



FAMILY LAW

Decades-Old Property Feud Resolved: SC's Judgment on Will and Succession

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Introduction

The Supreme Court of India's pronouncement in *Metpalli Lasum Bai (Since Dead) and Others Versus Metapalli Muthaiah (D)* By LRs¹ offers crucial insights into the complexities of Hindu personal law, particularly concerning adoption and the devolution of property.

This case untangled a decades-old property feud, focusing squarely on the validity of a registered will and an oral family arrangement. The judgment carefully outlines the stringent burden of proof placed on a party disputing such instruments, particularly in light of admitted facts and consistent possession. By scrutinizing and ultimately reversing the High Court's findings, the Supreme Court underscored its role in upholding fundamental legal principles and ensuring that claims to ancestral property are established on firm legal grounds, thereby safeguarding legitimate heirs.

Background of the Case

The case involves a property dispute over land originally owned by Metpalli Ramanna, who died before 1949. His legal heir, Metpalli Rajanna (died 1983), had two children, Muthaiah and Rajamma, from his first marriage, and no children from his second marriage to Lasum Bai (the plaintiff).

Lasum Bai claimed that Rajanna had executed a registered Will on July 24, 1974, and made an oral family arrangement to distribute his properties, assigning her 6 acres and 16 guntas in Dasnapur (Survey No. 28) and a portion of other lands. This included a specific 4 acres and 16 guntas from Survey No. 28, which became the "bone of contention". Lasum Bai had sold two acres from her share in 1987, and entered an agreement to sell the remaining 4 acres and 16 guntas to Janardhan Reddy.

Muthaiah subsequently filed an injunction suit (Original Suit)² to prevent Lasum Bai from selling the properties, which was decreed in his favor in 1990, though the court noted Lasum Bai's title was not examined. Lasum Bai then filed Original Suit No. 2 of 1991 for declaration of her title based on the Will. Muthaiah argued the properties were joint ancestral properties and he was the sole co-parcener as Rajanna died intestate.

The trial court decreed in favor of Lasum Bai, affirming the Will's execution and the family arrangement. However, the High Court partially allowed Muthaiah's appeal, setting aside the trial court's judgment and decree, and holding that Muthaiah was entitled to a 3/4th share and Lasum Bai to a 1/4th share, granting a preliminary decree for partition. Both parties then appealed to the Supreme Court.

Legal and Judicial Reasoning

The Supreme Court, carefully analysed the principles governing adoption under Hindu law, the burden of proof, and the evidentiary value of various documents and testimonies.

1. Admitted Facts and Revenue Entries: The Court first acknowledged the admitted position that after the death of Metpalli Ramanna, the revenue entries (Khasra Pahunis) for the land in question were in the name of M. Rajanna. It was noted that under the prevailing revenue laws in Andhra Pradesh, these entries provide evidence of ownership. Lasum Bai's suit specifically based her claim on the registered Will dated July 24, 1974, and the oral family settlement.

2. Validity and Genuineness of the Registered Will:

- **Registration and Presumption of Genuineness:** The Will was a registered document. The Court emphasized that a registered document carries a presumption of genuineness.
- **Admission by Defendant-Muthaiah:** Crucially, Muthaiah, in his evidence, admitted that the signatures on the Will were those of his father, M. Rajanna. This admission was a significant factor in establishing the Will's authenticity.
- **Burden of Proof:** Since the Will was registered, the burden of proof shifted to the party disputing its existence – in this case, Muthaiah – to establish that it was not executed as alleged or that suspicious circumstances rendered it doubtful. Muthaiah failed to discharge this burden, especially given his admission of his father's signatures.
- **Distribution Scheme:** The Will distributed properties in defined proportions among Lasun Bai, Muthaiah, and Rajamma (M. Rajanna's widowed daughter). The Court observed that M. Rajanna likely anticipated disputes between Lasun Bai and Muthaiah, and therefore divided his properties through a family settlement and bequeathed shares via the Will to avoid future conflicts. Notably, the Will granted a "lion's share" of the property to Muthaiah, indicating it was not designed to unfairly deprive

him. This distribution pattern further supported the Will's genuineness, as a manipulated Will would likely have completely excluded Muthaiah.

3. Corroboration by Oral Family Settlement and Possession:

- **Consistency with Will:** The distribution of properties as per the oral family settlement (regarding which oral evidence was led) was found to be almost in the same proportions as the registered Will.
- **Admitted Possession:** Muthaiah himself admitted that Lasum Bai was in possession of 6 acres and 16 guntas of land, which fell into her share as per the Will. The Court found that evidence on record fortified the existence and persuasive nature of the oral family settlement, which was countenanced by the admitted possession of the suit schedule properties, including the disputed property, first with Lasum Bai and subsequently with the purchaser, Janardhan Reddy.
- **Acquiescence to Sale:** Lasum Bai had sold 2 acres of land from her share to Sanjeeva Reddy via a registered sale deed on August 27, 1987. This sale deed was never questioned by Muthaiah before any forum, implying his acquiescence to Lasum Bai's right over those properties.

4. Reversal of High Court's Decision:

- The trial court had correctly decreed the suit for declaration and permanent injunction in favor of Lasum Bai, granting her absolute rights over the suit schedule properties, including the disputed 4 acres and 16 guntas sold to Janardhan Reddy. The Supreme Court found the trial court's view to be based on an "apropos appreciation of the evidence and the prevailing legal principles" and "unassailable in facts as well as in law".
- The High Court, in contrast, was found to have "manifestly erred" in interfering with the "well-reasoned judgment" of the trial court and in substituting its own findings by reducing Lasum Bai's share. The Supreme Court concluded that the High Court's judgment did not "stand to scrutiny" and therefore reversed and set it aside. The judgment and decree of the trial court were consequently restored.

The Supreme Court's reasoning pivoted on the strong evidentiary value of the registered Will, reinforced by Muthaiah's own admission of his father's signatures and the consistent evidence of possession and prior unchallenged transactions, all of which supported the validity of Lasum Bai's claim under the Will and the oral family arrangement.

Outcome

The Supreme Court delivered a comprehensive outcome in this case, completely reversing the High Court's decision and restoring the trial court's original judgment as Metpalli Muthaiah had failed to prove his adoption by Metpalli Pochiah and Laxmi Bai. Consequently, Muthaiah was not entitled to inherit Pochiah's property as an adopted son.

Specifically:

- **Reversal of High Court's Judgment:** The Supreme Court found that the High Court had "manifestly erred" in interfering with the "well-reasoned judgment" of the trial court. Consequently, the impugned judgment of the High Court, was "reversed and set aside".
- **Restoration of Trial Court's Judgment:** The judgment and decree, rendered by the trial court, were "consequently, restored". This meant that Lasum Bai's claim of absolute ownership over the disputed properties, as granted by the trial court based on the registered Will and oral family arrangement, was upheld. The trial court had decreed the suit for declaration and permanent injunction in her favor, granting her "absolute rights over the suit schedule properties including the disputed property admeasuring 4 acres and 16 guntas which was sold to Janardhan Reddy".
- **Allowance of Lasum Bai's Appeal:** Civil Appeal³, filed by Metpalli Lasum Bai (since dead, represented by legal representatives of Janardhan Reddy) and others, was "allowed".
- **Dismissal of Muthaiah's Appeal:** Civil Appeal⁴, filed by the legal representatives of Metpalli Muthaiah, which challenged the High Court's granting of a 1/4th share to Lasum Bai, was "dismissed". This effectively meant Muthaiah's claim for a larger share, as well as any claim of the property being purely ancestral without the effect of the Will, was rejected.
- **No Order as to Costs:** The Court directed that there would be "No order as to costs".
- **Disposal of Pending Applications:** Any pending applications in relation to the appeals were to "stand disposed of".

The Supreme Court unequivocally affirmed the validity of the registered Will executed by M. Rajanna and the oral family arrangement, thereby confirming Lasum Bai's title and rights over the disputed property.

Author's view

The Supreme Court’s verdict in Metpalli Lasum Bai, is a powerful declaration on the sanctity of registered Wills and the critical role of evidence in property disputes.

The judgment highlights that a registered Will carries a strong presumption of genuineness, placing a heavy burden of proof on anyone challenging its authenticity. Crucially, the defendant Muthaiah’s own admission of his father’s signatures on the Will was a decisive factor, effectively dismantling his challenge. The Court also validated the oral family arrangement, noting its consistency with the Will and Lasum Bai’s admitted possession of the property. This highlights the legal weight given to genuine, acted-upon family settlements.

Furthermore, the Supreme Court strongly rebuked the High Court for “manifestly erring” and interfering with the trial court’s “well-reasoned judgment”. By restoring the trial court’s decree granting Lasum Bai absolute rights, the ruling reaffirms the principle of judicial deference to thorough factual findings by lower courts.

The judgment holds that property rights turn on a sound appreciation of the evidence and strict adherence to the law on properly executed testamentary documents.

For further details write to contact@indialaw.in

- 1. 2025 (SC) 734 [??](#)
- 2. No. 101 of 1987 [??](#)
- 3. Civil Appeal No. 5921 of 2015 [??](#)
- 4. Civil Appeal No. 5922 of 2015 [??](#)

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