಟಕ

Document Mandal : ಕರ್ನಾಟಕ

Document Village : ಬಿ.ಶಂಕರಪುರ

Schedule Of Conversion : (As per 'Annexure A' submitted by Applicant as per G.O. Ms.No.98 Revenue(DA&LR) Dept Dated 19.02.2018)

S No.	District	Mandal	Village	Sy.No.	Katha No	Katha Extent	Land Nature	Land Classification	Total Extent in Web Land	Area (in Units)	Extent Proposed for Conversion	Area (in Units)	Amount Paid	Remarks
1	ಕರ್ನಾಟಕ	ಕರ್ನಾಟಕ	ಬಿ.ಶಂಕರಪುರ	299	991	0.2000	ವಜ್ರ	ವಜ್ರ	2.38	acre-cents	0.2000	acre-cents	29670	Residential
				81-1		1.0000			8.12		0.6650			
								Total	10.5		0.865		29670	

The applicant filed Challana No 30164769802019 dated 20/02/2020 as a proof of payment of Conversion Tax (which is subject to realisation of the amount to Government).

**Note:** The receipt is issued on the declaration given by the land owner/applicant assuring that the land mentioned above are not covered by any litigation/court cases/encroachment and that lands are not assigned lands/ULC Surplus land/agriculture ceiling surplus land/Tank bed lands/Govt lands/forest lands/Endowment lands and that the land applied is as per the master plan and as per such other land use restrictions by local bodies / authorities. This receipt is subject to government guidelines mentioned in Land Conversion (OTC) Amendment Act/G.O. Ms.No.98 Revenue (DA&LR) Department 19.02.2018.

*B. K. Venkatesulu*

Name of the RDO: B.K.VENKATESULU  
Mandal:Kurnool  
Division:Kurnool  
District:Kurnool

**Note:** This is electronically generated receipt subject to conditions given under G.O.MS-No 98 Revenue (DA&LR) Department Dated: 19.02.2018

Note: This is a Digitally Signed Certificate, does not require physical signature and this certificate can be verified at [http://www.karnataka.gov.in](#) by furnishing the application number mentioned in the Certificate.



## Mee Seva Integrated Service Delivery Gateway

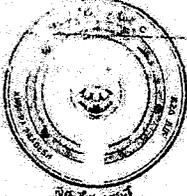
### Transaction Details

Transaction Id:	TANLCR012000112331	Application No:	NLCR012000112331
Name:	DUDDDEM PUDI KIRAN KUMAR	Service Name:	LAND CONVERSION (NEW)- GO MS NO 98
Transaction Date :	10/03/2020	Amount:	35
Status:	Approved	Remarks:	
Approved / Rejected Date:		Print Date:	10/03/2020
Printed By:	ESEVA-FKL138	Franchisee Id/ VLE Id:	ESEVA-FKL138
District:	కర్నూలు	Mandal:	కర్నూలు
SLA (In days):			

Note :

As per G.O. MS No 17, dated 6th March, 2019, the scanning charges beyond 4 pages have been revised to Rs. 5/- per page for uploading documents. The scanning charges up to 4 pages is free of cost.

Seva  
for better



Application No.

NLCR012000112294

Receipt for 'Intimation of Payment for Land Conversion'

AP19 45718135

Date: 10/03/2020

Date of Generation of Receipt : 10/03/2020

Transaction Id : TANLCR012000112294

Aadhaar No. : XXXX-XXXX-4114

Applicant Name : SAPURU RAJA SHEKARAPPA

Application No. : NLCR012000112294

Service Name : LAND CONVERSION (NEW)-GO MS NO 98

Document District : ಕರ್ನಾಟಕ

Document Mandal: ಕರ್ನಾಟಕ

Document Village : ಬಿ.ಶಂಕರಪುರ

Schedule Of Conversion : (As per 'Annexure A' submitted by Applicant as per G.O. Ms.No.98 Revenue(DA&LR) Dept Dated 19.02.2018)

S No.	District	Mandal	Village	Sy.No.	Katha No	Katha Extent	Land Nature	Land Classification	Total Extent in Ycb Land	Area (in Units)	Extent Proposed for Conversion	Area (in Units)	Amount Paid	Remarks
1	ಕರ್ನಾಟಕ	ಕರ್ನಾಟಕ	ಬಿ.ಶಂಕರಪುರ	299	990	0.2000	ವಸತಿ	ವಸತಿ	2.38	acre-cents	0.2000	acre-cents	67275	Residential
				81-1		1.7550			8.12		1.7550			
								Total	10.5		1.955		67275	

The applicant filed Challana No 30164776612019 dated 20/02/2020 as a proof of payment of Conversion Tax (which is subject to realisation of the amount to Government).

**Note:** The receipt is issued on the declaration given by the land owner/applicant assuring that the land mentioned above are not covered by any litigation/court cases/encroachment and that lands are not assigned lands/ULC Surplus land/agriculture ceiling surplus land/Tank bed lands/Govt lands/forest lands/Endowment lands and that the land applied is as per the master plan and as per such other land use restrictions by local bodies / authorities. This receipt is subject to government guidelines mentioned in Land Conversion (OTC) Amendment Act/G.O. Ms.No.98 Revenue (DA&LR) Department 19.02.2018.

*B. K. Venkatesulu*

Name of the RDO: B.K.VENKATESULU

Mandal:Kurnool

Division:Kurnool

District:Kurnool

**Note:** This is electronically generated receipt subject to conditions given under G.O.MS No 98 Revenue (DA&LR) Department Dated: 19.02.2018

**Note:** This is a Digitally Signed Certificate, does not require physical signature and this certificate can be verified by furnishing the application number mentioned in the Certificate.

10/20/20 04:17 PM

3/11/2020



## Mee Seva

Integrated Service Delivery Gateway

### Transaction Details

Transaction Id:	TANLCR012000112294	Application No:	NLCR012000112294
Name:	SAPURU RAJA SHEKARAPPA	Service Name:	LAND CONVERSION (NEW)- GO MS NO 98
Transaction Date :	10/03/2020	Amount:	35
Status:	Approved	Remarks:	
Approved / Rejected Date:		Print Date:	10/03/2020
Printed By:	ESEVA-FKL138	Franchisee Id/ VLE Id:	ESEVA-FKL138
District:	కర్నూలు	Mandal:	కర్నూలు
SLA (In days):			
Note :	As per G.O. MS No 17, dated 6th March, 2019, the scanning charges beyond 4 pages have been revised to Rs. 5/- per page for uploading documents. The scanning charges up to 4 pages is free of cost.		





## Mee Seva Integrated Service Delivery Gateway

### Transaction Details

Transaction Id:	TANLCR012000112301	Application No:	NLCR012000112301
Name:	DHULIPALLA VENKATA RAO	Service Name:	LAND CONVERSION (NEW)- GO MS NO 98
Transaction Date :	10/03/2020	Amount:	35
Status:	Approved	Remarks:	
Approved / Rejected Date:		Print Date:	10/03/2020
Printed By:	ESEVA-FKL138	Franchisee Id/ VLE Id:	ESEVA-FKL138
District:	శ్రీశైలం	Mandal:	శ్రీశైలం
SLA (in days):			

Note :

As per G.O. MS No 17, dated 6th March, 2019, the scanning charges beyond 4 pages have been revised to Rs. 5/- per page for uploading documents. The scanning charges up to 4 pages is free of cost.

**Government of Andhra Pradesh  
Water Resources Department**

From  
Sri V.Sudhakar Reddy, M.E,  
Executive Engineer,  
AVR HNSS Division No.2,  
Kurnool-518004.

To  
D. Kiran Kumar,  
S/o D.venkateswarlu,  
Saptagiri Nagar,  
Kurnool.

**Lr No.EE/ HNSS Dvn-2/KNL/DB/**

213 M

**Dt: 07.2021**

Sir,

Sub:- Water Resources Department – Request for the lifting of Spoil of 1000 M<sup>3</sup> from HNSS Main canal Spoil Bank near Safa Colledge @ Km 28.000 to Km 32.000 - Regarding.

- Ref:- 1) Representation of Sri.Kiran kumar Lr.No.Nil,Dt:29.06.2021.  
2) T.O. DEE's Lr.No:DEE/HNSS Subdivision No:4/KN/166E Dt:30.06.2021.  
3) SE's Memo No. SE/AVR HNSS -1 /KNL/TS/DEE2/AEE2/PK.24 (GL)99H2,Dt:09.07.2021.

\*\*\*

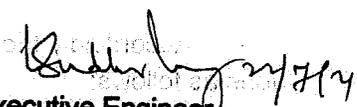
In the reference 3<sup>rd</sup> cited above, the Superintending Engineer, AVRHNSS Circle No.1,Kurnool has given permission for lifting 1000 M<sup>3</sup> of Hard Murrum/Spoil on cost basis which is available at HNSS Main Canal spoil bank Km.28.000 to Km 32.000 near safe College ,Kurnool for filling of pit holes, trenches in farm fields.

Accordingly the cost of the Hard Murrum/Spoil and the amounts to be paid are work done as follows:

Sl.No	Description	-	Amount
1	The cost of Hard Murrum as per SSR:2020-21 (SL.No.M-010) is Rs.95/- The cost of Hard Murrum for 1000m <sup>3</sup> = 1000×95 = Rs. 95,000/- This amount must be paid through challan in favour of pay and Account Officer, Kurnool.	=	Rs. 95,000/-
2	Seigniorage Charges:- Rs. 45/- per Cum. (As per G.O.MS. No. 11, Dt. 11.02.2020) for 1000m <sup>3</sup> = 1000×45= Rs. 45,000/- This amount must be paid through challan drawn in favour of Assistant Director, Mines Geology, Kurnool.	=	Rs.45,000/-

3	Collection of contribution towards the NMET fund as per Government Memo No. 14085/M.15/2015-1, Dt. 30.09.2015 @ 2% of the Royalty i.e., $45,000 \times 0.02 = \text{Rs. } 900/-$ The amount is payable to the account No. 35197602182 of State Bank of India, Main Branch, (691-11- Parliament Street), New Delhi-110-001, IFSC Code: SBIN0000691.	=	Rs.900/-
4	Collection of District Mineral Fund as per G.O.MS. No. 30 (Industries and Commerce M-11, Department) @ 30% of the Seigniorage fee i.e., $95,000 \times 5\% = \text{Rs. } 4750/-$ This amount is payable to District Mineral Fund under the Head of Account 8342-00-120-00. NVN. DDO code 09011307005.	=	Rs.4750/-
5	G.S.T @ 5% = $95,500 \times 5\%$	=	Rs.4750/-
6	Supervision Charges @ 2%	=	Rs.1900/-
	<b>Total Amount</b>	=	<b>Rs.1,61,050/-</b>

In this connection it is informed that, the above mentioned amount in the form of Challan's in original are received to this office. Hence it is informed that the permitted quantity of 1000 m<sup>3</sup> of spoil is to be lifted immediately and to be completed by 05.08.2021. It is also informed to lift the quantity between 8:00 am to 6:00 pm and requested to intimate the vehicle No's.

  
Executive Engineer,  
AVR HNSS Division No.2,  
Kurnool.

  
22/7



## Challan Reference Form

## GOVERNMENT OF ANDHRA PRADESH

CFMS Transaction ID: 50054346802021 Valid Upto: 01.08.2021

Treasury/PAO Code: 0901

STO: DTO-Kurnool

Service :

6129-Other Receipts

Major Head:

0070 Other Administrative Services

Sub-Major Head:

01 Administration of Justice

Minor Head:

800 Other Receipts

Group Sub-Head:

00 Not Applicable

Sub-Head:

81 Other Receipts

Detailed Head:

000 Not Applicable

Sub-Detailed Head:

000 Not Applicable

Charged/Voted:

V

Non-Contingency/Contingency:

N

Amount Rs:

95000.00

Amount In words Rs:

Ninety five thousand only

Purpose:

TOWARDS COST OF HARI

Remitter's Name &amp; Address:

D KIRAN KUMAR

H.NO.46-1M-DE-501, SAPTHAG  
KURNOOL

Remitter's Mobile Number :

9440280000

DDO Code:

09411210003

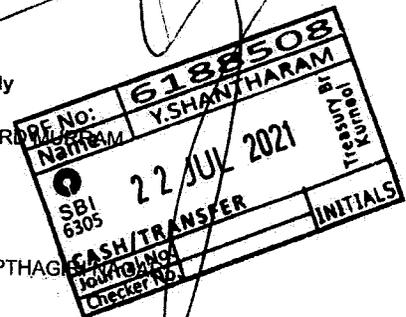
O/o EE HNSS DIVISION 2 KURNOOL

Status

Payment Pending

Bank Ref No :

CPAAXTOUF2



'Branch Teller: Use SCR 008765 Deposit &gt; Fee Collection &gt; State Bank Collect'

J-96

9700206007



Challan Reference Form

## GOVERNMENT OF ANDHRA PRADESH

CFMS Transaction ID: 50054315162021 Valid Upto: 01.08.2021

Treasury/PAO Code: 0901 STO: DTO-Kurnool

Service : 4008-Minor Minerals - Seigniorage Fee/Dead Rent

Major Head: 0853 Non-Ferrous Mining and Metallurgical Industries

Sub-Major Head: 00 Not Applicable

Minor Head: 102 Mineral Concession Fees, Rents and royalties

Group Sub-Head: 00 Not Applicable

Sub-Head: 02 Royalty on Minor Minerals

Detailed Head: 000 Not Applicable

Sub-Detailed Head: 000 Not Applicable

Charged/Voted: V

Non-Contingency/Contingency: N

Amount Rs: 45000.00

Amount In words Rs: Forty five thousand only

Purpose: TOWARDS SEINORAGE FEE

Remitter's Name & Address: D KIRAN KUMAR  
H.NO.46-1M-DE-501, SAPT GIRI NAGAR  
KURNOOL

Remitter's Mobile Number : 9440280000

DDO Code: 09011307002

O/o AD MINES & GEOLOGY KURNOOL

Status: Payment Pending

Bank Ref No : CPAAXTPND2

PF No:	6183508
Name:	Y.SHANTHARAM
SBI 6905	22 JUL 2021
CASH/TRANSFER	
Journal No.	INITIALS
Checker No.	

'Branch Teller: Use SCR 008765 Deposit > Fee Collection > State Bank Collect'

*J - ga*



## Challan Reference Form

## GOVERNMENT OF ANDHRA PRADESH

CFMS Transaction ID: 50054338962021 Valid Upto: 01.08.2021

Treasury/PAO Code: 0901 STO: DTO-Kurnool

Service : 6129-Other Receipts

Major Head: 0070 Other Administrative Services

Sub-Major Head: 01 Administration of Justice

Minor Head: 800 Other Receipts

Group Sub-Head: 00 Not Applicable

Sub-Head: 81 Other Receipts

Detailed Head: 000 Not Applicable

Sub-Detailed Head: 000 Not Applicable

Charged/Voted: V

Non-Contingency/Contingency: N

Amount Rs: 900.00

Amount In words Rs: Nine hundred only

Purpose: TOWARDS NMET FUND

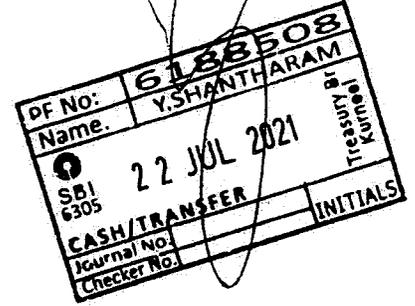
Remitter's Name & Address: D KIRAN KUMAR  
H.NO.46-1M-DE-501, SAPTHAGIRI NAGAR  
KURNOOL

Remitter's Mobile Number : 9440280000

DDO Code: 09010705014  
E.E, HNSS, Division-II, Kurnool

Status: Payment Pending

Bank Ref No : CPAAXTRQW7



'Branch Teller: Use SCR 008765 Deposit > Fee Collection > State Bank Collect'

J-26



## Challan Reference Form

## GOVERNMENT OF ANDHRA PRADESH

CFMS Transaction ID: 50054348372021 Valid Upto: 01.08.2021

Treasury/PAO Code: 0901 STO: DTO-Kurnool

Service : 1102-Minor Minerals- District Mineral Foundation (98% DMF)

Major Head: 8448 DEPOSITS OF LOCAL FUNDS

Sub-Major Head: 00 NOT APPLICABLE

Minor Head: 101 DISTRICT FUNDS

Group Sub-Head: 01 OWN FUNDS

Sub-Head: 13 DISTRICT MINERAL FUND

Detailed Head: 001 DISTRICT MINERAL FOUNDATION

Sub-Detailed Head: 001 Grants-in-Aid Deposits

Charged/Voted: V

Non-Contingency/Contingency: N

Amount Rs: 13500.00

Amount In words Rs: Thirteen thousand five hundred only

Purpose: TOWARDS DISTRICT MINERAL FOUNDATION

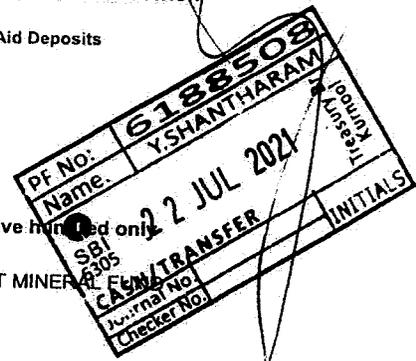
Remitter's Name & Address: D KIRAN KUMAR  
H.NO.46-1M-DE-501, SAPTHAGIRI NAGAR,  
KURNOOL

Remitter's Mobile Number : 9440280000

DDO Code: 09011307005  
DIST COLLECTOR & CHAIRMAN DMF KURNOO

Status: Payment Pending

Bank Ref No : CPAAXTQBV9



'Branch Teller: Use SCR 008765 Deposit > Fee Collection > State Bank Collect'

*Handwritten signature*



## Challan Reference Form

## GOVERNMENT OF ANDHRA PRADESH

CFMS Transaction ID: 50054404212021 Valid Upto: 01.08.2021

Treasury/PAO Code: 0901

STO: DTO-Kurnool

Service :

6129-Other Receipts

Major Head:

0070 Other Administrative Services

Sub-Major Head:

01 Administration of Justice

Minor Head:

800 Other Receipts

Group Sub-Head:

00 Not Applicable

Sub-Head:

81 Other Receipts

Detailed Head:

000 Not Applicable

Sub-Detailed Head:

000 Not Applicable

Charged/Voted:

V

Non-Contingency/Contingency:

N

Amount Rs:

4750.00

Amount in words Rs:

Four thousand seven hundred only

Purpose:

TOWARDS GST

Remitter's Name &amp; Address:

D KIRAN KUMAR

H.NO.1M-DE-501, SAPTHAGIRI NAGAR,  
KURNOOL

Remitter's Mobile Number :

9440280000

DDO Code:

09010705014

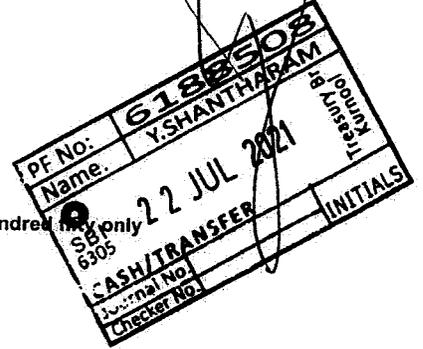
E.E, HNSS,Division-II, Kurnool

Status

Payment Pending

Bank Ref No :

CPAAXTRYQ1



'Branch Teller: Use SCR 008765 Deposit &gt; Fee Collection &gt; State Bank Collect'



## Challan Reference Form

## GOVERNMENT OF ANDHRA PRADESH

CFMS Transaction ID: 50054369342021 Valid Upto: 01.08.2021

Treasury/PAO Code: 0901

STO: DTO-Kurnool

Service :

6129-Other Receipts

Major Head:

0070 Other Administrative Services

Sub-Major Head:

01 Administration of Justice

Minor Head:

800 Other Receipts

Group Sub-Head:

00 Not Applicable

Sub-Head:

81 Other Receipts

Detailed Head:

000 Not Applicable

Sub-Detailed Head:

000 Not Applicable

Charged/Voted:

V

Non-Contingency/Contingency:

N

Amount Rs:

1900.00

Amount In words Rs:

One thousand nine hundred only

Purpose:

SUPERVISION CHARGES

Remitter's Name &amp; Address:

D KIRAN KUMAR

H.NO.46-1M-DE-501, SAPTHAGIRI NAGAR,  
KURNOOL

Remitter's Mobile Number :

9440280000

DDO Code:

09010705014

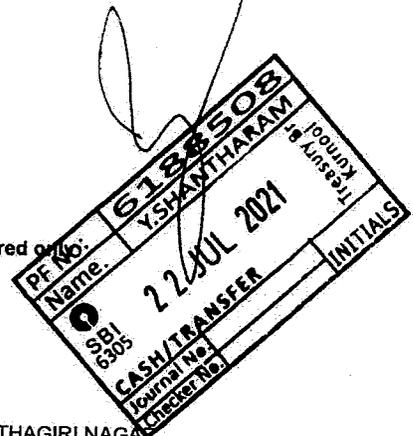
E.E, HNSS, Division-II, Kurnool

Status

Payment Pending

Bank Ref No :

CPAAXTRES0

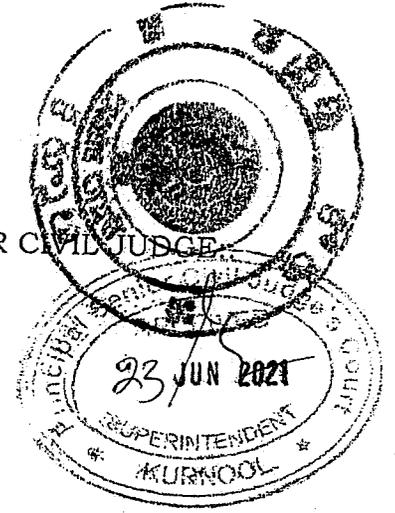


'Branch Teller: Use SCR 008765 Deposit &gt; Fee Collection &gt; State Bank Collect'

IN THE COURT OF THE PRINCIPAL SENIOR CIVIL JUDGE  
KURNOOL

O.S No. 46 /2021

- 1.Dhulipalla Koti Swamy
- 2.Araveti Babaiah
- 3.Duddempudi Kiran Kumar
- 4.Sapuru Rajasekharappa
- 5.Dhulipalla Venkata Rao



..... Plaintiffs

--Versus--

- 1.Nallabothula Balanna
- 2.Ballary Srinivasulu
- 3.Golla Kondalarao
- 4.Buddagari Pedda Lakshmanna
- 5.Saraph Venkateswara Prasadu

..... Defendants

PLAINT FILED ON BEHALF OF THE PLAINTIFF UNDER ORDER VII  
RULE 1 OF C.P.C

1. PLAINTIFFS :-

- 1.Dhulipalla Koti Swamy S/o D.Veeraiah, aged 65 years, Hindu, Business, R/o H.No.45-203-2-4-402, Sai Padmaja Enclave Apartment, Ashok Nagar, Kurnool city.
- 2.Araveti Babaiah S/o Araveti Subbaiah, aged 63 years, Hindu, Business, r/o H.No.15-9C-10/9C, Saibaba Peta, Nandikotkur, Kurnool District.
- 3.Duddempudi Kiran Kumar S/o D.Venkateswarlu, aged 50 years, Hindu, Business, r/o H.No.46-1M-DE-501, Saphagiri Nagar, Kurnool city.
- 4.Sapuru Rajasekharappa S/o Sapuru Kumarappa, aged 48 years, Hindu, r/o H.No.23/23-123B, Rajaveedhi, Nandikotkur, Kurnool District.
- 5.Dhulipalla Venkata Rao S/o Dhupalla Veeraiah, aged 60 years, Hindu, Business, r/o D.No.8-2-293/82/BE/20, Navanirman Nagar, near Jubilee Hills Public School, Jubilee Hills, Hyderabad City.

Address for Services

**SRI G.MADHUSUDHANA REDDY**

**CELL:94402 91373**

**SRI P.RAMU**

**SRI U.SUBBANNA**

**ADVOCATES, KURNOOL**

2. DEFENDANTS:-

- 1.Nallabothula Balanna S/o Nallabothula Ayyanna, aged 55 years, Hindu, Unemployee, r/o H.No.3-48, B.Thandrapadu village, Kurnool Mandal and District..

1) *Dhulipalla Swamy*

3) *D. Veeraiah* 57

2) *A. Babaiah*

... *S. Sushis*

*[Signature]*  
T.C.B.O.  
SUPERINTENDENT

2. Ballary Srinivasulu S/o Bellary Chinna Subbarah, aged 55 years, Hindu, Real Estate Business, r/o H.No.1-83, Sivareddypalle village, Kurnool Mandal and District.518452.

3. Golla Kondalarao S/o Golla Mala Kondaliah, aged 45 years, Hindu, r/o H.No.46-682-P-3-1, Budhawarapeta, Kurnool.

4. Buddagari Pedda Lakshmanna S/o Buddagari Samelu, aged 44 years, Hindu, r/o H.NO.1-252, Madiga veedhi, Uyyalawada village, Orvakal Mandal, Kurnool District.

5. Saraph Venkateswara Prasadu S/o Saraph Chinna Busaiah, aged 50 years, Hindu, r/o H.No.3-23-A, Nannur village, Orvakal Mandal, Kurnool District.

3. The plaintiffs jointly purchased the petition schedule properties as shown in the plaint schedule Item No.A to H. The description of the property is given in the plaint schedule. The plaint schedule property is situated at B.Thandrapadu village, Kurnool Mandal and District i.e., within the Jurisdiction of the Hon'ble Court.

4. The plaintiffs 1 to 5 are jointly purchased some of the plaint schedule properties i.e. Item No.A to D and Item No.E and H in the name of 1<sup>st</sup> plaintiff, Item No.F in the name of 2<sup>nd</sup> plaintiff, Item No.G in the name of 5<sup>th</sup> plaintiff from different persons under a registered sale deeds. The entire schedule properties are situated side by side to an extent of Ac.12.74 cents. The plaint schedule property Item No.A is an extent of Ac.4.99 cents in Sy.No.81/1 was purchased by the plaintiffs under a registered sale deed dated 17.11.2018 with document No.12426 of 2018, the Item No.B of the plaint schedule property is purchased by the plaintiffs under a registered sale deed dated 27.12.2018 with document No.14035 of 2018 to an extent of Ac.1.56 cents in Sy.No.81/1 out of Ac.2.00 cents and to an extent of Ac.1.00 cents in Sy.No.299. Item No.C of the plaint schedule property is purchased by the plaintiffs under a registered sale deed dated 28.01.2019 with document No.1136 of 2020 to an extent of Ac.0.79 cents in Sy.No.81/1. The Item No.D of the plaint schedule property is purchased in the name of 4<sup>th</sup> plaintiff under a registered sale deed dated 16.03.2019 with document No.3206 of 2019 to an extent of Ac.0.78 cents in Sy.No.81/1. The Item No.E of the plaint schedule

1) *[Signature]*

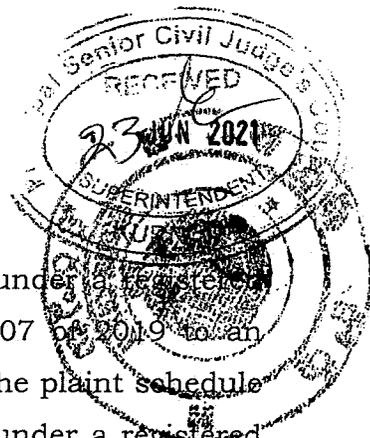
3) *[Signature]*

2) A. Balasubrah.

4) S. Rishu

5) *[Signature]*

J.C.B.O  
SUPERINTENDENT



:: 3 ::

property is purchased in the name of 1<sup>st</sup> plaintiff under a registered sale deed dated 16.03.2019 with document No.3207 of 2019 to an extent of Ac.1.00 cents in Sy.No.299. Item No.F of the plaint schedule property is purchased in the name of 2<sup>nd</sup> plaintiff under a registered sale deed dated 02.05.2019 with document No.4872 of 2019 to an extent of Ac.0.89 cents in Sy.No.301-2. The Item No.G of the plaint schedule property is purchased in the name of 5<sup>th</sup> plaintiff under a registered sale deed dated 05.08.2019 with document No.9194 of 2019 to an extent of Ac.0.93 cents in Sy.No.301/1. Item No.H of the plaint schedule property is purchased by the plaintiffs under a registered sale deed dated 20.12.2019 with document No.14631 of 2019 to an extent Ac.0.40 cents in Sy.No.300-1A and to an extent of Ac.0.40 cents in Sy.No.300-1B1. The total extent under the above sale deeds is Ac.12.74 cents and it is agriculture land at present. From the date of purchase the plaintiffs are in possession and enjoyment of the plaint schedule property and the plaintiffs names are mutated in the revenue records. The plaintiffs also availed loan for business purpose by keeping the original sale deeds in the Axis Bank, C.Camp, Kurnool. The certified copies of the sale deeds are herewith filed. The meseeva copies of Adangal and ROR is filed to show that the plaintiffs are in possession and enjoyment of the plaint schedule properties A to H.

5. The plaintiffs submit that the plaintiff's are the absolute owners of the plaint schedule properties and they are enjoying with valid right title and possession and prior to purchase their vendors were in possession and enjoyment. The defendants have no right, title and possession whatsoever over the suit schedule property. The defendants are trying to enter into the suit schedule property with the help of anti social elements and the defendants attempted to trespass into the suit schedule property on 13.06.2021. With great difficulty plaintiffs could avert the high handedness of the defendants. The defendants returned by challenging that they will come with more persons and will trespass into the suit schedule property. The plaintiffs have no option except approaching the Court for grant of

1) *[Signature]*

2). A. Bakavathi

3) *[Signature]*

4). S. Disha

5) *[Signature]*  
T.C.S.O.  
SUPERINTENDENT

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permanent injunction otherwise the plaintiffs will be put to great loss and hardship. Hence, the suit is filed for grant of permanent injunction restraining the defendants and their men or any other persons on their behalf not to interfere with the peaceful possession and enjoyment of the suit schedule property.

6. The cause of action for the suit arose on 13.06.2021 when the defendants tried to trespass into the plaint schedule properties and when the plaintiffs prevented the high handedness of defendants.

7. The plaintiffs and defendants and the suit schedule properties are situated within the Jurisdiction of this Hon'ble Court hence the Hon'ble Court has got Jurisdiction to entertain the suit.

8. PARTICULARS OF THE CLAIM :-

The plaintiffs are filed suit for permanent injunction restraining the

1. defendants not to interfere with the peaceful possession and enjoyment over the suit schedule properties is valued at Rs.21,00,000-00

9. For the purpose of Court fee and suit valuation the suit is valued at Rs.21,00,000/-. The fixed Court fee of Rs.23,426/- is payable and paid for grant of permanent injunction under section 26(c) of A.P.C.F and S.V Act.

It is therefore prayed that the Hon'ble Court may be pleased to pass a decree in favor of plaintiffs and against the defendants as prayed for.

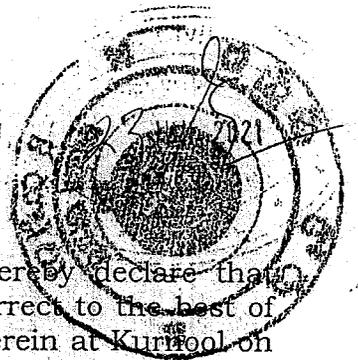
- a) for grant of permanent injunction restraining the defendants or their men or any other persons on behalf of defendants not to interfere with the plaintiff's peaceful possession and enjoyment over the suit schedule properties item No.A to H,
- b) costs of the suit and
- c) grant such other relief or reliefs as prayed for by the plaintiffs in the circumstances of the case.

*[Signature]*  
Advocate for Plaintiffs

*[Signature]*  
1. A. Balaiah,  
2. A. Balaiah,  
3. A. Balaiah,  
4. S. S. S. S. S.  
5. *[Signature]*

Plaintiffs

*[Signature]*  
T.C.B.O  
SUPERINTENDENT



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VERIFICATION

We, the above named plaintiffs, do hereby declare that what is stated in the above paras are true and correct to the best of my knowledge, belief information and we signed herein at Kurnool on 21.06.2021.

1. *[Signature]*  
 2. *[Signature]*  
 3. *[Signature]*  
 4. *[Signature]*  
 5. *[Signature]*

Plaintiffs

SCHEDULE

(The items A to H are situated side by side and total extent consists of Ac.12.74 cents situated in Sy.No.81/1, 299, 300/1A, 300/1B1, 301/1, 301/2 at B.Thandrapadu village, Kurnool Mandal and District.)

**Item No.A:-** as per registered sale deed dated 17.09.2018 the Agricultural land to an extent of Ac.4.99 cents out of Ac.9.04 in Sy.No.81/1 situated at B.Thandrapadu village, Kurnool Mandal, Kurnool Sub Registration and Kurnool Registration District with the following boundaries.

BOUNDARIES :-

EAST : Rastha,  
 WEST : Land in Sy.No.80 belongs to G.Pulla Reddy,  
 NORTH : Land in Sy.No.76 belongs to G.Pulla Reddy,  
 SOUTH : Land in same sy: number of B.S.Jameela Begum and others,

**Item No.B:-** as per registered sale deed dated 27.12.2018 the Agricultural land to an extent of Ac.1.56 cents out of Ac.2.00 in Sy.No.81/1 and Ac.1.00 cents in Sy.No.299 total Ac.2.56 cents is situated at B.Thandrapadu village, Kurnool Mandal, Kurnool Sub Registration and Kurnool Registration District with the following boundaries.

BOUNDARIES :-

EAST : Rastha,  
 WEST : Land in Sy.No.76 belongs to G.Pulla Reddy,  
 NORTH : Land in Sy.No.81/1 of B.S.Jameela Begum and others,  
 SOUTH : Land of B.S.Mohammed Miah and others.

**Item No.C:-** as per registered sale deed dated 28.01.2019 the Agricultural land to an extent of Ac.0.79 cents in Sy.No.81/1 is situated at B.Thandrapadu village, Kurnool Mandal, Kurnool Sub Registration and Kurnool Registration District with the following boundaries.

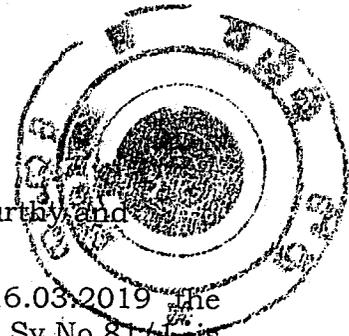
T.C.B.O

SUPERINTENDENT

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BOUNDARIES :-

EAST : Rastha,  
 WEST : Land of G.Pulla Reddy,  
 NORTH : Land of 4<sup>th</sup> plaintiff,  
 SOUTH : Land in Sy.No.299 of Golla Krishnamurthy and others.



**Item No.D:-** as per registered sale deed dated 16.03.2019 the Agricultural land to an extent of Ac.0.78 cents in Sy.No.81/1 is situated at B.Thandrapadu village, Kurnool Mandal, Kurnool Sub Registration and Kurnool Registration District with the following boundaries.

BOUNDARIES :-

EAST : Rastha,  
 WEST : Land of G.Pulla Reddy,  
 NORTH : Land of plaintiffs in same Survey number  
 SOUTH : Land of B.S.Mohammed Miah.

**Item No.E:-** as per registered sale deed dated 16.03.2019 the Agricultural land to an extent of Ac.1.00 cents in Sy.No.299 is situated at B.Thandrapadu village, Kurnool Mandal, Kurnool Sub Registration and Kurnool Registration District with the following boundaries.

BOUNDARIES :-

EAST : Rastha,  
 WEST : Land of G.Pulla Reddy,  
 NORTH : Land in the name of 1<sup>st</sup> plaintiff,  
 SOUTH : Land in Sy.No.300 and 301.

**Item No.F:-** as per registered sale deed dated 02.05.2019 the Agricultural land to an extent of Ac.0.89 cents in Sy.No.301-2 is situated at B.Thandrapadu village, Kurnool Mandal, Kurnool Sub Registration and Kurnool Registration District with the following boundaries.

BOUNDARIES :-

EAST : Land of Shyamsunder and others,  
 WEST : Land of G.Pulla Reddy,  
 NORTH : Land of B.S.Musthaq Hussain purchased by the 5<sup>th</sup> plaintiff  
 SOUTH : Land of B.S.Aref Hussain.

**Item No.G:-** as per registered sale deed dated 05.08.2019 the Agricultural land to an extent of Ac.0.93 cents in Sy.No.301/1 is situated at B.Thandrapadu village, Kurnool Mandal, Kurnool Sub Registration and Kurnool Registration District with the following boundaries.

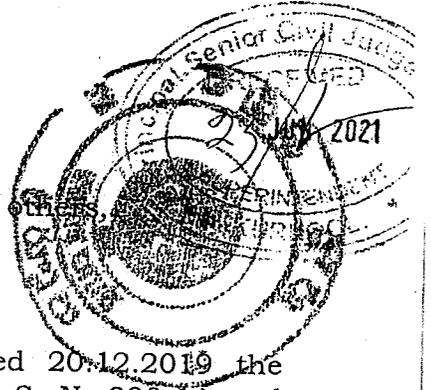
T.C.B.O.

SUPERINTENDENT

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BOUNDARIES :-

EAST : Land of Golla Krishnamurthy and others,  
 WEST : Land of G.Pulla Reddy,  
 NORTH : Land of plaintiffs,  
 SOUTH : Land in the name of 2<sup>nd</sup> plaintiff.



**Item No.H:-** as per registered sale deed dated 20.12.2019 the Agricultural land to an extent of Ac.0.40 cents in Sy.No.300-1A and Ac.0.40 cents in Sy.No.300/1B1 total extent Ac.0.80 cents is situated at B.Thandrapadu village, Kurnool Mandal, Kurnool Sub Registration and Kurnool Registration District with the following boundaries.

BOUNDARIES :-

EAST : Rastha,  
 WEST : Land in Sy.No.301,  
 NORTH : Land in Sy.No.299,  
 SOUTH : Land of Thirupal Reddy and Uma Devi.

List of documents:-

1. Certified copy of Registered Sale Deed in favour of plaintiffs dated 17.11.2018 vide document No.12426 of 2018 for Sy.No.81/1 to an extent of Ac.4.99 cents.
  2. Certified copy of Registered Sale Deed in favour of plaintiffs dated 27.12.2018 vide document No.14035 of 2018 for Sy.No.81/1 to an extent of Ac.1.56 cents and in Sy.No.299 to an extent of Ac.1.00 cents.
  3. Certified copy of Registered Sale Deed in favour of plaintiffs dated 28.01.2019 vide document No.1136 of 2019 for Sy.No.81/1 to an extent of Ac.0.79 cents.
  4. Certified copy of Registered Sale Deed in favour of plaintiffs dated 16.03.2019 vide document No.3206 of 2019 for Sy.No.81/1 to an extent of Ac.0.78 cents.
  5. Certified copy of Registered Sale Deed in favour of 1<sup>st</sup> plaintiff dated 16.03.2019 vide document No.3207 of 2019 for Sy.No.299 to an extent of Ac.1.00 cents.
  6. Certified copy of Registered Sale Deed in favour of 2<sup>nd</sup> plaintiff dated 02.05.2019 vide document No.4872 of 2019 for Sy.No.301-2 to an extent of Ac.0.89 cents.
  7. Certified copy of Registered Sale Deed in favour of 5<sup>th</sup> plaintiff dated 05.08.2019 vide document No.9194 of 2019 for Sy.No.301/1 to an extent of Ac.0.93 cents.
  8. Certified copy of Registered Sale Deed in favour of plaintiffs dated 20.12.2019 vide document No.14631 of 2019 for Sy.No.300-1A to an extent of Ac.0.40 cents and in Sy.No.300-1B1 to an extent of Ac.0.40 cents.
  9. Meeseva copies of Adangals over the suit schedule properties.
  10. Meeseva copies of 1B Register over the suit schedule properties.
- (The certified copies of original sale deed are in Axis Bank, Kurnool and the plaintiffs availed loan, the originals will be produced as and when Honourable Court directs the plaintiffs).

Advocate for plaintiffs

T.C.B.O

SUPERINTENDENT

IN THE COURT OF THE PRINCIPAL SENIOR CIVIL JUDGE  
KURNOOL

I.A.No. 332 /2021 in O.S No. 46 /2021

1.Dhulipalla Koti Swamy and others ..... Petitioners/Plaintiffs

--Versus--

1.Nallabothula Balanna and others ..... Respondents/Defendants

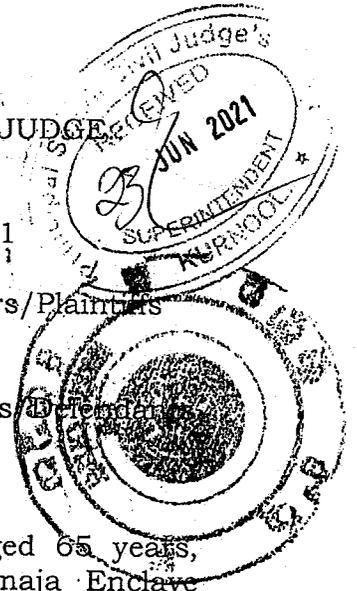
AFFIDAVIT

I, Dhulipalla Koti Swamy S/o D.Veeraiah, aged 65 years, Hindu, Business, R/o H.No.45-203-2-4-402, Sai Padmaja Enclave Apartment, Ashok Nagar, Kurnool city, do hereby solemnly affirm and state as follows:-

1. I am the 1<sup>st</sup> petitioner herein and 1<sup>st</sup> plaintiff in the above suit and I am giving affidavit on behalf of other petitioners also, as such I am well acquainted with the facts of the case.
2. The petitioners 1 to 5 are jointly purchased some of the plaint schedule properties i.e. Item No.A to D and Item No.E and H in the name of 1<sup>st</sup> petitioner, Item No.F in the name of 2<sup>nd</sup> petitioner, Item No.G in the name of 5<sup>th</sup> petitioner from different persons under a registered sale deeds. The entire schedule properties are situated side by side to an extent of Ac.12.74 cents. The petition schedule property Item No.A is an extent of Ac.4.99 cents in Sy.No.81/1 was purchased by the petitioners under a registered sale deed dated 17.11.2018 with document No.12426 of 2018, the Item No.B of the petition schedule property is purchased by the petitioners under a registered sale deed dated 27.12.2018 with document No.14035 of 2018 to an extent of Ac.1.56 cents in Sy.No.81/1 out of Ac.2.00 cents and to an extent of Ac.1.00 cents in Sy.No.299. Item No.C of the petition schedule property is purchased by the petitioners under a registered sale deed dated 28.01.2019 with document No.1136 of 2020 to an extent of Ac.0.79 cents in Sy.No.81/1. The Item No.D of the petition schedule property is purchased in the name of 4<sup>th</sup> petitioner under a registered sale deed dated 16.03.2019 with document No.3206 of 2019 to an extent of Ac.0.78 cents in Sy.No.81/1. The Item No.E of the petition schedule property is purchased in the name of 1<sup>st</sup> petitioner under a registered sale deed dated 16.03.2019 with document No.3207 of 2019 to an extent of Ac.1.00 cents in Sy.No.299. Item No.F of the petition schedule property is purchased in the name of 2<sup>nd</sup> petitioner under a registered sale deed dated 02.05.2019 with document No.4872 of 2019 to an extent of Ac.0.89 cents in Sy.No.301-2. The Item No.G of the petition schedule property is purchased in the name of 5<sup>th</sup> petitioner under a registered sale deed dated 05.08.2019 with document No.9194 of 2019 to an extent of Ac.0.93 cents in Sy.No.301/1. Item No.H of the petition schedule property is purchased by the petitioners under a registered sale deed dated 20.12.2019 with document No.14631 of 2019 to an extent Ac.0.40

*[Handwritten Signature]*

T.C.B.O  
*[Handwritten Signature]*  
SUPERINTENDENT



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cents in Sy.No.300-1A and to an extent of Ac.0.40 cents in Sy.No.300-1B1. The total extent under the above sale deeds is Ac.12.74 cents and it is agriculture land at present. From the date of purchase the petitioners are in possession and enjoyment of the petition schedule property and the petitioners names are mutated in the revenue records. The petitioners also availed loan for business purpose by keeping the original sale deeds in the Axis Bank, C.Camp, Kurnool. The certified copies of the sale deeds are herewith filed. The meseeva copies of Adangal and ROR is filed to show that the plaintiffs are in possession and enjoyment of the petition schedule properties A to H.

3. The petitioners submit that the plaintiff's are the absolute owners of the petition schedule properties and they are enjoying with valid right title and possession and prior to purchase their vendors were in possession and enjoyment. The respondents have no right, title and possession whatsoever over the suit schedule property. The respondents are trying to enter into the suit schedule property with the help of anti social elements and the respondents attempted to trespass into the suit schedule property on 13.06.2021. With great difficulty petitioners could avert the high handedness of the respondents. The respondents retuned by challenging that they will come with more persons and will trespass into the suit schedule property. The petitioners have no option except approaching the Court for grant of permanent injunction otherwise the plaintiffs will be put to great loss and hardship. Hence, the suit is filed for grant of permanent injunction restraining the respondents and their men or any other persons on their behalf not to interfere with the peaceful possession and enjoyment of the suit schedule property.

4. I have got prima facie case and balance of conveyance and if the injunction is granted I will be put to great loss and hardship.

It is therefore prayed that the Hon'ble Court may be pleased to grant add-interim injunction restraining the respondents or any other person on behalf of respondent, not to interfere with my peaceful possession and enjoyment over the petition schedule property item No.A to H till the disposal of suit otherwise I will be put to great loss and hardship in the interest of justice.

Solemnly affirmed and I  
signed herein at Kurnool (Before me)  
on 21.06.2021.

*[Signature]*  
DEPONENT

*[Signature]*  
ADVOCATE :: KURNOOL

*[Signature]*  
T.C.B.O  
SUPERINTENDENT

IN THE COURT OF THE PRINCIPAL SENIOR CIVIL JUDGE:  
KURNOOL

I.A.NO. 337/2021 in O.S.No. 46 /2021

1. Dhulipalla Koti Swamy S/o D. Veeraiah, aged 65 years, Hindu, Business, R/o H.No.45-203-2-4-402, Sai Padmaja Enclave Apartment, Ashok Nagar, Kurnool city.
2. Araveti Babaiah S/o Araveti Subbaiah, aged 63 years, Hindu, Business, r/o H.No.15-9C-10/9C, Saibaba Peta, Nandikotkur, Kurnool District.
3. Duddempudi Kiran Kumar S/o D. Venkateswarlu, aged 50 years, Hindu, Business, r/o H.No.46-1M-DE-501, Saphagiri Nagar, Kurnool city.
4. Sapuru Rajasekharappa S/o Sapuru Kumarappa, aged 48 years, Hindu, r/o H.No.23/23-123B, Rajaveedhi, Nandikotkur, Kurnool District.
5. Dhulipalla Venkata Rao S/o Dhupalla Veeraiah, aged 60 years, Hindu, Business, r/o D.No.8-2-293/82/BE/20, Navanirman Nagar, near Jubilee Hills Public School, Jubilee Hills, Hyderabad City.

--Versus--

Petitioners

1. Nallabothula Balanna S/o Nallabothula Ayyanna, aged 55 years, Hindu, Unemployed, r/o H.No.3, 48, B.Thandrapadu village, Kurnool Mandal and District..
2. Ballary Srinivasulu S/o Bellary Chinna Subbaiah, aged 55 years, Hindu, Real Estate Business, r/o H.No.1-83, Sivareddypalle village, Kurnool Mandal and District. 518452.
3. Golla Kondalarao S/o Golla Mala Kondaiiah, aged 45 years, Hindu, r/o H.No.46-682-F-3-1, Budhawarapeta, Kurnool.
4. Buddagari Pedda Lakshmana S/o Buddagari Samelu, aged 44 years, Hindu, r/o H.No.1-252, Madiga veedhi, Uyyalawada village, Orvakal Mandal, Kurnool District.
5. Saraph Venkateswara Prasadu S/o Saraph Chinna Busaiah, aged 50 years, Hindu, r/o H.No.3-23-A, Nannur village, Orvakal Mandal, Kurnool District.

Respondents

PETITION FILED ON BEHALF OF THE PETITIONER UNDER ORDER  
39 RULE 1 AND 2 C.P.C

For the reasons stated in the accompanying affidavit it is prayed that the Hon'ble Court may please to grant temporary injunction restraining the respondents or any other person on behalf of the respondents not to interfere with the petitioner's peaceful possession and enjoyment over the petition schedule property till the disposal of suit otherwise the petitioner will be put to great loss and hardship in the interest of justice

*[Signature]*  
Advocate for Petitioner

SCHEDULE

(The items A to H are situated side by side and total extent consists of Ac.12.74 cents situated in Sy.No.81/1, 299, 300/1A, 300/1B1, 301/1, 301/2 at B.Thandrapadu village, Kurnool Mandal and District.)

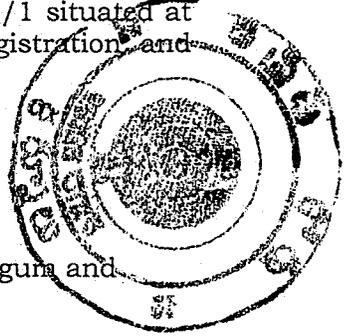
*[Signature]*  
T.C.B.O  
SUPERINTENDENT

:: 2 ::

**Item No.A:-** as per registered sale deed dated 17.09.2018 the Agricultural land to an extent of Ac.4.99 cents out of Ac.9.04 in Sy.No.81/1 situated at B.Thandrapadu village, Kurnool Mandal, Kurnool Sub Registration and Kurnool Registration District with the following boundaries.

**BOUNDARIES :-**

EAST : Rastha,  
WEST : Land in Sy.No.80 belongs to G.Pulla Reddy,  
NORTH : Land in Sy.No.76 belongs to G.Pulla Reddy,  
SOUTH : Land in same sy.number of B.S.Jameela Begum and others,



**Item No.B:-** as per registered sale deed dated 27.12.2018 the Agricultural land to an extent of Ac.1.56 cents out of Ac.2.00 in Sy.No.81/1 and Ac.1.00 cents in Sy.No.299 total Ac.2.56 cents is situated at B.Thandrapadu village, Kurnool Mandal, Kurnool Sub Registration and Kurnool Registration District with the following boundaries.

**BOUNDARIES :-**

EAST : Rastha,  
WEST : Land in Sy.No.76 belongs to G.Pulla Reddy,  
NORTH : Land in Sy.No.81/1 of B.S.Jameela Begum and others,  
SOUTH : Land of B.S.Mohammed Miah and others.

**Item No.C:-** as per registered sale deed dated 28.01.2019 the Agricultural land to an extent of Ac.0.79 cents in Sy.No.81/1 is situated at B.Thandrapadu village, Kurnool Mandal, Kurnool Sub Registration and Kurnool Registration District with the following boundaries.

**BOUNDARIES :-**

EAST : Rastha,  
WEST : Land of G.Pulla Reddy,  
NORTH : Land of 4<sup>th</sup> plaintiff,  
SOUTH : Land in Sy.No.299 of Golla Krishnamurthy and others.

**Item No.D:-** as per registered sale deed dated 16.03.2019 the Agricultural land to an extent of Ac.0.78 cents in Sy.No.81/1 is situated at B.Thandrapadu village, Kurnool Mandal, Kurnool Sub Registration and Kurnool Registration District with the following boundaries.

**BOUNDARIES :-**

EAST : Rastha,  
WEST : Land of G.Pulla Reddy,  
NORTH : Land of plaintiffs in same Survey number  
SOUTH : Land of B.S.Mohammed Miah.

**Item No.E:-** as per registered sale deed dated 16.03.2019 the Agricultural land to an extent of Ac.1.00 cents in Sy.No.299 is situated at B.Thandrapadu village, Kurnool Mandal, Kurnool Sub Registration and Kurnool Registration District with the following boundaries.

**BOUNDARIES :-**

EAST : Rastha, WEST : Land of G.Pulla Reddy,  
NORTH : Land in the name of 1<sup>st</sup> plaintiff,  
SOUTH : Land in Sy.No.300 and 301.

**T.C.B.O**  
**SUPERINTENDENT**

:: 3 ::

**Item No.F:-** as per registered sale deed dated 02.05.2019 the Agricultural land to an extent of Ac.0.89 cents in Sy.No.301-2 is situated at B.Thandrapadu village, Kurnool Mandal, Kurnool Sub Registration and Kurnool Registration District with the following boundaries.

**BOUNDARIES :-**

EAST : Land of Shyamsunder and others,  
 WEST : Land of G.Pulla Reddy,  
 NORTH : Land of B.S.Musthaq Hussain purchased by the 5<sup>th</sup> plaintiff  
 SOUTH : Land of B.S.Aref Hussain.

**Item No.G:-** as per registered sale deed dated 05.08.2019 the Agricultural land to an extent of Ac.0.93 cents in Sy.No.301/1 is situated at B.Thandrapadu village, Kurnool Mandal, Kurnool Sub Registration and Kurnool Registration District with the following boundaries.

**BOUNDARIES :-**

EAST : Land of Golla Krishnamurthy and others,  
 WEST : Land of G.Pulla Reddy,  
 NORTH : Land of plaintiffs,  
 SOUTH : Land in the name of 2<sup>nd</sup> plaintiff.

**Item No.H:-** as per registered sale deed dated 20.12.2019 the Agricultural land to an extent of Ac.0.40 cents in Sy.No.300-1A and Ac.0.40 cents in Sy.No.300/1B1 total extent Ac.0.80 cents is situated at B.Thandrapadu village, Kurnool Mandal, Kurnool Sub Registration and Kurnool Registration District with the following boundaries.

**BOUNDARIES :-**

EAST : Rastha,  
 WEST : Land in Sy.No.301,  
 NORTH : Land in Sy.No.299,  
 SOUTH : Land of Thirupal Reddy and Uma Devi.

*[Signature]*  
 Advocate for Petitioner

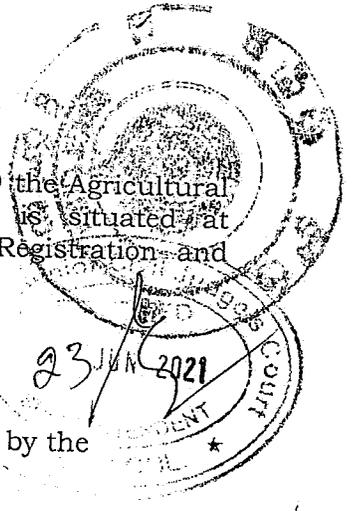
*[Signature]*  
 Petitioner

**VERIFICATION**

We, the above named 1<sup>st</sup> petitioner, do hereby declare that what is stated in the above paras are true and correct to the best of my knowledge, belief information and I signed herein at Kurnool on 21.06.2021.

*[Signature]*  
 Petitioner

*[Signature]*  
 T.C.B.O.  
 SUPERINTENDENT



-1-

File No.REV.GSECOLARR(GEN)/32/2021-SA(G1)-COLLKRNL

From  
Sri P.Koteswara Rao IAS,  
Collector & Dist. Magistrate,  
Kurnool

To  
The Hon'ble Chairperson,  
State Human Rights Commission,  
Andhra Pradesh.

Rc.G2/ 1063 /201 date 23.09..2021

Sir,

Sub:-Hon'ble Human Rights Commission - Land Issue – Kurnool District – Kurnool Rural Mandal – B.Thandrapadu Village – Petition filed by Sri P.T.Sai Pradeep and three others, District Vigilance & Monitoring Committee S.C./ST, Kurnool Dist. – Filed petition disclosing that the area of tank was 70.00 acres of land in Sy.no.81/1 in Kurnool Mandal, to extent of 14.00 acres of the tank Permanently closed – The Hon'ble State Human Rights Commission issued directions to the Collector, Kurnool to cause Inspection of Tank by the competent authorities and submit report within 4 weeks– Factual report submitted – Regarding.

- Ref:- 1. Interim Directions dated 19.7.2021 of the Hon'ble Human Rights Commission, Andhra Pradesh in S.R. no. 116 of 2021 in H.R.C.No.0157 of 2021.
2. Proceedings no. Rc.G1/1063 /2021 dated 17.08.2021 of the Collector & Magistrate, Kurnool
  3. This office letter No. G2/1063/2021 dated 17.8.2021 addressed to The Hon'ble State Human Rights Commission, A.P.,
  4. Report of the Committee constituted in the reference 2<sup>nd</sup> cited
- 

I invite the kind attention of the Hon'ble State Human Rights Commission, Andhra Pradesh to the references cited.

I submit that in reference 1<sup>st</sup> cited, on the petition relating to closure of a part tank of B.Thandrapadu village(Sy.no.81/1) of Kurnool Mandal filed by Sri P.T.Sai Pradeep and three others, District Vigilance & Monitoring Committee S.C./ST, Kurnool District, the Hon'ble State Human Rights Commission, A.P., has issued Interim directions to the Collector, Kurnool, "to forthwith cause an inspection of the subject tank to be made by a competent Government Officer and direct such officer to conduct Survey of the subject tank with the help of a Government Surveyor and submit a preliminary report with the Survey Plan through the District Collector to this Commission within four weeks from the date of receipt of the copy of this order. The District Collector is also directed to ensure that the said officer submits along with his said report, the certified true copies of the revenue/village records relating to the subject tank showing its survey number and area etcetera".

I submit that in obedience to the Interim Orders of the Hon'ble State Human Rights

## File No.REV.GSECOLARR(GEN)/32/2021-SA(G1)-COLLKRNL

Commission, Andhra Pradesh, in the reference 2<sup>nd</sup> cited, a team of officers consisting of (1) Revenue Divisional Officer, Kurnool (2) Superintending Engineer, Irrigation, Kurnool (3) Assistant Director., S & LR, Kurnool and (4) Tahsildar, Kurnool, has been appointed for inspection of tank situated at B.Thandrapadu village(Sy.no.81/1) of Kurnool Mandal with a direction inspect the tank and submit report and in the reference 3<sup>rd</sup> cited, the Hon'ble Human Rights Commission, A.P., has been requested time of 4 weeks for submission of factual report.

I submit that the appointed Committee has inspected the Tank on 02.09.2021 and submitted its report in the reference 4<sup>th</sup> cited. The Committee has verified Revenue and other relevant records and also inspected the B.Thandrapadu Tank, which is called as "Gangamma Cheruvu". As per report of the Committee, the water is being stored in Sy.nos.76, 77,78, 79,80,81/1,299,301,309 and 310 of B.Thandrapadu village of Kurnool rural Mandal. The details of the above Survey numbers as per Revenue Records are as follows:

**As per Re-Settlement Register:**

Sl.No	Sy.No	Extent	Classification	Name of the Pattadar	Remarks
1	76	20.25	G.D	Names as per RSR No.28	Name of the Pattadar at No.28 Hussain Khan and 7 Others
2	77	0.53	G.D	L Krishtarow and Jafarsaheb	
3	78	0.83	G.D		
4	79	7.32	G.D	L Krishtarow and Jafarsaheb	
5	80	3.45	G.D	Yelukuri Padmanna	
6	81	9.40	G.D	Karim Khatubibi	
7	299	2.38	G.D	Karim Khatubibi	
8	301	5.94	G.D.	Krishtarao	
9	309	1.32	G.D	Yelukuri Padmanna	
10	310	3.72	G.D	L Krishtarow and Jafarsaheb	

**As Village Map:-**

The land in Sy.No.76 Extent 20.25 Acs., of B.Thandrapadu Village of Kurnool Rural Mandal have been notified as Thandrapadu Cheruvu

**As per ROR:**

Sy.No	Extent	Enjoyment Extent	Name of the Pattadar
.			

## File No.REV.GSECOLARR(GEN)/32/2021-SA(G1)-COLLKRNL

76-1	17.35	17.35	G.Pulla Reddy
77	0.53	0.21	Mythaf Khan
		0.22	Hyder Khan
79	7.32	7.32	G.Pulla Reddy
80	3.45	3.45	G.Pulla Reddy
81-1	8.12	5.00	Jawarila Baldev
		3.12	Jattenna, Ratnamanna
299	2.38	2.38	Bahari lal Baldev   Gargeyapuram Yellanna
309	1.32	1.32	G Pulla Reddy
310	3.72	3.72	G Pulla Reddy

As per RH

As per RH it is ascertained that, sale transactions in respect of Sy.No.76, 79, 80, 309 & 310 have been took place in the year 1946 and in respect of Sy.No.78 sales transaction took place in the year 1942 and in respect of Sy.No.77 sales transaction took place in the year 1943 and in respect of Sy.No.81 & 299 sales transaction took place in the year 1936 and in respect of Sy.No.301 sales transaction took place in the year 1932.

As per Manual Adangal Fasali : 1422

Sy.No	Total Extent	Khata No	Enjoyment Extent	Classification	Nature	Name of the Pattadar	Name of the Enjoyer
76-1	17.35	3	17.35	Cheruvu	Patta	G.Pulla Reddy	Cheruvu
76-2	2.90			Govt Land	Govt Land	N.H.18 Road	
77	0.53	746	0.53	Metta	Patta	Perapogu Chinna Tirupalu (Rematanna)	Perapogu Chinna Tirupalu (Rematanna)
78	0.83		0.83	Govt Land	Govt Land	Cheruvu Gattu	Cheruvu Gattu
79	7.32	3	7.32	Metta	Patta	G Pulla Reddy	Cheruvu
80	3.45	3	3.45	Metta	Patta	G Pulla Reddy	Cheruvu
81-1	8.12	132	1.56	Metta	Patta	B.S Mohammad Miah S/o B S Sharaf	
		183	1.65	Metta	Patta	B S Eqbal Hussain S/o Sharaf	
		184	1.67	Metta	Patta	Mohsin Hussain S/o Mohaseen Hussain	
		185	1.67	Metta	Patta	Aarif Hussain S/o B.S Sharaf	
		188	1.57	Metta	Patta	B.S.M Miah S/o B.S.Sharaf	
81-2	0.92		0.92	Govt Land	Govt Land	N H 18 Road	
299	2.38	188	1.19	Metta	Patta	B.S.M Miah S/o B.S.Sharaf	
		183	1.19	Metta	Patta	B S Eqbal Hussain S/o Sharaf	
309	1.32	3	1.32	Metta	Patta	G Pulla Reddy	Cheruvu
310	3.72	3	3.72	Metta	Patta	G Pulla Reddy	Cheruvu

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As per Webland Adangal

Sy.No	Total Extent	Khata No	Enjoyment Extent	Classification	Nature	Name of the Pattadar	Name of the Enjoyer
76-1	17.35	9999	17.35	Cheruvu	Patta	Migulu Bhoomi	
76-2	2.90	20001305	2.90	Govt Land	Govt Land	N.H.Road	
77	0.53	746	0.53	Metta	Patta	Perapogu Chinna Tirupalu (Rematanna)	
78	0.83	20000506	0.83	Govt Land	Govt Land	Cheruvu	
79	6.03	9999	6.03	Metta	Patta	Migulu Bhoomi	
80	3.45	9999	3.45	Metta	Patta	Migulu Bhoomi	
81-1	8.12	989	1.47	Metta	Patta	Dhoolipalla Venkata Rao (Dhoolipalla Veerayya)	
		990	2.24	Metta	Patta	Saavuru Rajaseharappa (Saavuru Kumarappa)	
		991	1.47	Metta	Patta	Duddempudi Kiran Kumar (Duddempudi Venkateswarlu)	
		992	1.47	Metta	Patta	Dhoolipalla Kotiswamy (D Veeraiah)	
		993	1.47	Metta	Patta	Aarveti Babaiah ( A Subbaiah)	
81-2	0.92	20001305	0.92	Govt Land	Govt Land	N H Road	
299	2.38	690	0.19	Metta	Patta	Dr.Sirajunnisa Begum (late Iqbal Hussain)	
		989	0.20	Metta	Patta	Dhoolipalla Venkata Rao (Dhoolipalla Veerayya)	
		990	0.20	Metta	Patta	Saavuru Rajaseharappa (Saavuru Kumarappa)	
		991	0.20	Metta	Patta	Duddempudi Kiran Kumar (Duddempudi Venkateswarlu)	
		992	1.20	Metta	Patta	Dhoolipalla Kotiswamy (D Veeraiah)	
		993	0.20	Metta	Patta	Aarveti Babaiah ( A Subbaiah)	
		9999	0.19	Metta	Patta	Migulu Bhoomi	
309	1.32	9999	1.32	Metta	Patta	Migulu Bhoomi	
310	1.83	9999	1.83	Metta	Patta	Migulu Bhoomi	

It is also submitted that as per the Mandal Surveyor report, water is being stored in the following Sy.Nos. of B.Thandrapadu Village of Kurnool Rural Mandals

## File No.REV.GSECOLARR(GEN)/32/2021-SA(G1)-COLLKRNL

Sy.No.	Extent (in Acs.,)
76	20.25
77	0.53
78	0.83
79	7.32
80	3.45
81/1	8.12
299	2.38
301	5.94
309	1.32
310	3.72
<b>Total</b>	<b>53.86</b>

The pattadars of the land in Sy.No.81/1, 299, 301-1, 301-2 have paid land conversion fee in terms of G.O.Ms.No.98 Revenue (DA & LR) Dept., dt.19.02.2018 in respect of the above lands to an extent of 12.00 Acs., approximately of B.Thandrapadu Village of Kurnool Rural Mandal in the month of March, 2020.

Further, as per the records available with the Minor Irrigation Department,, it is established that the Gangamma Cheruvu was within the hands of Panchayat Raj Department upto year 2005 and as per G.O.Ms.No.216 dt.13.06.2005 of PR & RD (Progs.I) Dept., the Executive Engineer, PR Division, Kurnool has instructed the Mandal Assistant Engineer to handover the PR Tanks to Assistant Engineer. Irrigation. The Gangamma Cheruvu of B.Thandrapadu Village in Kurnool Mandal with ayacut of 25.22 Ha (62.32Acs.,) with condition of the tank "satisfactory" was handed over by Panchayat Raj Department to Irrigation Department on 27.09.2005.

As per Irrigation Department Gangamma Cheruvu is having following Hydraulic particulars

1.	Tank Name	::	Gangamma Cheruvu
2.	Village	::	B.Thandrapadu
3.	Mandal	::	Kurnool
4.	State	::	Andhra Pradesh
5.	Location		
	a. Latitude	::	15 <sup>o</sup> 45' 37.3407" N
	b. Longitude	::	78 <sup>o</sup> 03' 53.1122" E
6.	Capacity of the tank	::	12.039 Mcft
7.	Area of the tank in Ha (Foreshore and Tank bund)	::	28.148 Ha (or) 69.55 Acres This area includes weir portion and tank bund.
8.	Full Tank Level	::	+310.180 mts
9.	Length of Bund	::	459.00 Mts
10.	L/s Sill level of suicide	::	+308.295 Mts.

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12.	Catchment area	::	3.356 Sq miles / 8.688 Sq Km
13.	Weir length	::	49.00 Mts.

There are two feeding channels namely Pala Vagu and Mallamma Vagu to this tank. As the tank is Within the KUDA area, many Survey Nos were converted to Non-agriculture land and Real Estate .During the year 2019, the water from HNSS Main Canal is lifted by pumping to this tank through Pala vagu (Feeder Channel).

During the inspection by the Committee members on 02-09-2021, the villagers represented for the restoration of tank to its full capacity to feed the tail end ayacut and recharging the bores for agriculture in the downstream villages of B.Thandrapadu, Pasupula, and Sudireddy palli, Padidempadu and Venkayapalli.

The District Vigilance and Monitoring Committee members have represented that, as per G.O.Ms.No.216 dt.13.06.2005 of PR & RD (Progs.I) Dept., the Panchayat Raj have handover the Tank to Minor Irrigation. Finally, they have requested to submit proposals for land acquisition of the land in Sy.No.76, 77, 78, 79, 80, 81, 299, 309, 310 of B.Thandrapadu Village of Kurnool Rural Mandal. Further, they have represented that they are depending on this water body for drinking water, irrigation and cattle feeding etc.

During inspection, it is ascertained that the pattadars of Sy.No.81-1 and 299 have made representation for lifting of hard murrum / spoil on cost basis on 29.06.2021 to the Executive Engineer, AVR HNSS Division-2 and they have accorded permission on 22.07.2021for lifting murrum / spoil which is available for filling of pit holes, trenches in farm fields, accordingly they have availed the murrum / spoil on cost basis and filled the pits and also laid along with border.

The Survey Nos.81-1 and 299 are falling within the FTL boundary of Gangamma cheruvu. Some private persons are raising the land of Sy.Nos.81-1 and 299 by filling with soil of the tank foreshore and disturbing the geological features of the land obstructing the inflows from elevated lands. This will reduce the tank storage capacity and decreasing the Ayacut.

Finally, the findings of the Committee are as follows.

- 1) As per Revenue Record i.e., RSR of B.Thandrapadu Village, all Survey Numbers in which water is being stored are patta lands except Sy.No.78
- 2) The Panchayat Raj officials have handed over an extent of 25.22 Ha (62.32 Acs.) to Irrigation Department on 27.09.2005 whereas the Survey Numbers and their details are not noted.

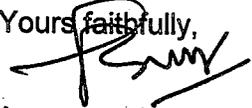
File No.REV.GSECOLARR(GEN)/32/2021-SA(G1)-COLLKRNL

- 3) As per report of the Irrigation Department, Ayacut is fixed to an extent of 41.79 Acs., of B.Thandrapadu Village of Kurnool Rural Mandal.
- 4) The villagers requested for the restoration of tank to its full capacity to feed the tail end ayacut and recharging the bores for agriculture in the downstream villages of B.Thandrapadu, Pasupula, and Sudireddy palli, Padidempadu and Venkayapalli
- 5) The Tank water may be useful for recharge of bore wells, drinking water in the vicinity of the village.

I submit that after examining the report and verification of the Revenue Records etc., submitted by the Enquiry Committee constituted by this office, it is found that the Tank (being called as Gangamma Cheruvu) of B.Thandrapadu village of Kurnool (Rural) Mandal, is situated in Sy.no.76 and water stored area is covered by the extents of Survey numbers of 76, 77,78, 79, 80, 81, 299, 301,309 and 310 of B.Thandrapadu village and all these survey numbers (except sy.no.78) are patta lands as per Land Records namely R.S.R., ROR, R.H. and webland adangal of B.Thandrapadu village of Kurnool (R) Mandal. With respect to Sy.no.78, extent 0.83 acres, there was no Pattadar name in column no.16 and no remarks in column 17 of R.S.R, in Webland Adangal, its classification is shown as "Govt. land – Cheruvu" and as per R.H., Sy no. 78, extent 0.83 acres, is shown under category of Porambokes.

In view of the above facts, I submit that B.Thandrapadu Tank and its water storage area falls under Survey nos. 76, 77,78, 79, 80, 81, 299, 301,309 and 310 of B.Thandrapadu village of Kurnool (R) Mandal and all these survey numbers (Except Sy.no.78, extent 0.83 acres) are Patta land as per Revenue/Registration department records. The Thandrapadu Tank is vested with the Irrigation Department and as per report of the Irrigation department, the capacity of tank is 12.31 M cft and ayacut under this Tank is 62.32 acre. So, I addressed the Superintending Engineer, Irrigation Circle, Kurnool, informing that if they are in need of the lands covered by Tank and its water storage area, to file Requisition and give Consent for taking action under Land Acquisition Act. I submit herewith the report of the Committee along with the attested copies of the following revenue/Sub Registrar records for kind perusal of Hon'ble State Human Rights Commission, Andhra Pradesh.

1. The Original report of the Committee.
2. Re Settlement Register copies for the Sy.nos. covered by the Tank.
3. Record of Rights copies.
4. Village Map copy
5. Webland Adangal copies
6. Register Holding copies
7. Copy Minor Irrigation department letter taking over the possession of Tank.

Yours faithfully,  
  
 District Collector

**Subject:** O.A. NO. 193/2021 (SZ) - D. Rajavardhan Reddy v. State of Andhra Pradesh & Ors.  
**Date:** Monday, 11 April 2022 at 3:08:52 PM India Standard Time  
**From:** Amritha Sathyajith <amritha@focuslaw.in>  
**To:** kodumury@gmail.com <kodumury@gmail.com>, reddymadhuri09@gmail.com <reddymadhuri09@gmail.com>  
**CC:** Arun Karthik Mohan <arun@focuslaw.in>  
**Attachments:** O.A. No. 193 of 2021 (SZ) - Reply Statement of R 7 to 11 along with Annexures.pdf

To,

1. Mr. Venkat Reddy Kodumury  
Counsel for the Applicants
2. Ms. Madhuri Reddy  
Counsel for Respondent Nos. 1 to 6

Dear Sir/Ma'am,

I represent Respondent Nos. 7 to 11 in the captioned application. Please find attached herewith the Reply being filed on behalf of the Respondent Nos. 7 to 11, by way of service.

Kindly acknowledge receipt.

Yours sincerely,

Amritha Sathyajith  
For Arun Karthik Mohan  
Counsel for Respondent Nos. 7 to 11