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

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

Family Suit No. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_/2024

**\_\_\_\_\_\_\_\_\_\_** Son of \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Resident of \_\_\_\_\_\_\_\_\_\_\_

**Plaintiff**

**V E R S U S**

**\_\_\_\_\_\_\_\_\_** Daughter of\_\_\_\_\_\_\_\_\_\_ Resident of \_\_\_\_\_\_\_\_\_\_\_\_

**Defendant**

###### SUIT FOR RESTITUTION OF CONJUGAL RIGHTS

### Respectfully Sheweth:

1. That the marriage between the parties was solemnized, according to Muslim rites, on 0.1.20 for a consideration of Rs. 50,000/- as dower which was later on given by the plaintiff to the defendant. **Copy of Nikah Nama is attached herewith.**
2. That out of this wedlock two children namely \_\_\_ & \_\_\_\_ were born and presently living with the defendant.
3. That The spouses enjoyed a harmonious marital life and fulfilled their matrimonial duties amicably. The plaintiff maintains profound love and affection for his wife during which time the plaintiff consistently met all of the defendant's needs.
4. That about six months ago the Parents of the defendant came in the house of the plaintiff and requested that a marriage ceremony is going to be solemnized and the presence of the defendant is necessary.
5. That the plaintiff agreed and the defendant went with her parents along with minors and took with her cash of 50,000/- and Gold Ornaments 3 Tolas along with precious cloth and promised that she will come back with in some days.
6. That after a week, the plaintiff approached the defendant to return home. However, the defendant's parents, with malicious intent and ulterior motives and without valid justification, forcefully dissuaded her from going to the plaintiff's house. They also made derogatory remarks against the plaintiff.
7. That as aforesaid, the plaintiff has great love and affection towards the plaintiff and seeking to restart his life with plaintiff and the plaintiff is also ready to perform his matrimonial obligations with the defendant but the parents of the defendant are the main obstacles in this re-union of the spouses hence, this suit.
8. That the plaintiff is ready to perform his part of conjugal rights but the defendant throughout has failed to perform her part of conjugal rights and giving mental torture to the plaintiff by blaming with the false allegations upon and instigation of her family members, hence this suit.
9. That the cause of action accrued in favor of the plaintiff and against the defendant due to the above-mentioned facts and circumstances of the case and lastly after the refusal of the defendant, the cause of action is still continuing.
10. That the parties of the suit reside at Lahore, the cause of action also accrued at Lahore, so this Honorable Court has got the jurisdiction to entertain and try this suit.
11. That the requisite court fee has been affixed on the plaint.

**Prayer
It is, therefore, most humbly prayed** that a decree for Restitution of Conjugal Rights may kindly be passed in favor of the plaintiff and against the defendant ordering the defendant to perform her matrimonial obligations with the plaintiff.

**Any other just and equitable relief** to which this Honorable Court may deems proper and fit in the circumstances of the case may also kindly be awarded to the plaintiff.

#### **Plaintiff**

Through

###### \_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Advocate High Court**

## ***V E R I F I C A T I O N***

Verified on oath at Lahore on this 1th day of \_\_ 20 that the contents of the above paras are correct to the best of my knowledge information and belief.

**Plaintiff**