

IN THE HIGH COURT OF SINDH AT KARACHI

Constitutional Bench Matter

CP No. D-:_____ of 2026

1. **Mr. Saifuddin (Advocate)**
Son of Jalaluddin Muslim, Adult,
Leader of the Opposition, City Council, KMC
Office at Office at Room no.9,
2nd Floor, KMC Building, MA Jinnah Road,
Karachi.

2. **Taimoor Ahmed**, Son of Tanveer Ahmed,
(Attorney of Petitioner No. 1 and Co-Petitioner)
Muslim, Adult, Office at Office at Room no.9,
2nd Floor, KMC Building, MA Jinnah Road,
KarachiPetitioners

VERSUS

1. **Province of Sindh**
Through Secretary, Local Government and Housing & Town
Planning (HTP) Department
Office at Sindh Secretariat, Karachi

2. **Karachi Metropolitan Corporation (KMC)**
Through its Municipal Commissioner,
Office at KMC Main Building, M.A. Jinnah Road, Karachi.

3. **The Mayor, of Karachi**
Office at KMC Main Building, M.A. Jinnah Road, Karachi

4. **The Director General (Parks & Horticulture),**
Karachi Metropolitan Corporation,
Office at Frere Hall,
Fatima Jinnah Road,
Karachi. Respondents.

**CONSTITUTIONAL PETITION UNDER ARTICLE 199 (1)(a)(i)
AND (1)(b)(ii) OF THE CONSTITUTION OF PAKISTAN 1973**

RESPECTFULLY SHOWETH:

1. That Petitioner No. 1, Mr. Saifuddin, is a Muslim, adult, Pakistani national, duly elected Leader of the Opposition in the City Council of the Karachi Metropolitan Corporation, a position recognised under the Sindh Local Government Act, 2013 ("SLGA 2013"), pursuant to the notification issued by the

KMC Municipal Commissioner Secretariat vide No. PR/MC/KMC/2024/3_86, dated 13/06/2024, confirming his election as Leader of the Opposition in the City Council, KMC. **A copy of the said notification is annexed hereto and marked as Annexure P/1.**

2. That in his capacity as Leader of the Opposition in the City Council of KMC, Petitioner No. 1 is directly responsible for scrutinising the actions of the ruling administration, safeguarding the rights of citizens, and ensuring that the resolutions and executive acts of KMC are within the bounds of law. The impugned resolution directly concerns the unlawful commercialisation of Beach View Park a public open space under KMC's custodianship and the illegal award of 3 (three) acres thereof to a private organisation for the construction of a museum, which strikes at the very foundation of public rights and his statutory duties as Leader of the Opposition. That Petitioner No. 1 is a law-abiding citizen of Pakistan, entitled to the Fundamental Rights guaranteed under Chapter I, Part II of the Constitution of Islamic Republic of Pakistan, 1973, including the right to life with dignity under **Article 9**, the right to equality before law under **Article 25**, and the right of access to public open spaces as part of the constitutionally recognised right to a clean and healthy environment. He files this petition both in his personal capacity as a citizen and as Leader of the Opposition.
3. That the Petitioners have raised objections to the impugned resolution from the floor of the City Council itself, and has been consistently vocal in opposing the illegal commercialisation of public parks. He has been directly and adversely affected by the passing of the said resolution in the manner described hereinbelow, which was carried through in deliberate violation of the procedural requirements of the SLGA 2013, suppressing

his right and the right of other elected members to deliberate upon the matter. Petitioner No. 2, is also a member City council, KMC, Co-files this petition as a responsible member of the City Council KMC, also acts as an attorney of the petitioner No. 01. **Copy of power of attorney attached as annexure**

4. That Karachi Metropolitan Corporation (KMC), is a local government body established under the Sindh Local Government Act, 2013, responsible for the management, protection, maintenance, and development of public open spaces, parks, and recreational areas within the metropolitan limits of Karachi. KMC is the custodian of Beach View Park, situated in the Clifton area of Karachi. It is through the instrumentality of KMC's City Council that the impugned resolution has been passed, purporting to award 3 (three) acres of Beach View Park to a private organisation for construction of a museum.
5. That Respondent No. 3, the Mayor of Karachi, is the elected head of the Karachi Metropolitan Corporation and presides over the City Council. It is his constitutional and statutory obligation to ensure that KMC acts strictly within the bounds of law, complies with judicial orders of the superior courts, and does not permit the alienation or commercialisation of public open spaces for private benefit. That the Respondent No. 2 and 4 are also the officials of the KMC works under the administration and supervision of the Mayor of Karachi,
6. That the City Council of KMC, is the legislative body of the Karachi Metropolitan Corporation constituted under the SLGA 2013. The City Council has, through a procedurally and substantively defective resolution passed on 12th March 2026, purported to award approximately 3 (three) acres of Beach View Park land to Citizens Archive of Pakistan (CAP), a private

organisation, for the construction of a museum an act that is without legal authority and in direct violation of binding judicial pronouncements of the superior courts of Pakistan.

7. That Beach View Park is a designated public open space and recreational park forming part of the urban green infrastructure of Karachi. It is situated in the Clifton area and has served for decades as a public park for the citizens and residents of Karachi. Beach View Park is designated as a public open space under the Master Plan and applicable statutory frameworks and is subject to the protection of several binding judgments of the Honourable Supreme Court of Pakistan and the Honourable High Court of Sindh.
8. That the Honourable Supreme Court of Pakistan and the Honourable High Court of Sindh have, in numerous authoritative judgments and orders including petitions filed by organisations such as Shehri Citizens for a Better Environment expressly prohibited any construction, commercialisation, or encroachment upon designated public open spaces and parks in Karachi, and have directed that such spaces be preserved and maintained exclusively for public recreational use. That notwithstanding the foregoing constitutional and judicial protections, the Respondents have, through the impugned resolution, set in motion a process that would result in the permanent transfer of 3 (three) acres of Beach View Park to a private organisation Citizens Archive of Pakistan (CAP) for the purpose of constructing a museum thereon; an act that constitutes a direct and blatant violation of the law, the rights of citizens, and the binding judicial orders of the superior courts.
9. That on 12th March 2026, the City Council of the Karachi Metropolitan Corporation purportedly passed City Council Resolution No. 146/2026, Agenda Item No. 13, approving the

establishment of a museum on a 3-acre portion of Beach View Park through a Public-Private Partnership (PPP) arrangement with Citizens Archive of Pakistan (CAP) a private organisation. **copy of the said resolution is annexed herewith and marked as Annexure P/2.**

10. That the said resolution was introduced and passed in a manifestly illegal and dubious manner. The agenda for Agenda Item No. 13 pertaining specifically to the Beach View Park resolution was deliberately never issued or circulated to the members of the City Council prior to the meeting of 12th March 2026. This is significant because agendas for all other items on the same Council meeting were duly circulated beforehand, and the withholding of the agenda for this particular item alone was a calculated and deliberate act designed to prevent the elected members including Petitioner No. 1 from examining, preparing, and deliberating upon this critical matter before the meeting. This is in direct violation of the mandatory procedural requirements of the Sindh Local Government Act, 2013 and the rules framed thereunder. **circulated agendas versus the absent agenda for Item No. 13 is annexed herewith and marked as Annexure P/3.**

11. That during the Council meeting of 12th March 2026, when the said resolution was introduced, several elected members of the City Council including Petitioner No. 1 in his capacity as Leader of the Opposition sought to speak and deliberate upon this resolution. However, the members were reportedly restricted and prevented from speaking. The resolution was then rushed through the Council and declared as passed within mere seconds, without any meaningful deliberation, proper voting procedure, or transparent discussion conduct wholly inconsistent with and in violation of the democratic and procedural norms mandated by the SLGA 2013 for the

functioning of the City Council. That demonstrating the continuing pattern of procedural violations, the impugned resolution was again presented before the City Council on 23rd May 2026 for amendment once again without the issuance of a prior formal agenda to Council members. This second presentation further evidences the deliberate, systematic, and ongoing nature of the procedural illegality, as the Respondents have repeatedly bypassed the mandatory statutory requirements governing the conduct of City Council proceedings. **copy of the said resolution is annexed herewith and marked as Annexure P/**

12. That the Citizens Archive of Pakistan (CAP), the private organisation to which the 3-acre portion of Beach View Park has been purportedly awarded under the impugned resolution, is described in the relevant correspondence and background material as a non-profit heritage organisation. However, regardless of the characterisation of the recipient organisation or the P-P-P arrangement, no authority under the SLGA 2013 or any other law permits the award, alienation, or use of designated public park land for any construction purpose whether cultural, commercial, semi-commercial, or otherwise particularly where binding judicial orders of the superior courts expressly prohibit any such activity on public open spaces in Karachi.

13. That the impugned resolution, if implemented, would result in the permanent loss of 3 acres of a designated public open space to a private construction project, set a dangerous precedent for the further commercialisation of the remaining public parks of Karachi, and violate the constitutional rights of millions of citizens of Karachi who rely upon these parks as their only access to open air and recreational space in an increasingly dense urban environment.

14. That the Petitioners have no other adequate or efficacious remedy available except to invoke the extraordinary constitutional jurisdiction of this Honourable Court under Article 199 of the Constitution of Pakistan, 1973. The Petitioners have raised and continue to raise objections through all available forums, but to no avail. The cause of action is continuing and of public importance, necessitating urgent judicial intervention to preserve the subject public open space from irreversible damage.

15. That In light of the foregoing facts and circumstances, this Honourable Petition is filed on the following grounds, as That the impugned resolution and the proposed construction at Beach View Park directly violate the Fundamental Rights of the citizens of Karachi including the Petitioners guaranteed under the Constitution of Islamic Republic of Pakistan, 1973, including but not limited to: (a) Article 9 Right to Life: the superior courts have consistently held that the right to life includes the right to a clean and healthy environment and access to public open recreational spaces; (b) Article 14 Inviolability of Dignity: the deprivation of public parks degrades the quality of life and dignity of urban citizens; and (c) Article 25 Equality Before Law: the citizens of Karachi are entitled to equal benefit of the judicial protections afforded to public open spaces, which the Respondents have selectively and arbitrarily disregarded.

16. That the right to a clean and healthy environment is an intrinsic and inalienable component of the fundamental right to life under Article 9 of the Constitution, as authoritatively expounded by the Honourable Supreme Court and High Courts in numerous landmark environmental and public interest cases concerning urban open spaces in Pakistan. The

commercialisation and construction at Beach View Park constitutes a direct and irreversible assault upon this constitutionally recognised right.

17. That there exist binding judgments and orders of the Honourable Supreme Court of Pakistan and the Honourable High Court of Sindh, including orders arising from petitions specifically filed by Shehri Citizens for a Better Environment and other public interest litigants, which expressly prohibit any construction, encroachment, commercialisation, or alienation of designated public open spaces and parks in Karachi. The Respondents, as statutory public authorities, are constitutionally and legally bound to comply with and enforce these orders. The passage and implementation of the impugned resolution in defiance of these judicial orders constitutes a brazen violation of the rule of law and the supremacy of judicial orders.
18. That the Honourable Supreme Court has consistently and categorically held that public open spaces, parks, and green belts in urban areas of Pakistan are public trust properties that cannot be alienated, encroached upon, commercialised, or diverted to any private use irrespective of the nature of the arrangement or the characterisation of the recipient organisation. No administrative resolution, PPP arrangement, or NOC issued by any municipal authority can override or circumvent these binding judicial pronouncements. The impugned resolution is therefore void ab initio and of no legal effect.
19. That the violation of subsisting judicial orders of the superior courts by the Respondents who are statutory public authorities renders every act taken in furtherance of the impugned resolution, including any construction or development at Beach

View Park, not only unlawful but also constitutive of contempt of court, and liable to be set aside by this Honourable Court in exercise of its constitutional jurisdiction under Article 199.

20. That the SLGA 2013 does not confer any authority upon the City Council or KMC to alienate, award, or permit the use of designated public park land for any construction purpose whatsoever whether framed as a PPP arrangement, a cultural institution, a museum, or any other characterisation. The absence of any such enabling provision in the statute renders the impugned resolution ultra vires and void.
21. That no lawful process was followed prior to the passage of the impugned resolution, including the mandatory requirements of public notice, stakeholder consultation, environmental review, or any higher-authority approval that would be required before any change in the use or status of public open space land. The absence of any such process independently renders the resolution unlawful and a nullity. That the same resolution was again presented for amendment on 23rd May 2026, again without a prior issued agenda demonstrating a deliberate and continuing pattern of statutory violations. The amendment process is equally infected by the same procedural illegality as the original resolution and is independently void.
22. That public parks and open spaces are public trust properties held by the State and its instrumentalities including KMC in trust for the present and future citizens of Karachi. The public trust doctrine, firmly recognised and applied by the superior courts of Pakistan, imposes a fiduciary and non-delegable obligation upon the State not to alienate, commercialise, or permit encroachment upon such properties for private benefit. The impugned resolution constitutes a flagrant and fundamental breach of this doctrine and must be struck down

by this Honourable Court.

23. That the implementation of the impugned resolution and any construction at Beach View Park will result in irreversible damage to the subject public open space, the permanent loss of irreplaceable urban recreational land in one of the most densely populated cities in the world, and the destruction of public rights that cannot be adequately compensated in monetary terms. The harm to constitutional rights is not speculative but is presently manifesting and will become irreparable unless this Honourable Court intervenes urgently.

24. That this petition is filed in the public interest and concerns the rights of millions of citizens of Karachi who have no other avenue for the protection of their constitutional right to public open spaces. The balance of convenience overwhelmingly favours the grant of the relief prayed for, including immediate interim relief restraining any further action in furtherance of the impugned resolution.

25. That the impugned City Council Resolution No. 146/2026 dated 12th March 2026 (Agenda Item No. 13), and any subsequent resolution or act passed in furtherance thereof, are illegal, unlawful, ultra vires, void ab initio, and without lawful authority, being in violation of the SLGA 2013, the Constitution of Pakistan, 1973, and the binding judicial orders of the superior courts.

26. That the Petitioners crave leave to add, amend, and urge additional grounds at the time of hearing of this petition.

PRAYER

In view of the foregoing submissions, the Petitioners most respectfully and humbly pray that this Honourable Court may

graciously be pleased to:

- (a)** Declare City Council Resolution No. 146/2026, Agenda Item No. 13, dated 12th March 2026, and any resolution passed in amendment or furtherance thereof, to be illegal, ultra vires, void ab initio, and of no legal effect;
- (b)** Issue a writ of prohibition or any other appropriate writ, order, or direction restraining the Respondents, their officers, agents, contractors, and all persons acting under their authority from carrying out any construction, development, commercialisation, or activity of any nature whatsoever at Beach View Park, Karachi, or awarding, leasing, or transferring any portion thereof to any private entity or organisation;
- (c)** Issue a writ of mandamus or appropriate direction to the Respondents to demolish and remove any structure or boundary wall already raised or any site preparation carried out at Beach View Park, and to restore the land to its original condition as a public open space;
- (d)** Issue a direction to all Respondents to ensure strict and continuing compliance with the binding judgments and orders of the Honourable Supreme Court of Pakistan and the Honourable High Court of Sindh concerning the protection of public open spaces and parks in Karachi, and specifically Beach View Park;
- (e)** Pending the final hearing and disposal of this petition, issue an ad interim order restraining the Respondents from implementing, acting upon, or taking any step in furtherance of the impugned resolution, including any construction, development, or award of land at Beach View Park;
- (f)** Direct the concern authorities to immediately halt, seal, and

prevent any construction activity at Beach View Park;

(h) Pass any other order(s) that this Honourable Court may deem just, fit, and proper in the circumstances of this case.

Karachi

Dated: 02th June, 2026

ATTORNEY OF THE PETITIONER

ADVOCATE FOR THE PETITIONER

IN THE HIGH COURT OF SINDH AT KARACHI

Constitutional Bench Matter

CP No. D-:_____ of 2026

Mr. Saifuddin & AnotherPetitioners

VERSUS

The Province of Sindh & OthersRespondents

AFFIDAVIT

I, Taimoor Ahmed, Son of Tanveer Ahmed, (Attorney of Petitioner No. 1 and Co-Petitioner) Muslim, Adult, Office at Office at Room no.9, 2nd Floor, KMC Building, MA Jinnah Road, Karachi the Petitioner, do hereby state on oath as under: -

1. I say that being the Petitioner 02 as well as attorney of the Petitioner No. 01 in the captioned matter, hence I am well conversant with the facts and circumstances of this case.
2. I say that unless the accompanying petition is filed by me and is granted the interest of the Petitioner shall be seriously prejudiced and Petitioner shall suffer irreparable loss, harm and injury.
3. That whatever has been stated above is true and correct to the best of my knowledge, belief and information.

Karachi

Dated ___ June, 2026

DEPONENT

CNIC # _____

CELL # _____

IN THE HIGH COURT OF SINDH AT KARACHI

Constitutional Bench Matter

CP No. D-:_____ of 2026

Mr. Saifuddin & AnotherPetitioners

VERSUS

The Province of Sindh & OthersRespondents

APPLICATION UNDER SECTION 151 C.P.C

For the fact and reasons disclosed in the accompanying affidavit, it is humbly prayed on behalf of the Petitioner, above named that this, Honorable Court may graciously be pleased to accept Photostat copies of the annexure and exempt the Petitioner from filing the original documents which at present is neither in its power nor possession and would be filed if and when directed by this Honorable Court.

Prayer is made in the interest of justice.

KARACHI

Dated ___June, 2026

ADVOCATE FOR THE PETITIONER

IN THE HIGH COURT OF SINDH AT KARACHI

Constitutional Bench Matter

CP No. D-:_____ of 2026

Mr. Saifuddin & AnotherPetitioners

VERSUS

The Province of Sindh & OthersRespondents

AFFIDAVIT IN SUPPORT OF APPLICATION U/S 151 CPC

I, Taimoor Ahmed, Son of Tanveer Ahmed, (Attorney of Petitioner No. 1 and Co-Petitioner) Muslim, Adult, Office at Office at Room no.9, 2nd Floor, KMC Building, MA Jinnah Road, Karachi the Petitioner, do hereby state on oath as under: -

1. I say that being the Petitioner 02 as well as attorney of the Petitioner No. 01 in the captioned matter, hence I am well conversant with the facts and circumstances of this case.
2. I say that the copies of annexure annexed with the petition are not readily available with the petition, and the same shall be filed as and when required by this Hon'ble Court.
3. I say that unless the accompanying application is granted the interest of the Petitioner shall be seriously prejudiced and Petitioner shall suffer irreparable loss, harm and injury.
4. That whatever has been stated above is true and correct to the best of my knowledge, belief and information.

Karachi

Dated ___ June, 2026

DEPONENT

CNIC # _____

CELL # _____

IN THE HIGH COURT OF SINDH AT KARACHI

Constitutional Bench Matter

CP No. D-:_____ of 2026

Mr. Saifuddin & AnotherPetitioners

VERSUS

The Province of Sindh & OthersRespondents

APPLICATION U/R-9, CHAPTER III-B VOLUME - V,
OF THE HIGH COURT RULES AND ORDERS

For the facts and reasons stated in the accompanying affidavit, it is humbly prayed on behalf of the Petitioner, above named that this Honorable Court may graciously be pleased to fix the captioned petition in court/chamber on ____day of June, 2026, as the same requires urgent consideration.

This prayer is made in the interest of justice.

Karachi

Dated ___ June, 2026

ADVOCATE FOR THE PETITIONER

IN THE HIGH COURT OF SINDH AT KARACHI

Constitutional Bench Matter

CP No. D-:_____ of 2026

Mr. Saifuddin & AnotherPetitioners

VERSUS

The Province of Sindh & OthersRespondents

AFFIDAVIT

I, Taimoor Ahmed, Son of Tanveer Ahmed, (Attorney of Petitioner No. 1 and Co-Petitioner) Muslim, Adult, Office at Office at Room no.9, 2nd Floor, KMC Building, MA Jinnah Road, Karachi the Petitioner, do hereby state on oath as under: -

1. I say that being the Petitioner 02 as well as attorney of the Petitioner No. 01 in the captioned matter, hence I am well conversant with the facts and circumstances of this case.
2. I say that the accompanying application for urgent hearing has been drafted and filed under my specific instructions. The contents thereof are correct and same may be treated as integral part of this affidavit.
3. I say that unless the accompanying application is granted, the interest of the Petitioner shall be seriously prejudiced and he shall suffer irreparable loss, harm and injury.
4. That whatever stated above is true and correct to the best of my knowledge and belief.

Karachi

Dated: ___ June, 2026

DEPONENT

CNIC # _____

CELL # _____

IN THE HIGH COURT OF SINDH AT KARACHI

Constitutional Bench Matter

CP No. D-:_____ of 2026

Mr. Saifuddin & AnotherPetitioners

VERSUS

The Province of Sindh & OthersRespondents

APPLICATION UNDER ORDER XXXIX RULE 1 & 2 CPC
READ WITH SECTION 151 C.P.C

For the fact and reasons disclosed in the accompanying affidavit, it is humbly prayed on behalf of the Petitioner, above named that this, Honorable Court may graciously be pleased to restrain the Respondents from performing official duties and further to restrain the Respondents from taking any coercive/adverse action upon the subject matter, till final adjudication of the instant petition.

Ad interim orders, without notice are solicited in above terms.

Prayer is made in the interest of justice.

Karachi

Dated ___ June, 2026

ADVOCATE FOR THE PETITIONER

IN THE HIGH COURT OF SINDH AT KARACHI

Constitutional Bench Matter

CP No. D-:_____ of 2026

Mr. Saifuddin & AnotherPetitioners

VERSUS

The Province of Sindh & OthersRespondents

AFFIDAVIT

I, Taimoor Ahmed, Son of Tanveer Ahmed, (Attorney of Petitioner No. 1 and Co-Petitioner) Muslim, Adult, Office at Office at Room no.9, 2nd Floor, KMC Building, MA Jinnah Road, Karachi the Petitioner, do hereby state on oath as under: -

1. I say that being the Petitioner 02 as well as attorney of the Petitioner No. 01 in the captioned matter, hence I am well conversant with the facts and circumstances of this case.
2. I say that the accompanying injunction application under Order XXXIX Rule 1 & 2 CPC has been filed on my specific instructions, the contents whereof may be treated as integral part of this affidavit for the sake of brevity.
3. I say that I reiterated the contents of the main petition, for the sake of brevity the same are not being reproduced here and the same may kindly be treated as an integral part of this affidavit.
4. I say that the Petitioner has a prima facie case and balance of convenience also lies in his favor and unless the accompanying application is allowed, the Petitioner shall suffer irreparable loss, harm and injury.
5. That whatever has been stated above is true and correct to the best of my knowledge, belief and information.

Karachi

Dated: _____ June, 2026

DEPONENT

CNIC # _____

CELL # _____

VAKALATNAMA
IN THE HIGH COURT OF SINDH AT KARACHI
Constitutional Bench Matter

CP No. D-: _____ of 2026

Mr. Saifuddin & AnotherPetitioners

VERSUS

The Province of Sindh & OthersRespondents

KNOW ALL TO WHOM THESE PRESENTS SHALL COME THAT Taimoor Ahmed, Son of Tanveer Ahmed, (Attorney of Petitioner No. 1 and Co-Petitioner) in the above noted case do hereby make, appoint, authorize, nominate, constitute and ordain (1) MR. USMAN FAROOQ, Advocate (2) MR. AGHA ABDUL FATEH Advocate, (3) MR. MUHAMMAD SAYD ANJUM Advocate (4) MR. MR. AHMED MUNEEB Advocate Advocate (5) MR. AKHTER Advocates 6) Mr. FARRUKH HUSSAIN Advocate in the above mentioned cause to do all the following acts, deeds and things or any of them, that it is to say:-

As my/our true and lawful Advocate (s) jointly and severally and empower them to act, appear, present Application(s), cross examine witnesses, withdraw or compromise for me/us in my/our name(s) on my/our behalf in the above matter, and for the purpose and in connection therewith to deposit or withdraw money(s), grant receipt(s), file in or take out document (s) and paper and to do all act(s), deed (s) and thing (s) or any of them whatsoever that may be deemed necessary or advisable for the prosecution/defense of the said suit/case and I say that any act so done by the said Advocate (s) after accepting this power shall be considered as my/our own act to all intents and purpose.

I also undertake to pay their professional fee in the above matter and that they would be at liberty to withdraw their appearance from the above matter in case their full fee is not paid before the conclusion of the above matter until the same is paid.

RECEIVED BY ME/US ON _____ FROM _____.

Signatures/Thumb Impressions

1) MR. USMAN FAROOQ Advocate
16057/HC/Karachi

2) AGHA ABDUL FATEH Advocate
/HC/Karachi

3) MR. AKHTER Advocate
/HC/Karachi

4) AHMED MUNEEB Advocate
/HC/Karachi

Accepted: Subject to the mentioned above address for service is as under:

USMAN FAROOQ LAW ASSOCIATES
Office No. 3 & 4, K.M.C Building, Jigar Muradabadi Road, Near Islamia
College, Karachi. Cell Number: 0333 – 8421560

IN THE HIGH COURT OF SINDH AT KARACHI

Constitutional Bench Matter

CP No. D-:_____ of 2026

Mr. Saifuddin & AnotherPetitioners

VERSUS

The Province of Sindh & OthersRespondents

AFFIDAVIT

I, Taimoor Ahmed, Son of Tanveer Ahmed, (Attorney of Petitioner No. 1 and Co-Petitioner) Muslim, Adult, Office at Office at Room no.9, 2nd Floor, KMC Building, MA Jinnah Road, Karachi the Petitioner, do hereby state on oath as under: -

1. I say that this is the first petition and no other petition or any kind of proceedings have been filed by me before any forum except this petition.
2. I say that whatever has been stated above is true and correct to the best of my knowledge, belief and Information.

Karachi:

Dated ___ June, 2026

DEPONENT

CNIC # _____

CELL # _____

IN THE HIGH COURT OF SINDH AT KARACHI
Regular Bench

CP No. D-:_____ of 2025

Dr. Saad Qasim KhanPetitioner

VERSUS

The Province of Sindh & OthersRespondents

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Photocopies of:

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1.	Memo of petition		
2.	A copy of the said notification is annexed		
3.	Copy of power of attorney attached as annexure		
4.	A copy of the said resolution is annexed herewith and marked		
5.	circulated agendas versus the absent agenda for Item No. 13 is annexed herewith and marked as Annexure		
6.	Undertaking		
7.	Urgency Application a/w Affidavit		
8.	Exemption Application a/w affidavit		
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Karachi:

Dated: ___ June, 2026

ADVOCATE FOR THE PETITIONER