BEFORE THE ISLAMABAD HIGH COURT, ISLAMABAD

CM No. /2014

in

W.P. No. /2014

Bolo Bhi and another

Versus

Federation of Pakistan and others

WRIT PETITION UNDER ARTICLE 199 OF THE CONSTITUTION OF ISLAMIC REPUBLIC OF PAKISTAN, 1973 READ ALONG WITH ALL OTHER ENABLING PROVISIONS OF THE LAW

APPLICATION FOR INTERIM RELIEF

The Applicants/ Petitioners respectfully submit as under:

- 1. The Applicants/Petitioners have filed the captioned Writ Petition before this Honourable Court, the contents of which may kindly be read as an integral part and parcel of this application.
- 2. The Impugned Notification dated 29.08.2006, the Internet censorship regime constructed under it and the actions of Respondents blocking websites and ordering Internet censorship are devoid of lawful authority and ultra vires of the Constitution. The Applicants/Petitioners therefore have a strong *prima facie* case that is likely to succeed on its merits.
- 3. If the Impugned Notification is not suspended the Applicants/Petitioners and the citizens of Pakistan may suffer irreparable loss through the arbitrary and whimsical block of access to information and data and so the balance of convenience/inconvenience favors the Applicants/Petitioners.
- 4. It would thus be in the interest of justice to suspend the Impugned Notification and restrain Respondents from taking any further action under the Impugned Notification until the disposal of this Writ Petition.

PRAYER

In view of the foregoing, it is most humbly prayed that the Impugned Notification dated 29.08.2014 may be suspended and Respondent No. 2 be restrained from taking any further action under it till the disposal of this Writ Petition.

Applicants/Petitioners

Through

Babar Sattar Advocate High Court Sarah Rehman Advocate High Court