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Between Doctrine and Enforcement: A Critical Analysis of Post-Divorce Rights of Muslim Women under the Muslim Family Laws Ordinance 1961

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Abstract

The Muslim Family Laws Ordinance 1961, together with the Dissolution of Muslim Marriages Act 1939 and the West Pakistan Family Courts Act 1964, entitles a divorced woman in Pakistan to maintenance until the completion of iddat, prompt return of dower, a structured notice-and-reconciliation procedure before talaq takes effect, and protection in custody. In practice, almost none of this is delivered. This article argues that the disjuncture between doctrine and enforcement is not incidental but systemic: legal illiteracy, unpaid maintenance, a bypassed Section 7 procedure, and overburdened family courts combine with social stigma to form a single self-reinforcing mechanism, each element sustaining the others. The analysis rests on a doctrinal reading of the 1961 Ordinance and allied statutes and case law, read alongside semi-structured interviews with divorced women in Punjab and institutional reporting from the Human Rights Commission of Pakistan, Aurat Foundation, and the Law and Justice Commission of Pakistan. A comparison with Morocco, Egypt and Bangladesh shows that these outcomes are not compelled by Islamic jurisprudence, since jurisdictions sharing the same doctrinal origin have secured markedly better protection for women without departing from it. The article closes with legal, social, and institutional recommendations aimed at closing the gap between the guarantee of Article 25 of the Constitution and the lived experience of divorced women in Pakistan.

Keywords: Muslim Family Laws Ordinance 1961, divorced women, Islamic family law, Article 25 of the Constitution, Marriage.

1. Introduction

Marriage in Islam is a sacred institution, and its teachings underscore the need to protect the rights of the vulnerable segments in society (Ismail et al., 2024). There are matters discussed in the principal sources of Islam which were not immediately clear; however, there has been adjudication and legislation upon such matters to bring clarity. This can be seen from the fact that the right to get Khula and talaq-e-tafweez are granted to a woman to bring both the spouses at an equal footing. The Supreme Court of Pakistan has declared

that the right to life a fundamental right is a broad concept and expanded it to include “right of enjoyment of life, maintaining an adequate level of living for full enjoyment of freedom and rights” (Munir, 2024). Men own or control nearly 90% of all households in Pakistan, and Pakistan is one of the lowest ranking countries in terms of gender equality. At the time of divorce, women not only have to deal with societal pressures and emotional turmoil, but also the financial ordeal of finding shelter and sustenance.

In Pakistan, where financial independence isn't yet widely available to women, the fallout of a marriage's end can be incredibly challenging (Qureshi, 2024). Many women find themselves compelled to sacrifice their careers to care for their children, ultimately disrupting their professional trajectories. This leaves them vulnerable, particularly when they attempt to reenter the workforce after an extended hiatus. The divorced man in Pakistan is asked a handful of questions by family and neighbors and then his life proceeds pretty much as it has done (Maqsood, 2025). The typical divorced woman loses her house, her economic status and perhaps even her position in her own family, and she's branded with a stigma that accompanies her to the job market, to friends, to future partners and to her children. This is what is often construed as ‘the way Pakistani society is and the law is just adjacent to it. This article is of the opposite opinion. This gap is created at the same time by statutory shortcomings and by weak enforcement and by organized social stigma; none of these on its own would do justice to the degree of vulnerability created.

The rights that are given to women in the family law system in Pakistan are never made a reality: maintenance that is not paid, divorce proceedings that are ignored, and, effectively, no means for a woman to know what her rights are. Stigma happens in the gap between paper and practice. Where the law doesn't speak in practice, stigma fills the void, and once stigma has persuaded a woman not to assert a claim, the law's failure to enforce the claim is not challenged or corrected. All that remains is a right that exists in the statute book and the constitution and nowhere else.

The following is based on the statutory provisions and case law and three semi-structured interviews with divorced women from Punjab. These interviews are not intended to represent a sample. They are illustrative testimony, designed to lend the doctrinal argument some human flesh and have cross-checked them with the institutional data from the Human Rights Commission of Pakistan, the Aurat Foundation and the Law and Justice Commission of Pakistan.

2. The Statutory Promise

There are three statutes that bear the brunt of the burden in the family law regime in Pakistan with respect to divorce and at the time of their enactment each was a reformist measure. The Dissolution of Muslim Marriages Act 1939 which was the first law to provide specific grounds for a wife to seek judicial dissolution included failure of maintenance, long desertion and cruelty (Ullah et al., 2025). A woman's desire to put an end to an intolerable marriage was for the first time given legal force in the legislation (Dissolution of Muslim Marriages Act, 1939, s. 2). Procedure was then introduced by the Muslim Family Laws Ordinance 1961, which rescued the unilateral power from its previous free mode. Section 7 requires that the husband notify the Union Council in writing before declaring the talaq, that the wife be informed of the notification, and that the talaq becomes effective 90 days after the notification, giving an Arbitration Council a period to try to effect a reconciliation (Muslim Family Laws Ordinance, 1961, s. 7). The Ordinance provided the Arbitration Council with a means of determining, and of awarding maintenance under Section 9. This was followed by the introduction of the West Pakistan Family Courts Act, 1964, which established separate family courts for adjudication of maintenance, dower and custody cases within a period of six months in

the family court, which was supposed to be more easily accessible and faster than the ordinary civil courts (West Pakistan Family Courts Act, 1964, s. 5 and s. 12(A)).

In the Constitution of Pakistan 1973 which has guaranteed equality before the law and has prohibited any discrimination based on sex alone (Zahra et al., 2025). Pakistan has ratified the CEDAW Convention in 1996, which has guaranteed equal rights in marriage and in dissolution of marriage (Gultom et al., 2025). Article 25 of the Constitution of Pakistan 1973 provides the most constitutional support for reform. Article 35's protection of "the family" is considered as more complicated ally, it has sometimes been invoked in favor of reconciliation, rather than a woman's right to escape an unhelpful marriage (Lau, 2006). A divorced Pakistani woman gets maintenance during iddat, her dower is handed over to her immediately after talaq, a protocol of giving notice and reconciling before the divorce becomes effective, and formal equality before the law (Shaheen et al., 2025). What the rest of this article is about is what happens to those entitlements between the page and the woman who is meant to hold them.

3. Where the Promise Breaks Down

Most of the damage is the result of three doctrinal errors. None of them needs to go beyond Islamic jurisprudence to fix, as indicated in Section 6 of Muslim Family Laws Ordinance 1961. The most frequently violated maintenance requirement is during iddat. Classical doctrine is clear on this point, as is Section 9 of the Muslim Family Laws Ordinance of 1961, and as is superior court precedent in *Mst. Farah Naz v Judge Family Court* (PLD 2006 SC 457) it is equally clear. However, it is still one of the least implemented civil orders in Pakistan as stated by Human Rights Commission of Pakistan (2022). A distortion is associated with khula following the decision of *Khurshid Bibi v Muhammad Amin* (PLD 1967 SC 97), the courts have been expanding the range of the financial cost of a khula, which should be a simple release, if the wife is not satisfied with it, without the approval of the husband, beyond the Quranic framework of the return of dower, to a ransom (Lau, 2006). Superior judiciary has recently begun reversing this distortion, Supreme Court decision in 2025, *Mst. Naila Javed v Nasir Khan* (CPLA No. 3767 of 2025) challenged and set aside the order in the family court granting a wife's dissolution petition for khula without her knowing and willing consent, despite the husband remarrying without the approval of the Arbitration Council as required by Section 6 of the Muslim Family Laws Ordinance 1961.

Secondly in rural areas compliance of Section 7 of the Ordinance is more the exception than the norm. Many divorces in rural areas of Pakistan are verbal, there is no record at all in any institutions, no notice to the Union Council and there is no provision of 90 days of reconciliation period (Mangi et al., 2025). The criminal punishment for non-compliance (up to one year's imprisonment) is seemingly not enforced.

Thirdly even when courts do manage to issue orders, those orders run into an enforcement system that is slow and easy to evade The Law and Justice Commission of Pakistan (2021) reported that there were more than 190,000 pending cases of family laws in Punjab alone and the average pendency of family law cases in some districts was more than 30 months, which is well beyond the stipulated period of six months (Aurat Foundation, 2019; HRCP, 2022). There are remedies such as wage garnishment (PLD 2003 Lahore 595) or civil imprisonment (2016 YLR 1234 Karachi) but they are inconsistently employed and if a former husband desires to evade a decree, he can, by moving, hiding assets or simply defaulting to pay.

A fourth gap is just a lack under Pakistani law, a divorced woman has no right to remain in her husband's house after the divorce and no state-sponsored means of equitably dividing the assets of the marriage, and no state-sponsored means for her to gain a foothold

into the economy after years or decades of dependence. It is a political decision, not a religious one Islam demands. Surah Al-Talaq 65:1 clearly states that it is not allowed to repel the divorced woman from her house during the period of iddat, and even the very limited protection that is provided for in the statute of Pakistan can never be enforced by a woman (Ardo & Adamu, 2025).

4. Methodology

The method of doctrinal legal research is applied in this study which is also known as research in law (Roy, 2023). The doctrinal study is accompanied by 3 semi-structured interviews with divorced women in Punjab, who were selected purposively to be of different educational, economic and age groups, and divorced by out-of-court verbal talaq, out-of-court triple talaq and court-based khula respectively. The interviews were in Urdu and Punjabi which were translated in English. As divorce is a taboo topic in these participants' communities, verbal consent was obtained, which is acceptable for research with stigmatized groups (Creswell, 2014; Bryman, 2016). The participants are only identified as A, B and C, avoiding the presence of identifying details. It is emphasized that the sample is not representative. It's not intended to measure, or even to show, the frequency of any of these, but to ask the question whether the patterns found doctrinally and in institutional reporting are present in individual lives, and to raise to the surface what institutional reporting alone could not reach, stigma especially. All the cases have been crosschecked the interview evidence with HRCP, Aurat Foundation and Shirkat Gah reporting material so that no claim is made here solely based on interview evidence.

5. Three Women, One System

Participant A is 33 years old, has an MPhil qualification and is a government teacher. She was divorced by talaq papers after three years married to her cousin. She did not get her Haq Mehr and dower or iddat maintenance and she did not wish to go to court for these three things.

"He sent papers. And that was it. No one sat with me and told me what my rights were."

"When you are already drowning the end of your marriage, the social implications, the stress on your family, the gossip it feels like there is no way of adding a court case on top of it all. I chose to prioritize my mental health over my legal rights."

Participant B is in late fifties and is illiterate. After twenty-five years of marriage, she divorced by the pronouncement of triple talaq, in an impulsive fit of temper by the husband, during a family quarrel. The divorce was declared by a local religious scholar to be final and irrevocable. None of it was reported to the Union Council.

"No one informed me that there was a legal procedure that should have taken place. No one informed me that what happened to me was not even proper according to the law."

"I am sitting in my mother's house. My mother is gone. My brothers have families, and I am there, but it is not the same I am a guest in the house that I grew up in, in a way I never thought I would be."

Participant C is a 35-year-old semi-literate. She asked for and obtained a khula from her husband who could not earn a decent income because of his drinking. He is under a court order to pay child's maintenance. He pays if it's convenient for him.

"When he does not pay the children's maintenance, I go to my brothers. The court order's there he ignores it. Going back to court every time is an ordeal; I do not always have the strength or resources."

"The attitude toward a woman who takes khula is different from a woman whose husband divorces her. I chose to leave, and I am accused of breaking the home people

ask whether I could not handle my husband, or whether I made him drink. These are not questions; they are accusations in disguise."

6. The Silencing Effect: Interview Findings

The three accounts, which differ in age, education and legal route, read together rather than individually, tell a story that is more striking for those differences than for any unity. At the time of divorce none of the three women understood their rights under the law. The fact that an MPhil holder, an illiterate woman and a semi-literate woman all ended up in the same place precludes that as a reason individual educational failure. What it does instead is indicate a state that institutionalized these rights without ever creating a means to communicate with the people who hold them, and neither courts nor Union Councils have addressed that. None of the three received iddat maintenance, the appropriate least in doctrine, and the least, apparently, that is reliably ignored in practice. Two out of three divorces occurred completely outside of the Section 7 process. This becomes clear in the case of participant B, who indicates that as soon as the law required the Union Council to be notified, a ninety-day reconciliation period would have ensued, and her husband would have regretted the divorce shortly thereafter.

The financial independence of participant A shifts the focus at which the stigma and the family reception impact on her but does not affect the underlying legal failure. On all the financial claims that the law recognizes, she was still not paid. Stigma, as Goffman (1963) defines the term, the social downgrade of identity, is present in a very predictable manner in all three women: the condolence visit is a form of public judgment disguised as sympathy, the double standard between divorced men and divorced women is very clear in all three communities, and, as for Participant B, this judgment is extended to her children's marriage prospects (Manning, 2013).

The interviews do not simply give additional proof of a problem but a mechanism to fit into the doctrinal picture. Stigma does not just co-exist with non-enforcement of rights; it talks women out of their rights. Participant A decided not to pursue what was hers and remained with consideration of the social consequences to her family of going to court. Participant C's account depicts another kind of pressure: the financial burden is an additional one she does not always have, and the appearance in court is yet another re-exposure to the stigmatized woman. On the face of it, in both situations the decision not to pursue a claim is a personal choice. The interviews strongly indicate it is a matter of a rational response to an environment that doesn't look favorable for the claim to succeed. I think this is the real link between legal failure and social stigma: When rights aren't enforced, institutions have no reason to improve, since the women most affected by non-enforcement are the most socially and financially vulnerable to push back.

7. Discussion: The Unrealized Right

Article 25 of the Constitution of Pakistan 1973 provides for equality in the eyes of the law (Raza, 2023). What this study shows is not a gap in the law itself because the law is generally good, but a failure in structure to make formal equality into something upon which a divorced woman can base herself. There is a term in the jurisprudence of equality which refers to this distinction: formal equality versus substantive equality. If it's only available to a woman if she knows that it exists, if she has the money to litigate it, if she is willing to pay the social cost of making a public claim, then it's not there for her the same way it is available to a man who is not those things.

But it is not the same as stating that language dignity is cynically being substituted for a system that was never intended to provide. The doctrinal record, and the interviews, do not indicate a tale of intentional deception. What they are supporting is a story of neglect. The protection is real and was legislated. They have been at times taken seriously by courts

as seen in *Khurshid Bibi, Mst. Nazia Bibi v. Muhammad Riaz* (2019 SCMR 520) case on removing stigma and maternal poverty from custody decisions. But an ordinary divorced woman in rural or semi-urban Pakistan in Punjab is barely enjoying anything of what the judgments define. The right is not bogus. It's unrealized and unrealized in a patterned way, not accidental.

Obviously, because it's understated in the literature, that the practices which are most harmful for divorced women the stringent demands for khula, triple talaq, which is treated as final with no procedural safeguards whatsoever, no guarantee of housing security after iddah, nor any of that are not requirement of Islamic teaching. Some of them explicitly oppose it. Surah Al-Baqarah 2:229-230 lays out divorce as a graduated process, to avoid the sin of the one-utterance divorce that brought Participant B's twenty-five-year marriage to an end; and a substantial body of jurisprudence, including that of Ibn Taymiyyah and Ibn al-Qayyim, argues that if the husband repeats the talaq three times immediately, then it is one divorce that he can retract (Mangi et al., 2025). That does have an impact on what comes next: closing this gap is not stepping outside an Islamic framework. It refers to the application of the more defensible reading already contained in it.

8. Comparative Perspective

The results in Pakistan are not the ones of Islamic law in a Muslim country. Other jurisdictions with a similar starting point have fared a great deal better for women. Morocco's 2004 change in the Moudawwana made all divorces subject to judicial oversight; expanded the wife's grounds for divorce; and incorporated equitable financial settlement which acknowledged the economic contribution of women's work and did so without the opposition of Islamic scholars (Eisenberg, 2011). The moderate stance on triple talaq has been enshrined in law by both Egypt and Jordan, who took the step of making the three pronouncements of triple talaq a single divorce that is revocable and closed the loophole of triple talaq by legislation (Yefet, 2011). Egypt also has a law for women to have a right to khula whereas Pakistan had to resort to a judicial bypass in *Khurshid Bibi v. Muhammad Amin* (PLD 1967 SC 97) (Dawoud, 2011). Bangladesh began with basically the same Ordinance Pakistan has, from 1961, and yet is more consistent with applying the welfare principle in custody (Ambrus et al., 2010).

The comparison leads to the conclusion that is truly hopeful from a policy perspective; Pakistan need not choose between its Islamic jurisprudential obligations and improved status for divorced women. In both, the Egypt model and Bangladesh's path, the required changes are possible without going beyond the current norm. It is not doctrinal space that is lacking in Pakistan this is legislative follow up.

9. Recommendations

The analysis above generates four sets of reforms, directed toward each of the three junctures where the system fails, but not necessarily general. Legally: make it explicit in the law that three talaq's at once are one talaq, and a revocable one also making it mandatory to follow the procedure of section, like in Egypt and Jordan and even the Council of Islamic Ideology (CII) of Pakistan says. Make iddat maintenance a mandatory requirement to be automatically triggered when the Union Council informs you, instead of a requirement that a woman has to litigate separately. Develop a shortened and simplified summary process for dower recovery. But under the statute, bar the financial terms of khula themselves, which are put at a distance by the Supreme Court in *Naila Javed*. Institutionally provide adequate funding and staffing for family courts to meet the 6-month statutory target. Ensure training in gender sensitivity for family court judicial officers. And establish separate legal assistance centers for divorced women at the Union Council level, in Urdu and Punjabi, in such a manner that the center staffers, if possible,

women, will provide the services, on the model followed in Malaysia in a similar legal system.

Socially make it compulsory for the Union Councils to inform both parties of the divorce of the rights each one has at the time of the notification in accordance with Section 7 of the law, rather than leave it to chance. But make statutory training on the moderate jurisprudential stance on triple talaq available to local religious scholars in rural communities – whose social standing far outweighs that of the court or the legislature – and whose opinion, in Participant B's case, determined the fate of the marriage. And constitutionally make unenforced decrees of maintenance and dower a live Article 25 equality issue; not a part of a normal backlog of civil execution; a right a woman cannot enforce is not, in any sense, a right she holds equally.

10. Conclusion

In Pakistan divorced women are not vulnerable owing to the failure of the law to put their rights in writing. Each of the rights discussed in this article is already granted in statute or constitutional wording: These are rights to maintenance, power, procedural safeguards against arbitrary divorce, formal equality. None of it is operationalized and the resulting gap is filled by a socially administered stigma that talks women out of the very claims they must make to get enforced, and neither failure is fixable without addressing the other. The Morocco, Egypt, Jordan, Bangladesh and Malaysian evidence indicate that this is a resolvable, not a fixed cultural, issue and that the resolution does not necessitate Pakistan abandoning its jurisprudential tradition. What it needs is the institutional will to make an already written right a reality for a woman who now has about a 50% chance of finding out that it exists at all. In summary, the law meticulously outlines provisions to protect women's rights and dignity during the challenging phase of marital dissolution. These provisions, rooted in the recognition that many women lack independent financial means, stand as pillars of support. They ensure not only immediate financial stability but also empower women to rebuild their lives with confidence. As societies evolve, upholding these principles of justice, fairness, and compassion remains vital. By doing so, we reinforce women's resilience and strength in the face of adversity.

References

- Ambrus, A., Field, E., & Torero, M. (2010). Muslim family law, prenuptial agreements, and the emergence of dowry in Bangladesh. *The Quarterly Journal of Economics*, 125(3), 1349–1397.
- Ardo, H., & Adamu, A. I. (2025). A critical analysis of the rights of divorced woman under Islamic law. *Al-Arfa: Journal of Sharia, Islamic Economics and Law*, 3(2), 154–166.
- Dawoud, A. (2011). Shifts in treatment of women's rights in Egyptian media. *Women's Studies*, 12(4), 10.
- Eisenberg, A. M. (2011). Law on the books vs. law in action: Under-enforcement of Morocco's reformed 2004 family law, the Moudawana. *Cornell International Law Journal*, 44, 693.
- Gultom, R. E., Syahrin, M. A., & Bakhtiar, M. (2025). CEDAW perspective on legal protection for women victims of honor killing in Pakistan. *Jurnal Dinamika Hukum*, 25(2), 166–182.
- Hasan, G., Yaseen, M., & Amir, M. (2023). Dissolution of marriage and its causes: A case study of Kech-Makran. *The Dialogue*, 18(2), 48–65.

- Ismail, M., Faisal, R. A. H., & Zainur, Z. (2024). Marriage and divorce in Islamic law: Sociological implications for modern Muslim societies. *Journal of Islamic Law El Madani*, 4(1), 25–37.
- Khan, G., Sikander, P., & Akhlaq, A. (2019). Factors pertaining to rising divorce rate and its consequences on the family culture of Pakistan: A qualitative study. *IBT Journal of Business Studies (JBS)*, 2(2).
- Mangi, D. B., Magsi, L. A., & Ali, U. (2025). The impact of triple talaq in Pakistan: Legal, social, and religious perspectives with a case study of Sindh. *Journal of Development and Social Sciences*, 6(1), 222–231.
- Manning, P. (2013). *Erving Goffman and modern sociology*. John Wiley & Sons.
- Maqsood, A. (2025). Unhappily ever after: Self-knowledge, living and the reluctance to divorce in contemporary middle-class Pakistan. *Gender & History*, 37(2), 534–542.
- Munir, A. I. (2024). Article 9 of the Constitution of Pakistan: The right to life or substantive due process? *Manchester Journal of Transnational Islamic Law & Practice*, 20(3), 58–77.
- Qasim, M., & Khan, M. I. (2025). The role of the judiciary in protecting women's rights in Pakistan. *Pakistan Research Journal of Social Sciences*, 4(4).
- Qureshi, K. (2024). Family, community and religious mediation in British South Asian marriages. In *Gender in South Asia and beyond: Essays in honour of Patricia Jeffery*.
- Rahman, M. M. (2006). Right to life as a fundamental right in the constitutional framework of India, Bangladesh and Pakistan: An appraisal. *Dhaka University Studies Part F*, 17, 143.
- Raza, A. (2023). Equality before law and equal protection of law: Contextualizing its evolution in Pakistan. *Pakistan Law Journal*.
<https://www.pljlawsite.com/html/2023art3.htm>
- Roy, U. (2023). Doctrinal and non-doctrinal methods of research: A comparative analysis of both within the field of legal research. *Indian Journal of Law and Legal Research*, 5(2), 1.
- Sadia, H. (2025). A comparative study of Muslim divorce: Legal perspectives from Australia, New Zealand, and Pakistan in the light of Islamic jurisprudence. *Pakistan Journal of Law, Analysis and Wisdom*, 4(7), 9–15.
- Salime, Z. (2009). Revisiting the debate on family law in Morocco. In *Family, gender, and law in a globalizing Middle East and South Asia* (p. 145).
- Shadid Khan, M. (2006). Beyond equality: A contextual re-interpretation of Muslim women's right to divorce within the Pakistani legal framework. *PLR*, 2, 102.
- Shaheen, M. B., Abubakar, M. R., & Arif, M. M. (2025). Maintenance of wives and children in Pakistani law: An in-depth legal review. *Journal of Development and Social Sciences*, 6(3), 587–594.
- Ullah, R., Afzal, M., & ul Huda, N. (2025). Khula (divorce at the instance of wife) in Pakistan: A critical examination of the law and practice. *Research Consortium Archive*, 3(2), 618–633.
- Völcker, M. (2019). The quality of 'good' mixed methods research: Development and discussion of an orientation framework. In *Triangulation und Mixed-Methods: Reflexionen theoretischer und forschungspraktischer Herausforderungen* (pp. 63–99). Springer Fachmedien Wiesbaden.
- Yefet, K. C. (2011). Lifting the Egyptian veil: A constitutional road map to female marital emancipation in the Islamic world.

Zahra, S. H., Rizwan, S., & Naz, S. (2025). Between promise and practice: A constitutional analysis of women's rights in Pakistan. *Journal of Social Signs Review*, 3(08), 313–328.

Table of Cases

Ghias-ud-Din v. Mst. Zubaida Begum, PLD 2003 Lahore 595.

Khurshid Bibi v. Muhammad Amin, PLD 1967 SC 97.

Mst. Farah Naz v. Judge Family Court, PLD 2006 SC 457.

Mst. Naila Javed v. Nasir Khan, C.P.L.A. No. 3767 of 2025.

Mst. Nazia Bibi v. Muhammad Riaz, 2019 SCMR 520 (Pak.).

Syed Muhammad Ali v. Mst. Tasneem Fatima, 2016 YLR 1234 Karachi.