

Plaint

THE REPUBLIC OF UGANDA
IN THE HIGH COURT OF UGANDA AT.....
HIGH COURT CIVIL SUIT NO;..... OF
(Insert Plaintiff's Name)::: PLAINTIFF

VERSUS

1.(Insert Defendant's name)::: DEFENDANT
2. THE REGISTRAR OF TITLES:::DEFENDANT

PLAINT

1. The plaintiff is a male/ female adult Ugandan of sound mind whose address of service for purposes of this suit shall be **(Insert plaintiff's physical/ postal address.**
2. The defendant is an adult Ugandan male/ female presumed to be of sound mind and the plaintiff undertakes to effect service of court process upon him/her.
3. The second defendant is an officer of government with the responsibility to effect changes on land titles and is being sued in that capacity.
4. The plaintiff brings this suit
 - a) to recover from the 1st defendant land comprised in block..... plot which the 1st defendant fraudulently acquired and
 - b) for orders that the 1st defendant's title be cancelled and the second defendant registers the plaintiff as the proprietor of the suit land.
 - c) that the said land be put in possession of the plaintiff and
 - d) for special and general damages and mesne profits arising from the defendant's wrongful and or unlawful possession of the plaintiff's land
5. The facts constituting the defendant's cause of action arose as hereunder; *(Here give the details of how the defendant was fraudulent eg in a case of registration through fraud refer to the facts below for guidance)*
 - a) The plaintiff was at all material times the registered proprietor of the land comprised **in (give details of the land)** (hereinafter referred to as 'the suit land'
 - b) In 2010, the defendant took on employment in the USA and the left the duplicate certificate of title under the custody of the a one Munanura Fred, the defendant's brother for safe custody.
 - c) That in 2011, without authorisation from the plaintiff, the defendant fraudulently colluded with the said Munanura Fred who fraudulently transferred the land to the defendant and the latter proceeded to have the land registered in his names.
 - d) The plaintiff avers that the defendant obtained title and registration of the suit land through fraud.

PARTICULARS OF FRAUD:

(This paragraph must be included detailing the specific details of the fraud that is attributable to THE DEFENDANT)

- i. By accepting to unlawfully purchase the suit land from his brother Munanura fred being fully aware that the latter was only holding the plaintiff's certificate of title for safe custody

ii. By forging the defendant's signature and causing the transfer of the suit land without the knowledge or authority of the plaintiff.

iii. ***Insert any other facts deemed relevant***

6. The plaintiff avers that by reason of the defendant's fraud, the plaintiff was unlawfully deprived of his title to the suit land as a result of which the plaintiff prays that this honourable court be pleased to award the plaintiff the prayer sought.

7. The cause of action arose at within the jurisdiction of this honourable court; WHEREFORE the plaintiff prays that judgment be entered against the defendant and for;

- a) A declaration that the defendant's registration as proprietor was fraudulent and unlawful
- b) A declaration that the defendant is entitled to be re instated on the register as proprietor of the suit land.
- c) An order that the 2nd defendant cancels the 1st defendant's title in respect of the suit land and registers the plaintiff s proprietor of the same
- d) Special damages arising from the loss of income following the 1st defendant's unlawful eviction of the plaintiff's tenants.
- e) Mesne profits for the deprivation of the land
- f) Interest from the date of judgment until payment in full
- g) Costs of this suit

Dated at this Day of 20.....

.....
PLAINTIFF'S NAME AND SIGNATURE