

IN THE COURT OF HON'BLE DISTRICT JUDGE, \_\_\_\_\_.

HMA Petition No. \_\_\_\_\_ OF \_\_\_\_\_

Smt. \_\_\_\_\_ wife of Shri \_\_\_\_\_ D/o \_\_\_\_\_ R/o \_\_\_\_\_.

...PETITIONER

VERSUS

\_\_\_\_\_ son of Shri \_\_\_\_\_ resident of \_\_\_\_\_

.....RESPONDENT

PETITION UNDER SECTION 13 OF THE HINDU MARRIAGE ACT, \_\_\_\_\_ FOR  
DISSOLUTION OF THE MARRIAGE BY A DECREE OF DIVORCE

SIR/Madam

The petitioner respectfully submits as under:-

1- That the petitioner was married with the respondent on \_\_\_\_\_ at  
\_\_\_\_\_ according to Hindu rites and ceremonies in the presence of friends,  
relatives and family members of both the parties. An affidavit to this effect is enclosed  
herewith the petition.

2- That the status of the parties before the marriage and at the time of filing the present  
petitioner were/are as under

PETITIONER RESPONDENT

Status Residence Status Residence.

i) Before \_\_\_\_\_  
Marriage \_\_\_\_\_

ii) At the Married -do- Married -do-  
time of  
filing of this  
Petition

3- That after the marriage the petitioner and the respondent lived together as husband  
and wife and consummated their marriage at the residence of the respondent and out of  
the said wed lock one child namely \_\_\_\_\_ alias \_\_\_\_\_ was born on  
\_\_\_\_\_.

4- That from the very beginning of the marriage the behaviour of the respondent was not  
good towards petitioner. The respondent is habitual of daily drinking and gambling  
/Lottery and after drinking the respondent always used to give merciless beatings to the  
petitioner. The respondent used to spent all his earnings on taking liquor and gambling.  
The respondent pressurized the petitioner to bring the amount of Rs. \_\_\_\_\_/-  
from her parents and when the petitioner refused to bring the amount then the

respondent gave merciless beatings to the petitioner. The parents of the petitioner gave the amount of Rs. \_\_\_\_\_/- and Rs. \_\_\_\_\_/- to the respondent on two occasions but the respondent did not mend his ways rather he continuously tortured the petitioner to bring more money from her parents. The respondent always taunted the petitioner by giving abusive and unparliamentary language without any cause in the presence of relatives and friends. The life of petitioner became like a hell due to the respondent's behaviour.

5- That although the parents of the respondent arranged a very decent marriage according to his financial capacity and gave sufficient dowry/ Istri Dhan items, but yet the respondent was very greedy in nature from the very beginning of marriage. The respondent sold away entire jewelries and ornaments of the petitioners on playing lottery and drinking. The respondent committed a lot of cruelties with the petitioner and turned out the petitioner, only due to the reason that the respondent had refused to bring Rs. \_\_\_\_\_/- from her parents on \_\_\_\_\_. The life of the petitioner has been made like a hell. The respondent threatened that he will not keep and maintain the petitioner till his demands are not fulfilled by her parents.

6- That various panchayats were convened at the house of the respondent and the parents of the petitioner requested the respondent to keep and maintain the petitioner but the respondent clearly refused to keep and maintain the petitioner. The last panchayat was convened on \_\_\_\_\_ in the presence of respectable , relatives in which Shri \_\_\_\_\_ son of Shri \_\_\_\_\_ R/o

\_\_\_\_\_ and Shri \_\_\_\_\_ son of Shri \_\_\_\_\_ R/o House NO. \_\_\_\_\_ were also present but the respondent did not agree to keep and maintain the petitioner and the respondent put the condition that he will not keep the petitioner without obtaining the illegal amount of Rs. \_\_\_\_\_/-from the parents of the petitioner.

7. That the petitioner bears all type of cruelties because the petitioner wanted to save her married life and do not want to spoil her life. Many times the parents and relatives advised the respondent to get-off to drink and to behave properly but to no use. The petitioner also tried to advise the respondent many times to change his behavior and not to drink but the respondent refused to accept the legitimate requests of the petitioner and the relatives.

8- That the respondent has deserted the petitioner without any reasonable and justifiable cause and rhyme and hence it has become impossible for the petitioner to live more in the company of the respondent therefore, the petitioner is entitled for a decree of divorce on the grounds of cruelties and desertion.

9- That the cause of action to file the present petition accrued to the petitioner many times when the respondent abuses in the filthy language and the petitioner was beaten

mercilessly. The cause of action also accrued on \_\_\_\_\_ when the respondent turned out the petitioner alongwith her minor daughter. The cause of action further arose on each and every date when the Panchyats were convened and it lastly arose on \_\_\_\_\_ when the respondent clearly refused to keep and maintain the petitioner. Hence this petition.

10- That the parties are Hindus by religion.

11- That the present petition has not been by the petitioner filed in collusion with the respondent.

12- That no such petition is pending or has been filed or decided by any court of law on the same subject matter between the same parties.

13- That petitioner has no legal impediments why the relief sought for is not granted to the petitioner.

14- That the petitioner is still residing at \_\_\_\_\_ the marriage was solemnized at \_\_\_\_\_ within the jurisdiction of this hon'ble court therefore, this hon'ble court has got the jurisdiction to entertain and try the present petition.

15- That a fixed court fee has been paid on the petition.

PRAYER:

It is, therefore, prayed that a decree for Divorce Under section 13 of the Hindu Marriage Act, 1955 thereby dissolving their marriage of the petitioner and the respondent on the grounds of cruelty and desertion may kindly be passed in favour of the petitioner and against the respondent along with costs of the petition. It is prayed accordingly.

PETITIONER.

Through counsel:

\_\_\_\_\_ Advocate, \_\_\_\_\_.

VERIFICATION:

Verified that the contents of Paras No.1 to 12 and 14 of the petition are true to best of my knowledge and Paras No. 13 & 15 of the petition are true to best of my belief as information received by me through my counsel. Last Para is the prayer before this hon'ble court.

Verified at \_\_\_\_\_ on \_\_\_\_\_

PETITIONER.