

A Thematic Study of Executive-Judiciary Relations in Pakistan during Zardari Era (2008-2013)



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Abstract: *This article examines the relationship between executive and judiciary in Pakistan during Zardari era. Due to the Chief Justice's suo motu actions, President Musharraf suspended him. In response, a strong mass effort to reinstate the chief justice was launched. Meanwhile, the chief justice and other deposed justices were supposed to be reinstated by the PPP administration that was created as a result of the 2008 general election, but this proved to be untrue. Nevertheless, the chief justice was reinstated after a year of constant delay tactics, and the judiciary developed into such a strong institution that it was able to convict a prime minister. In this article a thematic study is done to understand the position of relationship of the two institutions on various junctures. This article finds that in the above mentioned era most of the time had strained relations between the two institutions. At the end some recommendations are given for smooth relations between the two institutions and avoid tussles. For this article data is mostly collected through secondary sources like journal articles, reliable newspaper articles and books. Qualitative method is applied and descriptive-analytical technique is used.*

Keywords: Executive, Judiciary, Zardari Era, Judiciary restoration, NRO Judgment, PM Conviction, Tahirul Oadri Petition

Brief History of Executive-Judiciary Relations (2007-2008)

In 2005, Iftikhar Muhammad Chaudhry succeeded Irshad Hassan Khan as Pakistan's Chief Justice. He made an effort to treat the well-known instances in an open and unbiased manner. He consistently applied his suo motu powers to uphold the rule of law in matters pertaining to human rights as well as matters involving politics and the general welfare. The most prominent instances involving political and public interests included the disappearance of individuals, the sale of Pakistan Steel Mills (PSML), presidential elections, the postponement of the general elections, and the

legitimacy of Musharraf's concurrent employment as President and Chief of Army Staff. Chief Justice questioned prominent police officials in the missing persons case and issued severe measures against them. Chaudhry, the Chief Justice, drew attention to numerous anomalies in the privatization process during the PSML case. The national exchequer suffered financial losses as a result of the case's widespread corruption (Khan, & Muhammad, 2020). The chief justice's autonomous actions ran counter to Pakistani President Musharraf's desires. His sole option was to remove the Chief Justice from the scene permanently. He called the Chief Justice to army house in order to satisfy his wants. The Prime Minister was in the

army house with Musharraf and other top military officers. Musharraf repeatedly accused him of egregious misbehavior during their talk, and he was under pressure to step down as Chief Justice or face legal action. Along with Musharraf, several senior military officers even forced the Chief Justice to quit. During this mandatory retirement ceremony, the Chief Justice was promised lucrative positions upon his resignation. However, he defied Musharraf's expectations and demonstrated bravery by refusing to step down. Musharraf was enraged by the chief justice's response (Habib, Akhtar, & Madni, 2019). He prepared a Reference against the Chief Justice in order to provide legal protection. The President claimed in the Reference that Pakistan's Chief Justice helped his son, Arslan Iftikhar, prosper in his career. On November 3, 2007, Musharraf, acting in his capacity as COAS, declared an emergency throughout Pakistan after suspending the Chief Justice. The 1973 Constitution was shelved, and Provisional Constitutional Order (PCO) No. 1 of 2007 was published (Khan, 2017). Even when Musharraf's complaint against the Chief Justice was rejected by most justices in accordance with Article 209, the former did not bother to modify his plans against the latter. The legal community stood up to preserve the rule of law in the nation since it was clear from Musharraf's autocratic actions that he meant to silence the judiciary. Lawyers all around Pakistan were waving signs that said things like "Go Musharraf Go" (Khan, & Muhammad, 2020). The 2008 general elections ended General Pervez Musharraf's protracted military dictatorship and reinstated civilian administration led by the Pakistan People Party (PPP). The PML (N) became the main opposition party in parliament. Asif Ali Zardari took the oath of office as Pakistan's president, while Yousaf Raza Gillani was appointed prime minister. The years 2008–2013, when Asif Ali Zardari served as the primary administrator, are referred to as the Zardari Era (Gohar, etal, 2022).

Bhurban Accord and Judiciary Restoration

A political accord between the leaderships of the two major parties was known as the Bhurban Accord or Murree Declaration. On March 8,

2008, at Pearl Continental Bhurban in Murree, Punjab province, Asif Ali Zardari and Nawaz Sharif inked an accord. Accordingly, the agreement is referred to in Pakistan's political history as the Bhurban pact (Khan, 2016). The principal aim of the agreement was to reinstate judges, chief among them Justice Iftikhar Muhammad Chaudhary, who had been removed by President Musharraf during the emergency rule that was instituted on November 3, 2007. According to the accord, all the judges who were removed would be reinstated shortly once the central government was formed (Dawn, 2008, March 10).

It was agreed that a legislative resolution would be used to address the problem. The judges' restoration date was April 30, 2008, since the 30-day term began on March 30, 2008, when the government was established at the center. But as the matter was dragging on, the PPP's own think tank, Barrister Aitzaz Ahsan, president of the Supreme Court Bar Association, claimed at a press conference in Quetta on April 1, 2008, that the president was hatching plots to undermine the agreement because the Murree accord was reached for the benefit of the nation as a whole. It guarantees the independence of the judiciary and the reinstatement of judges who have been removed. The legal community opposed institutional conflicts of any kind.

The Lawyers' Movement promotes the bolstering of institutions that had been compromised by previous dictators, like as Gen. Musharraf, who was still in power at the time, in order to serve their own personal interests. When deposed judges are reinstated, there won't be a judicial crisis because their cases would be decided on the merits (Shahid, Dawn, 2008, April 02). Zardari never seemed to be sincere about the judges' return, as seen by his media remarks claiming the Murree Declaration was a political statement rather than a hadith. While signing the declaration, which said, first, in clause 2, that the judges would be restored through a parliamentary resolution and, second, that no methodology for disposing of the then-sitting Chief Justice Dogar and his colleagues judges would be provided, the political cunning of the PML (N) was unable to comprehend the

internal cunning of the PPP. Both of these things did not go as planned due to the incompetence of the PML (N)'s advisors (Gohar, etal, 2022).

Differences within Executive over Reinstatement of Judges

The coalition of the PPP government was committed by the Murree Declaration to address the judges' issue first. The resolution on judges' restoration was quickly brought to a final draft. But there was a difference between Nawaz Sharif and Zardari. While Zardari resisted Iftikhar Chaudri's reappointment as Chief Justice, Nawaz desired total restoration through resolution. The work on a constitutional package was secretly started by the PPP attorneys. Two recommendations floated: first, Justice Iftikhar should immediately resign in order to be restored, and second, the Chief Justice's term should be fixed in the constitution at three years. That way, in June 2008, he could be removed with ease. Given the current situation, the judiciary issue was complex (Gohar, Khattak, Sajid, & Mehboob, 2023). Zardari used political posturing to postpone the return of the judges. PPP owed Justice Abdul Hameed Dogar a great deal because of the pending criminal cases against Zardari under the 2007 National Reconciliation Ordinance (NRO). Therefore, Dogar's favor was to expedite his discharge from the cases. On April 21, 2008, the PCO Supreme Court Bench, led by Justice Abdul Hameed Dogar, accepted a petition that eliminated the graduation requirement for running for office in the Provincial Assemblies or Parliament. Due to the significant degree of suspicion surrounding Zardari's graduation claim, this verdict made it possible for him to run for a seat in the National Assembly. Zardari's election as prime minister would be made possible by winning a seat in the national assembly. Consequently, Justice Dogar's candidacy for Chief Justice of the Supreme Court was supported by Zardari and his close advisors (Business Recorder, 2008, April 22). Zardari also wished to prevent conflict with the military, which may arise after the reinstatement of the judges as they could challenge the legitimacy of Musharraf's instructions while he was still president (Gohar etal, 2020) and as earlier mentioned that the

criminal cases under NRO pertaining to Zardari that were still pending in court. At a press conference on April 21, Zardari and Nawaz, however, stated that they had agreed to restore the judiciary and that they were now headed in that direction. Despite being opposed to the Murree declaration, the two parties established a committee to determine how judges would be restored. PML (N) representatives included Federal Minister Chaudry Nisar Ali Khan, Senator Ishaq Dar, and Muhammad Asif. PPP representatives included Senate Leader Raza Rabbani, Federal Minister for Information Sherry Rehman, and Interior Minister Rehman Malik. In order to support Musharraf's advisors, the PPP team was purposefully doing this.

The PPP thought that the prompt reinstatement of judges would elevate the political status of the PML (N) (Haider, Reuters, 2008, April 22). Zardari abruptly left for Dubai on April 24 during the committee's sessions, leaving the hopeful country in a precarious predicament. But in order to fulfill their pledge to the country in the Murree statement, the PML (N) and Bar leaders agreed to send a delegation led by Shahbaz Sharif to Dubai and meet with Zardari to resolve the judicial issue. If they didn't, the PML (N) might give up its coalition government with the PPP. After arriving back in Dubai on May 2, leaders of the PML (N) declared that conciliation had been reached by all parties and that a resolution calling for the reinstatement of the deposed justices will be presented to parliament on May 12, 2008. He even consented to the PCO justices remaining on the Supreme Court (Ahmad, 2012). A committee was established to discuss the procedures for the restoration of judges for this reason; nevertheless, the committee's inability to come to a consensus among its members resulted in the matter being referred back to the leaders of the opposing parties. Leaders of the PPP and PML (N) gathered in London to discuss the matter, however on May 10th, these talks too came to an end because of differences on keeping the PCO judges. PML (N) merely desired their appointment as ad hoc judges (Khan, 2016). On the judges' restoration process, however, there was also dispute. Nawaz said that

PML (N) ministries would resign from the federal cabinet on May 13, 2008, during a meeting with the PML (N) Central Working Committee on May 12, 2008, after his return to Lahore. Consequently, PML (N) left the coalition government. Nonetheless, the government continued to have backing in Parliament (Wasim, Dawn, 2008, May 13). The discussion reveals that the PPP did not uphold the Murree Declaration's respect, and that its leadership was not sincere in their efforts to restore deposed judges to their positions. Instead, it served its political interest in retaining Dogar as Chief Justice of the Supreme Court. Thus, the dissolution of the coalition government was brought about by the two parties' disagreement over the judiciary issue.

Islamabad Communiqué and Judges Case

On August 4, 2008, the leaders of the two coalition parties, the PPP and the PML (N), convened in Islamabad to settle their differences and end the impasse that resulted from the Murree Declaration's failure. On August 5, 2008, both sides agreed to formally request Musharraf's resignation, warning that he would face impeachment if he refused. On August 6, 2008, the PPP government made a concerted effort to sabotage the deposed judges' unity, particularly with regard to the Sindh High Court judges. The reinstatement of deposed judges was strongly opposed to this measure. Negotiations were halted as a result of the PML (N)'s objection to this measure. However, the PPP leadership later mediated a compromise (Khan, 2016). The Islamabad Communiqué was the name given to the joint declaration that was released in Islamabad following three days of rigorous negotiations between the two parties and their coalition allies. The coalition management will prepare a charge sheet against General Musharraf, according to the joint statement, which also states that the coalition has decided to abruptly begin the impeachment process. It further resolved that as soon as the president was impeached, all dismissed justices would be restored in exact accordance with the Murree Declaration." The Islamabad Communiqué decided on August 7, 2008, that all removed judges would be reinstated

immediately following Musharraf's impeachment in compliance with the Murree Declaration (Business Recorder, 2008, August 08). It was clearly mentioned in the Islamabad Communiqué that all deposed judges will be restored to their positions. Additionally, it was said that the restoration would only happen if a resolution was approved by the National Assembly. Therefore, upon Musharraf's departure on August 18, 2008, the judiciary needs to be restored. In contrast, the PPP leadership started to use posturing when it came to the issue of the judges' reinstatement. Coalition allies Maulana Fazlur Rehaman of the JUI (F) and Asfandiyar Wali Khan of the ANP intervened and pledged to break the impasse in 72 hours. But the coalition partners gave notice on August 21, 2008, and stated that judges would return on August 27, 2008 (Khan, 2016). The PML (N) moved the deadline to August 25, 2008, due to the declaration of the presidential election and Zardari's PPP nomination as a candidate for Pakistan's president. Zardari's nomination papers were not filed until after the PML (N) leadership worked to secure the reinstatement of deposed judges. On the other side, the PPP leadership planned to extend the deadline till the very last minute. On August 25, 2008, the PML (N) withdrew from the coalition due to the amended timeline for the restoration of judges (Reuters, 2008, August 25). Consequently, this is the second time that the PPP has failed to reinstall judges in line with the Murree Declaration and the Islamabad Communiqué. Due in large part to Zardari's influence from Abdul Hameed Dogar, the PPP and Zardari's protracted attempts to restore deposed judges created the impression that the judiciary, and especially Chaudhry Muhammad Iftikhar, would never be restored (Waseem, 2012). The aforementioned discussion is clear that the PPP government had no interest in robust institutions or effective governance. Their priorities were their personal interests.

Reaction of Executive towards Long Marches

On March 16, 2009, a movement to reinstate the judges removed due to emergency was initiated by Pakistani urban civil society elements and

lawyers. In Lahore, under the leadership of Nawaz Sharif PML (N), the legal community, political leaders, and representatives of civil society convened. It was anticipated that the chief justice and other removed judges would be reinstated by the PPP administration that was created as a consequence of the 2008 general election, however this proved not to be the case. The police were instructed by this civilian government to seal the capital city, Lahore, as March continued from Lahore to Islamabad. However, the demonstrators managed to break the law enforcement forces' siege by appearing on the street in some capacity. At first, Nawaz Sharif led the procession by himself, but later on, Supreme Court Bar Association President Aitzaz Ahsan also participated (Khan, 2016). This was historic long procession. There was extensive live coverage on almost every TV channel. When hundreds of people marched towards Islamabad to reinstate the judges, it appeared as though the entire country of Pakistan was trembling. Before the procession had gone more than a few miles, Nawaz Sharif received word in his car that Chief Justice Iftikhar Chaudhry and the other removed justices would be reinstated. The procession dispersed as a result of this news. Consequently, all of the Supreme Court's and high courts' ousted judges were reinstated on March 17, 2009, to their pre-November 3, 2007, positions. Following Mr. Justice Abdul Hameed Dogar's retirement on March 22, 2009, Mr. Justice Iftikhar Muhammad Chaudhry became Pakistan's top justice. The hard-won victory for the judiciary's emancipation has finally been realized. For the Bar's members, the historic occasion truly marked their D-day. It was a victory for the rule of law (Ahmad, 2012).

Reaction of Restored and Empowered Judiciary towards Executive

After being given back its rightful place, the judiciary began to assert itself as a strong, autonomous institution. The legislation gained controversy when all charges of terrorism, money laundering, and corruption against prominent politicians and officials between January 1, 1986, and October 12, 1999, were dropped. Approximately 8,000 people benefited

from this ordinance. In a petition he submitted, Dr. Mubashir Hassan contested the NRO's legitimacy. The ordinance was imposed in a dignified exercise of legislative power, according to the petition. It made clear that the distinction between common and classified accused was the foundation for the majority of the Ordinance's provisions. Approximately 3000 cases including rape, murder, and corruption were dropped in order to appease approximately 8000 defendants (Khan, & Muhammad, 2020). Asif Ali Zardari, the husband of former prime minister Benazir Bhutto, was the well-known recipient of the controversial NRO. He was facing outstanding money laundering cases in Switzerland. Benazir Bhutto and Zardari (who became president after Musharraf) were accused of laundering \$12 million through Swiss bank accounts in the 1990s. The Iftikhar Chaudhry-led Supreme Court panel ruled on December 16, 2009, that the NRO was an unlawful act that went against the interests of the country. Musharraf would be elected president and Benazir would be free to run in the general election without having to deal with corruption charges; this was the true arrangement that gave rise to the NRO. Zardari has been granted permission by NRO to ask the Swiss authorities to end all of the cases against him. Switzerland's constitution states that an individual is exempt from prosecution as long as they hold the position of head of state. As a result, after Zardari assumed office, the Swiss government decided not to press charges against him (Gohar & Sajid, 2023). The ruling by the Supreme Court was a turning point in Pakistan's democratic transition. Even though it was a political bombshell for President Zardari and the PPP, the effects spread beyond the mayhem of party politics.

Constitutional Amendments and Judiciary Reaction

The judiciary's response to the 18th constitutional amendment's passage further strained ties between the two institutions. The chief justice's total authority to designate judges was limited by the eighteenth amendment. The chief justice had the sole authority to choose court justices prior to the 18th Amendment's

passage. This change removed the chief justice's appointment authority under Article 175 (A). The executive and legislative branches also shared in the chief justice's authority (Khan, & Muhammad, 2020). Numerous legal specialists interpreted these modifications as a challenge to the judiciary's independence. Since the court saw this alteration as a danger to the judiciary's independence, it returned the case to the legislature for revision of the relevant section and recommendation. The fundamental framework of Article 175 was not violated by these court recommendations. The court's main demands were to strengthen and empower the judicial members in order to effectively regulate the appointment process. On January 1, 2011, Parliament passed the 19th amendment to the Constitution as a result of accepting this judicial review (Gohar, Sarwat, & Sajid, 2023). Prior to this, the court lacked the authority to interfere with the parliament's constitutional amendment rights; nevertheless, by demonstrating its leniency in this case, it demonstrated the constructive relationship that existed between the executive and judicial branches.

Memo Gate Scandal and Judiciary as Mediator

The letter including an article written by American-Pakistani businessman Mansoor Ijaz for "Financial Times" was the immediate problem. The story revealed that he was instructed to deliver President Asif Ali Zardari's message by Hussain Haqqani, the Pakistani ambassador to the United States. President Zardari was requesting something from Admiral Mike Mullen in the message. Zardari asked Mullen to persuade Pakistan's military chief, General Kayani, not to overthrow the PPP administration in Pakistan. Under article 184(3) of the Supreme Court's rules, petitions were submitted. The Pakistan Muslim League (N) leader Nawaz Sharif's appeal was accepted, and it was suggested that a three-person judicial panel be established to look into the memo gate incident.

As to the commission's findings, which were made public on June 12, 2012, it has been conclusively shown that the Memorandum was genuine and that Mr. Haqqani was its creator and

architect. Thus, the court's intervention broke the long-term political impasse between the army and the administration. Mr. Haqqani was fully held accountable, which allowed the military and the civilian government to be securely removed from the matter. Once more, the court established a precedent for institutional balance in Pakistan's democratic system (Gohar et al, 2020).

Contempt of Court Case and Disqualification of PM

As earlier stated that Cases against President Zardari were reopened by the NRO ruling, and Syed Yousaf Raza Gilani, the prime minister of Pakistan, was required by the constitution to write a letter to the Swiss authorities requesting the reopening of the cases. However, he refused to abide by the court's mandate. The judiciary accused PM of contempt of court as a result of his refusal. The Court concluded that PM deliberately disobeyed the Supreme Court's directions. Thus, on February 13, 2012, the court sentenced PM to a symbolic prison term (Khan, 2016). The PM was not declared disqualified by the Supreme Court. As a result of his disobedience of the court for failing to send a letter to the Swiss Authorities, the head of state was overthrown. The removal of the PM and the appointment of his successor were required by the constitution. Against the court's decision, the government may file an appeal within thirty days. The Speaker of the National Assembly had the constitutional right to forward the matter to the Pakistani Election Commission in order to remove the Prime Minister and any other assembly member indefinitely. Speaker of the House of Representatives Dr. Fehmida Mirza had no intention of referring the issue to the electoral commission. Opposition parties, however, were putting pressure on Gilani to step down. Gilani's disqualification as a parliamentarian and, thus, his removal as head of the executive branch, was ultimately decreed by a court on June 19, 2012 (Habib, Akhtar, & Madni, 2019). The PPP leadership strongly objected to the result, but it was upheld, and Raja Pervez Ashraf was chosen as the new prime minister. It was expected of the incoming prime minister to carry out the court's ruling in letter

and spirit. On the other hand, it had strained judicial and executive relations.

PAT Petition and Court Judgment

The problem stemmed from a petition submitted on February 7, 2013, under article 184(3) of the constitution, by Pakistan Awami Tehreek chairman Dr. Muhammad Tahirul Qadri, seeking the reformation of the Election Commission of Pakistan (ECP). He contested that "Articles 213 and 218 of the constitution were not followed in the appointment of the Chief Election Commissioner (CEC) and the selection of four members of the ECP." The plea was denied on the grounds that Chief Justice Iftikhar Chaudhary, who presided over the three-person bench, is a dual national. A person is so ineligible to serve in the parliament.

Regarding article 184(3) of the public interest lawsuit case, it is relevant to determine whether the court's decision in the current case qualifies as a public interest case. Constitutionally, the CEC's appointment and that of the other ECP members were notified on July 16, 2012, and June 16, 2011, respectively. The general public, as well as the representatives of the people in the parliament, including the opposing party's members, did not object to these appointments. It was unexpectedly brought to light by the individual who demonstrated his allegiance to the foreign nation (Khan, & Muhammad, 2020). After the assembly's five-year tenure were over, Tahirul Qadri demanded that the entire electoral process be restructured for the following general elections. Pakistanis were prepared to hold elections to choose their representatives (Khan, 2016). In these crucial situations, the court has an obligation to ascertain if the individual approaching the court is doing so genuinely and is not doing so to further personal or political agendas or other covert concerns that may be masquerading as public interests. It was often held that Qadri had the help of a non-political organization in his attempt to influence democracy by securing a court order. Nevertheless, the court denied the petition, stating that there was no breach of fundamental rights in the current case (Khan & Muhammad, 2020). In doing so, the court demonstrated its objectivity and expanded its authority in

opposing the military and the political class.

Conclusion

This article concludes that PPP government under the leadership of Zardari considered independent judiciary as an intimidation to their political intentions. Therefore they adopted delay tactics for the restoration of deposed judges during Musharraf regime. Despite the return of democracy, the politicians and judges indulged in political conflicts that potentially created an atmosphere of strained relations between executive and judiciary. Thus it could damage not only the judicial independence but also the democracy itself. During this period, the judiciary was restored after the long movement of legal community, political parties and civil society and led to the powerful institution. The judiciary had faced stern actions from executive in form of delay tactics of Zardari and resistance towards long marches, to attain the status of empowered and independent institution. However the judiciary as an independent institution had taken few decisions as reaction towards executive like NRO judgment, reservations on certain clauses under the eighteenth amendment, and compel the Parliament for passing nineteenth amendment, Contempt of Court case and PM conviction that mostly strained the relations between the executive and judiciary. The judiciary had played its role as mediator and show integrity in their judgments in some political crisis like in Memo Gate scandal and Tahirul Qadri petition led to positive signal. At the last in this article it is recommended that for the smooth and good relations between the two institutions should show flexibility and integrity and should adopt reconciliation policy. Both the institutions should not cross their boundaries for the sake of health wealthy democracy in Pakistan. This fragile state cannot afford more institutional crisis.

References:

Ahmad, S., S. (2012). *The Judiciary of Pakistan and It's Role in Political Crisis*, Royal Book Company, Karachi-Pakistan. "Coalition decides to impeach Musharraf". (2008, August 08). Business

- Recorder. Retrieved from; <https://www.brecorder.com/news/3540006/coalition-decides-to-impeach-musharraf-20080808785818>
- Gohar, S., Khattak, F. J., Sajid, H., & Mehboob, T. (2023). JUDICIAL POLITICS IN PAKISTAN SINCE 2009: A CRITICAL APPRAISAL. *Russian Law Journal*, 11(3), 3182-3188.
- Gohar, S., & Sajid, H. (2023). Politics of Pakistan Peoples Party (PPP) during Musharraf Regime: A Critical Appraisal. *INTERNATIONAL JOURNAL OF HUMAN AND SOCIETY*, 3(4), 41-49.
- GOHAR, S., SARWAT, T., & SAJID, H. (2023). JUDICIAL REFORMS IN PAKISTAN THROUGH CONSTITUTIONAL AMENDMENTS: A CASE STUDY OF THE PAKISTAN PEOPLES PARTY (PPP) GOVERNMENT (2008-2013). *Russian Law Journal*, 11(2).
- Gohar, S., Jawad, S., Sajid, H., Khan, M. A., Sumayya, N. Z., & Ullah, U. (2020). Pakistan Peoples Party Government and Military Relations during Zardari Era (2008-2013): An Analysis. *International Journal of Innovation, Creativity and Change*, 11(12), 881-892.
- Gohar, S., Jawad, S., Sajid, H., Sarwat, T., & Ullah, U. (2022). Role Of Pakistan Peoples Party In Politics Of Pakistan 2008-2018: A Decade Of Pragmatism. *Webology (ISSN:1735-188X)*, 19(1).
- Habib, R. I., Akhtar, N., & Madni, A. (2019). Relationship of superior judiciary and executives during democratic regimes in Pakistan: An analytical and historical study. *Pakistan Journal of Social Sciences*, 39(1), 313-326.
- Haider, K. S. (2008, April 22). *Judges issue won't break Pakistan coalition*. Reuters. Retrieved from; <https://www.reuters.com/article/us-pakistan-coalition-idUSISL23397220080422>
- Khan, M. I., & Muhammad, A. (2020). An Evaluation of Separation of Powers: A Case Study of Pakistan (2007-2013). *South Asian Studies*, 31(1).
- Khan, H. (2016). *Constitutional and Political History of Pakistan*, Karachi: Oxford University Press. "Pakistani coalition wrangles over president, judges". (2008, August 25). Reuters
- Shahid, S. (2008, April 02). Aitzaz sees conspiracy against Murree declaration. Dawn. Also available at; <https://www.dawn.com/news/296252/aitzaz-sees-conspiracy-against-murree-declaration>
- "Supreme Court strikes down graduation condition". (2008, April 22). Business Recorder, Also available at; <https://www.brecorder.com/news/3504254/supreme-court-strikes-down-graduation-condition-20080422725934>
- Wasim, A. (2008, May 13). *PMN-N walks out after hitting bricks wall: Judges Issue splits coalition; ministers to quit federal cabinet today*. Dawn. Retrieved from; <https://www.dawn.com/news/302567/pm-n-walks-out-after-hitting-brick-wall-judges-issue-splits-coalition-ministers-to-quit-federal-cabinet-today>
- Waseem, M. (2012). Judging democracy in Pakistan: Conflict between the executive and judiciary. *Contemporary South Asia*, 20(1), 19-31.
- "Zardari, Sharif in historic accord: PML-N joins govt at centre, Judges' restoration in 30 days". (2008, March 10). Dawn. Available at; <https://www.dawn.com/news/293053/zardari-sharif-in-historic-accord-pml-n-to-join-govt-at-centre-judges-restoration-in-30-days>