



Appeals and Second Appeals under the Code of Civil Procedure, 1908 A Critical Analysis of Judicial Interpretation and Procedural Challenges in Pakistan

Alam Zeb Khan

Assistant Professor, School of Law, Quaid-i-Azam University, Islamabad

Email: azkhan@qau.edu.pk

Abstract

The Appellate system provided by the Code of Civil Procedure, 1908 (CPC) is an integral part of civil justice in Pakistan. It allows litigants to find escalator mechanisms for correcting mistakes made in the process of civil adjudicator and also tries to maintain the finality of litigation. The CPC makes a difference between the first appeal and second appeal. Section 96 allows an appeal from decrees issued on the first occasion on relatively broad grounds but sections 100-103 are restrictively drafted and appeal is available only on certain legally significant issues. This paper is a critical study of both statutory and conceptual parameters in regard to first and second appeals in Pakistan with special reference to questions of fact and questions of law, substantial legal error (S.L.E), procedural restrictions, and duty to finally deal with litigation. The research is doctrinal and critical in nature and utilizes the CPC and latest scholars' research on the civil justice system of Pakistan. The paper explains why the difference between first and second appeals is necessary as otherwise there would be repetitive litigation, which would help off-set the big principle of judicial finality. However, delayed procedures, poor case handling, doubt regarding the extent of jurisdiction in second appeals and limitations in first appellate reviews limits the effectiveness of the current structures. The paper makes a number of suggestions, including strengthening the first appellate stage, enhancing the identification of legal questions on second appeals, implementing robust case-management mechanisms, making greater use of technology and preventing procedural abuse. It argues that a helpful framework for meaningful appellate reforms is based on a balance between the correction of errors, access to justice, judicial efficiency and finality and not on limiting the number of appeals.

Keywords: Code of Civil Procedure, 1908; first appeal; second appeal; section 96; section 100; substantial question of law; civil justice; procedural delay; judicial efficiency; Pakistan

1. Introduction

The right of appeal is a core principle of a legal process that will prevent judicial mistakes and strengthen the trust in the judicial process. Civil disputes often pose complex fact, evidence, statutory interpretation and contract issues, as well as issues pertaining to property rights and procedural fairness. Loopholes that give an empty promise of review of an initial wrongful decision are likely to promote the procedural finality at the cost of substantive justice. On the other hand, one that allows an unlimited number of re-thinkings about the same topic could render about final adjudication impractical. Thus, the law of appeals is an institutional compromise, between correctness and finality.

The main statutory laws in Pakistan relating to civil appeals are part of the Code of Civil Procedure, 1908 (CPC). The Code provides for various degrees of appellate review. There is, in general, a right of appeal from an original decree (as elaborated in Section 96) and a right of appeal from an appellate decree (as specified in Sections 100 to 103). The difference is designed to draw attention to itself. Both kinds of appeal provide various degrees of reconsideration of the original adjudication: The first for relatively



Vol. 3 No. 11 (November) (2025)

comprehensive reconsideration; the second for limited reconsideration based on designated legal and procedural reasons. The statutory architecture thus makes the assumption that the factual issues which can create many genuine disputes should normally be resolved at trial and first appeal, and that the role of the High Court should be in the first place to correct a failure to apply the law legally and also seriously.

This difference is especially pronounced in the context of Pakistan's civil justice system, where there are still significant delays and backlogs in cases. Procedural complexity, non-optimal case management, adjournments, inefficient procedural mechanisms, institutional barriers and case piling are the key reasons which account for the delay as identified by the recent empirical and doctrinal research (Zafeer et al., 2020a). With delayed adjudication, not only costs the court's efficiency but also litigants suffer huge economic and social costs. For instance, studies in Swat show that long-drawn out civil litigation could have impacts not only financially but also psychologically and socially on the litigants (F. Ullah, 2022a).

Delay is inherent in the issue and is related to appellate litigation. An appeal should not be made for the purpose of prolonging a controversy, but to correct a mistake. A structure of appeals can sometimes be a barrier to access to justice if these appeals are a recurring stage whereby factual issues are constantly re-adjudicated and relitigated in the form of a first and second appeal. The challenge thus lies in finding a way to make meaningful appellate remedies secure without rendering them vulnerable to abuse as devices to pour sand in the gears.

This is particularly important in context of section 100 of CPC. The second appeal is not an unlimited second appeal of the first appeal. Its jurisdiction is limited and grounds have to be legally recognized. The aim of the statutory restriction is to endorse the principle that the High Court will not normally re-evaluate the evidence simply to re-assess the conclusions as to the facts reached by the courts below. Conversely, a narrow reading of the second appellate jurisdiction could lead to the failure to correct an actual error of law, especially if it is to a finding of fact that is related to the inaccurate legal yardstick.

This paper critically studies this legal and procedural framework. It focuses upon five principal questions. What is the difference between first appeal and second appeal in the CPC? (Conceptual/Statutory) Secondly, what is the extent of the first appellate jurisdiction of section 96? Third, how are the limitations in scope of the powers of the Court set forth in sections 100-103 interpreted? Fourth, what are the issues to be addressed in relation to effectiveness of appellate litigation in Pakistan? Finally, what can be done in terms of reforms to enhance the appeal system without compromising access to justice?

The doctrinal and critical legal methodology is followed in the paper. The main source is the CPC and current studies on civil justice, delay of process, case management and judicial efficiency are accessed to place the CPC in perspective. The paper argues consciously not to discuss individual judgments or to account for case studies, but to keep a focus on statutory interpretation and institutional aspects.

The paper also includes the published research of the authors on "Baseless Adjournment" and "Delayed justice" in Pakistan. This study found procedural discipline and good judicial management as a major cause of undue delay in adjudication along with the importance of unnecessary adjournments (Javed et al., 2023a). It is germane to the instant matter because of the fact that the entire setting for the appellate proceedings was the same as that of the trial and that the sanction of nonsensical postponements and procedural applications could have the same effect on the appeal.

In this paper, it is argued that there is no reason why Pakistan should have to sacrifice or re-structure its two-appellation structure. Instead, the current system needs to be better institutionalized. The first-degree appellate court should really give a full and full review and the second appeal should continue to be a limited one to rectify merger of some significant wrongs of law and procedure. Better case administration, formulation of the



Vol. 3 No. 11 (November) (2025)

grounds on appeal and technology changes, and greater control of abuse of procedure will help ensure that appeals have a salutary effect, while avoiding needless delay.

2. Statutory and Conceptual Framework of Civil Appeals

To have a hierarchical system of appeals with varying levels of appeal performing different roles, as set by the CPC. The ordinary appeal mechanism starts with sections 96-99 on a statutory basis while second appeals are dealt with in sections 100-103. That these provisions stand alone should not be interpreted. These work together to create a hierarchy of appellate judging (Macdonald & Janda, 1984).

There is the general right of appeal from an original decree, according to Section 96. The standard of the provision is that failure of a party should ordinarily be afforded a chance to contest the determination of the trial court. The first appeal therefore is wider in scope than the second appeal as it is the first real hearing of an appeal on the original adjudication (Thomas, 2005).

It is intuitively easy to see why the concept of a first appeal for a judicial review touches the notion of justice. Trial courts decide factual issues and use the facts presented to the court to solve legal problems. A mistake is possible in the assessment of evidence, the discovery of the points of an issue, the understanding of what the law means or in the application of the law. Such errors could be corrected through a first appeal that offers an institutional mechanism.

The second, 'appeal,' does not have the same function. The appellate function would be undermined if a first appellate court did not receive the benefit of de novo review, once examination of the dispute by the trial court and reconsideration by the first appellate court had occurred. In order to be heard again, second appeals are thus restricted under s.100 to specified grounds. The limitation is reiterated by section 101 which expressly prohibits second appeals except on the grounds mentioned in section 101 (Ullah & Alam, 2022).

The statutory distinction embodies four principal principles.

First is error correction. The benefit of the appellate process is to protect against possible mis adjudication.

Secondly is hierarchical adjudication. Each court is given various responsibilities such that fact-finding is not done at every level of the courts.

The third is materiality as procedures. The cases that make it to the Court of Appeals vary widely given that not all technical glitches are eligible for appellate involvement. This underpinning is acknowledged in Section 99 which only allows for reversal or variation where something is wrong or irregular, but this doesn't impact on the merits/jurisdiction.

Fourth is finality. However, one day litigation needs to come to an end. Failure to provide for finality of court judgments would leave judicial decisions forever to be questioned and would allow final victory parties to never actually reap the benefits of the decision.

These principles are of great value in Pakistan where time delays in procedures are already a big problem. Procedures that are complicated, lack of judicial resources, backlog of cases, adjournments of courts, and non-efficacy related institutional inefficiencies have been found to be important determinants of delay in empirical studies (Zafeer et al., 2020b). It therefore must be considered in relation to not "only legal doctrine, but also by its effects in practice

Not all litigants should have unlimited opportunities to re-considers a case because of the existence of a statutory right of appeal. Instead the right needs to be working in a formal system where the roles of each appellate level are well defined. This is particularly important given that the quality of the first stage adjudication is often critical. It can then be the responsibility of the first appellate court to discuss the evidence and issues raised within the legal framework, while the High Court can focus on the more limited types of issues allowed by section 100.



Vol. 3 No. 11 (November) (2025)

The overall idea is thus to have a tapering system of appellate review: a more extensive review at the first grill of the appeal and a more limited review at the second grill of the appeal.

3. First Appeal under Section 96 CPC

The main legislation for an appeal from an original decree is in Section 96. It is important because of its relatively wide scope of jurisdiction established. The first appeal is disturbed by ordinary appellate jurisdiction in the case of section 96 unlike section 100 where only a substantial question of law can be challenged.

Therefore, the initial appeal could include issues of fact or issues of law or a mix of both. This is a broad jurisdiction which can be explained because the trial court is the first court wherein substantive battle is fought. An error at that stage could be on the evidence on which findings are made, or the application of the law to the facts found.

The first appellate court thus has an essentially corrective nature. It can re-examine the trial court's understanding of the pleadings, correct identification of the issues, the evaluation of the evidence and the application of law.

This sweeping language is not, however, conducive to litigation dragging on. The focus of the appellate process should be upon the grounds which truly flow from the original decree. Too many or too many times used can make the adjudication process longer and make the parties' issues de facto clouded.

Section 96 identifies some restrictions. An appeal would lie against an ex-parte decree, and this reflects the importance which was being laid on giving an opportunity for substantive consideration, even though a party is not a good appearance on the trial. Similarly, an appeal cannot be taken from a decree with consent of parties under section 96(3). The latter principle is aimed at ensuring the stability of consensual settlements in line with the overall policy of encouraging negotiated resolution (Singh, 2024).

Section 97 is about preliminary decrees. If a party does not contest a preliminary decree it, can it contested later in an appeal from final decree ordinarily. This provision is designed to bring about procedure finality by mandating a party to raise an objection at the proper stage and not reserving them.

The powers of the first appellate court are complemented with section 107 and Order XLI. The authority of the appellate court not only includes to hear a case finally but also to remand a case if there is a legal necessity for it and also to formulate points for the party when asked and direct for adduction of further evidence in peculiar circumstances recognized by law. These powers evidence the fact that the first appeal is not a mere formality. It's a real process of adjudication (Quddus, 2019).

The standard of first-appellate judgments is thus extremely important. Lack of examination of the appeal issues or a first appellate court that just copies from the lower court undermines the entire appellate system. It also can suggest to the appellant that he or she should go to the High Court because the facts appear to agree with him or her, but the law does not.

Given the issues of procedural delay, this is all the more critical. Authors' own studies have highlighted the impact of baseless adjournments on the delay of justice in Pakistan (Javed et al., 2023b). While that study focused on adjournments in general and not the setting of appellate proceedings, the results of that study do apply to appellate courts as "delay-producing procedural behavior" can occur at every stage of litigation.

The initial appeal, then, should be thought of as the primary civil litigation corrective phase. While its wide-ranging nature can be said to be warranted, effective case management and reasoned adjudication need to be in place.

4. Second Appeal under Sections 100–103 CPC

The second appeal is in a totally distinct position. Sections 100-103 create a limited jurisdiction designed to prevent the High Court becoming a normal third court which reviews facts.



Vol. 3 No. 11 (November) (2025)

The conditions for raising a second appeal are laid down in Section 100. The principal ones are that the proceedings were conducted in disregard of the law or of any lawfully recognized method of proceeding, there was failure to decide an important question of law and that there was a serious irregularity in procedure likely to have affected the justice of the trial. The limitation is reiterated in section 101 which allows for second appeals only on the basis set out in section 100.

Thus, the very essence of the problem is whether a question of fact is a substantial question of law. The requirement is as a jurisdictional filter. The appellant has to raise some matter or question that has value for further appeal.

he restriction's justification is at an institutional level. Wherever a second appeal was to be considered with both full freedom and finality of reconsideration, much of the finality of the appellate decision is lost. Several courts could hear the same case, filled in trial court, taken to first appellate court and then to High Court, with the same set of arguments being made in each.

The mandatory limitation is, at the same time, not to be construed mechanically. There are some blurred lines when it comes to legal questions and factual questions. The application of many laws in civil disputes requires specific facts, and is what is known as a mixed question.

For instance, the discovery of a fact could have been made using the wrong legal test. Likewise, a court could not have followed a court mandated process in analysing evidence. However, in those situations, the error might really be a mistake of law and rendering the opinion merely a "finding of fact" may risk missing that truth.

The proper distinction should therefore be based on what is alleged to be the specific error, not the terminology, used by the appellant. The mere use of legal language cannot convert a disagreement/taint of evidence into a question of law. On the other hand, it cannot be said that a real legal mistake can be ignored because it is coupled with a mistake in fact.

In this regard Section 103 is important as it allows in certain conditions, when the evidence on record is sufficient, the High Court to decide any question of fact which is required for the disposal of an appeal. This does not establish a general, or unlimited, fact-finding jurisdiction. It does not, however, function as an afterthought to section 100 and gives limited assistance to deal with issues of fact that have been impacted upon by a legally recognized error.

There is thus the relationship between section 100 and 103 showing that the latter is not a purely abstract legal appeal and is not a full-fledged appeal as a matter of fact either. A limited remedial authority.

The only main problem is related to the lack of clarity in whether the issues are legal or factual. But a broad reading of the limitation might mean that legitimate mistakes made by courts will not be corrected. Too narrow an interpretation could turn second appeals into factual appeals.

"A disciplined approach" suggests that the High Court consider the following questions: Is the alleged mistake one with respect to the application of a legal rule or the interpretation of a legal rule? Did the High Court fail to reach a decision on a legal question material to the determination of the case? Was there a serious error in the application of a procedure such as to materially misuse the rights of the parties and deprive the High Court of deciding the substantial question on its merits? The complaint which does not seek questioning of the inferences of fact but is for the substitution of one with the other hearsay usually will not belong to second appellate jurisdiction.

This separation also saves the judges' time. There is a huge backlog and delay in Pakistan's courts. The important contributors to the problem highlighted by research published in 2024 range from outdated procedural mechanisms, to institutional inefficiency, case accumulation, and inadequate case management (Kassar et al., 2024a). Free factual appeal at the second appellate level would put an added burden on already overburdened High Courts.

The effectiveness of the appellate setting needs to be judged not just from sections 96



Vol. 3 No. 11 (November) (2025)

and 100. It is also essential that the system can be used effectively. There are lots of procedural hurdles in Pakistan litigation on the appellate level.

5. Procedural Challenges in Appellate Litigation

The effectiveness of the appellate setting needs to be judged not just from sections 96 and 100. It is also essential that the system can be used effectively. There are lots of procedural hurdles in Pakistan litigation on the appellate level.

5.1 Delay and Backlog

Perhaps most important challenge is delay. Backlog and the length of proceedings are always cited as problems of the civil justice system in Pakistan (Imran et al., 2024). The effective enjoyment of legal rights is facilitated if the litigation is not delayed, as otherwise, the litigant who wins his case may only receive it years after.

Appellate processes can exacerbate this issue if it is a frequent rather than a rare occurrence. An issue one already has taken up a lot of judicial time at the preliminary level may go up for appeals and may not be settled.

There is no answer to the problem of appeals other than that the appeal is not to be abolished. Instead, the court must determine whether the conduct is for the purpose of appealing the adverse ruling or whether it is for the purpose of frustrating enforcement of the adverse ruling.

5.2 Adjournments

Appellate work-taking unnecessary adjournments can be a major drag. A key conclusion of the authors' study was that baseless adjournment is a significant contributor to the delay of justice in Pakistan and that procedural discipline, especially, needs to be tightened (Javed et al., 2023c).

Therefore, appellate courts should enhance its scheduling practice. Adjournments ought to be issued only for the faithful purpose and may not turn into a successful instrument of deferment of substantive hearing.

5.3 Repetitive Litigation

The other challenge is the risk of resetting challenges. An appeal might be filed by a party, obtain further procedural relief and then try to have reconsidered what has already been decided.

This reduces the finality principle. The purposes of the procedural remedies should be different; they should not be piled on one another in order to ask for reconsidering the same dispute again and again.

5.4 Weaknesses in First Appellate Adjudication

The quality of first appellate decisions has a direct impact on second appeals. If the first appellate court doesn't adequately discuss material grounds, questions about factual and legal errors might go unresolved.

This may lead litigants to come at the High Court (and may put pressure on the second appellate Court to view matters which should have been determined at a lower level).

The strengthening of the first appeal thinking process is thus one of the best ways of mitigating unnecessary second appeals.

5.5 Procedural Complexity

The CPC has a detailed procedural structure, which has been elaborated over 100 years ago. Even though there are some modifications which modernized certain provisions of the amendments, complexity has been a major concern in the procedure.

The recent research has focused on the persistent effects of legacy processes and inefficient institutions to civil justice delay (Rajput, 2024). Adjudicating rules should not be used as an impediment to adjudication.



Vol. 3 No. 11 (November) (2025)

5.6 Cost and Access to Justice

The effectiveness of an appeal also needs to be affordable. Litigation costs include attorneys' fees, document costs, travel costs, costs associated with the court and the opportunity cost of time.

The impacts of extended civil litigation have been established by research projects in Pakistan, which have shown that such litigation can lead to significant socio-economic consequences, especially for those engaged in the litigation process and for their families (F. Ullah, 2022b). Hence, the issue of delay goes beyond being an administrative issue and is an access to justice issue.

A right of appeal is useless if the litigant has to wait several years and do not have sufficient funds to take the case up to the next level.

6. Judicial Efficiency, Case Management and Technological Reform

There needs to be more than arbitrary jurisdiction in the area of reform of the appellate process. The goal needs to be to improve the effectiveness of the entire appellate course of study.

Case management gives an essential way. Courts need to address the substantive issues in the case in the beginning of litigation; avoid any unnecessary adjournments; dissuade frivolous requests and set reasonable hearing dates.

The display projecting the figures is another shocking yet well-documented reality of the system of case-management in Pakistan, it requires technological and administrative changes to address the waiting list in the courts. To mitigate delays, the authors of this report consider e-filing, e-case tracking, the improvement of administrative systems, and technology to be potential solutions (Kassar et al., 2024b).

Such changes are especially appropriate for the appeal context as appeals require writ petitions to rely heavily on the record maintained by the courts below. Electronic transmissions of case documents, electronic records that can be easily searched, electronic filing and automated scheduling can significantly eliminate loss of time.

Use of technology should, however, supplement, not supplant, judicial decision-making. The primary goal should be the elimination of administrative hurdles not necessary in the process of judging and to enable the judges to devote attention to the reasoning of the law.

More structured pleadings can also be helpful in the appellate process. An appeal should state in a memorandum (appellate brief) what is being challenged, what is alleged to be error (legal or factual error), and what relief is requested. The Appellant in a 2nd Appeal would provide the specific law on which they are relying to invoke s. 100..

This accuracy would help to make things fairer and more efficient. Respondents would be thoroughly apprised of the nature of the case they are required to address and courts would have a definitive early indication whether there is indeed a genuine legal issue or no.

Thus, there is a need for strengthening the filtering mechanism at the Second Appellate Court. The intent should not be to screen off access to justice, but to focus High Court resources on those cases which in fact require a legal intervention.

7. Critical Evaluation and Reform Proposals

Existing two-stage appeal system is essentially justifiable. Appeals serve two broad purposes: One to correct the trial court's error and the other to ensure legal consistency and correctness without rehashing all of the trial's factual issues. Principal weaknesses are in implementation.

The principal weaknesses lie in implementation.

First, the first court of appeal should be beefed-up. Material grounds of first appellate judgments should be fully dealt with and give reasons on both factual and legal aspects. Pressure on the High Court will be lifted with a strong first appeal.

Secondly, second appeals should refer to the specific question of law being appealed. No



Vol. 3 No. 11 (November) (2025)

general allegations of misapprehension of evidence should be allowed on appeal. The importance and substance of the alleged legal error should be the central concern of the statutory threshold.

Thirdly, case management needs to be part of the process of appeal. Judges need to have the discretion to manage any adjournment for good cause, to prevent unnecessary adjournments, repetitive applications and to ensure that the parties have sufficient time to put their case.

Fourthly, digital appellate records need to be expanded. Administrative delays can be minimized and judicial review of voluminous dockets can be streamlined by using filing and transmission of case records.

Fifthly, there must be proportionate consequences, from procedural abuse. Finally, although appeals in good faith should be allowed, any repetitive and clearly unnecessary of process should be forfeited in the interest of getting final adjudication.

Sixth, law amendments should be accompanied by easy-to-understand transitional provisions. Amendments to the jurisdiction of the courts may create a vacuum if litigants and courts don't understand which statute to consult.

Last of all, reform should be geared towards quality and not fudging data on disposal. An greater number of cases disposed of doesn't necessarily means better justice. Significant benchmarks are the quality of reasoning, length of proceedings, uniformity of practice and the capacity to fix issues of the material law.

The goal should thus be to have a well-balanced system of appeals that is truly effective for the first appeal and sufficiently curbed for the second.

8. Conclusion

The pyramid of appeals in the Code of Civil Procedure, 1908, is significant in achieving a balance of correction of error in the adjudication process and finality of litigation. The first-degree appeal by way of section 96 offers a fairly wide appeal and sections 100-103 provide a limited second-degree appeal. The reason for this differentiation is that institutionally the facts covered in such an event are generally and normally not supposed to be reconsidered after the trial and first appellate courts have taken an active look at the matter.

The real problem in Pakistan is thus not one of the presence of first and second appeals but one how they work in a civil justice system plagued by delay, backlog, complexity of proceedings, adjournments and institutional weaknesses.

First appeal should be the main means of full reconsideration, both questions of fact and law. First appellate adjudication, therefore, needs to be improved. Whilst the grounds for a second appeal must continue to be confined to 'substantial legal and procedural error', the restraint must not extend beyond that so as to render the ability to correct genuine legal errors impossible.

The case management and then the way cases are framed as appeals should be improved, the repeat appeals should be controlled, there should be integration of technology and the ratio must be maintained between repetitive type of suits. The existing appeal system would not have to be done away with in order for these reforms to work. Instead, they would improve upon the already existing statutory framework set out by the CPC for better functioning.

In the end there needs to be a balance between access, correctness, efficiency, and finality in appellate justice. If there are too many levels of appeals, justice can be jeopardized and unlimited appeals can lead to an infinite number of appeals. In Pakistan, the use of an effective and meaningful appeal mechanism is, therefore, essential in which every level of the court would play its proper role: First the trial court would decide the issues raised in the case; second appellate court would give a comprehensive review; and third appellate court would correct an error of principle or procedure in the case. In such a way, the appeals would retain their safeguarding purpose whilst having less of an impact for delaying or misusing processes.



Vol. 3 No. 11 (November) (2025)

References

- Imran, M., Idrees, R. Q., & Saeed, M. A. (2024). Pendency of cases in Pakistan: Causes and consequences. *Current Trends in Law and Society*, 4(1), 52–61.
- Javed, S., Iqbal, M. A., & Saleem, H. A. R. (2023a). A Critical Analysis on Causes and Effects of Baseless Adjournments in Pakistan. *Pakistan Journal of Humanities and Social Sciences*, 11(2), 2293–2298.
- Javed, S., Iqbal, M. A., & Saleem, H. A. R. (2023b). A Critical Analysis on Causes and Effects of Baseless Adjournments in Pakistan. *Pakistan Journal of Humanities and Social Sciences*, 11(2), 2293–2298.
- Javed, S., Iqbal, M. A., & Saleem, H. A. R. (2023c). A Critical Analysis on Causes and Effects of Baseless Adjournments in Pakistan. *Pakistan Journal of Humanities and Social Sciences*, 11(2), 2293–2298.
- Kassar, G. R., Kausar, S., & Laghari, A. R. (2024a). Evolving case management systems: Technological and administrative reforms to address judicial delays in Pakistan. *Annals of Human and Social Sciences*, 5(3), 763–778.
- Kassar, G. R., Kausar, S., & Laghari, A. R. (2024b). Evolving case management systems: Technological and administrative reforms to address judicial delays in Pakistan. *Annals of Human and Social Sciences*, 5(3), 763–778.
- Macdonald, R. A., & Janda, R. (1984). *Administrative Law I*. HeinOnline.
- Quddus, U. (2019). *Judicial Immunity of Superior Courts Judges in Constitutional Framework: A Case Study of Pakistan*. PhD Thesis, International Islamic University, Islamabad Pakistan, 2019
- Rajput, M. A. (2024). Crisis of civil justice delays in Pakistan: Challenges and innovations. *Twejer Journal*, 7(2), 209–226.
- Singh, J. (2024). Challenging Silence: The Dynamics Of Ex Parte Decree Appeals. *Available at SSRN 4970237*.
- Thomas, R. (2005). Evaluating tribunal adjudication: Administrative justice and asylum appeals. *Legal Studies*, 25(3), 462–498.
- Ullah, F. (2022a). The undue delay in the civil suits and its symbiotic harms on the litigants' communal lives in Swat, Pakistan. *Liberal Arts and Social Sciences International Journal (LASSIJ)*, 6(2), 254–271.
- Ullah, F. (2022b). The undue delay in the civil suits and its symbiotic harms on the litigants' communal lives in Swat, Pakistan. *Liberal Arts and Social Sciences International Journal (LASSIJ)*, 6(2), 254–271.
- Ullah, I., & Alam, I. (2022). Appeal and Revision in Arbitration Matters under the Pakistani Legal Regime. *Journal of the Research Society of Pakistan*, 59(3), 20.
- Zafeer, H. M. I., Xue, H., & Maqbool, S. (2020a). Delaying factors regarding civil justice in Pakistan (lower courts). *Journal of Humanities and Social Sciences Studies*, 2(6), 15–22.
- Zafeer, H. M. I., Xue, H., & Maqbool, S. (2020b). Delaying factors regarding civil justice in Pakistan (lower courts). *Journal of Humanities and Social Sciences Studies*, 2(6), 15–22.