

BEFORE THE LEARNED CIVIL JUDGE (SENIOR
DIVISION), HOSHIARPUR

IN THE MATTER OF

SATBIR SINGH S/O GUL JIT SINGH
HNO- B-11 MCH 751/2, KAMALPUR, JALANDHAR ROAD,
OPP HIRA LAB, HOSHIARPUR

..... PLAINTIFF

V/S

1. HARJOT SINGH S/O PARGAT SINGH
R/O DERA KACHE QUARTERS, GOVT COLLEGE ROAD,
OPP HARBANS WOOD WORKS, HOSHIARPUR-PB

..... DEFENDANT

2. SHIV SOOD
S/O KUNDAN LAL SOOD, R/O B-33/44, NAI ABADI,
HOSHIARPUR

..... DEFENDANT

3. TIKSHAN SUD S/O JAGDISH RAM SUD,
R/O HNO- B-2/87, SARASWATI VIHAR,
DIST HOSHIARPUR-146001-PB

..... DEFENDANT

4. NITIN GUPTA @ NANNU
R/O 17-L MODEL TOWN HOSHIARPUR.

..... DEFENDANT

5. KULWANT SAINI,
HNO-170/A, MOH. LALGARH, NEAR DAV COLLEGE,
HOSHIARPUR

..... DEFENDANT

6. THAKUR RAMESH KUMAR
S/O JASWANT SINGH R/O 806, LAMBI GALI,
BAHADURPUR, HOSHIARPUR.

..... DEFENDANT

7. MEENU SETHI
W/O PROF PARSHAN SETHI, R/O HNO-246,
MOH FATEHGARH HOSHIARPUR

..... DEFENDANT

8. KAVITA PARMAR
W/O VINOD PARMAR, R/O B-12/343, NEW JAGATPURA
HOSHIARPUR

..... DEFENDANT

9. NIPUN SHARMADEFENDANT
S/O KRISHAN SHARMA , R/O 455 , SADA RAM COLONY ,
SUKKI CHOI ROAD , WARD NO-4 , NEAR SAMAYRA MEDICAL STORE,
HOSHIARPUR.
10. SAVITA SOODDEFENDANT
W/O ARJUN SOOD, B-4/1107 , MASHKIAN MOHALA ,
GAHRAN GATE , HOSHIARPUR.
11. SURESH KUMAR BHATIADEFENDANT
S/O KRISHAN LAL, HNO- 497 , STREET NO-8 , HOSHIARPUR
12. SUKHBIR SINGHDEFENDANT
R/O VILLAGE NANDAN , HOSHIARPUR
13. ASHWANI GAIND S/O SK GAIND,DEFENDANT
R/O PREM VILLA , HNO-35, SP5 AVENUE, ARORA COLONY ,
STREET NO-2, NEAR MOUNT CARMEL SCHOOL,
NEAR BANSAL STORE, HOSHIARPUR-PB
14. ANIL HANSDEFENDANT
C/O BALMIK MOHALLA, NEAR CLOCK TOWER, HOSHIARPUR
15. GURDEV SINGHDEFENDANT
C/O DERA KACHA QUARTERS, GOVT COLLEGE ROAD,
OPP HARBANS WOOD WORKS, HOSHIARPUR-146001-PB
16. CHARAN DASSDEFENDANT
C/O DERA KACHA QUARTERS, GOVT COLLEGE ROAD,
OPP HARBANS WOOD WORKS, HOSHIARPUR-146001-PB
17. SURINDER BHATTIDEFENDANT
C/O BALMIK MOHALLA, NEAR CLOCK TOWER, HOSHIARPUR
18. HAZARI LALDEFENDANT
C/O PRESS CLUB , ZILA PARISHAD COMPLEX , MALL ROAD ,
HOSHIARPUR,
19. PARMINDER BARIANADEFENDANT
C/O PRESS CLUB , ZILA PARISHAD COMPLEX , MALL ROAD ,
HOSHIARPUR.
20. RAJESH JAINDEFENDANT
C/O KALA NEKATAN , KOTWALI BAZAR , OPP SONY SHOWROOM ,
HOSHIARPUR

21. VIJAY PATHANIA

R/O VILLAGE PATARIA , UNA ROAD , HOSHIARPUR

.....DEFENDANT

(SUIT FOR CLAIM OF COMPENSATION / DAMAGES ON ACCOUNT OF
DEFAMATION CAUSED BY THE DEFENDANTS TO THE PLAINTIFF
AMOUNTING RUPEES TWENTY THOUSAND OR SUCH OTHER SUM AS THIS
HON'BLE COURT MAY DEEM PROPER OR ADEQUATE)

RESPECTED SIR/MADAM,

THE PLAINTIFF HUMBLY SUBMITS AS UNDER:-

1. THAT I SATBIR SINGH S/O SH GUL JIT SINGH R/O B-11 MCH 751/2 , KAMALPUR, JALANDHAR ROAD, HOSHIARPUR IS A PERMANENT RESIDENT OF THIS ADDRESS.
2. THAT I AM A LAW GRADUATE. I AM LAW ABIDING RESPONSIBLE CITIZEN WITH NO CRIMINAL RECORDS. AS A MATTER OF SOCIAL CAUSE I AM AN RTI ACTIVIST TOO. I HAD FILED RTI APPLICATIONS BEFORE THE SEVERAL PRESTIGIOUS INSTITUTION ACROSS INDIA TO OBTAIN INFORMATION IN PUBLIC INTEREST AND IN CITY HOSHIARPUR TOO.
3. THAT FOR THE PURPOSE OF SOCIAL CAUSE I HAD BEEN ORGANISING SEVERAL FREE MEDICAL CAMPS , BLOOD DONATION CAMPS , CAREER COUNSELING CAMPS FOR UNEMPLOYED YOUTH , PROGRAMMES PERTAINING TO DONATION OF BOOKS TO THE VARIOUS LIBRARIES IN HOSHIARPUR.
4. THAT GREAT MEDIA COVERAGE HAD BEEN THERE FOR THESE PROGRAMMES OF SOCIAL CAUSE IN FAVOUR OF PLAINTIFF SATBIR SINGH. SO PLAINTIFF ENJOYS A GOOD REPUTATION.
5. THAT IT NEEDS TO BE HIGHLIGHTED THAT THE REPUTATION OF A PERSON EFFECTS HIM NOT ONLY IN TERMS OF SOCIAL AND PUBLIC RELATIONS BUT THE REPUTATION OF A PERSON ALSO AFFECTS HIM PSYCHOLOGICALLY TO BE A SUCCESSFUL PERSON OR BE A FAILURE IN LIFE. RESPECT AND REPUTATION OF A PERSON CAN HELP A PERSON TO LEAD A PEACEFUL LIFE ALONG WITH SUCCESS AT ALL SPHERES OF LIFE. GOOD RESPECT AND REPUTATION OF A PERSON CAN HELP HIM TO BE SUCCESSFUL IN LIFE AND AT THE SAME TIME INJURY TO THE RESPECT AND REPUTATION OF A PERSON DEFINITELY PUT HIM AT A DOWN STEP. HERE IN THIS CASE THE PLAINTIFF IS LEADING PERSONAL AS WELL AS SOCIAL LIFE. INJURY TO THE REPECT AND REPUTATION OF THE PLAINTIFF EFFECTS HIM PERSONALLY AS WELL AS IT HURTS THE PEOPLE WHO ARE ASSOCIATED WITH HIM IN SHAPE OF SOCIAL LIFE AS WELL.
6. THAT ALTHOUGH IGNORANCE OF LAW IS NO EXCUSE. STILL THEN DEFENDANTS ARE SEVERALLY INFORMED BY THE PLAINTIFF THAT THEY THEREBY ARE