**IN THE COURT OF SENIOR CIVIL JUDGE WITH THE**

**POWERS OF JUDGE FAMILY COURT, LAHORE.**

**Family Suit No. \_\_\_\_\_\_\_\_\_\_\_\_\_\_/ 20\_\_**

1. **\_\_\_\_\_\_** daughter of \_\_\_\_resident of House No, **, Street No.**\_\_\_, Lahore
2. \_\_\_\_\_\_Minor through \_\_\_\_\_\_\_, Plaintiff No. 1 as next friend

**...Plaintiff**

# V E R S U S

**\_\_\_\_\_** son of\_\_\_\_\_resident of House No\_\_\_\_\_\_\_,Lahore.

**...Defendant**

**SUIT FOR DISSOLUTION OF MARRIAGE, RECOVERY OF MAINTENANCE, DOWER AND DOWRY ARTICLES**

### ***Respectfully Sheweth:***

1. That the addresses of the parties have been correctly given for the purpose of summoning of the parties by this learned court.
2. That the marriage between the parties was solemnized on 0\_\_.0\_.20\_\_ according to Muslim rites and the rituals, against a consideration of two (5) tola of gold ornaments as prompt dower, which was not handover to Plaintiff till the day. Rukhsati was also took place on the same day and out of this wedlock plaintiff no. 2 was born on \_\_\_\_\_\_\_
3. That plaintiff no. 2 is a minor and is suing through plaintiff no. 1 who is his real mother and has got no adverse interest against the minor plaintiff.
4. That soon after marriage, the relationship between the parties began to deteriorate. Despite enduring the offensive and objectionable behavior of the defendant, Plaintiff No. 1 chose to tolerate it in the hope of maintaining peace and stability in the family. However, the defendant disregarded these efforts and persisted in his harmful treatment toward Plaintiff No. 1, the Defendant commenced subjecting the Plaintiff to both mental and physical torment, the Defendant frequently inflicted severe physical violence upon the Plaintiff over trivial household matters.
5. That at the time of marriage the Plaintiff brought with her dowry articles and gold ornaments bestowed by her parents, valuing of Two million (Rs.2,000,000/-) which are still lying in the house of the defendant and being used by the defendant and his family members in rough manner. **(Copy of the list of dowry articles and receipts of gold ornaments is attached herewith as Annex\_\_\_\_** It is pertinent to mention here that immediately following the marriage, the Defendant took custody of all the gold ornaments given by the parents of the Plaintiff, it is necessary to mention here that the defendant also took custody of the gold ornaments which were given by the parents of the Defendant to the Plaintiff as a gift on the day of walima that gold ornaments include: bangles , necklace and earrings. It is pertinent to mention that after the matrimonial union, the Plaintiff has repeatedly requested and demanded the dower, however, the Defendant has consistently disregarded her lawful and rightful demand. **(Copy of Nikahnama is attached herewith as Annex A)**
6. That on 0.0.20\_\_, the Defendant began to escalate the physical abuse, and kicked out the Plaintiff from his house in three wearing apparels, along with the minor. Since then the plaintiff has been residing at her parents home with the minor.
7. That after ousting the Plaintiff the Defendant till today never ever contacted the Plaintiff for reconciliation of marriage, the Plaintiff and her parents tried their best to rehabilitate the Plaintiff in the house of the Defendant.
8. That few days ago, the Defendant called and subjected the Plaintiff to mental torment, declaring that he will never reconcile with Plaintiff, Defendant threatened further abuse if Plaintiff returned.
9. That this act of Defendant creates great hatred in the Plaintiff’s heart and in this situation, it is impossible for plaintiff to lead her life with that type of person, who ruined the life of Plaintiffs.
10. That The defendant has completely neglected the plaintiffs and has failed to provide any maintenance allowance.
11. That the defendant is a businessman with a substantial monthly income, and in addition, he receives rental income from commercial properties.
12. That the cause of action arose against the Defendant firstly when Defendant pushed out the Plaintiff on 0.0.20\_\_, secondly, when reconciliation failed and lastly a few days ago when the Defendant threatened further abuse if Plaintiffs returned to the house of defendant.
13. That the parties presently reside at Lahore and the cause of action accrued at Lahore, therefore, the family court at Lahore has ample jurisdiction to adjudicate upon the matter.
14. That the requisite court fee has also been affixed on the suit.

**PRAYER**

1. ***Under the circumstances submitted above, it is, most respectfully prayed that the suit may kindly be decreed in favour of the plaintiffs and against the defendant and the marriage between the parties may kindly be dissolve on the basis of Khula.***
2. ***A decree in favor of the plaintiff and against the defendant be passed that the plaintiff is entitled to Dower consisting of five Tola of Gold ornaments (as mention in column no,13 of the Nikah-Nama), with Dowery Articles, Bridal Gifts, Belonging of the Plaintiff and Gold ornaments, the defendant be ordered to return the same to the plaintiff. Or in lieu thereof a decree of equivalent amount at market rate at the time of decision of the suit may kindly be passed in favor of the plaintiff and against the defendant.***
3. ***Keeping in view the status of the plaintiff and her family in the society and earning capacity of the defendant maintenance allowance at the rate of Rs.50,000/- per month may kindly be ordered to be paid from 0-0-20\_\_ to the completion of iddat period, and Rs.15,000/- per month maintenance allowance for plaintiff no.2 (minor).***
4. ***Any other relief which this learned court deems just and appropriate may also be granted.***

**PLAINTIFF**

Through

**\_XYZ\_\_\_\_\_\_\_\_\_\_\_\_\_**

Advocate High Court

**VERIFICATION**

**Verified on oath at Lahore this day of \_\_, March, 20\_\_ that the contents of above plaint from 1 to 11 are true and correct to the best of my knowledge and rest of the paras are correct to the best of my information and belief.**

**PLAINTIFF**

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**\_\_\_\_\_\_\_** v e r s u s **\_\_\_\_\_\_\_**

**SUIT FOR DISSOLUTION OF MARRIAGE, RECOVERY OF MAINTENANCE, AND DOWRY ARTICLES**

**LIST OF WITNESSES**

1. Plaintiff herself.
2. \_\_\_\_\_\_\_\_\_\_ resident of House No,\_\_, Street No\_\_\_, Lahore.
3. \_\_\_\_\_\_\_\_\_\_ s/o \_\_\_\_\_\_ resident of House No,\_\_ Street No.\_\_ Lahore.

**PLAINTIFF**

Through

**XYZ\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

Advocate High Court