

filed on 23/9/2014

IN THE HONOURABLE HIGH COURT OF SINDH AT KARACHI  
[CONSTITUTIONAL JURISDICTION]

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Constitution Petition No. 2501 of 2014

Zulfiqar Ali Langah .....Petitioner

Versus

CMA # 24191/2014

Secretary Health Govt. of Sindh & Others.....Respondents

Pakistan Institute of Labour  
Education & Research..... Applicant Intervener

**APPLICATION UNDER SECTIONS 3, 6 & 12 OF THE CONTEMPT OF  
COURT ORDINANCE, 2003, READ WITH, ARTICLE 204 OF THE  
CONSTITUTION, 1973, READ WITH, SECTION 151, C.P.C., 1908**

It is most respectfully and most humbly submitted on behalf of the  
Petitioners that, for the detailed reasons stated in the accompanying Affidavit, this  
Honourable Court may be pleased to punish the persons named herein below, for  
consciously, deliberately and wilfully subverting, undermining and violating the  
Order dated: 22-05-2014, of this Honourable Court:-

- (i) Mr. Sajjad Saleem Hotiana  
Chief Secretary,  
Government of Sindh,  
Sindh Secretariat,  
Karachi
- (ii) Iqbal Hussain Durrani  
Secretary,  
Ministry of Health,  
Government of Sindh,  
Sindh Secretariat,  
Karachi

The abovementioned prayer is made in the interest of justice and may  
graciously be granted.

Karachi:

Dated: September \_\_\_\_\_, 2014

Advocate for the Applicant Intervener

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Secretary Health Govt. of Sindh & Others.....Respondents

Pakistan Institute of Labour  
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**AFFIDAVIT IN SUPPORT OF THE APPLICATION UNDER SECTIONS**  
**3, 6 & 12 OF THE CONTEMPT OF COURT ORDINANCE, 2003, READ**  
**WITH, ARTICLE 204 OF THE CONSTITUTION, 1973, READ WITH,**  
**SECTION 151, C.P.C., 1908**

I, Zulfiqar Ali Shah, son of Misri Shah, Muslim, Adult, resident/ office at PILER Centre, ST-001, Sector X, Sub-Sector V, Gulshan-e-Maymar, Karachi, holding CNIC No. 42201-070829-7, do hereby state on oath as under:

1. That I am the authorized person of the Applicant Intervener, in the present Petition and I am well conversant with the facts of this case.
2. That the accompanying Application has been filed and drafted under my instructions and for the sake of brevity, the entire contents of the accompanying Application may be read as a part of this Affidavit.
3. That through the Order dated: 22-05-2014, this Honourable Court, inter-alia, Ordered the Government of Sindh to launch an effective and widespread awareness campaign regarding the effects of measles, rubella and other related diseases, their causes and the ways and means to prevent occurrence thereof. All the directions and Orders to the Alleged Contemnors are all clearly specified and elucidated in the Order dated: 22-05-2014

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4. That over several months have passed since the passing of the Order dated: 22-05-2014 however, the Applicant Intervener is informed that the Alleged Contemnors have deliberately not complied with the Order dated: 22-05-2014. Therefore, the Alleged Contemnors have consciously, deliberately and wilfully subverted, undermined and violated the Order dated: 22-05-2014, of this Honourable Court.

5. That the Applicant Intervener has also sent to the Alleged Contemnors a Contempt Notice dated: 13-09-2014 for consciously, deliberately and wilfully subverting, undermining and violating the Order dated: 22-05-2014, of this Honourable Court. This Notice has been acknowledged by the office of the Alleged Contemnor No.1 through Letter dated: 17-09-2014.

*A copy of the Contempt Notice dated: 13-09-2014 is annexed and marked as Annex 'AX'.*

6. That in view of the above, it is most respectfully and most humbly submitted that this Honourable Court may be pleased to punish the Alleged Contemnors, named in the accompanying Application, for consciously, deliberately and wilfully subverting, undermining and violating the Order dated: 22-05-2014, of this Honourable Court.

7. That unless the accompanying Contempt Application is granted, the prestige of this Honourable Court will be damaged and the interests of the Petitioners and the public at large will be gravely prejudiced.

8. That whatever has been stated above is true and correct to the best of my personal knowledge and law stated, I believe to be correct in view of the advice from my legal counsel.

DEPONENT