Affidavit

1. Stamp or e-stamp note

[Choose one line and delete the other.]

Court affidavit: Not stamped. This affidavit is made for the immediate purpose of being filed and used in the court named below (Indian Stamp Act, 1899, Schedule I, Article 4, exemption (b), where the State schedule keeps it).

Other affidavit: Executed on non-judicial stamp paper or an e-stamp certificate for Rs 10, numbered SAMPLE-0000, dated 19 November 2026, bought in the name of Meera Udaharan.

IN THE COURT OF THE CIVIL JUDGE AT DELHI

Civil Suit No. 0000 of 2026, with the application for a temporary injunction

IN THE MATTER OF:

Arjun Kalpanik ... Plaintiff

versus

Northwind Builders Private Limited ... Defendant

Claim: Permanent injunction and removal of a wall

[If there is no suit or application, delete the court, number, parties and claim and write: **In the matter of** my application about access through the east passage, **before** the Managing Committee, Sample Enclave Residents Association. Then also replace paragraphs 2, 4, 5, 27 and 33 with the non-court wording printed with them, and delete paragraph 28 if no proceeding exists.]

AFFIDAVIT OF Meera Udaharan made on this 20 November 2026 before Farah Misaal, Notary, Delhi, at Delhi

(in support of the application for a temporary injunction)

[For non-court use, delete the line beginning "in support of".]

I, **Meera Udaharan** (the "Deponent"), daughter of Devan Udaharan, aged about 41 years, by occupation school teacher, Indian national, residing at Flat 204, Sample Enclave, Example Road, Delhi 110000, holding the identity document Voter identity card, number ending 0000,

do hereby solemnly affirm [or: make oath] and state as follows:

Competence and relationship

1. I am above 18 years of age and of sound mind. I understand the matters in this affidavit and I am competent to swear it.
2. I am not a party to the suit. I am a neighbour of the Plaintiff, who lives in Flat 104 of the same building. [Non-court wording: I make this affidavit on my own behalf.]
3. I have no financial interest in the property described below or in the result. I have no dispute with either party. I have never been employed by either of them.

Purpose

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4.

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I make this affidavit in support of the application for a temporary injunction filed by Arjun Kalpanik in this court. [Non-court wording: I make this affidavit for submission to the Managing Committee, Sample Enclave Residents Association in the matter of my application about access through the east passage.]

5. I know that the court may read this affidavit when it decides the application and may order me to attend for cross-examination. I am willing to attend. [Non-court wording: I know that the Managing Committee, Sample Enclave Residents Association may rely on this affidavit when it decides the matter.]

Basis of knowledge

6. Paragraphs 8 to 18 state what I myself saw, heard, measured or did. Paragraphs 19 to 22 state matters that I was told, took from a record or believe, and give the source or the ground of each.

7. I have lived in Flat 204 on the first floor of Sample Enclave, Example Road, Delhi (the "Building") since 1 June 2021. My balcony is directly above the passage on the east side of the Building, which runs from the rear gate to the main staircase (the "Passage"). From that balcony I can see the whole Passage, the rear gate and the side wall of the ground-floor shop.

Statement of facts

8. From 1 June 2021 until 2 November 2026 I walked through the Passage on most days. During that time I saw residents of the Building, including Arjun Kalpanik, use it on foot and with two-wheelers. I saw no gate, wall or lock across it in that period.

9. On 2 November 2026, at about 9:10 a.m., I was on my balcony. I saw four workers unload bricks, sand and bags of cement from a small goods vehicle at the rear gate. The words "Northwind Builders" were painted on its door.

10. I went down to the Passage at about 9:30 a.m. A man wearing a helmet was giving the workers instructions. He told me that his name was Vikram Namuna and that he was the site supervisor. I asked him what the workers were building. I record his answer in paragraph 20.

11. I stayed in the Passage for about 20 minutes. I saw two workers lay a line of bricks across the Passage, from the side wall of the shop to the boundary wall. They had laid two rows when I left.

12. At about 6:15 p.m. on the same day I came home through the rear gate. A brick wall crossed the full width of the Passage. The top of the wall was level with my shoulder. I could not pass, and I walked around the Building by the public road to reach the main staircase.

13. On 3 November 2026, at about 8:00 a.m., I took five photographs of the wall with my mobile phone. Two show it from the rear gate, two from the staircase side and one from my balcony. They show the wall and the Passage as I saw them at that time. Prints are **Annexure A**.

14. Immediately after taking the photographs I measured the Passage and the wall with a steel tape. The Passage at the wall was 2.4 metres wide. The wall was 1.5 metres high at its middle. I wrote the measurements, the date and the time in my notebook while I stood there. A copy of that notebook page is **Annexure B**.

15. While I was measuring, I saw Arjun Kalpanik come to the staircase side of the wall with a wheelchair. I saw Arjun Kalpanik turn back because there was no opening in the wall.

16. On 3 November 2026, at 11:42 a.m., I sent an email to the address printed on the notice at the shop. In it I described the wall and asked when the Passage would be opened. A printout of the

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email is **Annexure C**. I have checked my inbox and spam folder up to the date of this affidavit and have received no reply.

17. On 14 November 2026, at about 4:00 p.m., I saw workers plaster the side of the wall that faces the rear gate. I saw no door, gap or gate in it.

18. I last saw the wall on the morning of 20 November 2026, before I signed this affidavit. It still crossed the full width of the Passage.

Matters of information, record and belief

19. I did not see the underlying facts of the matters in paragraphs 20 to 22. I state the source of each.

20. **Information.** I am informed by Vikram Namuna, in the conversation described in paragraph 10 on 2 November 2026, and verily believe it to be true, that the company wanted that side closed and that the wall would stay. His words were: "The company wants this side closed. The wall will stay." I heard those words. I have no knowledge of my own of who gave the instruction.

21. **Record.** The copy notice marked **Annexure D** was handed to me on 3 November 2026 by Arjun Kalpanik. I am informed by Arjun Kalpanik that it had been put up at the main staircase, and I verily believe that to be true. The notice is dated 30 October 2026 and says that "rear side work" will begin on 2 November 2026. My only information about its contents comes from that copy. I believe that the work it announced is the work I saw, because the workers described in paragraph 9 came on the date that it gives. I did not see the notice on the staircase and I do not know who wrote or put up the original.

22. **Belief.** I believe that the workers were acting for Northwind Builders Private Limited. My grounds are the name on the vehicle described in paragraph 9 and the words in paragraph 20. I do not know whether any permission was given for the wall, and I say nothing about who owns the Passage.

Documents and annexures

23. Annexures A to D are listed at the end of this affidavit and form part of it. I took the photographs in Annexure A, wrote the notebook page in Annexure B and sent the email in Annexure C. I received the paper in Annexure D in the way stated in paragraph 21.

24. Each copy has been compared by me with the original, or with the electronic file, that I hold. Each is a true copy of it. I have not edited the image files or the text of the email.

25. The image files and the sent email are still on the phone and in the account with which I made them. Where they are submitted for admission in evidence under section 63 of the Bharatiya Sakshya Adhiniyam, 2023, the certificate required by section 63(4) is submitted with them as a separate document. This affidavit does not take its place.

26. The officer before whom I swear this affidavit has been shown every annexure so that it can be marked, dated and initialled.

Full disclosure

27. I have not knowingly concealed any fact that I know to be material to the purpose stated in paragraph 4. I have not sworn any other affidavit about these events. [Non-court wording: I have not concealed any fact material to this matter, and I have made no contrary statement to the Managing Committee, Sample Enclave Residents Association. If an earlier affidavit exists, give its date, the place where it was used and the difference, in place of this sentence.]

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28.

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I have not filed any suit, petition or complaint about the wall. Apart from the suit named in the heading, I know of no other proceeding about it.

Undertakings

29. I will preserve, and produce for inspection when the court or authority requires, the originals and electronic files that I hold and the identity document named above.

30. If I learn that a statement in this affidavit is wrong, or that a fact has changed so that it would mislead, I will tell the advocate or authority to whom I gave it without delay. I will then make a further affidavit that states the correction.

Voluntary statement

31. I make this affidavit of my own free will. No person has threatened or pressed me, or paid or promised me anything, to make it.

32. I gave the facts to an advocate's clerk, who typed them. I have read the typed pages in English, a language that I read and understand. I corrected them before signing.

Consequences of a false statement

33. I understand that I am bound to state the truth, and that knowingly making a false statement in this affidavit is an offence. For false evidence in a judicial proceeding, section 229(1) of the Bharatiya Nyaya Sanhita, 2023 provides imprisonment that may extend to 7 years and a fine that may extend to Rs 10,000. [Non-court wording: For false evidence in any other case, section 229(2) provides imprisonment that may extend to 3 years and a fine that may extend to Rs 5,000. Sections 216 and 236 may also apply.]

34. I have kept to facts. I have left out argument, abuse and matters that do not bear on the purpose in paragraph 4.

Every page above has been signed by me. Each alteration, if any, has been initialled by me and by the attesting officer.

Signature [or mark] of the Deponent:

Meera UdaharanDEPONENT

VERIFICATION

Verified at Delhi on 20 November 2026.

I, **Meera Udaharan**, the Deponent, verify that the contents of paragraphs 1 to 18 and 23 to 34 are true to my own knowledge. The statements in paragraphs 19 to 22 that I heard or received something are also true to my own knowledge. The facts so stated to me, and the matters of record, are derived from the sources named there, and the matters of belief rest on the grounds given there. I believe those matters to be true.

I solemnly affirm that this my declaration is true, that it conceals nothing, and that no part of it is false.

[If sworn: I solemnly swear that this my declaration is true, that it conceals nothing, and that no part of it is false, so help me God.]

Signature [or mark] of the Deponent:

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Meera UdaharanDEPONENT

IDENTIFICATION OF THE DEPONENT

[Use where the officer does not personally know the Deponent.]

The Deponent has signed [or marked] this affidavit in my presence. I know the Deponent personally and identify the Deponent to the attesting officer, to whom I am known.

Identified at Delhi on 20 November 2026 at 11:20 a.m. by:

Nikhil Udyan
Advocate, enrolment number SAMPLE-0000, Chamber 00, Delhi
Signature of the person identifying the Deponent:

ATTESTATION

[To be completed only by the notary, Oath Commissioner, magistrate or other authorised officer.]

Certified that the above was declared on [solemn affirmation/oath] before me this 20 November 2026 at Delhi in the district of Central Delhi by **Meera Udaharan**, daughter of Devan Udaharan, school teacher, residing at Flat 204, Sample Enclave, Example Road, Delhi 110000, who is personally known to me [or: identified at 11:20 a.m. at Delhi by Nikhil Udyan, Advocate, enrolment number SAMPLE-0000, Chamber 00, Delhi, who is personally known to me].

The exhibits marked A, B, C and D above referred to are annexed hereto under this date and my initials.

[Non-court wording, in place of the two paragraphs above: Solemnly affirmed [or sworn] and signed before me at Delhi on 20 November 2026 at 11:20 a.m. by Meera Udaharan, who is personally known to me [or: who was identified by Nikhil Udyan and produced Voter identity card, number ending 0000].]

The Deponent spoke these words before me: "I swear in the name of God [or: solemnly affirm] that this is my name and signature [or mark] and that the contents of this my affidavit are true."

I have initialled every page and every alteration, and I have marked, dated and initialled Annexures A to D.

Signature of the attesting officer:

Farah Misaal
Notary, Delhi
Registration or appointment number: SAMPLE-0000
Serial number in the register: 0000
(Official seal)

READ-OVER CERTIFICATE

[Use only if the Deponent does not know the language of the affidavit, cannot read it, does not fully understand its contents or appears to be blind. If used, delete the sentence in paragraph 32 about reading the pages. Otherwise delete this certificate.]

I certify that this affidavit and its annexures were read over and explained to the Deponent, **Meera Udaharan**, in Hindi, in my presence at Delhi on 20 November 2026. The Deponent said that the contents were correct and then signed [or made a mark] before me.

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Certified further that this affidavit has been read and explained to **Meera Udaharan**, the declarant, who seemed perfectly to understand the same at the time of making thereof.

Name and signature of the interpreter, if any:

Signature and seal of the attesting officer:

Farah Misaal

LIST OF ANNEXURES

Annexure A: Five photographs of the wall, 3 November 2026. See paragraph 13.

Annexure B: Copy of a notebook page with measurements, 3 November 2026. See paragraph 14.

Annexure C: Printout of my email, 3 November 2026. See paragraph 16.

Annexure D: Copy notice dated 30 October 2026. See paragraph 21.

Endorsement for the first page of each annexure

"This is Annexure [letter] referred to in paragraph [number] of the affidavit of Meera Udaharan, affirmed [or sworn] before me at Delhi on 20 November 2026."

Initials of the attesting officer and date:

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