**Defence To Suit For Foreclosure**

In the Court of ......................................

A.B. (add description and residence) ...................... Plaintiff

against

C.D. (add description and residence) .................... Defendant

**Respectfully**

1. The defendant did not execute the mortagage.

 2. The mortgage was not transferred to the plaintiff (if more than one transfer is alleged, say which is denied).

 3. The suit is barred by article ...... of the second scheduled to the [Indian Limitation Act, 1877 (15 of 1877).]

 4. The following payments have been made, viz.:-

 (Insert date) ................................ Rs. 1,000

 (Insert date) ................................. Rs. 500

 5. The plaintiff took possession on the... . of... .., and has received the rents ever since.

 6. The plaintiff released the debt on the... of...

 7. The defendant transferred all his interest to A.B. by a document dated.

 Dated :

                                                                           Defendant

                                                                          Through, Advocate

 Verification:

            I, \_\_\_\_\_\_, do hereby verify that the contents from paras 1 to \_\_\_\_\_\_ are correct and true to the best of my knowledge and personal belief and no part of it is false and nothing material has been concealed therein.

           Affirmed at Shimla this \_\_\_\_\_\_.

                                                            Defendant