**APPLICATION FOR AD-INTERIM STAY U/O 39, RULES 1 & 2 READ WITH SECTION 151 C. P. C.**

IN THE HON’BLE HIGH COURT OF....................

LA..................... of 19....................

in

Suit No..................... of 19........................................

C. D................................................................... Plaintiff

*versus*

C. F................................................................ Defendant

May it please to your lordship

The humble plaintiff most respectfully showeth as under:

1. That the plaintiff has filed the abovenoted suit against the defendant for possession and permanent injunction.

2. That the contents of the accompanying plaint may please be read as part of this application and the same have not been reproduced here for the sake of brevity.

3. That the plaintiff has a good *prima facie* case and there is every chance of the plaintiff succeeding in the matter.

4. That the balance of convenience is strongly in favour of the plaintiff and against the defendant. The plaintiff will suffer irreparable injury and loss if the interim relief prayed for is not granted.

**PRAYER**

It is therefore most respectfully prayed that the Hon’ble Court be released to grant an *ex pane* ad-interim injunction, restraining the defendants, their successor’s agents, representatives, attorneys, assignees, transferees, employees and/or anyone acting on their behalf or through them to either enter upon the premises No.....................; and/or to hold themselves as the owners and/or as the holders of any lawful capacity by any means described and/or to enter into any transaction, negotiation or discussion with or without consideration for sale or transfer or for creating any encumberance of the whole or any part of the said property and not to obstruct, interfere or impede in any manner the use or enjoyment or ownership of the said premises by the plaintiff No. 2 or any other person claiming through or under the said plaintiff No. 2

Such order or further *ex pane* ad-interim order as deemed fit and proper may also be passed.

Plaintiff

Through Advocate

Place:....................

Dated:....................