

# ***NAVIGATING THE BOUNDARIES: ASSESSING THE EVOLUTION OF FREEDOM OF EXPRESSION IN PAKISTAN IN THE CONTEXT OF INTERNATIONAL LEGAL STANDARDS***

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## **Abstract**

In order to provide a complex picture of the development of freedom of expression in the Islamic Republic of Pakistan, the article delves deeply into its historical roots, statutory frameworks, judicial interpretations, and international alignment. In light of the rapidly approaching era of fast technological innovation and changing societal dynamics, it is critical to evaluate Pakistan's position on freedom of expression, particularly in light of international legal norms. The origins of freedom of expression in Pakistan are traced back through times of both military rule and civilian administration. The 1973 Constitution's careful balancing act between democratic norms and Islamic beliefs lays the groundwork for comprehending the intricacies that mould the nation's right to free expression. Significant court rulings, later modifications, and legal advancements all shed light on how dynamic this basic freedom is. Examining Pakistan's legal system reveals Article 19 to be the cornerstone of the constitution that protects the right to free speech. The implementation issues are examined closely, though, taking into account the situation of media surveillance, the possibility of blasphemy legislation, and other factors. The article delves deeper into judicial interpretations by analysing precedent-driven evolution and citing seminal decisions that provide direction for the legal system. This highlights the judiciary's influence in defining the parameters of speech.

*As the piece progresses, it adds to a more complex knowledge of the potential and difficulties related to freedom of speech in Pakistan. By delving into this complex investigation, it hopes to improve the national dialogue as well as make a lasting impression abroad, igniting a worldwide dialogue about defending and advancing this basic right in the rapidly changing twenty-first-century world.*

**Keywords:** *Freedom of expression, Pakistan, International legal norms, constitution, International Legal standards.*

## **Introduction**

*The right to freely express oneself is a vital component of democracy, serving as a thread that connects the many perspectives within a community. It is the foundation upon which thriving democracies rest, providing a space where ideas, opinions, and thoughts may be freely exchanged without fear of retaliation or restriction. Without the ability to freely communicate our opinions, ideas, and views, we are unable to participate fully in democracy (Gaus, 1996a). Nonetheless, there are a number of circumstances in which the state may "limit" the freedom of expression, such as when it comes to morality, public order, national security, or public health. States that restrict people's freedom of expression often put their freedom at risk when they do not have to meet a substantial justification burden, as seen by numerous examples from throughout the globe (Gunatilleke, 2020). Regarding the right to free speech as a "claim right" and a "liberty" is crucial to treating it with dignity. In theory, "liberty" is the absence of any contradictory duty to do action or refrain from taking it. The freedom of speech is a liberty since it is unrestricted and allows anybody to express themselves.*

*With the world about to change and technology advancing at a breakneck pace, now is the perfect moment to look back at Pakistan's record on freedom of speech. Examining this matter via the prism of international legal norms is especially important, as local laws and the larger web of international norms both influence the limits of this fundamental right. Pakistan is among the very few countries that formally recognises the right to information as a basic freedom. This right ensures the freedom to have an opinion and to voice it in public. In summary, it is a crucial component of both a democratic state and freedom in general. The suggestions in the Removal and Blocking of Unlawful Online Content (RBUOC) are derived from the 2016 Pakistan Electronic Crimes Act (PECA) (Nayyar, 2022).*

*This fundamental right is expressed in the Islamic Republic of Pakistan in Article 19 of the 1973 Constitution, which purports to guarantee the freedom of speech for all of its inhabitants. The objective of this article is to analyse the various facets of Pakistani freedom of expression. The historical foundations of this right, the current legal system's efforts to protect it, the interpretations of this right within the sacred corridors of the judiciary, and the larger framework of international legal standards that provides the framework for a global conversation serve as its main*

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points of focus.

### **Historical Origin**

*It is crucial to remember that Pakistan's history has been turbulent, with brief periods of democratic governance interspersed with periods of substantial military authority. Interestingly enough, the Pakistani media has always been subject to stringent laws and regulations by the ruling party, regardless of their political status, or lack thereof, despite assertions that a free press is the hallmark of a democratic society. Democracy is not just dependent on the media; the media also depends on democracy. Pakistan offers an interesting case study when it comes to the defence of fundamental rights, especially in relation to the right to free expression (accessed July 21, 2016). Pakistan has a robust constitutional jurisprudence and a commitment to upholding constitutional ideals that coexist with deeply ingrained cultural, sociological, and religious norms that affect the right to free speech. Pakistan became an independent republic in 1947 after British rule ended (Basit, 2015).*

*It was especially notable since the first constitution of the country took more than eight years to enact. Before the first constitution was enacted, Pakistan was ruled under the 1948 Indian Independence (Amendment) Act and the 1935 Government of India Act (Khan, 2001). The present constitution was combined in 1973. The fundamental rights guaranteed by Pakistan's constitution are derived from the forces that were active throughout the country's war for independence from British domination. Numerous fundamental rights, including individual liberty and the protection of one's life and reputation, were guaranteed by common law. When India was ruled by the British, there was no comparable agreement on fundamental rights, and the protections that were provided were restricted to the various laws. Authorities may even take them back. A parliamentary system was used to write Pakistan's first constitution, which protected fundamental rights such the freedom of speech. Later, the 1962 Constitution protected the fundamental rights, which included the freedom of expression. In this sense, the 1973 Constitution is identical. The 1973 Constitution, however, expressly protected the press.*

### **The Historical Roots of Freedom of Expression in Pakistan: Unraveling the Tapestry**

*The historical foundations that have formed and sustained the basic right to freedom of expression in the Islamic Republic of Pakistan must be explored in order to fully comprehend the present. This investigation is not just a look back; rather, it is an important attempt to understand the complexities and subtleties that have shaped the free speech environment in this rapidly changing country. Pakistan's history is marked by protracted periods of dictatorship that severely restricted political speech and media freedom. These restrictions on information and viewpoints developed into a*

regulatory role in democratic systems. People are deterred from openly expressing their thoughts by criminal legislation because they fear facing legal consequences; this is particularly true for human rights campaigners and journalists (Desk, 2023).

### **The Genesis within the 1973 Constitution: Balancing Islamic Principles and Democratic Values**

The 1973 Constitution, which brought in a new era of political and intellectual balance between Islam and democracy, was a significant turning point in Pakistan's history. The constitution's writers used this context to guide their efforts in defining and defending the right to free expression. They succeeded in doing so by striking a delicate balance between the upholding of Islamic beliefs and democratic administration norms – a balance that still has an impact on how this fundamental right is defined today (Scholarship Spotlight: The History of the Reconstruction Amendments | UW School of Law, 2020). This careful balancing is reflected in the constitutional provisions pertaining to freedom of expression, which are summed up in Article 19. The constitution guarantees the right to freedom of speech and expression, but it also recognises that appropriate limitations must be put in place for the sake of public order or Pakistan's sovereignty and integrity, among other reasons. The way these constitutional sections interact reflects a complex strategy that aims to protect larger social interests while promoting freedom of expression.

### **Subsequent Amendments and Legal Developments: An Evolving Narrative**

The story of freedom of speech in Pakistan's past is dynamic and ever-changing, reflecting shifting political and social forces. This story has been made more difficult by subsequent legal developments and constitutional revisions. By having a clear understanding of these turning points, we may better appreciate how flexible the legal system is to meet the changing demands of Pakistani society. For example, the nation's dedication to fine-tuning the delicate balance between individual expression and community harmony is reflected in the several revisions made to Article 19 throughout time (Klug, 2015). These changes reflect the country's dedication to upholding the fundamentals of democracy while honouring its Islamic history, as well as its responsiveness to changing circumstances. Furthermore, the historical course of freedom of expression has been significantly shaped by important court decisions. In addition to interpreting the constitutional provisions, court rulings have established guiding principles for the modern implementation of these rights.

### **Setting the Stage for Evaluation: The Present State of Freedom of Expression**

As we look at its historical foundations, we lay the foundation for evaluating the state of freedom of speech in Pakistan now. The interplay of judicial rulings, constitutional amendments, and provisions offers a comprehensive picture of the nation's response to the problems posed by free speech. We cannot actively engage in democracy and express our thoughts, convictions, and beliefs without the freedom of expression. However, there are several situations in which the state may "limit" the

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right to free speech, including when it comes to public health, morals, national security, and public order. It becomes evident that rather than being static artefacts from the past, the historical underpinnings are dynamic variables that continue to impact Pakistan's contemporary debate on speech (Gunatilleke, 2020b). Subsequent segments of this inquiry will scrutinise the extant legal structure, judicial interpretations, and adherence to global best practises.

### **Legal Framework in Pakistan**

A parliamentary system was used to write Pakistan's first constitution, which protected fundamental rights such the freedom of speech. Later, the 1962 Constitution protected the fundamental rights, which included the freedom of expression. In this sense, the 1973 Constitution is identical. The 1973 Constitution, however, expressly protected the press. The 1973 Pakistani constitution's preamble states that the country's people wrote it with the goal of enacting Islamic principles of social justice, equality, freedom, and tolerance. On Pakistan's democratic system, pride is placed on the freedom of speech, which serves as the cornerstone for all other rights. The freedoms of expression, thought, religion, and worship are the cornerstones of the Pakistani constitution. Freedom of speech is a collective right whose nature becomes more apparent as new technologies allow it to be disseminated and improve quality of life, whereas freedom of thought is a personal right. Part III of the Constitution of the Islamic Republic of Pakistan talks about the fundamental rights of its people. The right to freedom of speech and expression is protected under Article 19 of the Pakistani Constitution (Mahmood, *The Constitution Of The Islamic Republic Of Pakistan*, 2015).

Freedom of expression is one of the core principles of fundamental rights in every democratic organisation. There is a guarantee of free speech on all subjects and occasions. It affects all facets of existence. Free speech includes discussing social, religious, political, and economic matters. The right to give and receive books from the general public is a part of the freedom of speech. Freedom of speech is the legal right to communicate by whatever means that is permitted. Furthermore, as stated in *Sakal Papers (P) Ltd., and Others v. The Union of India* (1962), the freedom to communicate one's opinions is included in the right to do so, subject to any justifiable constraints.

### **Article 19: A Constitutional Pillar**

Article 19 of the 1973 Constitution of the Islamic Republic of Pakistan gives its inhabitants the legal right to openly express and explain their ideas, opinions, and beliefs without fear, concern, apprehension, or guilt (Ahsan, 2020). A detailed analysis of Article 19 is given below:

Every citizen shall have the right to freedom of speech and expression as well

as freedom of the press, subject to any reasonable restrictions imposed by law in the interest of friendly relations with foreign states, the glory of Islam, the integrity, security, or defence of Pakistan or any part thereof, public order, decency, or morality, or in relation to contempt of court, the commission of or incitement to an offence.

Article 19 of the 1973 Constitution is the cornerstone of the right to free speech. It declares every citizen's right to freedom of speech and expression, subject to certain reasonable restrictions, in the interest of Pakistan's sovereignty and integrity, state security, friendly relations with other states, public order, decency or morality, or in relation to contempt of court, commission of or incitement to an offence (Afzal & Chen, 2023). Article 19's explanation shows how easy it is for Pakistanis to voice their opinions in any setting. It cannot be limited since it is an unalienable right. Nevertheless, the remaining part of Article 19 places restrictions on some limits. It makes it clear that this privilege can be used as long as it's not being abused and posing a direct threat to national security of the state or the interests of the general public. The freedom of expression has several dimensions, including the media, the judicial system, the armed forces, the legislature, and the commercial sector.

### **From Parchment to Practice: Implementation Challenges**

However, the effectiveness of this legislative framework will depend on how well it is put into action. How much do the unique requirements of Article 19 become reflected in the day-to-day lives of Pakistanis? The results of this investigation highlight the many intricacies and challenges that surround the country's free speech situation.

### **Media Landscape and Regulatory Framework**

Flew and Suzor (2019) contend that national governments, as well as local governments, set policies that restrict the flow of foreign media content and decide what content is permitted to pass through digital and traditional media channels. However, the legal system's control over media practises has certain disadvantages. While regulations are necessary to ensure that journalism is ethical, they do not equate to restricting free expression. Understanding the practical effects of freedom of expression requires looking at how media regulations accomplish this balance (B, 2020). A large-scale mainstream media campaign against former Prime Minister Imran Khan's policies followed the recent toppling of his administration in April 2022. Given the importance of youth and social media to the growth of the political movement led by former Prime Minister Imran Khan, this event could have been a trigger for a reconfiguration of Pakistani politics. Furthermore, as they encourage stronger social cohesiveness and economic progress, media technological convergence and digitalization are highly advantageous to Pakistan and other developing countries.

### **State Surveillance and Digital Rights**

Digital authoritarianism has grown to be a potent tool of national governance

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*in Pakistan as a result of the government's enforcement of laws and regulations to control the internet, particularly the Prevention of Electronic Crimes Act (PECA). Human rights groups that focus on digital rights are part of Pakistan's robust civil society, and the judiciary there has shown resistance. These groups raise issues about data security, privacy regulations, and internet access for impoverished people. The boundaries of expression in an era where digital communication is paramount extend beyond virtual realms. State surveillance raises concerns about possible limitations on online expression and abuses of digital rights, even when it is ostensibly done for national security reasons (ECPS\_Admin, 2023b). Analysing the connection between digital rights and freedom of speech highlights a contemporary issue that has to be investigated by the legal system.*

### **The Specter of Blasphemy Laws**

*Blasphemy laws are another spectre that haunts Pakistan's legal landscape. These laws have generated debate and worry because of the possibility that they would be abused to restrict freedom of speech (Ahmed & Gulrajani, 2020). A thorough examination of the intricate relationship between blasphemy laws and constitutional protections illuminates a nuanced dynamic that has to be carefully taken into account within the judicial system.*

*A careful analysis of Pakistan's legal structure protecting free speech uncovers a complicated web of intricate constitutional protections, difficult regulatory issues, and complex social dynamics. In order to guarantee that the freedom to speech stays strong and significant in the constantly changing context of Pakistani society, legal experts, legislators, and the general public must have an ongoing conversation about the many obstacles that arise throughout the transition from paper to practise.*

### **Judicial Interpretations**

*The judiciary interprets the subtleties of constitutional rights in courtrooms, acting as a guardian. Judges' rulings serve as important markers that delineate the parameters that permit the growth of free speech. We may learn more about the judiciary's role in shaping Pakistan's changing expression environment by examining seminal cases and the judicial theory underlying them (Fatiana et al., 2018). This section explores through the history of judicial interpretations in an attempt to decipher the judicial philosophy that defines expression's boundaries and exposes the spaces where it can thrive.*

### **Landmark Cases: Guiding Lights in the Legal Landscape**

*The 1973 Constitution clearly and explicitly guarantees the right to freedom of expression to the people of Pakistan. The judiciary's impact on the development of free speech is evidenced by significant decisions that set legal standards. These cases set the norm for how the judiciary carefully balances the demands of society as a whole*

with the rights of individuals to free expression. They are also often indicative of societal concerns and conversations.

### **Asma Jilani v. Government of the Punjab (1972)**

The judiciary was tasked with balancing the protection of free speech with national security considerations following the conflict of 1971. A turning point was the Asma Jilani case, which demonstrated the court's dedication to protecting the freedom to dissent even in difficult circumstances (Asma Jilani Vs Government of Punjab, 2023). *Asma Jalani v. Government of Punjab*, one of the most significant instances in Pakistan's constitutional history, forbade the use of martial law as a means of revoking the constitution.

### **Mazhar Ali Khan v. Federation of Pakistan (1996)**

The Mazhar Ali Khan case addressed the difficult balance between the state's regulatory power and the media's position as watchdogs in the ever-evolving environment of press freedom. The court's careful consideration of this case demonstrated that it recognised the critical role that the media plays in promoting free and open communication.

The judiciary has faced several difficulties in these instances, ranging from blasphemy and defamation suits to concerns pertaining to the freedom to demonstrate. The subtleties of these rulings offer vital insights into the judiciary's strategy for striking a balance between society interests and individual liberty in addition to demonstrating legal expertise.

### **Evolution through Precedent: Setting the Tone for Expression**

Instead of being a static process, the evolution of freedom of expression is a dynamic one that is shaped by the court's shifting opinions. A developing legal system is held together by the precedents set by earlier decisions, which influence subsequent decisions (Panhwar, n.d.). To demonstrate the judiciary's awareness of evolving public discourse, take into account the potential for provisions that ban hate speech or place restrictions on political expression to be understood differently over time. The way that evolution and precedent interact dynamically shows how flexible the court may be to meet the needs of a changing society.

Pakistani judges' views of the right to free speech are a complex web of precedent, philosophical ideas, and the never-ending search for a precarious equilibrium. The judiciary, as protectors of fundamental rights, provides vital landmarks that help the country navigate the limits where free speech thrives. The changing environment demonstrates the judiciary's legal expertise as well as its dedication to defending a basic right that is essential to a healthy democracy.

### **Alignment with Global Practices**

In a time when ideas flow across borders with ease and borders are permeable, the evaluation of freedom of speech cannot be limited to national borders. This section examines Pakistan's position in relation to international legal norms and best practises throughout the world (Sharif & Kataria, 2020). Can we draw any insights



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*from the practises of other jurisdictions? Is it possible to improve Pakistan's legal system to better represent a harmonic fusion of local customs and international standards? The article seeks to add to a comprehensive understanding of the opportunities and difficulties that constitute freedom of expression as we negotiate its bounds in Pakistan. Diverse viewpoints on the right to free speech are offered by various nations worldwide. Pakistan stands to gain valuable insights from the experiences of other nations via the examination of successful models and the recognition of areas for improvement. For example, by studying how other countries manage the challenging balancing act between security concerns and free expression, or how they handle emerging difficulties in the digital world, Pakistan's legislative system may be improved.*

### **Comparative Analysis: Gauging Alignment with International Norms**

*A comparison analysis serves as the basis for evaluating conformity with international standards. How well does Pakistan's legislative framework adhere to regional or global agreements such as the International Covenant on Civil and Political Rights (ICCPR) or the European Convention on Human Rights? By carefully examining these criteria, one may gain a comprehensive understanding of Pakistan's strengths and possible areas for improvement in order to move the country closer to international best practises.*

### **Emerging Challenges: Navigating the Digital Frontiers**

*Within the international discourse on freedom of speech, the digital sphere offers previously unheard-of opportunities as well as difficulties. Compared to other countries, how does Pakistan handle concerns about digital rights, internet restriction, and surveillance? In order for Pakistan's legal system to continue to adapt to the changing needs of digitally native expression and communication, it is imperative that these concerns be addressed (Crawley et al., 2011).*

*Through investigating its historical foundations, evaluating the current legal system, analysing judicial rulings, and determining conformity with international standards, we set out on a path towards a more knowledgeable and dynamic dialogue – one that echoes not just domestically but internationally as well.*

### **Conclusion**

*This investigation, which covers the legal, historical, and global aspects of Pakistani freedom of expression, finds a complex environment moulded by judicial interpretations, cultural values, and the delicate relationship between international norms and constitutional principles. The historical foundations, which are ingrained in times of military rule and democratic administration, highlight how resilient free expression is in the face of changing social dynamics. Article 19 of the 1973 Constitution serves as the cornerstone of the legal system, but its effectiveness is put*

to the test when faced with obstacles to implementation, such as media rules and the intricacies of digital rights. Famous instances demonstrate how the judiciary strikes a fine balance in interpreting the law, therefore defining the parameters that allow for the free exchange of ideas. It is crucial that Pakistan adhere to international best practises as it traverses the digital frontiers and faces new difficulties. The comparative study identifies areas that require development and emphasises the necessity of a harmonious marriage of regional traditions and global standards. In conclusion, our investigation adds to a richer, dynamic conversation that transcends national boundaries and resonates around the world. At this crucial juncture, Pakistan can learn from past events, legal systems, and international comparisons to construct a future in which the right to free speech is not only safeguarded but flourishes in the face of 21st-century complexity, allowing a multitude of voices to coexist peacefully both domestically and internationally.



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