



CIVIL COURTS JALANDHAR
IN THE COURT OF Ms. Renuka Kalra
Civil Judge (Junior Division)-18 Jalandhar
Next Date, Purpose of case, Orders and Judgments as well as other
case information is available on <http://ecourts.gov.in>

**SUMMONS FOR DISPOSAL OF
SUIT**
(O. 5, R. 1, 5.)

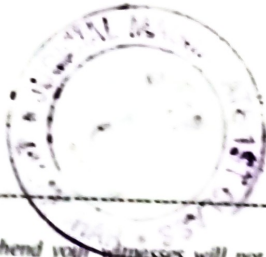
CS/1463/2024
SATBIR SINGH Vs SHAMSHER SINGH
Previous Date 24-05-2024
NEXT DATE : 16-07-2024

To,
SANDEEP KUMAR
:- SUBASH CHANDER
R/O NEW FATEHGARG, NEAR DESH BHAGAT COLLEGE, DIST. HOSHIARPUR
146001, MOBILE - 98764-79740

Whereas **SATBIR SINGH** has instituted above said case against you for you are hereby summoned to appear in this Court in person or by a pleader duly instructed (and able to answer all material questions relating to the suit, or who shall be accompanied by some person, able to answer all such questions, on the **16-07-2024 at 10:00 o'clock in the forenoon**, to answer the claim; and as the day fixed for your appearance is appointed for the final disposal of the said case, you must be prepared to produce on that day all the witnesses upon whose evidence and all the documents upon which you intend to rely in support of your defence.

Take notice that, in default of your appearance on the day before mentioned, the case will be heard and determined in your absence.

Given under my hand and the seal of the Court, this 24-05-2024




**Civil Judge (Junior Division)-18
Jalandhar**

Notice -

1. Should you apprehend your witnesses will not attend of their own accord, you can have a summons from this Court to compel the attendance of any witness, and the production of any document that you have a right to call upon the witness to produce, on applying to the Court and on depositing the necessary expenses.
2. If you admit the claim, you should pay the money into Court together with the costs of the suit, to avoid execution of the decree, which may be against your person or property, or both.
- 3.

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BEFORE THE HON'BLE COURT OF CJ (SD) ,
JALANDHAR

In The Matter Of

1. Satbir Singh Aged About 43 Years
S/O Sh Gul Jit Singh, Hno- B-11 Mch 751/2 ,
Kamaltpur , Jalandhar Road , Hoshiarpur-Pb

.....Plaintiff

V/S

1. Shamsheer Singh Bhardwaj S/O Gurdish Singh
Hno-10, Arora Colony , Kakkon , Opp Shani Mandir,
Hoshiarpur, Mobile: 99887-26336
2. Manjinder Singh S/O Didaar Singh
R/O Village Diyanatpur, Kathar, Jalandhar Road, Near Peer Lakh Datta, Jalandhar City.
3. Onkar Singh S/O Hari Singh
C/O Bhagat Hari Singh Charitable Trust / Hospital , Vpo Dadyal , Salla Khurd,
Tehsil Garhshanker , Dist- Hoshiarpur-Pb
4. Raminder Sagoo
C/O Bhagat Hari Singh Charitable Trust / Hospital , Vpo Dadyal, Salla Khurd ,
Tehsil Garhshanker , Dist- Hoshiarpur-Pb
5. Parwinder Singh Nijjar S/O Didaar Singh
R/O Village Diyanatpur, Kathar, Jalandhar Road, Near Peer Lakh Datta, Jalandhar City
6. Deepak Chaudhary S/O Prem Dass
R/O Hno 174 , Ward No-05 , Street No-1 ,
Shalimar Nagar , Near Neelam Supermart, Hoshiarpur. (Mobile: 9463240863)
7. Ashnav Sahota D/O Paramjit Sahota
Hno-12 , Ward Number 5, Sham Chaurasi , Near Govt School, Dist Hoshiarpur
(Mobile: 9988542651)
8. Sandeep Kumar S/O Subash Chander ,
New Fatehgarh , Near Desh Bhagat College ,
Dist Hoshiarpur 146001 (Mobile: 98764-79740)
9. Nitin Gupta ,
C/O Nitin Gupta's C.A Office , Near Civil Hospital ,
Garhshanker , Dist-Hoshiarpur
10. Vinay Mohan (Rt Constructions)

Una Road , Opp Shashi Nursing Home , Hoshiarpur-146001.
(Mob 98142-38409)

11. Omkar (Clerk/Munshi)
C/O Chamber Number 313 , Lawyer Complex , Dist Courts Hoshiarpur.
12. Preeti D/O Swaran Singh
Gobindpur Khun Khun, Muradpur Guru Ka Hoshiarpur (Mobile: 8872916672)
13. Rohit Bhardwaj S/O Gurdish Singh
Ward No.11 , House No.450 , Shiv Mandir Wall Gall.,
Tanda , Hoshiarpur IPb 144203 (Mobile: 98884-07653)

.....Defendants

**(Suit For Claim Of Compensation / Damages & Permanent Injunction On
Account Of Defamation Caused By The Defendants To The Plaintiff
Amounting Rupees Fifty 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 Guljit Singh R/O B-11 Mch 751/2 , Kamalpur, Jalandhar Road, Hoshiarpur Is A Permanent Resident Of This Address.
2. That I Am An Advocate. I Am A Law Abiding Responsible Citizen . 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. I Am A Human Rights Activist And A Whistle Blower.
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.
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 Respect 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 Causing Defamation To The Plaintiff Which Is An Unlawful Act. Still Then Defendants Continued To Do Unlawful Acts.
7. That Plaintiff Humbly Submits That He Is A Law Abiding Citizen And Willing To Resort All The Issues Through Course Of Law. When Defendants Did Not Stopped Then Plaintiff Had To Resort The Issue Of Defamation Through Course Of Law Hence Filing This Suit.
8. That Defendant Namely Raminder Kaur Sagoo In Connivance With All Other Defendants Who Works As A Team Member Filed One Complaint Number 2193618 Dated 18-11-2021 Against The Plaintiff. This Complaint Was Thoroughly Enquired By The O/O Dsp Nri Wing At Jalandhar As Well As O/O Aig Nri Wing Situated At Jalandhar. This Complaint Got Concluded In Favour Of The The Plaintiff On Dated 11-07-2022. The Complaint Was Found False Hence Was Closed. During This Complaint All The Defendants Used Highly Defamatory And Offensive Words Against The Plaintiff. One Defendant Deepak Chaudhary Got Recorded His Statement Where Highly Defamatory Words Are Used Against The Plaintiff. Here It Is To Be Highlighted That It Is Not Only The Complainant At Nri Wing And Deepak Chaudhary But All Defendants Defamed The Plaintiff While Processing Of The Complaint. The Plaintiff Had To Suffer A Great Loss Of Reputation During The Processing Of The Complaint. At The End The Complaint Is Found False Hence It Is Closed. The Copy Of The Conclusion Report And Statement Of Deepak Chaudhary Is Attached Herewith For Your Ready Reference As **Annexure-1 And Annexure-2**.
9. That Defendant Namely Raminder Kaur Sagoo In Connivance With All Other Defendants Who Works As A Team Member Filed **Re-Enquiry** Of One Complaint Number 2193618 Dated 18-11-2021 Against The Plaintiff. This Complaint Was Thoroughly Enquired By The O/O Dsp Nri Wing At Jalandhar As Well As O/O Aig Nri Wing Situated At Jalandhar. This Complaint Got Concluded In Favour Of The The Plaintiff On Dated 31-03-2024. The Complaint Was Found False Hence Was Closed. During This Complaint All The Defendants Used Highly Defamatory And Offensive Words Against The Plaintiff. One Defendant Deepak Chaudhary Got Recorded His Statement Where Highly Defamatory Words Are Used Against The Plaintiff. Here It Is To Be Highlighted That It Is Not Only The Complainant At Nri Wing And Deepak Chaudhary But All Defendants Defamed The Plaintiff While Processing Of The Complaint. The Plaintiff Had To Suffer A Great Loss Of Reputation During The Processing Of The Complaint .At The End The Complaint Is Found False Hence It Is Closed. The Copy Of The Conclusion Report And Statement Of Deepak Chaudhary Is Attached Herewith For Your Ready Reference As **Annexure-3**.
10. That Plaintiff Filed One Complaint With Nri Wing Pb Police Which Was Marked To The Dsp Nri Wing Jalandhar With Uid Number 2268690. In This Complaint

The Defendants Did Recorded Their Statements Including Parvinder Singh Nijjar Defendant Number-25, Sandeep Kumar Defendant Number - 26, Ashnav Sahota Defendant Number-27, Deepak Chaudhary Defendant Number-28. The Defendants used highly Defamatory Words Against The Plaintiff In Their Statements Given By Them While Proceedings Of This Complaint At C/O Dsp Nri Wng, Bikaner. The Copy Of The Conclusion Report And Statements Is Attached Herewith For Your Ready Reference As **Annexure-4**.

11. That The Defendant Number-25 Namely Parvinder Singh And Raminder Sagoo Defendant Number-26 Filed One Complaint With Vp Number 2302069 Dated 18-06-2022 And Vp Number 2379969 Dated 24-06-2022 Against The Plaintiff Where Highly Defamatory Language Is Used Against The Plaintiff. Here It Is Specially Highlighted That Certified True Copies Of The Complaints Through Email By These Persons Are Also Obtained By Us Through The Process Of Rti. In These Complaints It Is Clearly Written That Deepak Chaudhary, Onkar Singh, Raminder Sagoo, Ashnav Sahota And Sandeep Kumar Are Working As A Team In All This Illegal Process Followed By The Defendants. So All These Persons Named Here Are Made Defendants In The Present Civil Suit. The Copy Of The Conclusion Report And False Complaints By Defendants Are Attached Herewith For Your Ready Reference As **Annexure-5**.

12. That One fir Also Got Registered By The Plaintiff Against The Defendants And It Is Fir Number 94 Dated 21-03-2023 At P-S City Hoshiarpur U/S 406, 420 Ipc. The Copy Of Such fir Is Attached Herewith For Your Ready Reference As **Annexure-6**. The Police Has Presented The Challan In The Court Of Competent Jurisdiction In Favour Of The Plaintiff.

13. That Defendants Namely Sandeep Kumar, Ashnav Sahota And Deepak Chaudhary Went To The Extreme When They Filed One False Case Against Plaintiff Sattbir Singh At Punjab State Human Rights Commission. The Plaintiff Had Obtained The Certified Copies Of The Case, Whole Proceedings And Decision Of The Punjab State Human Rights Commission And It Is Found That highly Defamatory Language Is Used In This Case And Their Proceedings Against The Plaintiff And His Family Members. The Defendants Have No Fear In Mind While Making False Statements Before Statutory Institutions Like Pshrc. The Punjab State Human Rights Commission Had Dismissed The Case On Date 21-09-2023. It Is The Biggest Instance Of Illegal Acts Of The Defendants & Document In Shape Of Evidence To Prove The Claim Of The Plaintiff. The Whole Set Of The Documents Pertaining To The Punjab State Human Rights Commission Is Attached Herewith For Your Ready Reference As **Annexure-6**.

14. That The Defendant Number 1 Namely Shamsher Singh Bhardwaj Had Threatened To Kill The Plaintiff Multiple Times And For This One Complaint Was Sent By Plaintiff To The Hon'ble Pb And Hr High Court Through Registrar, Although It Is A Matter Of Criminal Contempt Of Court However Such Document Is Being Submitted Here To Explain The Character Of The Defendants.

15. That Shamsher Singh Bhardwaj & Rohit Bhardwaj Are Two Brothers And They Are Involved In Taking Away Hard Earned Money Of The Plaintiff. Other Defendants Like Preeti, Omkar (Munshi), Manjinder Singh, Vinay Mohan, Nitin

Gupta Are Equally Involved In All These Illegal Acts Hence They Are Equally Liable For The Torts As Well As Criminal Proceedings To Be Initiated. All Defendants Have Worked In A Team And More Documents Shall Be Placed On Record During Proceedings Of The Case.

16. That It Is Clearly Stated That All Defendants Are Working In A Team To Defame The Plaintiff In Very Technical Manner. Some Of The Defendants Are Expert In Spreading Rumour & Their Character Shall Be Proved Before The Court In Due Course Of Time And Further Proceedings Of The Present Civil Suit.
17. That It Needs To Be Clarified That Locations Of Some Of The Defendants Can Be Different But All Of Them Have Contributed In Team Work To Defame The Plaintiff In A Planned Manner.
18. That All The Defendants Are Clearly Responsible To Defame The Plaintiff And All This Is Being Done To Pressurise Me To Withdraw Legal Proceedings Initiated By Me Against Various Defendants.
19. That The Defamation Thus Caused By The Defendants To The Plaintiff Is A Criminal Offence Too U/S 499,500 Of The Indian Penal Code 1860. The Plaintiff Reserves The Right To File A Criminal Complaint U/S 499, 500 Ipc Against The Defendants.
20. That The Plaintiff Has Suffered Untold Physical And Mental Harrassment And Agony Due To False And Concocted Defamatory Acts Of The Defendant. All The Propaganda Made By The Defendant Is Baseless And Without Any Truth. The Entire Motive Of The Defendant Is To Defame And Humiliate The Plaintiff Before The Public And Social Community And To Cause Physical Harrassment And Mental Agony To The Plaintiff.
21. That On Account Of The False And Concocted Allegations Of The Defendants And Defamatory Acts Of The Defendants The Plaintiff Has Suffered Big Loss Of His Reputation And Prestige As The Plaintiff Was Defamed In The Social Life Due To Reckless Conduct Of The Defendants. The Reputation Of The Plaintiff Has Been Lowered In The Estimation Of The Social Community And The General Public At Large Because Now The People Have Started Considering The Plaintiff As A Person Of Illegal Ethics And The General Public Is Avoiding The Plaintiff.
22. That All Defendants As Defendants No-01 To 13 Are Habitual Of Causing Defamation And It Is Continued Till Present.
23. That Cause Of Action Arose On Date 03-05-2024 When Plaintiff Came To Know That Defamation Against The Plaintiff Is Continued By Defendant No-01 To 13 & All Of Them Are Working As A Team.
24. That In View Of Fact That Principles Of Natural Justice State That Audi Alteram Partem So Being A Law Loving Person The Plaintiff Had Invited Defendants For An Amicable Settlement And Talks On Table But The Defendants Had Refused.

25. That Although Ignorantia Juris Non Excusat Is Followed By All Of Us Still Then Defendants Are Severally Suggested By The Plaintiff That Their Acts Are Unlawful And They Can Be Sued For The Same Along With Criminal Proceedings But The Defendants Have Always Ignored The Plaintiff And Continued To Act Unlawfully.
26. That Plaintiff Reserves His Right To Initiate Criminal Proceeding Against Any Or All Of The Defendants For The Actionable Torts Of Defendant No-1 To 13 Stated Here.
27. That The Civil Court At Jalandhar Has Got The Jurisdiction To Hear And Try The Present Suit. The Plaintiff Is Having No Other Efficacious Remedy Except To File The Present Suit.
28. That Defendants Had Dishonest Intentions "Ab Initio".
29. That In View Of The Fact That "Actus Non Facit Reum Nisi Mens Sit Rea". The Defendants Have Done All This Intentionally , Repeatedly And Severally So They Have Committed Multiple Actionable Torts.
30. That Accused Are "Communis Hostis Omnium". The Actionable Torts Of Defendants Harms The Whole Society Not Just The Plaintiff.
31. That Acts Of The Defendants Include Both Elements " De Facto And De Jure ".
32. That Defendants Are Ordinary "Homo Sapiens Sapiens" Just Like Any Body Else Hence All Acts Explained Here Done By The Defendants Amount To Be An Actionable Tort.
33. That Plaintiff Has Always Acted Like A "Tranquilizer" In The Process And Believed In "Symbiotic" Relationship But The Defendants Have Always Acted Like Negative Thinker. The Defendant Number 01 And 13 Are Acting Like A "Catalyst" Or An "Enzyme" To "Worsen" The Situation For Their Own Benefit & Harming The Public On The Whole And Plaintiff In Person.
34. That Plaintiff Shall Submit The Report Of Deoxyribo Nucleic Acid F Print & Handwriting Expert As And When Required In The Proceeding Of The Court By Presenting Application For The Same.
35. That In View Of Point Number 01 To 34 , All The Defendants From Defendant No-1 To 13 Are Working As A Team To Cause Defamation Against The Plaintiff In Particular. Hence All Defendants Are Equally Responsible. So It Is Required In The Interest Of Law And Justice To Issue Decree Against Defendant No-1 To 13 For The Acts Of Defamation Being Done By Them.
36. That Actual Claim Of Damages Against The Defendants Amount To Be Rs 93 Lakhs Approx & Such Calculation Shall Be Presented Before The Court At Appropriate Stage And Plaintiff Reserves The Right To Increase The Claim Of Damages To The Extent Of Rs 93 Lakh Or More As Per The Circumstances Of The

Time With Deposit Of Requisite Court Fees. At This Time The Present Claim Is Being Made Subject To Increase With Deposit Of Requisite Court Fee.

37. That It Is Also Highlighted That Defendants Had Done Defamation Against The Plaintiff Specially On Date 07/11 & 09/11 Of The Previous Year. They Are Also Doing Their Best To Take Away Hard Earned Money Of The Plaintiff Amounting Rs 09 Lakh 11 Thousand. Defendants Are Working To Take Away My Hard Earned Money Amounting Rs 07 Lakh 11 Thousand Based On Separate Claims.

Prayer : It Is Prayed Before This Hon'ble Court In View Of The Fact That Defendant Number 01 To 13 Have Done Defamation Against The Plaintiff Multiple Times , Intentionally , Repeatedly And Severally. The Act Of Defendants Is An Actionable Tort As Well As A Criminal Offence. So A Decree In Favour Of The Plaintiff And Against The Defendant Number 01 To 13 Be Issued For Payment Of Damages To The Plaintiff By Defendants With Interest @ 12 % Per Annum And Litigation Cost . The Decree For Permanent Injunction Be Also Issued In Favour Of Plaintiff And Against The Defendants For Illegal Act Of Defamation By Defendant Number 01 To 13.

The Decree Is Prayed To Be Issued In Favour Of Plaintiff In The Interest Of Law And Justice.

Date: 24-05-2024
Jalandhar

Submitted By
Satbir Singh
(Plaintiff)

Verification: Verified That The Contents Of All The Sentences Of The Plaint From Point No-1 To 37 Are True And Correct To The Best Of My Knowledge And Belief And Nothing Has Been Kept Concealed Therein.

Date: 24-05-2024
Jalandhar

Submitted By
Satbir Singh
(Plaintiff)
Aadhaar: 3822 5683 5437

Through Counsel ,
Deepinder Singh
(Advocate) ,
95305-60160

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