

**IN THE COURT OF DISTRICT & SESSIONS JUDGE,**  
**Lahore.**

*Ali Raza son of Ali resident of Model Town.*

***....Petitioner***

**V E R S U S**

1. *Station House Officer, Police Station Model Town, Police Station City.*
2. *Respondent Name son Respondent Father Name, resident of Respondent Address.*

***....Respondents***

**PETITION UNDER SECTION 22-A & 22-B, Cr.P.C. FOR**  
**RESTRAINING THE RESPONDENTS FROM**  
**HARASSING THE PETITIONER ILLEGALLY AND**  
**UNLAWFULLY.**

***Respectfully Sheweth:***

1. That the addresses and particulars of the parties given above are correct for the purposes of the services of notices and summons etc.
2. That the brief facts leading to file the present petition are that the respondents No. 1 & 2 are harassing, pressurizing the petitioner and demanded Illegal Demand Description for nothing.
3. That respondent No.2 in connivance with the respondent No.1 on First Raid Date raided the house of the petitioner alongwith Unknown Police Officials Count unknown police officials and humiliated the petitioner and his family members including Parda Nasheen ladies and damaged household articles. It is pertinent to mention here that respectables of locality saved the

- petitioner and his family members in miserable condition from the cruel hands of respondents.
4. That respondents Second Raid Time Description raided again the house of the petitioner and caused harassment and severe threats to the petitioner.
  5. That the petitioner is a respectable citizen of Country Name and running a business of Petitioner Business Type in Business Area, Business City the respondents are damaging the reputation of the petitioner by visiting again and again on the shop and house of the petitioner.
  6. That under Article 4 of the Constitution the rights of the individual to be dealt in accordance with law and it is the statutory duty of public functionaries to perform its duties in good faith, honesty and within persistent of its powers that persons concerned should be treated in accordance with law as guaranteed by Article 4 of the Constitution of the Pakistan 1973, but this dictum has been violated by the respondents when being public functionary they are legally bound to act in accordance with law.
  7. That the petitioner is law-abiding citizen of Country Name and there is no criminal or any other case against the petitioner.
  8. That there is no alternative immediate and adequate remedy available to the petitioner to redress his grievances except to file the instant writ petition.

### **P R A Y E R**

***In view of above submissions it is humbly requested that present petition may kindly be accepted and respondents may kindly be directed not to harass and threat the petitioner illegally and unlawfully.***

***Any other relief, which this Honourable Court deems fit may also be ordered.***

*Petitioner*

*Through*

*Dated: Filing Date*

**Advocate One Name**

Advocate High Court

**Advocate Two Name**

Advocate High Court

**NOTE:**

*Under the instruction of my client this is the first petition on the subject matter.*

***Advocate***

IN THE COURT OF DISTRICT & SESSIONS JUDGE, Lahore.

**In re:**

*Ali Raza VS S.H.O. Model Town etc.*

**PETITION UNDER SECTION 22-A & 22-B, Cr.P.C. FOR RESTRAINING THE RESPONDENTS FROM HARASSING THE PETITIONER ILLEGALLY AND UNLAWFULLY.**

**AFFIDAVIT OF Ali Raza son of Ali resident of Model Town.**

I the above named deponent do hereby solemnly affirm and declare as under:

That the contents of the accompanying petition are true and correct to the best of my knowledge and belief, nothing has been concealed thereof.

***Deponent***

**VERIFICATION**

*Verified on oath at Verification City on this Verification Date In Words that the contents of the above said affidavit are true and correct to the best of my knowledge and nothing has been concealed thereof.*

***Deponent***