

## **SUPREME COURT VERDICT IN THE NO- CONFIDENCE MOTION AGAINST PRIME MINISTER IMRAN KHAN: A CRITICAL ANALYSIS**

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### **Abstract**

*The objective of this paper is to assess the role of the Supreme Court verdict critically, shedding light on both its strengths and weaknesses. On April 3, 2022, the Deputy Speaker of the National Assembly of Pakistan, Mr. Qasim Suri, issued a ruling. He rejected the No-Confidence Resolution presented against Prime Minister Imran Khan under Article 05 of the Constitution of Pakistan. Additionally, he declared the Resolution as a foreign conspiracy supported by a 'Cypher.' Subsequently, the matter was brought before the Supreme Court of Pakistan, which set aside the Speaker's ruling and reinstated the Resolution. This development has triggered a debate among legal experts, politicians, and commentators, with some endorsing and others criticizing various aspects of the verdict. The research for this paper relies on the court's verdict and orders, public access interviews with different legal experts and journalists, articles, editorials, and news reports. Both positive and negative facets of the verdict are meticulously examined and highlighted.*

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### **Introduction**

The Constitution of Pakistan (1973) grants Members of the National Assembly (MNAs) the right to initiate a Resolution of No-Confidence (RNC) against the Prime Minister, subject to the procedural guidelines outlined in Article 95. (The Constitution of Pakistan, art. 95).

Opposition parties submitted a no-confidence motion along with an application signed by 140 Members of the National Assembly for the requisition of the National Assembly session under Article 54(3) of the Constitution in the secretariat of the National Assembly. Consequently, by the Rules of Procedure and the Constitution of Pakistan, the Speaker was obligated to convene the National Assembly session by March 22, 2022. (Dawn.com, 2022).

Attorney General for Pakistan Khalid Javed Khan briefed Prime Minister Imran Khan about the voting process on the Resolution of No Confidence (RNC), providing legal and political options to counter the motion (Tribune, 2022). Meanwhile, some PTI dissenting members were found hiding in Sindh House Islamabad, allegedly poised against their party during the no-

confidence motion vote. The dissidents numbered 24, according to one member, while another claimed that more than 24 PTI members were opposing the party and Prime Minister Imran Khan's policies (Tribune, 2022). Two days later, PTI issued show-cause notices to the dissenting party members (Tribune, 2022).

Speaker Asad Qaiser disregarded the opposition's warning and convened the National Assembly session on March 25, 2022, at 11:00 A.M (Friday) at the Parliament House. The requisition submitted by the opposition on March 8 under Article 54(3) of the Constitution aimed to convene the session, but on January 21, a motion was passed to hold the meeting of OIC Foreign Ministers on March 22-23 in the Assembly Hall. The Assembly Hall and its lobbies were under renovation starting from the end of February, responding to the Ministry of Foreign Affairs requirements. The Senate Secretariat was contacted to convene the session on receiving the requisition on March 8, but the hall was unavailable due to renovation. Despite efforts to find an alternative venue, the Chairman CDA and Deputy Commissioner Islamabad conveyed the unavailability of a suitable place in writing. Given these circumstances, Speaker Asad Qaiser exercised delegated powers under Article 54(3) and Article 254 of the Constitution to call the Assembly meeting (Dawn.com, 2022).

The National Assembly session resumed on March 28 presided over by Deputy Speaker Qasim Khan Suri. The agenda included the Resolution of No Confidence against Prime Minister Imran Khan, which was tabled after Deputy Speaker Qasim Suri's permission. Opposition Leader Shehbaz Sharif moved the motion, stating that under the Rules, Procedure, and Conduct of Business of the National Assembly, the Resolution of No Confidence against the Prime Minister was being moved. The motion declared that Imran Khan, the Prime Minister of Pakistan, had lost the confidence of the majority of the members of the National Assembly, and he should not continue in office. After moving the no-confidence motion, a member count was conducted, and with the support of 161 opposition members, the resolution was accepted, i.e., the no-confidence motion was tabled. The Deputy Speaker adjourned the session on March 31 at 4:00 PM, and the debate on the motion was scheduled to begin on that day (Dawn.com, 2022). The following day, PTI chief Imran Khan issued written instructions to his National Assembly members, directing them not to attend the session on the day of voting on the Resolution of No Confidence. He also emphasized that Article 63A would be applied to those MNAs who violated the party's instructions (Tribune, 2022).

The proceedings for voting on the Resolution of No-Confidence Motion in the National Assembly commenced under the supervision of Deputy Speaker Qasim Suri. Seventeen members

of Tehreek-e-Insaf relocated and occupied seats in the opposition lobby of the National Assembly. When Law Minister Fawad Chaudhry was permitted to speak on a Point of Order by the Deputy Speaker, he expressed his viewpoint. Chaudhry highlighted that on March 7, our ambassador was informed during a meeting that a Resolution of No-Confidence against Imran Khan was underway, and the success of this resolution would impact Pakistan's relations. The Minister questioned the sovereignty of the nation, emphasizing that no foreign power has the right to manipulate the elected Government through conspiracy, stating that such actions violate Article 5 of the Constitution. The Deputy Speaker, after acknowledging the Minister's points, ruled that the motion of no confidence was against the Constitution, national sovereignty, and independence, consequently rejecting the resolution and adjourning the session. The detailed ruling, in written form, was concurred by Speaker Asad Qaisar (Dawn.com, 2022).

Following the Deputy Speaker's rejection of the No-Confidence Resolution, Prime Minister Imran Khan recommended the President to dissolve the National Assembly under Article 58(1) with Article 48(1) of the Constitution. Subsequently, the President issued a notification to dissolve the National Assembly based on the Prime Minister's advice (Dawn.com, 2022).

The Supreme Court took suo moto action and issued a hearing order on the no-confidence vote issue. The Chief Justice, in consultation with several judges, decided to proceed under Article 184(3) of the Constitution. A bench chaired by the Chief Justice, including Justice Ijaz-ul-Ahsan and Justice Muhammad Ali Mazhar, was formed. The case was designated Suo Moto Notice No. 1, 2022. The Attorney General of Pakistan, the President of the Supreme Court Bar, and lawyers from various political parties appeared before the court. The written order emphasized issuing a notice to the Attorney General regarding the constitutionality of the Deputy Speaker's initiative under Article 5. However, the court did not provide a finding or hear the aggrieved party. The court intended to examine whether the Deputy Speaker's action was protected under Article 69. To maintain law and order, all political parties and forces were directed to uphold peace in the country. Any action by state institutions or officials deemed unconstitutional would be subject to the Supreme Court's scrutiny. The Interior and Defence Secretaries were instructed to submit a report on measures taken to establish law and order nationwide (Dawn.com).

The Supreme Court directed that the petitions filed by the People's Party and the Supreme Court Bar be scheduled for a hearing with suo moto notice, and the Supreme Court Bar and the Pakistan Bar were instructed to assist the Supreme Court on the suo moto notice. The court mandated that the case be heard the

following day at 1 pm before the larger bench. Before this, Chief Justice Umar Atta Bandyal took notice of the prevailing situation in the country and emphasized that all state institutions should refrain from taking any illegal actions.

A five-member larger bench of the Supreme Court, headed by Chief Justice Umar Atta Bandyal and comprising Justice Ijaz-ul-Ahsan, Justice Mazhar Alam Miankhel, Justice Muneeb Akhtar, and Justice Jamal Khan Mandokhel, issued a short order declaring the Speaker's ruling against the constitution null and void. The Resolution of No-Confidence was reinstated, rendering all decisions based on the previous ruling were declared null and void. While addressing the Deputy Speaker's ruling, the court emphasized that the Prime Minister could not advise the President to dissolve the Assembly, as a No-Confidence Resolution was pending in the National Assembly against him. The court deemed the Prime Minister's advice contradictory and without legal effect (Short order of Suo Moto No. 1 of 2022).

As directed by the Supreme Court, the National Assembly session was resumed on April 9, 2022. During the session, Minister of Foreign Affairs Shah Mehmood Qureshi initiated a discussion on the 'threatening letter' (Cypher), leading to opposition protests. The opposition insisted on a vote on the Resolution of No-Confidence. Speaker Asad Qaisar resigned within the given deadline, and Ayaz Sadiq took over as the

presiding officer. Voting on the Resolution of No-Confidence proceeded, with PTI members leaving the House. The Speaker announced that 174 members voted in favour of the Resolution, resulting in the passage of the No-Confidence Resolution against Prime Minister Imran Khan in the National Assembly with 174 votes (Dawn.com, 2022).

Furthermore, in his capacity as Acting Speaker of the National Assembly, Qasim Suri forwarded the original 'cypher' to the Chief Justice of Pakistan. The Chief Justice's office received the letter in a sealed envelope on April 12, 2022. (Geo News, 2022). Additionally, the Chairman of PTI, Imran Khan, penned two letters—one addressed to President Dr Arif Alvi and the other to Chief Justice Umer Ata Bandial. These letters urged the establishment of commissions to investigate the alleged 'foreign conspiracy' (Tribune, 2022).

Responding to Imran Khan's request, President Dr Arif Alvi wrote a letter to Chief Justice Umar Ata Bandial, urging the formation of a judicial commission to probe the 'foreign conspiracy.' In the letter, the President detailed the 'cypher', highlighting its potential hazards and its connection to public interest, integrity, and national security. The President also cited examples of previous judicial commissions formed to investigate matters of public interest (President of Pakistan Letter no. DO (P)- 1/2022, dated: May 12, 2022).



## **A Review of Supreme Court's Verdict**

The comprehensive and unanimous judgment of the larger bench, led by Chief Justice of Pakistan Umar Ata Bandial, has been meticulously detailed. Addressing the matter's maintainability, the court emphasized its relevance to fundamental rights, making it admissible under Article 184(3) and Article 17 of the Constitution as both suo moto and constitution petitions. The judgment highlighted the judiciary's role in cases related to fundamental rights, with a focus on the Executive providing genuine evidence to defend its decisions regarding national security matters.

Moreover, the court dismissed the constitutional bar under Article 69 for the judiciary to review the Speaker's ruling, asserting that when the Speaker violates the Constitution, judicial intervention is justified. The ruling on April 3, 2022, was deemed unconstitutional, leading to the setting aside and restoration of the 'Resolution of No Confidence.' The court emphasized that if the resolution is presented in the National Assembly, it cannot be rejected except through voting. The Speaker's jurisdiction does not extend to ruling on Article 5, and his decision paved the way for the Prime Minister to advise the President to dissolve the National Assembly.

The court declared the 'cypher' matter as dubious which requires investigation. Furthermore, despite the unconstitutional acts of the Speaker, Prime Minister, and President, favouring new general elections based on the 'cypher,' the court acknowledged these as political scenarios requiring political insight rather than legal issues.

The judgment noted the Government's unprecedented demand for suo moto action on national security and compared it to the *Memo Case*. Justice Mazhar Alam Miankhel emphasized the violation of the sacred trust by government officials, suggesting that Article 6 could be invoked by parliamentarians to prevent such constitutional transgressions in the future. While Justice Jamal Khan Mandokhel expressed that the demand for a new general election resembled the Doctrine of Necessity, he argued against its application in this case. He underscored the misuse of the Doctrine of Necessity in Pakistan, resulting in negative consequences (Supreme Court detailed judgment, 2022).

### **Legal and Political Analysis**

The first meeting of the National Security Committee under the chairmanship of Imran Khan endorsed the foreign interference and said to issue demarche and in the second meeting under the chairmanship of PM Shehbaz Sharif, the findings of the first meeting were endorsed but now, it is said that it was not conspiracy but interference. If there is intention, then action will

be followed, if you intend to go outside where you set now then you will act after the intention. If 'action' i.e. interference has taken place then the 'intention' i.e. conspiracy has taken place first, if there is action then certainly there was the intention. DGISPR has no knowledge about the law that what is the difference between conspiracy and interference. But unfortunately, the court said that the evidence had not come out, although all these were sufficient for inquiry and conduct under Article 184 (3). (Ahsan, 2022)

The Supreme Court has rightly concluded that the process was executed without any evidence, Speaker Qasim Suri did not have any constitutional right to give a ruling under Article 5 and he had not any evidence on which he decided. The personal note of Justice Miankhel is not the decision of the court, nor the order of the court, he has demanded Parliament to make a solution for the future so that no one should play with the constitution in this way in the future. Moreover, the government can file a reference against any person under Article 6 and High Treason Act 1973, if the Government wants. (Raja, 2022)

On an additional note, the judge has left the issue of Article 6 to the Parliament, as far as the question is concerned, is it a historical judgment or not? Future will decide this question based on its impacts. However, the option of investigation is still open for respondents. If a person commits an unconstitutional act, it will not fall under the subject of Article 6, Article 6 is to be

applied to a person when he takes over as Pervez Musharraf did on October 12, 1999. (Zuberi, 2022)

As far as Article 6 is concerned, it is part of the minority judgment in this case but in a unanimous decision, nothing has been said about Article 6, therefore the minority judgment has no legal value. Moreover, Article 6 is about the subversion of the Constitution, subversion means to suppress, to dispose of the Constitution. Wrong interpretation does not fall on the subject of subversion of the Constitution and violations do not mean subversion of the Constitution. It is so sad to declare a violation of the constitution as a subversion of the constitution. (Mansoor, 2022)

People see Article 6 very casually, one party stands and talks to file Article 6 reference against another party but if you study Article 6 carefully then you will see its conditions are very strict, it states that if a person (i) abrogates the constitution i.e eliminate the constitution, for example, when the military impose Martial Law, (ii) or subvert the constitution i.e ruin the constitution, (iii) does not allow the constitution to work then you can file a reference under Article 6. People violate the constitution daily, therefore, related cases are filed against them. In this case (Speaker Ruling), there are no elements of abrogation or subversion of the constitution, Justice Miankhal has said about the legislation, not to file reference under Article 6 (Usmani, 2022).

In this judgment, the court has buried the Doctrine of Necessity. When there is a proceeding of a case in a court then the government can present a document to strengthen her stance but in this case, five judges say that the 'cypher' did not produce to the court but an attempt was made to share a few contents, another important thing is that the 'cypher' was received on March 07, the Government did not share it with anyone till March 28, nor investigate, nor made an investigation commission also the Government did not discuss it in National Assembly proceedings from March 28 to March 31, therefore it is an attempt to defeat the resolution of no confidence. As far as Article 6 is concerned, if the government satisfies that someone has committed the act of abrogation of the constitution then she can file a reference of High Treason under Article 6. The additional note (of Justice Miankhel) only gives justification to the Government to file a reference, then the trial court will decide whether the abrogation of the constitution is committed or not. (Bhooon, 2022)

The court could not give any decision more than this. The five judges' bench was not an inquiry commission nor a court of inquiry, if the President of Pakistan places a document in the Supreme Court, it can never be used in judicial proceedings until the Government presents it before the concerned bench, therefore, the government should have presented the decoded 'cypher' through Attorney General or counsel as a confidential

document but this process was not followed by the government. If the government did the same then the Chief Justice would make an inquiry commission or judicial commission like in *Memogate Case* and subsequently the commission would present findings and then the court would give a verdict based on the inquiry commission's findings and the proceedings of the court. Therefore, the present verdict of the Supreme Court is right. The court has cited the meeting of the National Security Committee and its press release in para no. 8, therefore the court has admitted foreign interference, after this admission it was the responsibility of the government not the court to inquire into the 'cypher' matter. There was only one question before the court whether the Speaker's ruling was right or not. The court has said that you did not resolve the controversial factor, nor made an investigation commission, or the Government did not understand worthy to make an inquiry commission. The Supreme Court is not a 'trial court'. Imran Khan's demand about the *suo moto* action on the 'cypher' controversy is not right, this was the subject of government when the Law Minister raised the matter on the floor of the house then the Speaker should have formed an inquiry commission or parliamentary committee. The committee hears the matter in in-camera sitting and the cypher should have presented to the committee, then the committee would give its findings. In this case (Speaker Ruling) the court has said that information about the 'cypher' was also not sufficient, the court

pointed out three aspects, one, the 'cypher' did not share with Parliament, second, there was no debate on the 'cypher' in the house, third, no investigation was done on it. As far as Article 6 is concerned, the language used by the judge is unconstitutional, he has levelled the 'violation of the constitution' to the 'abrogation of the constitution', but there is a large difference in both. Abrogation means if someone by force abrogates/eliminates the constitution. The judge declared the act of the Speaker unconstitutional and then Article 6 was discussed, the basis of this additional note is wrong (Shaheen, 2022).

To present a document in the court there is a proper channel: The Government should have presented the document 'cypher' through the Attorney General then the court would examine and give findings. Another point is that the 'cypher' was not discussed properly in the Parliament, it should have been discussed, after that, some findings would have come out, then a commission would have been formed or the finding would have been submitted to the court and finally the court would have given a verdict. The decision of the Supreme Court is right and the 'cypher' did not submit properly, nor there was something hazardous in the 'cypher'. As far as Article 6 is concerned, the Speaker has a constitutional designation and if he violates the constitution then the reference should be filed under Article 6. (Dogar, 2022)

As far as the political aspects and impacts of this decision are concerned, if the government decides (after the Supreme Court this verdict) to file a case under Article 6 against politicians like elected Ex-Prime minister, Speaker, or other political persons then it will mean that the current Government is issuing the death warrant of democracy in its own hands. In Pakistan, clean chits have been given to Gen Ayub Khan, Gen Zia Ul Haq, and Gen Pervez Musharraf but cases against those elected people who never invited anyone to do unconstitutional acts (impose Martial Law or takeover). When you deprive parliamentarians (especially the Speaker) of the privilege of interpretation of the constitution then what will happen to outsiders like journalists, politicians etc? If a journalist interprets Article 19 of the Constitution that he has complete freedom to speech and expression but later realizes that the said article does not give complete freedom to speech and expression but there are some limits, then will a case under Article 6 be filed against him? (Akram, 2022).

The Supreme Court is not a trial court and the PTI narrative about the foreign interference and conspiracy ruined was based on a 'cypher' but the PTI counsel did not present it before the court in a proper way, therefore, the court rejected the PTI stance and all responsibility falls on PTI counsel. As PTI counsel had not presented the case properly in the *Nasarul Mulk Commission*, same this case was not properly presented here (Mir, 2022).



## **Conclusion**

This decision of the court is very important. Firstly, it set aside an unconstitutional ruling of the Speaker, if it did not reverse then Article 95 would become dysfunctional in the future and it would open the way to reject the Resolution of No Confidence Motion. Secondly, the maintainability of the case is discussed although both sides of the parties did not challenge the maintainability of the case, which was a positive aspect. Thirdly, The controversy about the court's intervention in the House proceedings under Article 69 is also cleared and placed the principle that the House proceedings have no absolute protection, if there is a violation of the Constitution then the court can inquire but irregularities of procedure i.e., the conduct of business is protected under Article 69. Fourthly, despite the unconstitutionality of the Speaker, the demand for a new election on political grounds was rejected; hence the Doctrine of Necessity was buried in this case. The last positive aspect of this verdict was that an act taken in the name of national security can now be questioned in the court and the Executive shall give bona fide evidence in support of the act. There were also some flaws. Firstly, Justice Mazhar Alam Miankhel has discussed Article 6 in his additional note and levelled 'violation of the constitution' to the 'abrogation, subversion and suspension of the Constitution' Also the language used by the honourable judge is harsh but the additional note has no legal status. Secondly, the matter of alleged foreign conspiracy

is still not resolved, the court should have sought and examined the 'cypher' on which ground the Minister of Law raised the matter and subsequently, the Speaker gave the ruling. Thirdly, the excuses of the court are not so strong that the *Memo Case* was different from this case in two ways: i), there were admissions from the Government side in the *Memo Case* but there were not, ii), the Government in *Memo Case* was not willing to make a commission of inquiry. There are also some admissions from the Government side: the first meeting of the National Security Committee was held under the chairmanship of PM Imran Khan and both Military and Civil leadership termed the cypher as 'blatant interference in the internal affairs of Pakistan' by a foreign country, the second meeting of The National Security Committee was held under the chairmanship of PM Shehbaz Sharif and the findings of the first meeting were endorsed. Moreover, the Government was expected to be changed and the same happened later, therefore there were concerns about a commission of inquiry under the new Government as Gen (R) Tariq refused to head the inquiry commission and said that the incumbent Government seemed to be changed in two days and the new Government would dissolve, not cooperate the commission or even make it dysfunctional.

Therefore, in these circumstances, the court should have made a judicial commission like *the Memo Commission*. On one side the alleged foreign conspiracy is concerned with national security as

well as with the fundamental rights of Pakistan's citizens because they have the right to information under Article 19A, whether the alleged 'cipher' matter was true or not.

## References

- Daily Jang. (2022, April 10). The Federal Cabinet approved showing the alleged threatening letter to the Speaker, Chairman Senate Chief Justice. *Daily Jang*, p. 1.
- Dawn.com, & Bhatti, H. (2022, April 4). All orders and actions initiated by PM, president subject to court order: SC. *DAWN.COM*. Retrieved from <https://www.dawn.com/news/1683235>
- Dawn.com, & Bhatti, H. (2022, April 8). Supreme Court restores National Assembly, orders no-confidence vote to be held on Saturday. *DAWN.COM*. Retrieved from <https://www.dawn.com/news/1683857>
- Dawn.com, & Chaudhry, F. (2022, April 10). Imran Khan loses no-trust vote, prime ministerial term comes to unceremonious end. *DAWN.COM*. Retrieved from <https://www.dawn.com/news/1684168>
- Dawn.com, & Chaudhry, F. (2022, March 28). NA session adjourned till March 31 after tabling of no-confidence resolution against PM Imran. *DAWN.COM*. Retrieved from <https://www.dawn.com/news/1682250>
- Dawn.com, & Gurmani, N. (2022, March 26). NA session adjourned without tabling of no-trust motion against PM. *DAWN.COM*. Retrieved from <https://www.dawn.com/news/1681773>
- Dawn.com, & Khan, S. (2022, April 4). President Alvi dissolves National Assembly on PM Imran's advice. *DAWN.COM*. Retrieved from <https://www.dawn.com/news/1683230>
- Dawn.com, & Khan, S. (2022, April 9). Lt Gen (r) Tariq Khan excuses himself from govt commission to probe 'foreign conspiracy' *DAWN.COM*. Retrieved from <https://www.dawn.com/news/1684043>
- Dawn.com, Gurmani, N., & Chaudhry, F. (2022, April 8). NA speaker dismisses no-trust move against PM Imran, terms it contradictory to Article 5. *DAWN.COM*. Retrieved from <https://www.dawn.com/news/1683067>

- Dawn.com, Khan, S. (2022, April 1). NSC decides to issue strong demarche to unnamed country over 'threat letter' *DAWN.COM*. Retrieved from <https://www.dawn.com/news/1682723>
- Dawn.com. (2022, April 8). Govt forms commission to probe 'foreign conspiracy': Fawad. *DAWN.COM*. Retrieved from <https://www.dawn.com/news/1684037>
- Dawn.com. (2022, March 20). Speaker Asad Qaiser summons crucial NA session on no-trust resolution on March 25. *Dawn.Com*. Retrieved from <https://www.dawn.com/news/1680931>
- Dawn.com. (2022, March 29). PM Imran ready to show letter on 'foreign conspiracy' to CJP: Asad Umar. *DAWN.COM*. Retrieved from <https://www.dawn.com/news/1682411/pm-imran-ready-to-show-letter-on-foreign-conspiracy-to-cjp-asad-umar>
- Dawn.com. (2022, March 8). Opposition submits no-trust motion against PM Imran. *Dawn.Com*. Retrieved from <https://www.dawn.com/news/1678940/opposition-submits-no-trust-motion-against-pm-imran>
- Desk, W. (2022, April 12). SC has received threat letter, says Deputy NA Speaker Qasim Suri. *Geo News*. Retrieved from <https://www.geo.tv/latest/411105-sc-has-received-threat-letter-says-deputy-na-speaker-qasim-suri>
- Dunya News. (2022, July 14). *Dunya Kamran Khan Kay Sath | 14 July 2022 | Dunya News* [Video file]. Retrieved from <https://www.youtube.com/watch?v=znPZbCC96lw&feature=youtu.be>
- G. (2022, July 14). *Live with Dr. Shahid Masood | GNN | 14 July 2022* [Video file]. Retrieved from <https://www.youtube.com/watch?v=lXeKbUil8eg&feature=youtu.be>
- Geo News. (2022, March 8). *Geo News Headlines* [Video file]. Retrieved from <https://youtu.be/r5cphofzQRU>

- Geo News. (2022b, July 14). *Another blow to Imran Khan from the Supreme Court - Capital Talk - Hamid Mir - 14 July 2022* [Video file]. Retrieved from <https://www.youtube.com/watch?v=i6cWW8g6m4&feature=youtu.be>
- Government of Pakistan (1973). *Constitution of Pakistan*. Islamabad: Government of Pakistan  
[https://www.supremecourt.gov.pk/downloads\\_judgements/s.m.c.\\_1\\_2022\\_detailed.pdf](https://www.supremecourt.gov.pk/downloads_judgements/s.m.c._1_2022_detailed.pdf)  
[https://www.supremecourt.gov.pk/downloads\\_judgements/s.m.c.\\_1\\_2022\\_07042022.pdf](https://www.supremecourt.gov.pk/downloads_judgements/s.m.c._1_2022_07042022.pdf)
- Inam, U. (2022, March 8). PM Meeting with Youtubers. *The Nation*. Retrieved from <https://nation.com.pk/2022/03/08/pm-meeting-with-youtubers/>
- Judgement of Supreme Court of Pakistan (July 14,2022). Retrieved from President of Pakistan Letter no. DO (P)- 1/2022. (May 12, 2022)
- Supreme Court of Pakistan Short Order. (April, 07, 2022) Retrieved from The Express Tribune. (2022, April 30). Imran urges CJP, President Alvi to investigate “foreign conspiracy.” *The Express Tribune*. Retrieved from <https://tribune.com.pk/story/2354880/imran-urges-cjp-president-alvi-to-investigate-foreign-conspiracy>
- The Express Tribune. (2022, March 15). PM Imran confers with AGP on no-trust move. *The Express Tribune*. Retrieved from <https://tribune.com.pk/story/2347935/pm-imran-confers-with-agp-on-no-trust-move>
- The Express Tribune. (2022, March 17). ‘24 PTI lawmakers’ surface from Sindh House amid horse-trading allegations. *The Express Tribune*. Retrieved from <https://tribune.com.pk/story/2348439/24-pti-lawmakers-surface-from-sindh-house-amid-horse-trading-allegations>
- The Express Tribune. (2022, March 19). PTI dissidents issued show-cause notices. *The Express Tribune*. Retrieved from <https://tribune.com.pk/story/2348717/pti-dissidents-issued-show-cause-notice>

- The Express Tribune. (2022, March 29). Imran directs MNAs to stay away from no-trust session. *The Express Tribune*. Retrieved from <https://tribune.com.pk/story/2350152/imran-directs-mnas-to-stay-away-from-no-trust-session>
- The News international & Yusuf, N. (2022, May 12). President Alvi urges CJP to form commission on regime change conspiracy in Pakistan. *The News International*. Retrieved from <https://www.thenews.com.pk/latest/957194-president-alvi-urges-cjp-to-form-commission-on-regime-change-conspiracy>
- Tv, S. (2022, July 14). *7 se 8 with Kiran Naz - SAMAATV - 14 July 2022* [Video file]. Retrieved from <https://www.youtube.com/watch?v=teuXaKmveG0&feature=youtu.be>
- Tv, S. (2022, July 14). *PTI ke wakeel se kahan ghalti hoi - Hamid Mir ne andar ki baat bata di - Awaz -SAMAATV- 14 July 2022* [Video file]. Retrieved from <https://www.youtube.com/watch?v=kMvx1nfJRCc&feature=youtu.be>
- 92 News HD. (2022, July 14). *Hard Talk Pakistan with Dr Moeed Pirzada | Habib Akram | 14 July 2022 | 92NewsHD* [Video file]. Retrieved from <https://www.youtube.com/watch?v=XcfOEaFIh0&feature=youtu.be>
- 92 News HD. (2022, July 16). *Sazish ya Madakhlat? Aitzaz Ahsan blasting analysis | Article 6 on Imran Khan? | 92NewsHD* [Video file]. Retrieved from <https://www.youtube.com/watch?v=zT9tdMG-WMs&feature=youtu.be>