

IN THE COURT OF _____

CASE NO. _____ OF 20__

IN THE MATTER OF:

A

.....PLAINTIFF

VERSUS

B

.....DEFENDANT

**APPLICATION UNDER ORDER XI RULE 1 CPC SEEKING LEAVE TO
DELIVER INTERROGATORIES ON BEHALF OF THE
PLAINTIFF/DEFENDANT.**

MOST RESPECTFULLY SHOWETH:

1. That the present suit is pending before this Hon'ble Court and is at the stage of _____.
2. That the pleadings in the present matter have been completed and certain material facts remain in controversy which are necessary for the just adjudication of the case.
3. That the Applicant seeks leave of this Hon'ble Court to deliver interrogatories to the Opposite Party for the purpose of obtaining admissions and clarifications on material questions in issue.
4. That the proposed interrogatories are bona fide, relevant to the matters in question, and are not in the nature of a fishing or roving inquiry.
5. That the interrogatories are necessary for narrowing down the scope of dispute and for effective adjudication of the present suit.
6. That the list of proposed interrogatories is annexed herewith as **Annexure A**.

PRAYER

In view of the above, it is most respectfully prayed that this Hon'ble Court may be pleased to:

- a) Grant leave to the Applicant to deliver interrogatories to the Opposite Party;
- b) Pass any other order(s) as this Hon'ble Court may deem fit and proper in the interest of justice.

AND FOR THIS ACT OF KINDNESS, THE APPLICANT AS IN DUTY BOUND SHALL EVER PRAY.

PLAINTIFF

Place:

Date:

(Counsel for Applicant)

ANNEXURE A

INTERROGATORIES ON BEHALF OF THE PLAINTIFF/DEFENDANT

1. Whether it is correct that you entered into an agreement dated ____ with the Applicant?
2. Whether it is correct that a sum of Rs. _____ was received by you from the Applicant on ____?
3. Whether it is correct that you issued cheque bearing no. _____ dated _____ in favour of the Applicant?
4. Whether the said cheque was dishonoured on presentation? If so, state the reason for dishonour.
5. Whether you have made any payment towards the said liability after ____? If yes, provide details.
6. Whether you deny the contents of paragraph __ of the plaint/written statement? If so, specify which part is denied.

(...continue as required...)

Verification

I, _____, the Applicant above named, do hereby verify that the above interrogatories are relevant to the matters in question in the present suit.

Place:

Date: