

IN THE COURT OF SENIOR CIVIL JUDGE,
RAWALPINDI.

Zubair Alam son of Muhammad Fazil Chatta R/O House No.
1, Street No.1, Ratta Amral, Rawalpindi

...Plaintiff

Versus

NADRA, Adyala Road Rawalpindi through its Manager

...Defendant

SUIT FOR DECLARATION AND MANDATORY
INJUNCTION

Respectfully Sheweth,

1. That the plaintiff was born in the year 1975. On attaining the age of majority, the Identity Card of plaintiff was applied for, which was issued to him bearing CNIC No.

37405-0000000-0. In the above said CNIC of plaintiff, the date of birth of plaintiff was wrongly mentioned as 1961.

2. That the correct year of plaintiff's birth is 1975 which is evident from various documents like Old ID Card No. 300-75-4545441, Service Book and Service Card etc.
3. That the NADRA authority was approached for correction of date of birth but the request was not entertained, hence this suit.
4. That cause of action finally accrued when the request of plaintiff was not entertained by the defendant, which is still continuing.
5. That the office of the NADRA, Rawalpindi is situated within the territorial jurisdiction of this Honourable Court and the plaintiff is also residing at Rawalpindi, hence this Honourable Court got the jurisdiction to entertain the matter in hand.

6. That the proper court fee has been affixed on the plaint.

PRAYER:

In view of above, it is therefore, most humbly prayed that a decree for the following:

1. Declaration to the affect that the correct the year of birth of plaintiff is 1975 which is as per his Old ID Card No. 300-75-4545441, Service Book and Service Card etc.
2. Mandatory injunction, directing the defendant to correct the year of birth plaintiff in his record and after making necessary correction issue the CNIC to plaintiff.

may kindly be passed in favour of plaintiff and against the defendant.

Any other relief, which this Honourable Court
deems fit and proper may also be granted to the plaintiff.

Plaintiff

Through

Mehmood Alam

Advocate High Court

VERIFICATION:-

Verified on oath at Rawalpindi on this 02nd day of April 2021 the
contents of the para 1 to 3 of the suit the suit are true and correct
to the best of my knowledge and rest of the paras are believed to be
true and correct as per information received.

Plaintiff