Sample Application for consolidation of cases in the same court.

**Civil Suit No.<<suit\_number>>/2012**

**1.<<plaintiff\_1>> son of <<plaintiff\_1\_father>>, 2.<<plaintiff\_2>>**   
**3.<<plaintiff\_3>>**   
 **Daughters of Muhammad Shafi (deceased).**

**4. <<plaintiff\_4>> Widow of <<plaintiff\_5\_father>> son of Muhammad Shafi 5.<<plaintiff\_5>>**   
**6.<<plaintiff\_6>>**   
**7.<<plaintiff\_7>>**   
 **Plaintiffs No. 5 to 7 sons of Muhammad Ashraf (deceased).**

**8.<<plaintiff\_8>> D/o Muhammad Ashraf W/o <<plaintiff\_8\_husband>> 9.<<plaintiff\_9>> Wd/o <<plaintiff\_9\_husband>> son of Muhammad Shafi**   
**10.<<plaintiff\_10>>**   
**11.<<plaintiff\_11>>**   
**12.<<plaintiff\_12>> W/o <<plaintiff\_12\_husband>>**   
 **Plaintiffs No. 10 to 12 sons and daughter of Liaqat Ali (deceased).**

**13.<<plaintiff\_13>> Wd./o <<plaintiff\_13\_husband>> son of Muhammad Shafi (deceased) 14.<<plaintiff\_14>>**   
**15.<<plaintiff\_15>>**   
 **Plaintiffs No. 14 & 15 sons of Muhammad Aslam (deceased).**

**16.<<plaintiff\_16>>**   
**17.<<plaintiff\_17>>**   
**18.<<plaintiff\_18>>**   
 **Plaintiffs No.16 to 18 daughter of Muhammad Aslam (deceased).**

**19. <<plaintiff\_19>> Wd./o <<plaintiff\_19\_husband>> son of Muhammad Shafi (deceased) 20.<<plaintiff\_20>> son of Abdul Razzaq**   
**21.<<plaintiff\_21>>**   
**22.<<plaintiff\_22>>**   
 **Plaintiffs No. 21 & 22 daughters of Abdul Razzaq (deceased).**

**All r/o <<address>>.**

***Plaintiffs***

**VERSUS**

**1.<<defendant\_1>>**   
**2.Excise and Taxation Department, Ichhra Circle-I, Zone No.4, Region-(A), Ihsaan Building**  **2/A, Freed Kot Road, <<residence\_city>>.**

***Defendants***

**SUIT FOR DECLARATION WITH CONSEQUENTIAL RELIEF.**

***Respectfully Sheweth:-***

**1.That the predecessor-in-interest of the plaintiffs has six sons and two daughters namely**  **Muhammad Mushtaq (plaintiff No.1), Mst. Firdous**  **Begum, Mst. Misbah Parveen**  **(daughters/plaintiffs No.2 & 3), Muhammad Ashraf (deceased) husband of plaintiff No.4**  **and father of plaintiffs No.5 to 8, Liaqat Ali (deceased son) husband of plaintiff No.9 and**  **father of plaintiffs No.10 to 12, Muhammad Aslam (deceased son) husband of plaintiff**  **No.13 and father of plaintiffs No.14 to 18, Abdul Razzaq (deceased son) husband of**  **plaintiff No.19 and father of plaintiffs No.20 to 22. It is pertinent to mention here that**  **one son namely <<deceased\_son>> has also died issueless.**

**2.That the said Muhammad Shafi died on <<death\_date>> and leaving behind plaintiffs as his legal heirs. It is pertinent to mention here that after the death of said Muhammad Shafi/ predecessor-in-interest of plaintiffs, his five sons have also died.**

**3.That the predecessor-in-interest of plaintiffs left behind the property No.<<property\_number>>, Circle-I, Zone-IV, Region-A situated at <<property\_address>>. Copy of registered sale deed attached here with.**

**4.That pedigree table of legal heirs of deceased Muhammad Shafi is on next page.**

**5.**  **That after the death of Muhammad Shafi, the predecessor-in-interest of plaintiffs,**  **plaintiffs inherited his property mention in para No.3 of the plaint, being his legal heirs**  **according to their legal shares respectively.**

**6.**  **That the plaintiffs approached the defendant No.2 for transferring the suit property in**  **their names but he refused to do so. The defendant No.2 is legally bound to transfer the**  **said property in the name of plaintiffs according to Sharia Law but the defendant No.2**  **without any legal justification refused to transfer the said property in the name of the**  **plaintiffs. The defendant No.2 also demanded the decree of court as declaration of legal**  **heirs of deceased, hence this suit.**

**7.That the cause of action firstly accrued in favour of plaintiffs against the defendant No.2 on <<cause\_of\_action\_date>> after the death of predecessor-in-interest of plaintiffs and lastly when the defendant No.2 refused to transfer the suit property in the name of plaintiffs which is still continuing.**

**8.That the parties reside in <<verification\_city>> and cause of action has also arisen here, therefore this**  **learned court has got jurisdiction to try and adjudicate upon this matter.**

**9.**  **That the value of the suit for the purposes of court fees and jurisdiction is fixed at**

**<<suit\_value>> which is exempt from affixation of court fees.**

**PRAYER:**

***In view of the above* submissions, it is therefore, most humbly prayed that a decree for declaration may very graciously be passed in favour of plaintiffs as legal heirs of deceased Muhammad Shafi in supreme interest of justice, equity and fair play.**

***It* is further prayed that the defendant No.2 may very kindly be directed to transfer the suit property in the name of the plaintiffs in the relevant Departmental Record.**

***Any* other relief which this honourable court deems fit and appropriate in favour of the plaintiffs may also be awarded.**

***Plaintiffs***

**Through:-**

**<<advocate\_name>>**  **Advocate High Court VERIFICATION:**   
**Verified on oath at Lahore on this 24th day of February 2012 that the contents of the Suit are true and correct to the best of my knowledge, information and belief and nothing has been concealed so far.**

***Plaintiff***