

IN THE SUPREME COURT OF PAKISTAN  
(Appellate Jurisdiction)

CMA No.----- K of 2025

IN

CA No. 86- K of 2023

Pinyal and anothers..... Appellants

Versus

Mst. Ajaib Khatoon & others..... Respondents

Counsel for the Petitioner:-

Counsel for the Respondent.

Ghulam Shabbir Baloch AOR  
A.G. Sindh

INDEX

S.	Description of Documents	Date	Pages
01.	Concise Statement on behalf of the Respondents	.07.2025	1
02.	Sale Deed	29.04.2013	2-7
03.	Affidavit Of Fact & Service		8-9
04.	Notice		10

CERTIFICATE

Certified that I have prepared the above index and all necessary documents have been filed therein according to Supreme Court Rules.

Ghulam Shabbir Baloch  
AOR for the RESPONDENT

IN THE SUPREME COURT OF PAKISTAN  
(Appellate Jurisdiction)

A

CMA No.----- -K of 2025

IN

CA No. 86- K of 2023

Pinyal and anothers..... Appellants

Versus

Mst. Ajaib Khatoon & others..... Respondents

STATEMENT

It is respectfully submitted I am filing Statement in the above noted on behalf of the Respondent before this Hon'ble Court.

Ghulam Shabbir Baloch  
AOR for the RESPONDENT

**IN THE SUPREME COURT OF PAKISTAN**  
(Appellate Jurisdiction)

**CIVIL APPEAL No: 86 -- K OF 2023**

Pinyal and another-----Appellants

Versus

Mst: Ajaib Khatoon & others-----Respondents

**CONCISE STATEMENT**

**(Under Order XXIII Rule 1 of the Supreme Court of Pakistan)**

That the Sub-Registrar Khairpur, cited as Respondent No. 11 Respectfully and humbly states as under:-

1. That the sale deed which is shown in the matter is concerned with answering Respondent No. 11 Sub-Registrar Khairpur vide Serial No. 698, bearing Registered No. 641 Dated. 29-04-2013, Preserve in office of the Photo Registrar Mirco Filming Unit Sukkur under M.F Roll No. U 124/3472 Dated. 28-05-2013, in respect of Residential House an area 1610-Sq: feet Situated in Muhalla Dabbar Khairpur Town Khairpur, Taluka and District Khairpur, was registered in this office executed by seller namely; Hussain Bux S/o Muhammad Yousif by cast Odhano in favour of purchasers namely; 1. Pinyal and 2. Khadim Hussain both sons of Chodhiyo Khan Dharejo, which was registered in this office in the basis of all required documents, viz. P.T.1 Certificate, Extract Certificate Deh Form II and other documents issued by Mukhtiar Kar Revenue Taluka Khairpur and verification letter of Assistant Commissioner Khairpur, the aforesaid sale deed was duly registered in the office of the Sub-Registrar Khairpur under the provisions of the Registration Act, 1908.
2. That the Registered sale deed document is genuine, verified, and available in the official record of the Sub-Registrar's office Khairpur and a attested Copy of the same has been submitted before this Honorable Court.
3. That the undersigned Sub-Registrar Khairpur respectfully submits this concise statement for the kind perusal and consideration of this Honorable Court.

**PRAYER:-**

It is most respectfully and humbly prayed to this Honorable Court that the above submission may kindly be taken on record in compliance with the Honorable Court's order.

Dated:- \_\_\_\_\_



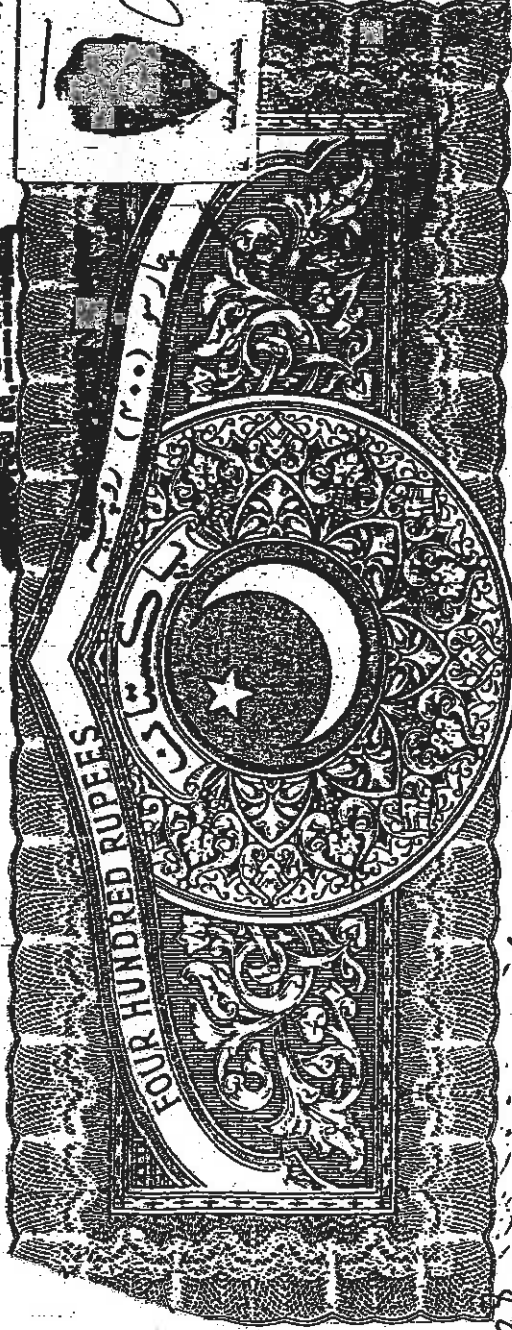
(LIAQUAT ALI SHAIKH)  
SUB-REGISTRAR KHAIRPUR

STAN

URGENT

64

400 RS.



38-4-2-4-2 Pin xal go chodhiyo khar Dhere Jot

Witnessed ~~Attested~~ ~~Attested~~  
Witnessed ~~Attested~~ ~~Attested~~  
Witnessed ~~Attested~~ ~~Attested~~

698

Registered on 29/4/2013

Received by the  
Registration Fee  
Endorsement Fee  
Stamp Fee

1000  
85  
400  
Total 1490

Sub. Registrar

Sub. Registrar

1000

7 8 6

SALE DEED OF RESIDENTIAL HOUSE AREA  
1610-00 SQ: FEET PROPERTY BEARING EXCISE &  
TAXATION NO: D/2/1234/B, OLD NO: D/2-SI-123/A/1  
SITUATED AT PLOT NO: 23 SITUATED AT MUMALLA  
BAREILLY KHAIIRPUR TOWN/TALUKA KHAIIRPUR  
SUB DISTRICT AND DISTRICT REGISTRATION  
KHAIIRPUR IN CONSIDERATION OF RS:- 1,00,000/-  
IN WORDS RUPEES ONE LACE ONLY.

ATTESTED

This deed of sale is made on this the 29 th Day

of April 2013 at Khairpur between:-

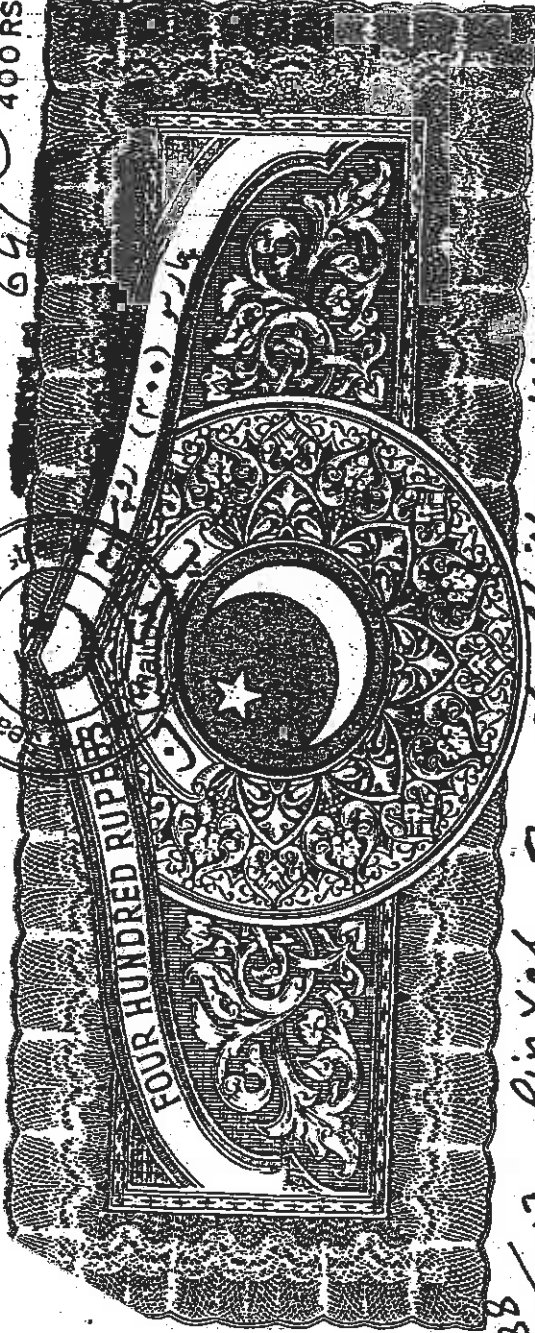
UB-REGISTRAR  
KHAIIRPUR

Contd. P/2.

1/AN



400 RS.



588/2102-2 Chodhiyo Khan Dharejo

Page No: 2.

HUSSAIN BUX S/O MUHAMMAD YOUSIF  
ODHANO AGED ABOUT 60 YEARS,

Occupation business-man R/o Muhalla Ghareebabad  
Khukra Taluka Gambat & District Khairpur NIC No:  
45202-3068719-3.

Here-in-after called as **VENDOR** of the first part.

**A N D,**

1. PINYAL AGED ABOUT 42 YEARS,  
Business-man NIC No: 45205-6103080-9.
2. KHADIM HUSSAIN AGED 30 YEARS,  
Business-man NIC No: 45205-8190914-5.

Both sons of Chodhiyo Khan Dharejo residence of  
Village Goondriro Post Loung Faqeer Taluka Kotdiji and  
District Khairpur.

Here-in-after called as **PURCHASER** of the second part.  
(Equal share).

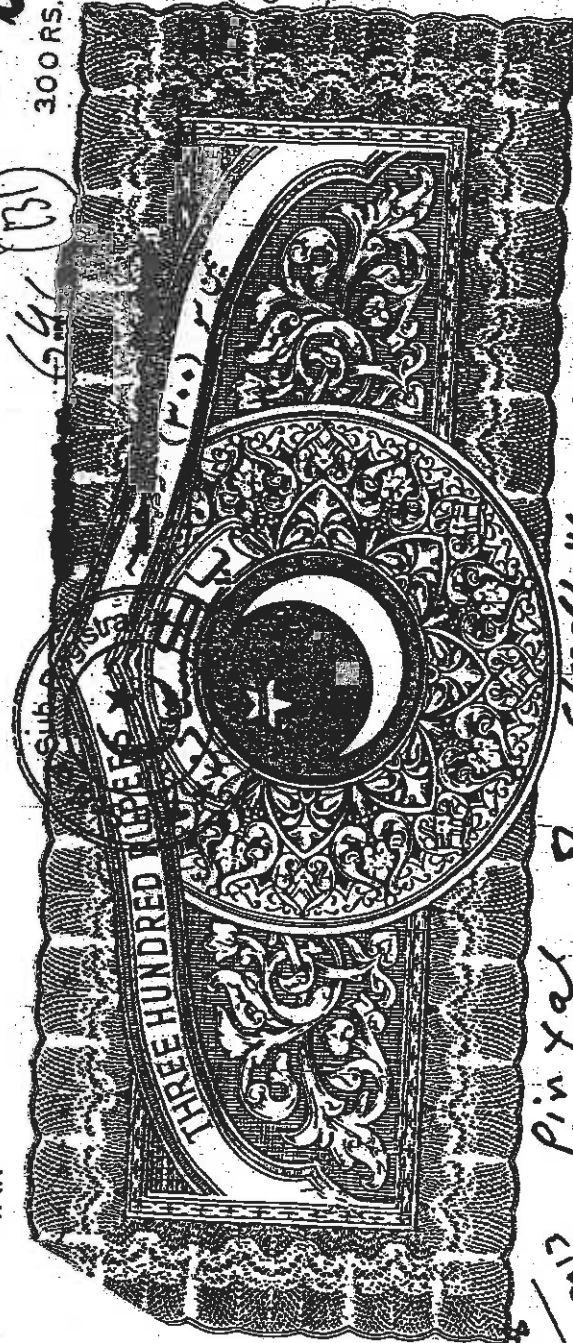
**TESTED**

JB-REGISTRAR  
KHAIRPUR

Contd.....P/3.

AN

300 RS.



38/11-17  
16-4-2017

~~Sub-Registrar, Khairpur~~  
Sub-Registrar, Khairpur

Page No: 3.

Whereas the vendor is absolute owner of the property fully described the title of this deed according to record of rights and total holding in Certificate P.T.I issued by Excise & Taxation Office Khairpur, Extract certificate issued by Taluka Municipal Office Khairpur and Deh Form-II issued by the concerned Tapedar and countersigned by Taluka Mukhtiarkar (Revenue) Khairpur Jaryan No: 112 dated:- 25.3.2013 SCANNED vide No: 264669 dated:- 3.4.2013 and verify by Assistant-Commissioner Khairpur No: AC/ 184 dated:- 25.4.2013. The original documents are attached with sale deed.

The property under sale is not purchased from any non- Muslim on or after 1st: March 1947.

Whereas the vendor have agreed to sell & purchaser has agreed to purchased the above said property in the sum of Rs:- 1,00,000/= in words rupees one lac only.

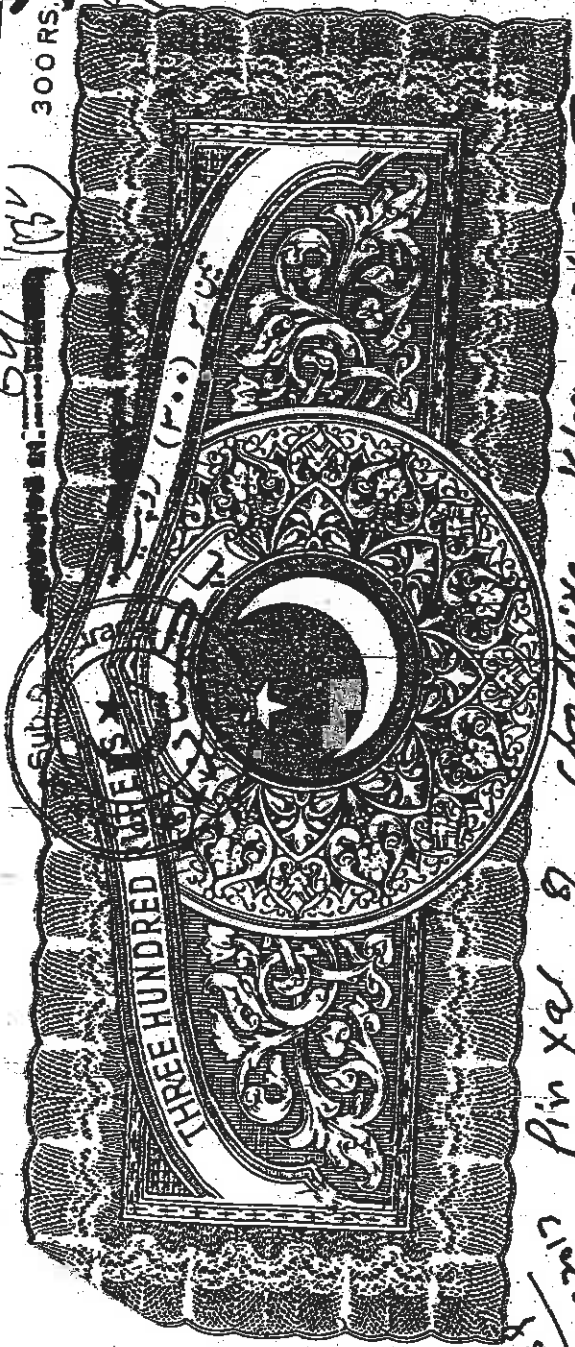
Contd... P/4.

**ATTESTED**

SUB-REGISTRAR  
KHAIRPUR

300 RS.

120



88	Pin xal 8%	Chodkigo	Kha	Dhara 5%
88	Pin xal 8%	Chodkigo	Kha	Dhara 5%

~~CONFIDENTIAL~~

Now in pursuance of the said agreement and in consideration of the sum of Rs:- 1,00,000/= in words rupees one lac only, paid by the purchaser to the vendor the receipt of the said sum the vendor hereby fully admit and acknowledge, the vendor as owner hereby transfer to the purchaser by way of sale all the above property with all its rights, boundaries, ways, peaches etc, for ever.

Whereas the vendor have handed over the actual & physical possession of the said property to the purchaser for ever, where after the purchaser shall be its absolute owner.

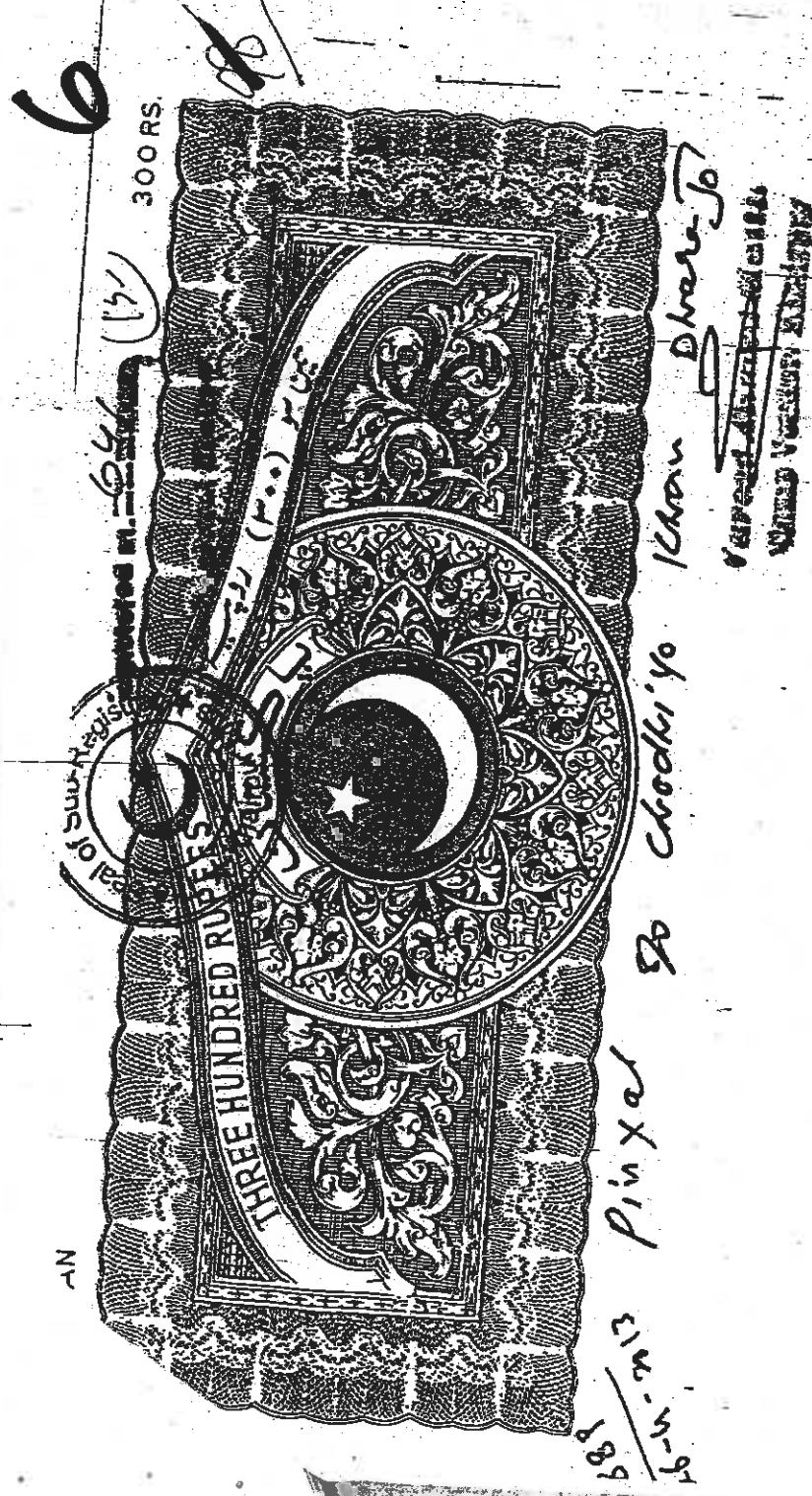
## BOUNDARIES OF PLOT:

1. EAST BY:- Plot of Nabi Bux sold to Mumtaz 46 feet
2. WEST BY:- Street 46 feet
3. NORTH BY:- Plot of Nabi Bux 35 feet
4. SOUTH BY:- House of Shah Muhammad 35 feet

Contd...P/5.

**ATTESTED**

SUB-REGISTRAR  
KHAIRPUR



AN

Stamp: Registered at 646 (13/1)

300 RS.

6889/13 Pinxal So Chockiyo Khan Dhar-Jo  
Vendor: ~~Abdullah Khan~~  
Wahid Vardar, Khairpur

Page No: 5.

Whereas the vendor hereby covenant that they have not obtained or intend to obtain any loan from any Co-Operative Bank or Co-Operative Society throughout Pakistan, neither the vendor nor the said property is indebted to any such institutions and there is not case of any nature pending in any Court of Law against the said property as it is free from all the charges & encumbrance of what so ever nature.

*[Handwritten signature]*

Any contentions if raised by any body in respect of the said property shall stand as null and void and be treated as malafide. In case the purchaser will be deprived of the said property by vendor defect in the title to sell, the vendor hereby binds themselves along with their heirs and other movable and immovable property wherever available to pay the losses and damages to the purchaser.

**ATTESTED**

Contd.....P/6.

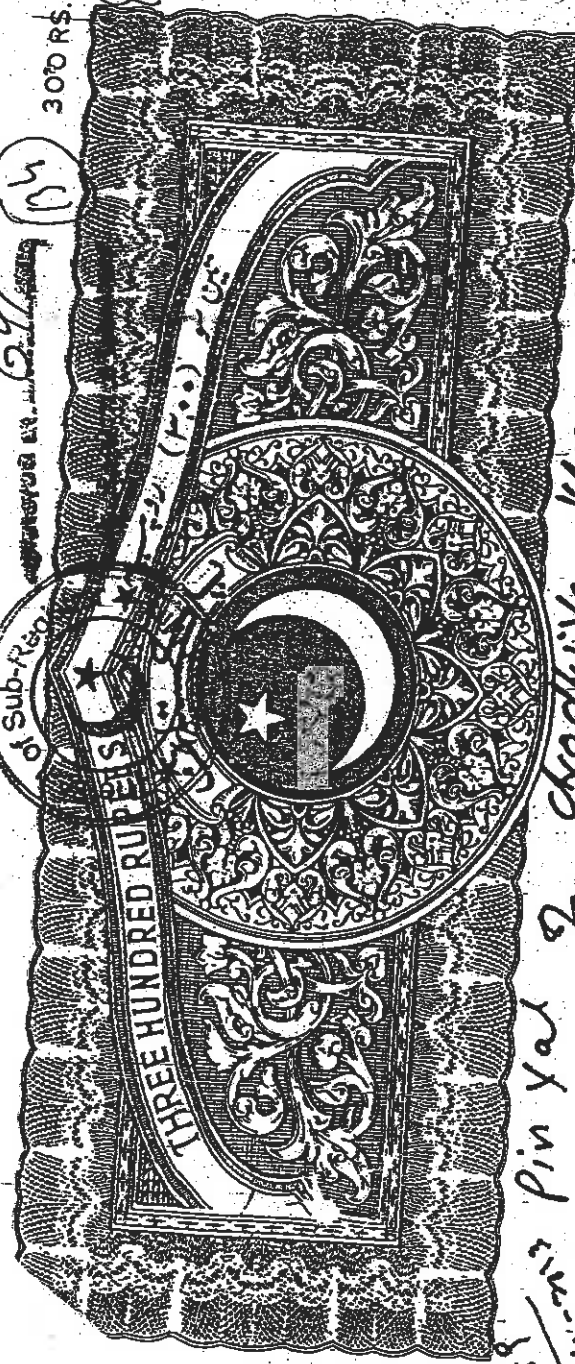
**SUB-REGISTRAR  
KHAIRPUR**



300 RS.

646

of Sub-Reg.



889 Pin Val 90 Chodhiyo Khau Dhare 76

Page No: 6.

In witness where of the vendor have set their hands to this sale deed on the day and Year here-in -

Signature of Vendor  
HUSSAIN BUX

1) WITNESS:-

Mohammed Ashraf 90 Sachid Divo  
Village Sachid Divo Marg  
45203-7126719-3

2) WITNESS:-

Samarullah 90 Chodhiyo Hussain  
Kharipur Colony Mahallan Shingon  
DRAFTED & TYPED BY:-  
2173788-3

Allah Bakhayo Channa  
Stamp Vendor & Bond Writer  
Khairpur.

ATTESTED

SUB-REGISTRAR  
KHAIRPUR