

IN THE COURT OF SENIOR CIVIL/FAMILY JUDGE,
RAWALPINDI

NAME OF THE WIFE Daughter Of XXXXXXXXXXXX, CNIC #: 00000-
0000000-0 presently residing at _____

.....PLAINTIFF

Versus

NAME OF HUSBAND Son Of XXXXXX, resident of _____

.....DEFENDANT

SUIT FOR DISSOLUTION OF MARRIAGE ON
THE BASIS OF KHULA

Respectfully Sheweth: -

1. That the Plaintiff got married to the Defendant at District Gujrat in accordance with Muslim Rites on dated 00-00-0000 (Copy of Nikah Nama is attached).
2. That the amount of Haq Mehar was Rs. 5000/- (Five thousand) that has been paid at the time of Nikah.

3. That the couple was blessed with 1 son, the name and date of birth is mentioned below...

1.		
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4. That the plaintiff is living on her own for the past 5 years. The defendant has not paid any maintenance to the Plaintiff or to the minor son.

5. That due to extreme hatred that has been developed in the heart of the plaintiff against the defendant. The plaintiff cannot live in the hateful union of marriage within the limits prescribed by Allah Almighty. Thus, the plaintiff seeks the dissolution of her marriage on the grounds of khula on the basis of following:

- I. Hatred between the spouses.
- II. Nonpayment of maintenance for the past five years.
- III. Obsessed
- IV. Rudeness
- V. Mental torture

6. That the plaintiff is living separately with her one minor son namely _____ for the past five years.

7. That the Defendant was requested again and again to divorce the Plaintiff but he refused to do so. Hence this suit.

8. That the Plaintiff is entitled to get the decree of dissolution of marriage. All the efforts made by the Plaintiff on this behalf have brought no fruit hence this suit. Therefore, the Plaintiff has been left with no other option but to file the instant suit.

9. That the cause of action accrued to the Plaintiff a few days ago, when the Defendant refused to divorce the Plaintiff, which still continues.

10. That the requisite court fee has been affixed on the plaint.

11. That the Plaintiff is a resident of Rawalpindi. This Honorable Court has got the jurisdiction to entertain the suit, try the same and grant the relief.

PRAYER:

In the circumstances, mentioned above, it is, most respectfully prayed that a decree for dissolution of marriage on the ground of khula, be passed in favour of the plaintiff and against the defendant with cost.

It is further prayed that any other adequate relief, which this Honorable court deems fit and proper, may also be awarded to the plaintiff in the best interest of justice.

PLAINTIFF

THROUGH

FAHMIDA NAZ SHEIKH
ADVOCATE HIGH COURT
RAWALPINDI.

VERIFICATION: -

Verified on this _____ day of _____ 2023 at Rawalpindi that the contents of para no. 1 to 7 are true and correct. Rests of the paras are believed to be true as per the information furnished.

PLAINTIFF

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