

MUDDASIR IOBAL CHAUDHRY & ASSOCIATES ADVOCATES, SOLICITORS & LEGAL CONSULTANTS

Ref No. GPLN/302/2025

Dated: 21-08-2025

Muddasir Iqbal M.A. LLM, PGD

M. Faizan

Salman Nanji M.S Criminology Advocate High Court

M. SIRAJ LLB Advocate High Court

Rahid Jamal, S/o Jamal Uddin Muslim, adult, Resident of House C-41, Rafah-e-Aam Housing Society, Malir Halt,

Subject:

LEGAL NOTICE

Dear Sir.

Under instructions, on behalf of my client namely Mr. Baqir Habib S/o Haidar Habib, resident of Karachi, I am serving you with the following notice in unequivocal terms:-

- 1. That my client is a respectable, law abiding and aged about 71 years senior citizen of Islamic Republic of Pakistan, a well known person, has earned a good reputation and respectability amongst the people of society, as well as his relatives and family members.
- 2. That you are a close relative of my above said client and due to familial conflicts and personal grudge, you have maliciously started a campaign against my client by spreading false, baseless and highly provocative allegations that my client has "Left Islam" and he is a "Murtid" and liable to be killed.
- 3. That you have circulated such hateful and threatening messages via Whatsapp, claiming that you have obtained a Fatwa from an Islamic Organization namely "Tanzeem Tauheed Trust" declaring my client as "Murtid" and "Wajibul_Qatal", thereby openly inciting violence against him and encouraging others

That your such actions and campaign on your part constitute the gravest forms of criminal intimidation, defamation, religious hatred and direct incitement of murder. Your conduct has not only severely endangered the life and safety of my client but has also caused him mental torture, social humiliation, isolation and irreparable loss of reputation, and above all, his very life has been placed in jeopardy. He has been forced into isolation within his own home, living under constant fear, his family members are also under severe fear and harassment due to your reckless actions.

Office No. 402, 4th Floor, Insaaf Chamber, M. A. Jinnah Road, Light House, Karachi. Email: jurisclinickhi@gmail.com, Facebook: facebook.com/Jurisclinic

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- Therefore, through this legal notice, you are strictly called upon to:
 - a) Immediately and permanently cease and desist from publishing, circulating, or posting any false, provocative, defamatory, or threatening statements or posting any talenter in WhatsApp groups, social media platforms, or otherwise,
 - b) Immediately delete all such messages and posts already circulated by you,
 - c) Issue a written and publicly recorded apology addressed to my client within seven (7) days of receiving this notice, retracting all false allegations and undertaking never to repeat the same in future,
 - d) Refrain from contacting my client directly or indirectly for the purpose of harassment or intimidation.
- Take notice that in case of your failure to comply with the above demands within the stipulated time, my client will be left with no alternative but to initiate appropriate civil and criminal proceedings against you before the competent courts of law, including but not limited to:
- Filing a criminal complaint for harassment, criminal intimidation, a) incitement to murder, defamation, and offences under the PPC and PECA Act.
- Instituting a civil suit for damages for an amount not less than ten millions, b) PKR 100,00,000/-] on account of loss of reputation, mental torture, and endangerment of life,
- Seeking a permanent injunction restraining you from repeating such c) unlawful acts.

of All consequences, liabilities, and costs arising from your illegal acts shall rest entirely upon you. Which may please be noted accordingly

Copy To:

Legal Notice

1. S.H.O A-Falah Police Station,

2. S.S.P Complaint Cell Korangi,

3. Director FIA/NCCIA.

(For taking immediate Legal Action according to Law)

Yours Sincerely

Muddasir (qbal Chaudhry Advocate of Nigh Court.

MUDBASIR IOBAL CHAUDHRY MALLM PGD

Advocate High Court