**IN THE COURT OF GUARDIAN JUDGE, LAHORE**

Guardian Application No.\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_/2024.

**\_\_\_\_\_\_\_\_** wife of \_\_\_\_\_\_\_\_\_\_\_\_\_\_ resident of House, Lahore.

***........Petitioner***

### VERSUS

***\_\_\_\_\_\_\_\_\_*** son of \_\_\_\_\_\_\_\_ resident of Street No. House No. \_\_\_. Lahore.

***.........Respondents***

**PETITION UNDER SECTION 7 OF GUARDIAN & WARDS ACT, 1890 FOR APPOINTEMENT OF GUARDIAN NAMELY** \_\_\_\_\_\_\_

# Respectfully Submitted: -

1. That the addresses of the parties as spelled out above are correct and sufficient for the purposes of service of process upon the parties.
2. That the marriage of the applicant with respondent was solemnised on 1.01.20\_\_ in accordance with the Muslim rites.
3. That out of said wedlock and matrimonial alliance, one male child namely\_\_\_\_\_ hereinafter to be referred to as “**the minor**” was born on 2.02.20\_\_.
4. That later on, the differences sprang up inter se the applicant/petitioner and respondent as a result of which friction crept into the marital relation and it began non-congenial for the mental health and physical well-being of the minor as well as the petitioner to co-habitat as a happily wedded couple and family. The petitioner tried her best to iron out those differences by finding out the middle path and common ground but to no avail.
5. That due to said differences and lack of congeniality and harmony, the petitioner and respondent agreed to live separate and apart from each other since June,20\_\_ so that the minor is saved form the toxic environment and is provided with the congenial and safe environment for his welfare.
6. That the petitioner being the mother of the minor entitled to be appointed as guardian of the minor on the following **grounds:**
7. That the petitioner is an educated lady and she can provide proper, cultural, moral, and social education.
8. That the petitioner is keenly interested to support, welfare, provide good health, extreme good education and proper upbringing of minor.
9. That in this tender age the company of the mother / petitioner is a basic necessity of upbringing the minor rather than that of a father.
10. That the petitioner is able to look after the minor in a better way with full love and affection.  The petitioner is the only lady being the mother of the minor who can make the bright future of the minor.
11. That if the petitioner may not declare guardian of the minor the petitioner and the minor will suffer from irreparable loss and injury.
12. That the cause of action occurred in favour of the applicant and against the defendant when the defendant ousted the petitioner from his house on \_\_\_\_\_\_\_\_secondly when \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_
13. That the applicant is currently residing at Lahore, therefore, this Honourable Court has got the jurisdiction to try and adjudicate upon the matter.

That the prescribed court fee has been affixed on the application.

**P R A Y E R: -**

***Under the above said circumstances, it is most respectfully prayed that the instant petition may kindly be accepted and the petitioner may very kindly be appointed as guardian of the minor namely* \_\_\_\_\_\_ *for the better welfare of the minor.***

***It is also humbly prayed that the petitioner may kindly be allowed to take the minor with her abroad in the welfare of the minor.***

***Any other relief which this Honourable Court deems fit and proper may also be awarded.***

#### Petitioner

Through

**\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

Dated 0.0.20\_\_ Advocate High Court.

***VERIFICATION***:-

Verified on oath at Lahore on this 1rd day of Jan 2024 that the contents of the paras are correct to the best of my knowledge, information and belief.

***……Petitioner***

**IN THE COURT OF GUARDIAN JUDGE, LAHORE**

In re: -

**\_\_\_\_\_\_\_\_\_\_ V/S *\_\_\_\_\_\_\_\_\_***

**APPLICATION UNDER SECTION 7 OF GUARDIAN AND WARDS ACT.**

**AFFIDAVIT OF \_\_\_\_\_\_\_\_** wife of \_\_\_\_\_\_\_ resident of House No. \_\_Street No.\_\_ Lahore.

I the above-named deponent do hereby solemnly affirm and declare as under: -

1. That the contents of the accompanying application may kindly be read as an integral part of this affidavit.
2. That the contents of the accompanying application are correct and true to the best of my knowledge and nothing has been concealed therefrom.

# Deponent

### V E R I F I C A T I O N

Verified on oath at Lahore on this 1rd day of Jan 2024 that the contents of the above affidavit are correct and true to the best of my knowledge and nothing has been concealed therefrom.

**Deponent**

**IN THE COURT OF GUARDIAN JUDGE, LAHORE**

In re: -

**\_\_\_\_\_\_\_\_\_\_ V/S *\_\_\_\_\_\_\_\_\_***

**APPLICATION UNDER SECTION 12 OF GUARDIAN AND WARDS ACT**

**Respectfully Sheweth :-**

1. That the petitioner has filled accompanying petition, under section 7 of the guardian and ward act in this Honourable Court, which has not yet been fixed for regular hearing.
2. That grounds taken in the petition may kindly be read as an integral part of this application, according to which there is every likelihood of petitioner success.
3. That it is in the welfare of the minor that his custody be remained with the petitioner.
4. That the balance of convenience is in the favour of the petitioner and in case minor is not ordered to be remained with the petitioner, she will suffer irreparable loss and injury.

**Prayer**

 ***It is, therefore, most respectfully prayed that the respondent No.1 may kindly be restrained from snatching/taking away the custody of the minor namely \_\_\_\_\_\_\_\_\_ from the petitioner illegally, unlawfully or by any other illegal manner.***

***Ad-interim injunction may kindly be allowed in the meanwhile.***

***Petitioner***

***Through***

 ***\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_***

**IN THE COURT OF GUARDIAN JUDGE, LAHORE**

In re: -

**\_\_\_\_\_\_\_\_\_\_ V/S *\_\_\_\_\_\_\_\_\_***

**APPLICATION UNDER SECTION 12 OF GUARDIAN AND WARDS ACT.**

**AFFIDAVIT OF \_\_\_\_\_\_\_\_** wife of \_\_\_\_\_\_\_ resident of House No. \_\_Street No.\_\_ Lahore.

I the above-named deponent do hereby solemnly affirm and declare as under: -

1. That the contents of the accompanying application may kindly be read as an integral part of this affidavit.
2. That the contents of the accompanying application are correct and true to the best of my knowledge and nothing has been concealed therefrom.

# Deponent

### V E R I F I C A T I O N

Verified on oath at Lahore on this 1rd day of Jan 2024 that the contents of the above affidavit are correct and true to the best of my knowledge and nothing has been concealed therefrom.