Criminal Writs Quashing Of FIR Sample Draft

<<plaintiff\_name>> daughter of <<plaintiff\_father\_name>> , Resident of <<plaintiff\_address>>.

***Plaintiff***

**Versus**

<<defendant\_name>> son of <<defendant\_father\_name>> Resident of Street No , 75, Dhoobi Ghat Aurangzaib Road Wahga Town <<plaintiff\_current\_residence>>.

***Defendant***

**SUIT FOR DISSOLUTION OF MARRIAGE.**

**Respectfully Sheweth : -**

1.That the plainff was married with the defendant in accordance with Muslim rites on 10 june 2010 and a sum of rupees <<dower\_amount>> /- as prompt dower which sll has not been paid by the defendant to the plaintiff, copy of nikah nama is enclosed.

2.That out of this wedlock no child was born .

3.That the relaon between the spouses remained cordial only few days in the beginning of of the marriage and after that defendant start beating the plaintiff on very common house hold matters.

4.That the atude of the defendant and his family was very cruel and harsh arrogant and unreasonable towards the plainff, he started making demands from the plainff to bring money form her parents and on the refusal of the plaintiff he used to beat the plaintiff mercilessly.

5.That despite the physical and mental torture given to the plainff by the defendant, the plainff tried her level best to reconcile the maer for the sake of her matrimonial life but the behavior of the defendant became more harsh and cruel on on <<desertion\_date>> the defendant deserted the plainff from his house in wearing apparels only aer giving severe beangs to the plainffadn since then the plainff is residing on the above menoned address without being maintained by the defendant.

6.That the defendant habitually assaulted the plainff and made her life miserable by cruelty of act and conduct as she was unable to fulfill the illegal and immoral demands of the defendant.

7.That the defendant is in the habit of intoxication and is also involved in criminal activities.

8.That the defendant has never maintained the plainff and they are making their both ends meet by the help of parents of plaintiff.

9.That due to the atude of the defendant the plainff has got fixed aversion in her mind against the defendant and it is now impossible for the plainff to live with the fefendant as his legally wedded wife , as such the plainff seeks dissoluon of her marriage on the ground of \* KHULLA \* also .

10.That the cause of acon has arisen in favour of the plainff and against the defendant firstly at the time of solemnization of marriage between the plaintiff and the defendant, secondly in 05-09-2014 when the plainff was ulmately deserted by the defendant from his house aer giving severe beatings to the plaintiff, hence the cause of action is still continuing to occure.

11.That the plainff is now residing at Lahore , so this honoura ble court has got th enre jurisdiction to adjudicate upon the matter.

12.That the appropriate court fee has been affixed on the plaint for the sasfacon of the court.

PRAYER :

In view of the above mentioned facts and circumstances, it is most respectfully prayed that the titled suit may very kindly be decreed in favour of the plainff and against the defendant on the following terms : -

A decree for dissoluonof marriage may kindly be passed in favour of the plainff and against the defendant with costs.

Any other relief , which this honourbale court deems fit and proper, in the circumstances of the case, may also be awarded in favour of the plaintiffs.

**Plaintiff**

Verification : -

Verified on oath today the 10th Day of February 2015 that the Contents of the above paras are True

and correct to the best of my Knowledge and nothing has been Concealed.

**Plaintiff**

Through :-

**<<advocate\_name>>**

Advocate High Court

Civil Courts Lahore