

Khulla Application Form Template for Pakistan



Disclaimer

- This is a sample template for what a Khulla Application looks like in Pakistan, you are strongly advised to seek legal assistance before you intend to use it.
- We accept no liability of its use, as we have uploaded this in good faith for the general public to see it and be aware of it.
- By providing this document online, we are not entering into a client-attorney relationship.
- For assistance in divorce matters, visit our website www.24justice.pk or contact us via WhatsApp on
 - If you’re contacting us from outside of Pakistan (0092) 308 5510031
 - From within Pakistan, its 0308 5510031

Sample Khulla Application Form in Pakistan

Suit for Dissolution of Marriage & recovery of dowry articles and maintenance allowance.

Below is the standard format of Suit for Dissolution of Marriage by way of Khulla. These are filled in, attested for oath notary (with an oath application) and then submitted.

For simplicity, the person issuing the divorce (The wife) will be mentioned as the “Plaintiff” and the person receiving the divorce (The Husband) will be mentioned as the “Defendant”. **All the items that should be edited will be in red.**

When submitting this application, the court fees (in sticker form) must also be attached, along with a copy of the Legal Power of Attorney (which your lawyer would provide).

Khulla applications can be submitted into any court where the plaintiff, the wife, resides in. The maximum period (As per the orders of Supreme Court) to issue the khulla is a period of 6 months, in the event that this lasts longer than 6 months, you can use our transfer application to change the judge, and the khulla is usually ordered in the preliminary hearings.

Items that should be attached to this application are as follows:-

- 1) A Valid Legal Power of Attorney
- 2) Copy of the nikkahnama (which should be attached and labelled as “Annex A”).

- 3) If there are children from this marriage, mention them in the blue parts (which should be added and amended) along with their B Forms (Birth Certificates) should also be attached (which should be attached and labelled as “Annex B”).
- 4) If you are also seeking a recovery of Bridal Gifts, Dowery, Maintenance and/or Haq Mehr, then you should add and amend all sections in Green, as well as attach receipts of these as “Annex C”, unless you have no children from the marriage (and have not attached any B Forms) in which case you should attach these documents under “Annex B”.
- 5) IF there is a [prenuptial agreement](#) in place, then attach a copy of this also. Customized features will be highlighted in green.

**For Professional assistance with [Document Attestation](#),
[Divorce](#), [Khulla](#), [Child Custody](#) and other legal matters,
contact us**

IN THE COURT OF SENIOR CIVIL JUDGE/ FAMILY COURT JUDGE (Name of Judge), (Name of City).

FAMILY SUIT NO: _____/(Enter Year here)

Plaintiff

(Name of Plaintiff), DAUGHTER OF (Name of Plaintiff’s Father) RESIDENT OF (Plaintiffs Address either in Pakistan or Abroad).

VERSUS

Defendant

(Name of Defendant), SON OF (Name of Defendant’s Father), RESIDENT OF (Defendants Address either in Pakistan or Abroad).

SUIT FOR DISSOLUTION OF MARRIAGE BY WAY OF KHULLA, RECOVERY OF DOWRY ARTICLES, BRIDAL GIFTS, OR IN ALTERNATIVE SUM OF RS. *** VALUE THEREOF AND BELONGINGS OF WIFE AND FOR MAINTENANCE ALLOWANCE.**

Respectfully Sheweth:

1. That the Plaintiff was married to the Defendant on (Date of Marriage) in accordance with tenets of Islam, for consideration of Haq Mehr of Rs./USD/GBP (Insert amount in figures) (Then write the amount out in words here) the Nikkahnama of which is attached under Annex A. From this marriage a son/daughter was born on (date of birth) whose birth certificate is attached under Annex B.
2. That the marriage was cordial until (date of when issues arose) due to (reason of why issues started). Since then, the relationship has been destroyed and the Plaintiff seeks khulla as (Insert the reasons here for the Khulla).
3. That on (Date of departure) the Plaintiff left for her own safety/was forced to leave her marital home, leaving everything at (where her items are)/taking everything with her.
4. Reconciliation attempts have been attempted, but despite their best efforts, they have failed.
5. That in view of the above narrated circumstances and manifest misdeeds of the defendant the plaintiff has developed a strong hatred for the defendant and now the spouses cannot live

amicably within the limits prescribed by Almighty Allah, therefore, the plaintiff is entitled to dissolution of the marriage inter alia on the ground of “Khula”.

6. That the plaintiff presently resides in (City of residence), therefore, the family Court at (City where the court is) has ample jurisdiction to adjudicate upon the matter.

7. (If there is a claim for Dowry and Bridal Gifts) That the plaintiff belongs to a well of family and at the time of marriage the plaintiff was given following Dowry Articles by her family, receipts of which are attached as Annex B/C:

(List of items, include Haq Mehr here also if it hasn’t been paid)

Total: (Total amount in PKR Rs of everything)

8. That all the dowry articles and bridal gifts given to the defendant at the time of Rukhsati amounting Rs.(Total amount) are in the possession of the defendant.

9. That the defendant earns about (amount the defendant earns) per month and he can easily provide maintenance to the plaintiff at the rate of (amount requested as alimony) from (Date the plaintiff left the defendant) until her Iddat is completed.

10. That a court fee of Rs.** has been affixed at the plaint as required under the law.

Prayer

In light of the aforementioned circumstances, it is humbly prayed that decree may be passed in favour of the plaintiff and against the defendant:-

(i) for dissolution of marriage on the basis of “Khula”.

(ii) for recovery of dowry articles, ornaments, bridal gifts or in alternative sum of (Total amount requested) &

(iii) for maintenance be passed in favour of the plaintiff @ (Monthly amount requested) per month from (date of physical separation) till the completion of the ‘Iddat’ period.

Signed

PLAINTIFF

THROUGH

Legal Counsel

Date

IN THE COURT OF SENIOR CIVIL JUDGE/ FAMILY COURT JUDGE (Name of Judge), (Name of City).

FAMILY SUIT NO: _____/(Enter Year here)

(In the case of **Plaintiff**, DAUGHTER OF (Name of Plaintiff’s Father) Versus **Defendant**, SON OF (Name of Defendant’s Father).

SUIT FOR DISSOLUTION OF MARRIAGE, RECOVERY OF DOWRY ARTICLES, BRIDAL GIFTS, OR IN ALTERNATIVE SUM OF RS. *** VALUE THEREOF AND BELONGINGS OF WIFE AND FOR MAINTENANCE ALLOWANCE.**

Signed Affidavit of Plaintiff, (Name of Plaintiff), DAUGHTER OF (Name of Plaintiff’s Father) RESIDENT OF (Plaintiffs Address either in Pakistan or Abroad).

I, the above named petitioner do hereby solemnly affirm and declare as under:-

That contents of the above titled suit are true and correct to the best of my knowledge and to the best of my belief and recollection, and noting is suppressed from this Honourable Court.

DEPONENT

VERIFICATION

Verified on oath at (City of where the court is), on this day (date of submitting the case) that the contents of above affidavit are true and correct to the best of my knowledge and belief.

DEPONENT