

BEFORE THE HON'BLE COURT OF DISTRICT JUDGE, S.A.S NAGAR
MOHALI.

H.M.A CASE NO _____ OF 2026

Mr. **xxxxxxx** Versus Ms. **xxxxxxx**

Application Seeking
permission for engagement of
counsel to file petition U/s
13 of H.M.A.

Respectfully Showeth:

- 1.That the applicant is filing the above stated petition in this Hon'ble Court
- 2.That the applicant has no knowledge about the case and wants his case to be pursued by Deepak Malhotra & Avish Malhotra (Advocates).

It is therefore respectfully prayed that this application may kindly be allowed in the interest of Justice and applicant be allowed to pursue his case through advocate.

Date:

Place: Applicant

BEFORE THE HON'BLE COURT OF DISTRICT JUDGE, S.A.S NAGAR
MOHALI.

H.M.A CASE NO _____ OF 2026

Mr. **xxxxxxx** S/o **xxxxxxx** R/o **xxxxxxx** , S.A.S Nagar
Mohali, Punjab.160062.

Petitioner

Versus

Ms. **xxxxxxx** D/o **xxxxxxx** R/o **xxxxxxx**

..... Respondent

**Petition U/s 13 of the Hindu Marriage Act
for dissolution of marriage.**

Respectfully Showeth:

- 1.That the petitioner got married with the respondent on 29th August 2018 at **xxxxxxx** , S.A.S Nagar as per Hindu Vedic Rites and Rituals and all the expenses of marriage and engagement parties were met by the petitioner being love marriage. Out of the said wedlock no child was born.
- 2.That after marriage both Petitioner and respondent started living together at # **xxxxxxx** ,S.A.S Nagar, Mohali, Punjab.
- 3.That the age, status and place of residence of the petitioner/husband and respondent/wife before

marriage and at the time of filing the petition
were/areas under

		husband	husband	wife	wife
	status	Aged about	Place of residence	Aged about	Place of residence
Before marriage	Hindu Un- married	29	xxxxxxx	22	xxxxxxx
At the time of filing the present petition	Married	37	xxxxxxx	30	-do-

- 4.That the marriage between the petitioner and the respondent was organized by the petitioner parents. The petitioner, his Parents and / or his relatives had not taken any dowry in the marriage.
- 5.That the marital relations between the parties have not been very pleasant and compatible since 2nd

month of marriage till the date of filing of this Petition. The reasons for disharmony and non-compatibility are squarely attributable to the Respondent. Although the petitioner did all the efforts of pleasing the respondent by arranging two foreign trips (Bali plus Thailand) but the behavior of the respondent did not change.

6. That right from the second month of the marriage, the behavior/ attitude of the respondent towards the petitioner's mother father, other family members and relatives has been very insulting/disrespectful, quarrelsome, rude, insulting, adamant, dominating, violent and suicidal. The respondent has given the petitioner lots and lots of mental tension almost everyday by her acts of commission and omission, refusing to perform any of her matrimonial obligations. She has treated the petitioner with cruelty.

7. That after marriage the behavior and attitude of the respondent **xxxxxx** became very aggressive towards the petitioner and his family members. Respondent used to insult the petitioner in front of his servants and family members and tried to dominate him and his family members.

8. That the respondent was very whimsical. She used to break household items without any provocation. She

use to lock herself in the bathroom for hours for blackmailing the petitioner to fulfill her unnecessary demands.

9. That the respondent was in the regular habit of threatening petitioner that she will commit suicide and always threatens to mention name of the petitioner and his family members in the suicide note.

10. That the respondent has demanded divorce several times in the very first quarter of her marriage.

11. That the respondent used to dominate the petitioner in every household affair be it small or big under suicidal threat, thereby not at all leaving any choice for the petitioner but to suffer and sustain mental torture in silence.

12. That the respondent left the matrimonial home on _____ under the influence of her male friend and thereafter, for the last three years, the respondent was scaring the petitioner by threatening him that she is going to get his entire family falsely implicated in false criminal cases without staying with the petitioner.

13. That the male friends, parents, sisters & brother-in-law of the respondent interfere a lot into the life of the parties and caused separation

of both petitioner and respondent in three months of their marriage.

14. Cruelty [Section 13(1)(ia)] : That the facts detailed above shows that the respondent has treated the petitioner with cruelty. The respondent behaved in a very cruel manner with the petitioner and had tried her best to make the life of the petitioner hell by treating the petitioner inhuman manner and insulting the petitioner and his family members in every possible manner.

15. Desertion [Section 13(1)(ib)]:That the respondent voluntarily left the matrimonial home on /20__ without any sufficient or reasonable cause.Since then, the respondent has continuously deserted the petitioner for a period exceeding two years immediately preceding the institution of the present petition.The petitioner made sincere efforts through relatives, elders and mediators to bring the respondent back, but all such efforts proved unsuccessful.The desertion by the respondent is intentional, continuous, and without lawful justification.That the respondent under the influence of her unknown male friends deserted the many years of marriage with the petitioner by leaving him alone.

16. Adultery [Section 13(1)(i)]: That after the solemnization of the marriage, the respondent has voluntarily engaged in sexual relations with a person other than the petitioner. The petitioner states that the respondent has maintained an illicit relationship with Shri _____, resident of _____, which came to the knowledge of the petitioner on or about /20, when a DDR No. _____ was registered in the Police Station _____. The respondent has repeatedly associated with the said person in circumstances giving rise to a clear inference of an adulterous relationship. The petitioner has collected documentary and electronic evidence, including photographs, electronic communications, call records, hotel records (if any), travel records, social media communications, and testimony of witnesses, which shall be produced before this Hon'ble Court during the course of evidence. The petitioner submits that the conduct of the respondent amounts to voluntary sexual intercourse with another person after marriage and constitutes a valid ground for dissolution of marriage under Section 13(1)(i) of the Hindu Marriage Act, 1955.

17. That thus respondent is guilty of the matrimonial offence of cruelty, desertion and adultery as detailed above.

18. That no other such case is pending in any other hon'ble court.

19. That the present petition is not presented inclusion or connivance with the respondent.

20. That the marriage of the petitioner with the respondent was solemnized at Zirakpur, Mohali and hence this Hon'ble court has got the territorial jurisdiction to try this case.

21. That both the petitioner and respondent are living separately since 28th Feb 2019 and not cohabited as husband and wife for more than one year.

22. That the requisite court fees has been affixed on the petition.

Prayer:

It is therefore respectfully prayed that an order for dissolution of marriage in favour of the petitioner may kindly be passed.

Any other order which this Hon'ble Court may deem fit in the interest of justice.

Date:

Place: Mohali

Petitioner

Verification: Verified that the contents of para no 1
to 21 are true to the best of my knowledge and
nothing has been concealed therein.

Date:

Place: Mohali

Petitioner

Deepak Malhotra & Avish Malhotra

(Counsel for the Petitioners)