



**RESEARCH PAPER**

**Admiralty Practices in Pakistan: Myths and Realities**

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**ABSTRACT**

Maritime law is one of the primordial laws of the world and from its very inception it merged with the body of the international law. It provided a legal structure for rule of trade and commerce in international waters. Due to increase globalization, the significance of Maritime law has increased manifold and likewise, the jurisprudence of this subject has developed to a great extent. In Pakistan, this field is relatively lesser known. The Admiralty Jurisdiction of High Courts Ordinance, 1980 is the formalized form of "International Convention for the Unification of Certain Rules of Law Relating to Bills of Lading". The fundamental principle of Admiralty Law is to arrest the ship and give relief to the aggrieved party for getting security from the ship owners by invoking the admiralty jurisdiction under the Ordinance, 1980. The researchers have adopted the qualitative and quantitative research combination. This article is an attempt to examine and emphasize the upsides and downsides of the subject in the radiance of significant arrangements of the Admiralty law and the problem faced by the parties concerned specially in respect of arrest of vessel in Pakistan under the Ordinance, 1980. This is a critical analysis which also highlights the powers of the Judges of Admiralty Courts in order to exercise their authority and to achieve real object of Ordinance, 1980.

**KEYWORDS** Admiralty Law, Action in rem, Action in personam, Bill of Lading, Collision, Charterer.

**Introduction**

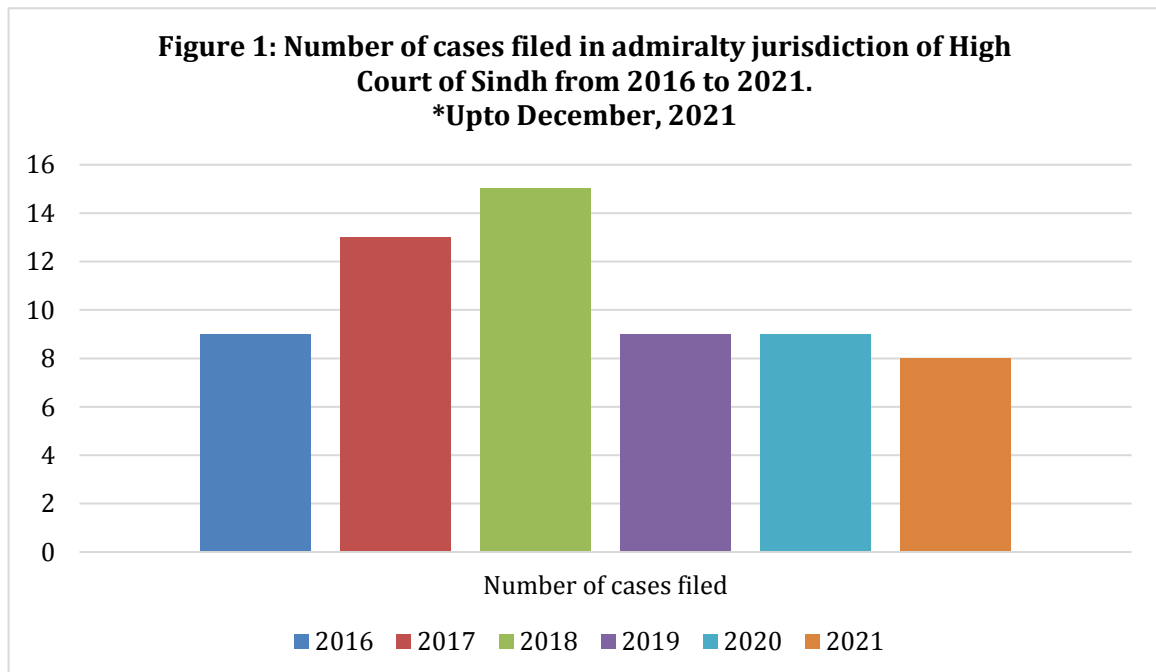
Prior to the promulgation of Admiralty Jurisdiction of the Ordinance, 1980, the admiralty jurisdiction was exercised by the High Courts of Sindh and Baluchistan under Section 6 of the 1861 English Admiralty Act in very restricted areas of maritime claims. For ready reference Section 6 is reproduced as under:

*"The High Court of Admiralty shall have jurisdiction over any claim by the owner or consignee or assignee of any bill of lading of any goods carried into any port in England or Wales in any ship, for damage done to the goods or any part thereof by the negligence or misconduct of or for any breach of duty or breach of contract on the part of the owner, master, or crew of the ship, unless it is shown to the satisfaction of the court that at the time of the institution of the case any owner or part owner of the ship is domiciled in England or Wales: Provided always, that if any such cause the plaintiff do not recover twenty pounds, he shall not be entitled to any costs, charges, or expenses incurred by him therein, unless the judge shall certify that the cause was a fit one to be tried in the said court."*



Image 1: The High Court of Sindh is one of the two courts exercising Admiralty jurisdiction in Pakistan. © A.Savin, WikiCommons

After the 1980 Ordinance was brought into force in Pakistan substantially adopting the enlarged scope of admiralty jurisdiction as set out in the English 1956 Administration of Justice Act. It was there after expected that there will be considerable litigation in Pakistan which in fact came true and during the years 1980 and 1990 a fairly large number of cases were in fact filed but on account of many procedural problems the few members of the bar who indulged in this exercise were somewhat discouraged and also on account of the unfavorable government policies, regarding the import scrap vessels, the number of admiralty cases progressively declined after the said period in spite of two large ports working in Karachi. The total number of admiralty cases filed in the High Court of Sindh during the years 2016, 2017, 2018, 2019, 2020 and 2021 are 9, 13, 15, 9, 9 and 8, respectively.



Identity of the vessel liable to be arrested was a cumbersome task. Furthermore, considering the extra ordinary nature thereof, the admiralty suits in the High Court were exclusively heard by the Chief Justice and a special priority was given to them until about 30 years ago. But unfortunately on the suggestion of a member of the bar (as he then was) the admiralty suits have now been assigned to the judges on the original side of the court whose hands are already too full and they have little time to take up such high priority matters with the result that the admiralty suits are listed on the appellate side of the original side Bench

and the proceedings are adjourned either for want of time or on account of want of interest in the claimants to proceed with the case expeditiously and long delays occur in the process.

### **Literature Review**

Historically, the Pakistani Courts exercised their jurisdiction under the Courts of Admiralty (Pakistan) Act XVI of 1891 and entertained claims under the Admiralty Court Acts of 1840 and 1861 of England. In the year 1891, there were two statutes Admiralty Court Act, 1840 and Admiralty Court Act, 1861. In the year 1925 the Admiralty Jurisdiction of the High Court in England was extended but this extension was not applicable to British India therefore that jurisdiction was not exercised by the Admiralty Courts in Pakistan. The Acts 1840 and 1861 were repealed by the Admiralty Jurisdiction of High Courts Ordinance, 1980 (the "Ordinance, 1980"). In Pakistan, the Sindh High Court and the Baluchistan High Court have jurisdiction to exercise their powers as an Admiralty Court under the Admiralty Jurisdiction of High Courts Ordinance, 1980 (AJHCO 1980b). The jurisdiction of our Admiralty Courts extends to all ships or aircrafts, local or foreign and wherever the residence or domicile of the owners may be (AJHCO 1980c). It also applies to all maritime claims whosoever arising (AJHCO 1980a).

### **Material and methods**

This is a non-experimental research based on secondary compiled data. The combination of qualitative, quantitative, empirical, descriptive, analytical and fundamental research methodologies are adopted. Primarily it is a non-empirical analysis, which is subjective in nature. It is an extensive literature review product of the verdicts of Hon'ble Apex Courts of Pakistan, Articles, online research journals and citations. The primary source of data is Sindh High Court. Microsoft Excel (2016), Online Google Forms, Statistical Package for the Social Sciences (SPSS, Version 25) and Mendeley are used to collect, analyze, interpret and cite data.

### **Results and Discussion**

#### **Definition of Ship**

It may be necessary to define the ship at the outset, in order to determine whether provisions of special admiralty statutes would be applicable to it, since the basis of liability will also be determined once it is established that a structure in dispute is a ship. For instance, if a collision occurs between a floating beacon, and a ship, the relevant provisions of admiralty law would not be applicable on a 'floating beacon' as was held in a House of Lords Judgment.



Image 2: Container Ship CMA CGM Arkansas in the Bosphorus Strait, Istanbul, Türkiye.  
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It may also be necessary to examine the definition of ship to determine whether a matter may be referred to the jurisdiction of admiralty courts, and limitation of liability consequently will also depend on whether the 'thing' or 'structure' falls within the definition of 'ship' under the law.

The British Merchant Shipping Act, 1995 defines a ship to include every description of vessel used in navigation, and the same meaning has been provided for under our Ordinance. The same definition is given by Supreme Court Act, 1981 under Section 24(1) which also includes a hovercraft in the definition. Hence, two features are deliberated in classification of an object as a ship: its bodily appearance and its use in triangulation water (Mandaraka-Sheppard 2001). In PLD 1985 Quetta 278, it was held that every floating structure in water could not be considered as a "ship" or "vessel". Floating structures have to be navigable, capable of encountering perils of sea and have the characteristics of a vessel.

### **The Arrest of Vessel**

The Ordinance, 1980 does not anywhere provide for the arrest of the vessel, but in a suit filed *in rem*, the vessel is ordinarily arrested by an order passed ex parte on an application under Rule 731 of the Sindh Chief Court Rules (O.S.) which is reproduced as under:

*"731. When a suit is instituted in rem, any party may on filing an affidavit, obtain from the Court a warrant for the arrest of the property proceeded against."*

On the basis of the above rule and words, "*where security shall have been given in the sum in which the suit has been instituted or such sums shall have been paid into Court...*" In the case of Alexander's Faith (F. H. S. and S. Siddiqui 1983) regarding the Rule 748 it would be attempted to argue that the Court has no discretion but to order security in the entire sum which has been claimed in the suit. The court repelled the argument and held that "*This rule referred to above cannot override the power of the Court to order release of the property arrested either unconditionally or upon such condition as it may deem fit in the circumstances of the case, upon hearing the parties while disposing of the application for arrest of property finally.*"

Moreover, the Ordinance in terms of Section 4(4) provides either for arrest of a particular ship in reverence of which the right arose, i.e., the offending ship or any other ship, who at the time the incident arose was owned by the defaulting party. This principle has been upheld in the recent case before the High Court of Sindh (Ghaffar 2019).

Thus, the plaintiff is bound to make out a strong case for the arrest of the vessel and has to satisfy the court as to the genuineness of his claim as well as the maintainability of the suit before he can obtain an order of arrest.

It is an established fact that an Admiralty suit cannot be equated with an ordinary suit filed on the original side, the court, as such held in the case of Nedon (Mian 1981), that the principles on which an order of injunction or an attachment before judgment is passed are not quite relevant to an application for the arrest of a vessel. Foreign vessels call at the ports in Pakistan for the specific and avowed purpose of discharging and loading cargo and then to sail away. The argument that the vessel is likely to sail away is misplaced for the purpose of an order for arrest. The object of arrest therefore is to obtain security for the claim or nothing else and in case of default on the part of the owner to obtain satisfaction of the claim in terms of the decree if any passed by the Court. Moreover, in case the Vessel leaves the jurisdiction of the Court without furnishing any security, no effective decree can be passed.

In the case of M.T. "Galaxy" (Tasnim 2011) the Learned Judge of Sindh High Court allowed the application for arrest of the vessel and the interim order passed in the suit was confirmed and held as under:

*"If the arrested vessel is allowed to leave the limits of the Courts jurisdiction without a security, the suit shall loose its utility. It may not be possible to execute the decree if any passed, as by time the suit will be finalized the vessel may sink or she may be purchased by the bona fide purchaser without notice."*

### **Amount of Security**

Under the Law of Pakistan, the maximum security which can be obtained by arresting a vessel is a sum equivalent to the value of the vessel at the time of the arrest, because a lien or right of arrest is regarded as having a value not greater than the property to be arrested (Naimuddin & Ghani 1981).

Under the rules there is no provision for any security to meet the cost of detention of the vessel which may easily be around US\$ 10,000 per day. On the other hand, it may not be easy to answer what security may be demanded from, for example a crew who files a claim for wages in the sum of Rs.25,000 only, in case his claim does not succeed or it turns out to be a false or frivolous case (Winter 1987).

Therefore, a reasonable balance is to be introduced by an appropriate amendment in the Ordinance and providing for in the admiralty rules when they would be framed, so as to protect ship owners against false claims and also not to deny a small claimant his right of recovery due to an order for security which may be prohibitive and beyond his means.

### **Admiralty Rules**

The forms used in the Admiralty Division of the Supreme Court in England under the Rules of Supreme Court Act, 1883, will be followed as close to as the system set down in the Code and by these principles and the conditions of each case will allow (SCCR 1944a). In exercise of jurisdiction, under the Colonial Courts of Admiralty Act, 1890, other proceedings in case brought in the Court, not expressly mentioned for by these rules, shall be delimited by the rules and practice of the Court in suits brought in it in the exercise of its original civil jurisdiction (SCCR 1944b).

In the case of Jehanzeb Dar v/s Maersk Line (Sarwana 2000), Mr. Justice S. A. Sarwana observed that:

*"Rules of Civil Procedure Code, 1908 are applicable to proceedings initiated in Admiralty Jurisdiction of High Court as long as the Rules mentioned in C.P.C. are not in conflict with or contrary to Sindh Chief Court Rules (O.S)."*

Admiralty Rules are to be framed under Section 8 of the Ordinance by the Federal Government and it is hoped that sooner or later it would be realized that the rules presently followed were framed under the Colonial Courts of Admiralty Act 1890 which was enforced by the 1891 Act which has since been repealed by the Ordinance of 1980. The Court is however inclined to continue to follow the existing rules as long standing practice of the Court until new rules are framed.

### **Aspects of Admiralty Jurisdiction**

Having considered the scope of Admiralty Court's jurisdiction, we may now consider the manner in which the jurisdiction may be exercised. The jurisdiction of Admiralty law may be exercised in *personam* or in *rem*. While all cases within the jurisdiction may be brought by an Admiralty claim in *personam*, but the unique and most important feature of

litigation in the Admiralty Court is the ability in certain circumstances to bring an Admiralty claim *in rem*.

Before considering the complexities involved in establishing action *in rem*, we may look into the distinction between action *in personam*, and action *in rem*. The action *in rem* was initially originated on the concept of maritime liens and the execution of judgment was allowed against the property arrested, on the theory that maritime lien attach to the property from the moment of the formation of such entitlement. Moreover, the unique characteristic of the action *in rem* is the ability of the marine claimant to ensue against the ship directly, and in such a case, the vessel becomes the 'defendant', and the ship is being personified. If the owner of the vessel becomes interested in defending the claim seemed in the proceedings or even recognized service of the writ *in rem*, the action would also become an action against the person.

### **Exercise of Admiralty Jurisdiction**

As to the exercise of jurisdiction *in rem* and *personam* it is submitted with utmost respect that there is a terrible mix up of the two at the highest level of the court not only in Pakistan but also in the UK, starting with the House of Lords decision in the Indian Grace case which had raised many problems instead of solving any. The court in that case was greatly influenced by the personal liabilities of the owners of the vessel in connection with a civil claim not involving any security in the *rem* jurisdiction with the result personification theory was completely overlooked, and the case has been criticized by a number of jurists. The Nigel Meeson gave his remarks in his book by stating that (Meeson 2000):

*"It is important to note that in all of the recent cases in which courts have been troubled by the question to what extent is a claim in rem different in substance from a claim in personam culminating in "The Indian Grace" (No. 2) the Court was not considering a claim truly in rem."* (Steyn 1998)

The dilemma arising from the procedural theory, as laid down under the Indian Grace case (Goff of Chievellery 1993) makes cases more complicated since the plaintiff is required to obtain evidence to establish that the operator of the vessel is the liable defendant. In today's world, the situation becomes even more complexed since the owner of the vessel may not be the demise charterer, or the managing company. Moreover, another issue that occurs is no claim can be taken in *Personam* against the beneficial owner of the vessel once it has been decided in *Rem*.

A like instance is also to be found in a decision of the Supreme Court of Pakistan in the case of Eastern Navigator (N. H. and A. H. D. Siddiqui 2001) in which the *rem* and *personam* jurisdictions appear to have been completely confused and the object of arresting a vessel for security was greatly overlooked and has become a subject for arguments that in the exercise of *rem* jurisdiction the arrest of the vessel is not called for. To top it all a learned single judge of the High Court of Sindh has even ordered substituted service by publication upon a vessel which was nowhere to be found within the jurisdiction at the time of the institution of the admiralty suit. It is pointed out that the lack of understanding of the nature of two proceeding i.e. *in rem* and *in personam* is mainly due to the old decisions of the admiralty court under 1861 English Act which Under Section 35 provided alternative to the court either to proceed *in rem* against the ship or against the owners *in personam*. In the 1980 Admiralty Ordinance, there is absolutely no corresponding provision. On the contrary Section 5 of the said Ordinance clearly sets out the matters in which the proceedings *in personam* can be resorted to Section 5 of the Ordinance is reproduced as follows:

#### **"5. Jurisdiction in personam of Courts in Collision and other Similar Cases:-**

*(1) No Court shall entertain an action in personam to enforce a claim to which this section applies [that is to say claims for damage, loss of life or personal injury caused by ships or arising out of collision between ships or out of the carrying out of or omission to carry out a manoeuvre in the case of one or more of two or more ships or out of non-compliance, on the part of one or more of two or more ships, with the regulations made under section 214 of the Merchant Shipping Act, 1923 (XXI of 1923).]*

**Note:** *the words in the [ ] brackets have been taken from section 5(6), which distinctly lays down the claims to which section 5 applies, unless -*

*(a) the defendant has his ordinary residence or a place of business within Pakistan; or*

*(b) the cause of action arose within the internal or territorial waters of Pakistan; or*

*(c) an action arising out of the same incident or series of incidents is proceeding in the Court or has been heard and determined in the Court."*

There is also an undesirable practice at the bar of instituting proceedings in rem against the vessel and also joining several other parties as defendants namely the local agent, the owner of the vessel or the shippers of the goods etc. who have indeed nothing to do with the proceedings in rem and the admiralty court ought to put the claimants to election either to proceed in rem or to proceed in personam. If the claimants elect to proceed in rem, the other parties arrayed in the suit should be struck off. If however, they elect to proceed against the other defendants in personam then the security should be discharged and the vessel should be struck off as a defendant as the cause of action against them is distinct from that against the vessel.

A ship may only be arrested in an action in rem. The Admiralty Rules do not provide for how an action in personam is to be commenced, it is a fact that an action in personam cannot be commenced by initiating the same process. By initiating an action in rem it would be difficult to reach the owners, operators or charterers of the vessel if they are not residing within the jurisdiction of the Court.

The main problem faced by the claimants for proceeding in rem for arresting a vessel is due to a lack of appreciation of the implication of Section 4 sub section 4 of the Admiralty Ordinance 1980 which among others provides for action in rem arising out of the liability in personam of the registered owner or charterer at the time of accrual of the cause of action and also at the time of arresting the vessel. The confusion is worst confounded in case of the arrest of a sister vessel, which is also not easily understood. The said Section 4 of the Ordinance provides for arresting either the offending vessel or the sister vessel only if the registered owners or the charterer own majority shares in the ship which is distinct from the shareholding of the company which owns it. The said Section refers to the shares in the ship itself which under Section 17 of the Merchant Shipping Ordinance 2001 are notionally divided into 64 parts.

The judicial sale of the ship by order of Admiralty Court ensures satisfaction of the entire claim pending in Court subject to availability of the sale proceeds and appropriate in the ordinary priority as discussed in Asian Queen Case (Naimuddin 1982). It is important to appreciate that the nature of the judicial sale as against sale ordered by Civil Courts or by any Administrative Authority.

Therefore, the crux of the rem proceedings is that the offending vessel is arrested by the admiralty court irrespective of the domicile or flag of the vessel or of her owners or the cause of action arising anywhere in the world. As a result, the personification theory of the vessel is promoted by resorting to admiralty jurisdiction for arrest of the vessel for obtaining

security as a result of which the claim is secured against the risk of disappearance of owner, and for other reasons, such as insolvency.

## **Conclusion**

Admiralty practice in Pakistan has left much to be desired both at the bar and the bench and the main problem is that a clear concept of this extra ordinary admiralty law and jurisdiction is greatly lacking among, the lawyers, except a handful of them who practice on shipping side. The need of the hour therefore is to popularize the availability on this extra ordinary remedy of the jurisdiction in rem as well as jurisdiction in personam exercised by the High Courts at Karachi and Quetta.

Since the promulgation of the Admiralty Ordinance 1980, a period of 40 years has gone by and the Government has failed so far to frame any rules under the said Ordinance and regrettably we are still following the rules framed under the Colonial Court of Admiralty Act 1890, "as practice of the court", because the act under which they were framed has long been repealed and is no longer in force.

At the end it is hoped that the Law Department of the Government of Pakistan will pay the required attention to bring out necessary amendments as discussed above and to frame the Admiralty Rules as soon as possible which would greatly facilitate the practice at the Bar.

## **Recommendations**

- Admiralty Ordinance, 1980 should expressly provide with the power of arrest which is the crux of the proceeding in rem.
- The admiralty law should clearly provide for the power of the court to arrest the res which is significantly absent in the Admiralty Ordinance 1980, although it is naive to suggest that without such specific power the admiralty court is not empowered to arrest any vessel because the power to arrest is undoubtedly inherent in the admiralty jurisdiction of the court, without which the proceeding in rem cannot be instituted or proceeded with.
- The admiralty law should also incorporate a precise jurisdiction of the court to entertain counter claims by the owners of the vessel in case of wrongful arrest or frivolous proceedings resulting in detention of the vessel, in the same suit, inspite of the nature of counter claim arising under the law of tort. It may be pointed out that under Rule 774 of the Admiralty Rules presently in force, any matter not provided for in the said rules are to be governed by the provisions of the CPC and counter claim can still be filed under order VIII of the Civil Procedure Code. The importance of entertaining counter claim which may be decided along with the main suit is obvious because the court seized of the case can best judge the circumstances of the counter claim and grant proper relief in the same suit and the defendant should not be driven to file separate suit for recovery of damages, which may take years to come up for trial.
- In doubtful claims, the Admiralty Court should have discretionary powers to bind down the claimants at least by an undertaking to pay damages arising out of wrongful arrest or detention of the vessel, in the same proceedings, where either negligently or fraudulently orders of arrest are procured.
- New Rules ought to be framed because the prevailing rules were framed under the Colonial Courts of Admiralty Act, 1891, which has been repealed.
- Admiralty cases due to their importance should be expeditiously disposed off or a timeframe be given as enshrined in National Judicial Policy for other cases.
- When the Admiralty suit comes for hearing and in the opinion of the Judge that the claim is well founded, the Judge may decide the suit by giving a decree in favour of the plaintiff.
- Action in rem is entirely distinct from the action in personam. Once a claimant decides to proceed against the vessel in rem, he cannot combine his claim in personam in the same suit, which is contrary to the spirit of in rem proceedings against the vessel.



- Under the Ordinance, 1980, Admiralty Courts in Pakistan have no jurisdiction to proceed the matters relating to action in rem and action in personam jointly or proceed to their own choice as provided under S.35 of the Admiralty Act, 1861.
- Admiralty Cases must be heard in the Bench of Chief Justice or Puisne Judge or by any Senior Judge of the Admiralty Court who is in the opinion of the Chief Justice has full knowledge of the Admiralty laws.
- The Judges of Admiralty Courts must have vast power in order to exercise their authority and to achieve real object of Admiralty Ordinance.
- The provision of the counter claim is to be included in Admiralty Ordinance, 1980.
- Admiralty Courts in Pakistan should strictly be followed the principle of the comity of nations and to enforce the judgment of the Foreign Admiralty Courts.
- In cases of arrest of the vessel the court must give its decision on the basis of affidavits if it involves the question of jurisdiction, and cannot be postponed till the final hearing of the case as decided in the case of Rice Trader (Akhter 1989).
- The Court should decide the amount of security while deciding an arrest application in an Admiralty case.
- To discourage vexatious and frivolous litigations, heavy cost out to be imposed.
- Suitable amendments to be made in the Ordinance, 1980 which safeguard the privileges of ship-owners against untrue claims as well as the right of recovery of small claimants.
- Rules should be framed regarding the Merchant Shipping Ordinance, 2001.
- No matter of admiralty should be decided on the point of technicalities and it is always being avoided in the interest of justice.

## References

- AJHCO. 1980a. *Admiralty Jurisdiction of High Courts Ordinance, Section 5(A)*. <https://pakistancode.gov.pk/pdffiles/administratorb34362be18405a0754066473ad4b3b23.pdf>.
- . 1980b. *Admiralty Jurisdiction of High Courts Ordinance, Section 5(B)*. <https://pakistancode.gov.pk/pdffiles/administratorb34362be18405a0754066473ad4b3b23.pdf>.
- . 1980c. *Admiralty Jurisdiction of High Courts Ordinance, Section 3*. <https://pakistancode.gov.pk/pdffiles/administratorb34362be18405a0754066473ad4b3b23.pdf>.
- Akhter, Saleem. 1989. "Maratos & Co v. 'Rice Trader.'" In *PLD KHI*, , 94. [www.pakistanlawsite.com](http://www.pakistanlawsite.com).
- Ghaffar, Muhammad Junaid. 2019. "Salat Marine Services Co. LLC v. M.T Bofors." In *PLD KHI*, , 533. [www.pakistanlawsite.com](http://www.pakistanlawsite.com).
- Goff of Chievelery, Lord. 1993. "Republic of India and Others v. India Steamship Co. Ltd." In *Lloyd's Law Reports*, , 387. <https://publications.parliament.uk/pa/ld199798/ldjudgmt/jd971016/india01.htm>.
- Mandaraka-Sheppard, Aleka. 2001. "Modern Admiralty Law." *Modern Admiralty Law*.
- Meeson, Nigel. 2000. Chapter 3, Admiralty Jurisdiction and Practice *Admiralty Jurisdiction and Practice*. Second. Informa Law from Routledge.
- Mian, Ajmal. 1981. "Bangladesh Shipping Corporation, Dacca v. S. S. Nendn." In *PLD KHI*, , 419. [www.pakistanlawsite.com](http://www.pakistanlawsite.com).
- Naimuddin. 1982. "Twaha VS Master M. V. Asian Queen." In *PLD KHI*, , 749. [www.pakistanlawsite.com](http://www.pakistanlawsite.com).
- Naimuddin & Ghani. 1981. "M.V. Nedon v. Bangladesh Shipping Corporation." In *PLJ*, , 463. [www.pakistanlawsite.com](http://www.pakistanlawsite.com).
- Sarwana, S. Ahmed. 2000. "Jehanzeb Aziz Dar v. Maersk Line." In *PLD KHI*, , 258. [www.pakistanlawsite.com](http://www.pakistanlawsite.com).
- SCCR. 1944a. *Sindh Chief Court Rules*.
- . 1944b. *Sindh Chief Court Rules (Original Side)*.
- Siddiqui, Fakhruddin H. Shaikh and Saeeduzzaman. 1983. "Convell Laboratories Ltd. v. M. V. Alexander's Faith." In *PLD KHI*, , 459. [www.pakistanlawsite.com](http://www.pakistanlawsite.com).
- Siddiqui, Nazim Hussain and Abdul Hameed Dogar. 2001. "Yukong Ltd. South Korean Company, Seoul South Korea v. M. T. Eastern Navigator." In *PLD SC*, , 57. [www.pakistanlawsite.com](http://www.pakistanlawsite.com).
- Steyn, Lord. 1998. "Republic of India and the Government of The Republic of India (Ministry of Defence) V. India Steamship Co. Ltd." In *Lloyd's Law Reports*, , 1.
- Tasnim, M. 2011. "Faisalabad Oil Refinery (Pvt.) Ltd. v. M. T. Galaxy." In *CLD*, , 885. [www.pakistanlawsite.com](http://www.pakistanlawsite.com).
- Winter, C. 1987. "England and Wales: Part I. Arrest of Vessels." : 1-46. <https://kluwerlawonline.com/ManualChapter/Maritime+Law+Handbook/MLH20190032>.