

Use of Digital Technology in Providing Women's Inheritance Rights under Islamic Law

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ABSTRACT

The right of inheritance provided by Islam to women could assure their empowerment. Even though the Islamic provisions and Pakistani constitution also safeguard this right, its refutation is persistent in rural areas of Pakistan. As there is no mechanism/system for automatic distribution of deceased assets among legal heirs. This article explores circumstances that women face after demanding their inheritance rights. Using qualitative methodology twenty women are selected as a sample from Hyderabad, Tando Allahyar, and Badin for collection of data through interview-in-depth. The result drawn by subjective analysis revealed that the current tendency among women in Sindh is to willingly waive off their share in favor of their brothers. This tendency reflects old customary traditions based on a feudal mindset, which dominates the free will of women. The prevailing misconception of command of Islamic law and difficult legal procedure to enforce women's inheritance rights also perform a key role in influencing the free will of ladies. This article suggests that in the era of technological advancement as now the record of the immovable and moveable property is mostly digitalized a system of automatic distribution of inheritance should be introduced through an online application by any heir of the deceased according to Personal law provided to National database registration Authority (NADRA). If the court process is simplified for inheritance distribution it will help more effectively in the present scenario of denial of inheritance rights to women. It could be done only at the Government level with the help of the judiciary.

Keywords: Islamic law of inheritance, Women's right to inheritance, Waiver of rights, Customs and practice, Digitalization.

Introduction

Women are given an inheritance by Islamic law, which is derived from Ahkam-ul-Quran. The majority of the population is Muslim in Pakistan, therefore matters of inherited property are dealt with according to Islamic law, and Islamic law provides the right to inherit property to Muslim women. Under provisions of Shariah women's right of inheritance is not only acknowledged but also confirmed in Quran Pak (Inayat Bibi v Ishaq Nazirullah (PLD 1992 SC 385)). Islam Religion gave this right when its customs don't allow and her right was passed on etc. as property. Allah says in Qur'ān, "O ye who believe! It is not lawful for

Article History

Received:
August 3, 2022

Revised:
September 19, 2022

Accepted:
September 24, 2022

Published:
September 30, 2022

you to forcibly inherit the women (of your deceased kinsmen) (Qurʾān: An-Nisāʾ 4:19). In Islamic law it is also provided that the properties of women are completely their own and male members and guardian have no claim over that, either inherited or self-acquired through personal earnings before or after marriage(Hajjat-ul-Wida, the last address of the Prophet(BPOH) on the occasion of the last pilgrimage) .

The Qurʾān is the primary source of guidance for all Muslims. It is combined with actions and sayings of the Holy Prophet (SAW) as well as other methods of Islamic juristic reasoning, e.g., consensus and analogical deduction, where needed. In the case of inheritance, the Qurʾān clearly without any doubt defined and categorically declared the shares in every case. All cases of inheritance have been *thoroughly* decided according to the command of Allah in Surah An-Nisa, Almaidah, and Al Baqrqh. Allah says in Qurʾān, "Unto the men (of a family) belonged a share of that which parents and near kindred leave, and unto the women a share of that which parents and near kindred leave, whether it be little or much - a legal share."(An-Nisāʾ 04:7.)

Surah An-Nisa rejected the all customs of Jahiliyah and defined and provided the share of women in Inheritance (The Qur'an 3:285, 16:58-59, 4:11-12-20-34-58-176,6:98) and in the case of Companion when the widow of Aws bin Thabit approached to Prophet(SWA) and complained that according to customary practice they deprived her and children of their right of inheritance. Hence at that time, the Prophet (SAW) withheld his opinion as the verse about inheritance rights was not revealed yet. After the revelation of that verse, the unjust custom of *Jahiliyya was declared void*. Saʿad bin AbbiWaqas (RA) narrated that, Prophet Muhammad (SAW) advised Saʿad bin Khaula (RA), who was on his deathbed, that "distribute his property among his wife and daughter rather than leaving it for charity". Prophet Muhammad (SAW) always gives priority to leaving families wealthy: I was suffering from an ailment that led me to the verge of death. The prophet (SAW) came to visit me. I said, "O Allah's Apostle! I have much property and no heir except my single daughter. Shall I give two-thirds of my property in charity?" He said, "No." I said, "Half of it?" He (SAW) said, "No." I said, "One-third of it?" He (SAW) said, "You may do so though one-third is also too much, for you should leave your off-spring wealthy than to leave them poor, asking others for help. And whatever you spend (for Allah's sake) you will be rewarded for it, even for a morsel of food which you may put in the mouth of your wife." I said, "O Allah's Apostle! Will I remain behind and fail to complete my emigration?" The prophet (SAW) said, "If you are left behind after me, whatever good deeds you will do for Allah's sake, that will upgrade you and raise you high. Maybe you will have a long life so that some people may benefit by you and others (the enemies) be harmed by you."(Muhammad bin Ismail Bukhari, *ShahihBukhari*, "Book of Inheritance Laws," vol. 8, book 80, Hadīth No 725)

Women inherit property from their father, son, and husband and it makes their share almost equal to men (Ali, 197-98) . In Pakistani society survival of a lady after demanding a share in the inheritance

Table 1: *Share of women prescribed in Quran.*

Share of Daughter	<p>Girl if have brothers: then she has half of brother's share.</p> <p>When lady have no other siblings: 'Fiqh Hanafi and Fiqh Jafria': gets total 1/2 of inheritance;</p> <p>Lady have sisters: share 2/3 of the total property would be divided equally among themselves; remaining 1/3 goes to other relatives;</p>
Share of Wife	<p>Wife receive 1/8 when she has children; 1/4th when she don't have children.</p> <p>Property devolves to wife as inheritance even during IDDAT in case of divorce i.e., the period when her divorce has not yet become final</p>
Share of Mother	1/6

In Pakistan, practically no woman can smoothly inherit property. If a girl is a single daughter issue then, dowry could be given to recompense for immovable property except in Thar, the desert and rural remote area of Sindh, where some women inherit property.

In almost all remote areas surrendering the share of inherited property by the lady is a widespread social practice without any legal hindrance. Lady always even after marriage depends on and trust on brothers and parents in difficult period therefore, she has fear of losing family ties.

Resultantly if the relationship with brothers is discontinued it also leads to ostracizing of women by relatives and also negatively affect the marriage of children.

So many tactics in our society are used to deprive women of acquiring their right to property through inheritance. In many cases, the father in his life gifts his property to his sons to deprive his daughter and wife of inheritance. After giving all property to his sons, nothing remains for the daughters. In many cases, fake death certificates are made fraudulently of the women co-sharers and the shares of them are transferred to brothers. Emotional blackmailing, force, and fraud property have been transferred by the male member of the family. According to people girls should not be given property because it only belongs to their sons and brothers. After marriage, she belongs to other families so she does not deserve property. In rare cases, if the woman gets her share then her brother and family members cut off relations with her. In this society, it looks like it defames or a curse. Even Islam is very clear and in Holy Quran, it is clearly defined that a daughter and sister should be given her share of the inheritance.

Chowdhry (2009) written a book with the title "Understanding women's land Rights: Gender Discrimination in Land Ownership" highlighted that dowry is considered to alternate property right in South Asia and the culture is settled that women are not supposed to claim their inheritance right ever. (chowdhry, 2009) Similarly during this Study revealed that due to the fear of fragmentation of agricultural land compel landlords to refuse the inheritance right of their female relations. In another article, Bina Agarwal connected women's inheritance right denial with division in property inclusive manner. (Agarwal, 1994) A NGO Awāz Foundation's research highlighted that the incidences of violent behavior and maltreatment of women continue directly proportional to the denial of the female inheritance of landed property. (Rehman, 2010) Research revealed that in Pakistan especially in rural areas that violence against women is directly connected with refusal and demand of female inheritance right given by Islamic law.

Every Government try to make Laws for the purpose to provide justice and securing women's right to inheritance but on the other hand especially in rural areas male member of families try their best to deprive females of their legitimate share of the property. On the order of the Honorable Supreme court land record of Sindh is computerized and it is better for future planning to avoid discrimination against women. Honorable Supreme Court also declared that devolution of property under Islamic law is automatic without any application. (ghulam ali vs Mst. Ghulam sarwar naqvi (PLD 1990 Sc 1), 1990)

To protect the rights of women Constitution of the Islamic Republic of Pakistan guarantees the removal of all kinds of discrimination and rights. And to discourage all kinds of practices to deprive women of their Inheritance rights passed the Criminal Law Amendment with the name "Prevention of Anti-Women Practices Act 2011" (HUSSAIN, 2 JULY 2021) which exclusively made to provide prohibit women's disinheritance under sections 498 A, 498 B, and 498 C, are read as under:

498A. Sāya that whoever by using deceitful or unlawful means depriving women of inheriting property moveable or immoveable at the time of opening succession shall be punished with imprisonment for either description for a term which may extend to ten years but not less than five years or with fine of one million rupees or both.

498C. this section provides prohibition of marriage with the Holy Quran. "Whoever compels or arranges or facilitates the marriage of a woman with the Holy Quran shall be punished with imprisonment of either description, which may extend to seven years

which shall not be less than three years, and shall be liable to a fine of *five hundred thousand rupees..*"

Because of the present scenario of denial of the right of inheritance Government of Pakistan made the above amendment to criminal law in the year 2011 that provides and also clearly declares that all kinds of denial of the right of women in inheritance are an offense. Even then our cultural practices and social pressure also play an important role in this context and create many hurdles for women. Study in hand is an effort to discover a factual situation on the ground and also challenges that women face in our society of Sindh regarding their choice about claiming their inheritance right in the property of ancestors.

Research Objectives

- Discover the will of women concerning their inheritance rights
- Detection of execution of laws determinants which shape the choices of Women in claiming or giving up their inheritance right.
- Explore the challenges in claiming their inheritance rights.
- Find out the new solution to this problem

Research Methodology

This article pursues the legal stance of the cases adopting qualitative methods to conclude the results/findings. A qualitative researcher is interested in understanding the meaning people have constructed, that is, how people perceive things and Islamic law and the experiences they have in the world. In the opinion of the researcher qualitative approach was fit to answer the research question of this study. It allowed the researcher to focus on the participants". Furthermore, data is compiled descriptively merely not only it is easy to drive results but clear in understanding. Because mere numbers were scientifically perfect but always remain far from reality and explain nothing.

Results

Challenges

This article explored that in the presence of an old customary mindset it is difficult for a woman to exercise her right independently. Resultantly women decide to waive their right to ancestral property. Finally collected data speak it that from natal relations or right of property, women have to select one of these two choices. Hence these types of compulsions always use to pressurize women to surrender their legal rights. As the practice of surrendering the right of inheritance is high than those who demand it, the researcher has devoted a major portion of this paper to not only explore the reason but find out the solution to this highlighted problem. During this study, only one solution has come to mind if the property is divided automatically by the use of modern technology then no one can compel women to surrender their rights. (Mst.Halima vs Muhammad Alam & others, 1999)

A prevalent misconception is especially in the Muslim community that women receive less share than men by inheritance. Resultantly women are considered inferior to men. According to Islamic law, a man is responsible for the monetary expenses of his wife and children. It consists of education, clothing, health, food, and other necessities. Additionally, at the ceremony of marriage, the husband is responsible to pay Meher as a dowry gift to the bride. He is also accountable for looking after himself, his wife, children, aging parents, and close relatives depending on his competence. It is revealed by analysis of research that if men inherit double of women did not confirm any kind of superiority or benefit to men. It is assumed that the responsibility of men is double of women as the man has the responsibility of his family as a custodian and caretaker, those he has to fulfill any way and in all conditions. Moreover, according to Islamic law men always do not inherit double shares like women. On the other hand, women in some conditions get more share than men. There exist too many other instances but this article merely discussed very few. If a Muslim deceased left behind his mother, father, daughter, and wife, then the daughter will receive half of the whole property by the way of inheritance. The father and mother each

will receive 1/6 and the wife will get one-eighth. The daughter receives a larger portion than the father in such type of situation. In the case of the deceased lady if she left her husband and daughter then the daughter receives half of the whole property and the husband receives a quarter, in both cases women got more share than men. In such type of scenario men and women get equal property. In another case, any Muslim who died leaving behind maternal brothers and sisters will get equal right of inheritance to finish up with sharing a third after the deceased's bequeathable property and also after paying liabilities if any. (Ahmad, 2016)

Interviews Report

Selected cases of Women claiming their right of Inheritance

In this study data derived is collected by interviewing women who claimed their right of inheritance only in very compelling circumstances when there was no other way out. A lady respondent claimed her right when she observed that the income of her husband is not sufficient and it became very hard for her to make both ends meet. In these compelling circumstances, she decided that she should claim her right. The respondent was from Badin and has six children to support. That woman disclosed that she was compelled due to horrible poverty and demanded her property right. She said that she can't keep her children hungry because she has nothing to provide food to her children properly and educate them. How painful would be for a mother to listen to the cry of her children because of hunger and sickness? Resultantly though she remains successful in getting her right of inheritance but her natal family boycotted her. In other cases, it is revealed that women claim their rights in very compelling circumstances like when a woman became a widow, is divorced by her husband, or is pressurized by in-laws and husband. If a lady lives in a joint family, mostly women claim her right just because of the pressure of in-laws. Five women in this study were pressurized to claim their right of inheritance by in-laws and husbands. For women, such a situation is very hurting because they always lose one or the other relations in either case. These conditions are very difficult because women sustain a loss in all situations means if they claim then they could lose their natal relations and if they do not claim then their in-laws deteriorate. A lady from my respondent told her situation that after the death of her brother she was not willing to claim her right. However, her husband pressurized her to do so. She said that when she told her husband that she don't want to demand her right of inheritance just because of her loved nieces, her husband said that her nieces are dearer to her than her children. During this study, another lady respondent said, "In my natal family when inheritance process started, my in-laws pressurized me to claim my share; since according to her my dowry was very small. Resultantly she was compelled by her mother-in-law to demand inheritance rights. She further said that even though that case is still in court, she is badmouthed by her brothers several times. She further woefully said that she is not respected by her natal relatives. These all facts made this fact very clear that in our society there is no acceptance of the claim by women of their rights. Even if these claims have been made due to adverse social circumstances, women are deemed as bad and greedy. No heed is paid to the fact that these women have rightfully inherited their shares. Moreover, in most cases, widowed women were seen to claim their inheritance. One lady among respondents was from TandoAllahyar told that she did not claim her right of inheritance from her natal family. However, she said that after the death of her husband her brothers never contacted her nor supported her in very difficult times. In such a situation, she decided to claim her legal right." Such a statement discloses that if any lady claims her right then she tries to justify her actions because of social conditions. Another big scenario in Sindh is the custom of the Karo Kari people due to fear of division of property they kill their sisters and female relations under the allegation of Karo Kari along with their enemies. A handful quantity of women reported claiming their right of inheritance with their own will. One of the worst factors is another custom of the marriage of women with the Holy Quran (HakBakhshish) which is totally against Islamic law and the soul of Islam. Only just to secure their property from division amongst women relations.

During the study, it comes the experience that from all respondents there was a single lady in this research who claimed inheritance right by her own choice and she don't have any financial problems or pressure

from her in-laws. That woman lives in Hyderabad. She decided to take her right with free mind and heart stating that "I have claimed my right of inheritance with my own will and without any duress. I did so because I wanted to do "sadaqakheraat" in the name of my parents who brought me up with extreme love and care." During present research and after study of the above cases it is very clear that women who demand their inheritance rights are very rare. Most women claim their right under compelling circumstances of financial crises or due to pressure from in-laws or husbands.

The situation of denial of inheritance rights to women is prevailing all over Pakistan. If women own property it will play a significant role in the advancement and empowerment of women which is difficult to tolerate for men. (Bishin, 2017)Corruption in the Judicial system of Pakistan is also a great cause of malpractices against women, one financial position of is also important for facing legal process. (Daley, 2013)In no circumstances it is observed that a brother, father or any husband surrender any property or right for his sister, daughter or wife. No such cases ever heard that any man withdraws from inheritance for his poor sister, daughter, or any female relation then why such expectations are made from women as a sister, daughter, wife, etc. It is never heard that any sister, daughter, or wife expelled her husband, brother, or father from her house. Even then preference is given to the male child by parents only due to "warasat" and being a "waris". The old pre-Islamic thinking is still prevailing in not only in Pakistan but in many other nations in the world.

Problems Faced by Women Demanding their Inheritance Right and Reason behind surrendering this right

Through a very detailed study during fieldwork, the researcher observed several socioeconomic determining factors which lead to the choice of women regarding the claim of their inheritance right. Those determining factors are lack of courage and awareness in women, the pressure of natal relations, emotional blackmailing and attachment with brothers, etc. Collected data reveals that the majority of women surrender their inheritance right in favor of brothers to follow social values and norms. Detailed reasons are discussed in the above paragraphs. The most common reason behind this situation is a lack of awareness about Islamic laws and the Quran. Quran and Sunnah provide rights of women in inheritance by prescribing share in Quranic verses (Eda Khan vs Mst.Ghanwar and others 2004 SCMR 1524, 2004). It is observed in nearly about all areas of Sindh, it was noted during the study that girls from the very beginning girls learn to scarify for brothers, and if they claim then it will be against customs. When it was asked other people why in Pakistan women surrender/withdraw their right of inheritance in favor of their brothers and never claim from natal relatives, most respondents replied, "All women who claim their right of inheritance are not good." Such type of statement reveals that the teachings of Islam are misunderstood by women in our society and in remote areas women are not aware of the fact that the right of inheritance from the property of ancestors and other family members is their basic human right and also given by Islam. Misconception about inheritance rights makes women believe that they could not claim their rights or even could not inherit property. Similarly, in some cases, dowry articles given by parents play an important role in leaving the inheritance right to girls. Most of the respondents of this study from remote areas believed that dowry given to them is an alternative to inheritance rights. In rural areas of Sindh, it is a presumption that dowry articles are equal to the right of inheritance. Due to this type of misconception girls never claim their rights or surrender their rights in favor of male members. Furthermore, when in-laws of women are rich or well off they stop them from claiming their right of inheritance from their natal family. During this study, I met with one lady who said that her husband did not allow her to claim her inheritance right because he thought it is an insult. Particularly in remote areas of Sindh women feels fear of claiming their right just because of the custom of Karo Kari and marrying them with the Holy Quran which is not acceptable in Islam. (IramRubab, 2018)

While examining our judicial system we can see that Judicial activism is somehow played the role of blessing for Pakistan but on the other hand, the system based on cultural customs prevailing in Pakistan which are frequently in use by the inhabitants to settle their issues outside the court like Panchayat and Jirga which had been continuously tolerated by the stakeholders and legislatures on the point of that the

hitting the customary practices or legislating against it will create a situation of chaos situation whereas they also afraid of to overstep or cross the boundaries of executives and judiciary due to vague separation of the power system of Pakistan. That is also pertinent to be taken into account that the Judiciary had always played a significant role in the development, modernization, and progressive governance that had been started since the independence of Pakistan and even sometimes supported the significance of Islamization as a source of law. (Chawdhry, 2009-2010)

Inheritance Right of Minor Girls: In the case of minor girls it is observed that when the father of any minor girl died her elder brothers and paternal uncles try to exclude her name from the Heirship certificate, and use all possible ways to usurp her share of property (Ali S. , 2006)

As the official registration of birth and death in the NADRA record is always considered authentic proof of one's identity, the people who did not register the birth of their female child make it easy to discriminate against daughters at the time of opening of inheritance. Thus, the percentage of births officially registered may have some relationship with parents' attitudes towards the daughters' rights to inherit property (chawdhry, 2011). All over Pakistan ratio of depriving minor girls of their due right of inheritance according to a report is:

"Overall ratio is 58.1%. However, it is maximum in Punjab (85%) followed by NWFP/FATA (75%), Gilgit (FANA) (50%), Baluchistan (12%), and Sindh (70%)." (Pakistan, 2002)

Mostly in Sindh and commonly all over Pakistan elders try to escape the names of minor girls from heirship certificates to deprive them of obtaining their inheritance (Ali SS, 1997-98).

Impersonation by other women: Women in Pakistan have no or less knowledge about their rights given in Islamic law. Along with different other tactics used to deprive a lady of his rights impersonation is also used by male members of the maternal family. It is also observed that whenever any lady denies surrendering her right brothers and other male family members bring other women in purdah as sisters for surrendering their right of inheritance in his favor. Impersonation easily could be controlled by the digitization of revenue and another record of rights. The main problem is registration of birth records in NADRA is very much necessary and requirement of time. If birth is not on the record of NADRA then it will be difficult to control such malpractices even after digitization is done. (Women(NCSW), 2021)

Digitalization of Record

In the court process number of documents are required to file and precede the case such as Nikahnama, CNIC, B-form, marriage certificate, etc, which is very difficult for women to acquire and file before the court of law (Women(NCSW), 2021). The process of digitalization of records of rights of immovable property records is an important step toward laying the foundation for creating more accurate and comprehensive property records to remove all kinds of discrimination against women in the distribution of inherited property. That record could be connected with the website of NADRA and an application design in this regard. (Ali S. , 197-98)

Conclusion

It is finally concluded that in the social setup of Pakistan, women could not claim their inheritance right confidently. Several interesting facts are observed during research and concluded one of them is that the financial status of families is also a relevant factor in the present context. The attitude towards women's inheritance rights is also positively dependent upon the improvement of the financial position of families. Respondent lady having larger family sizes and less property is less likely to give rights to daughters and on the other hand, women having small family sizes or high level of wealth may be more likely to give a share to women and even women who have property on their names. [xxiv]It is believed that as daughters are supported by their husbands, therefore securing the financial benefits of son are justified. It is important to note here that family size does not affect the intention of giving daughters their due shares in the property. Consequently, the situation is settled like a norm and even a father or brother or smaller

families believe that daughters and sisters should be given a share of the property but practically they did not intend to act on it due to social norms and practices creating obstacles in their way.

If any Government is really sincere to give inheritance rights to women then, it has to plan something different and there must be any defined mechanism by which inheritance rights could be transferred directly to female relations. There should be no need to contact anyone and claim inheritance rights and women could be able to get their inheritance right directly. To secure the right of minor girls Government should provide direct registration of birth through hospitals. In this regard, Hospitals may be provided link to NADRA Website as no girl face problems in the future.

Recommendations

- Only the use of technology can easily solve this big problem softly. An application could be designed online which provide service to women without asking brothers and father share could be provided to women according to Shariah Law.
- This service could be provided by NADRA because issuing authority of birth certificates, death certificates, and succession is now assigned to NADRA.
- Whenever applied for a death certificate and succession certificate of any person all his movable and immovable properties are automatically transferred in the name of his or her offspring according to the share provided under Islamic law.
- To secure the right of minor girls Government should provide direct registration of birth through hospitals. In this regard, Hospitals may be provided link to NADRA Website as no girl face problems in the future.
- Biometric verification system could easily remove the apprehension of impersonation on behalf of women in inheritance matters.
- Straightening legal procedures is also a need of time and plays an important role in providing rights to women.
- It is important and interesting to mention here that Islamic education of families is observed very significant factor in attitude towards their daughters and sisters, more likely to give their daughters their due shares in the property, more likely to view that women should be given their legal shares in the property and more likely to view that women may keep the property in their names

Acknowledgments

None

Conflict of Interest

Authors have no conflict of interest.

Funding Source

The authors received no funding to conduct this study.

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References

- Agarwal, B. (1994). *A Field of One's Own: Gender and Land Rights in South Asia*. Cambridge: Cambridge university Press.
- Ahmad, M. B. (2016). *Journal of Social Service Research*. Retrieved 7 2, 2022, from . State of Inheritance Rights: Women in a Rural District in Pakistan.: <https://doi.org/10.1080/01488376.2016.1177633>
- Ali SS, '. (1997-98). *Women's Human Rights in Islam: Towards a Theoretical Framework*. Islamic & Middle E. L.
- Ali, P. (1980). *Human Rights in Islam*. Lahore: Aziz Publishers.
- Ali, S. (2006). Rights of the child under Islamic Law and Laws of Pakistan: A thematic overview. *Journal of Social Studies* , 2.
- Ali, S. (197-98). Women's Human Rights in Islam: Towards a Theoretical Framework. *Y.B.Islamic & Middle E. L* , pp. 117-130.
- Bishin, B. G. (2017). *Comparative Politics*. Retrieved 6 2, 2022, from Women, Property Rights, and Islam : <http://www.jstor.org/stable/26330985>.
- chawdhry, A. (2011). A Women's Marriage to Quran: An Anthropological Perspective from Pakistan'In Anthrops. *Journal of law and social Research* , 411-422.
- Chawdhry, A. (2009-2010). The logic in the Tradition Share of Daughter in fathers Patrimony:a case study of Punjab. *Journal of Law and Social Research* , 27-40.
- Chowdhry, P. (n.d.).
- chowdhry, p. (2009). Understanding Women's Land Rights: Gender Discrimination in land ownership .
- Daley, S. (2013). 'Closing the gap between law and reality: Women's constitutional rights in pakistan. 'Closing the gap between law and reality , pp. 329-351.
- Eda Khan vs Mst.Ghanwar and others 2004 SCMR 1524 (Supereme court 2004).
- ghulam ali vs Mst. Ghulam sarwar naqvi (PLD 1990 Sc 1) (SUPREME COURT 1990).
- Hussain, D. F. (2 july 2021). *Enforcement of protective legislation for women*. Islamabad: DAWN.
- INAYAT BIBI VS ISHAQUE NAZIRULLAH, InayatBibi v IshaqNazirullah (PLD 1992 SC 385) (SUPREME COURT 1992).
- IramRubab, a. A. (2018). *Women's Right of Inheritance* . Retrieved 6 15, 2022, from Journal of Islamic Thought and Civilization: <https://journals.umt.edu.pk/index.php/JITC/article/view/107>.
- Mst.Halima vs Muhammad Alam & others, 1999 MLD 934 (High Court 1999).
- Pakistan, H. R. (2002). *state of Human rights in 2000*. Islamabad: Human Rights Commission.
- Rehman, S. (2010). *Denial of womens Right of Inheritance enhancing their vulnerability to domestic and social violence*. Islamabad: Awaz foundation islamabad.
- Women(NCSW), N. C. (2021, 6 20). *National Commission on the Status of Women (NCSW)*, . Retrieved 4 1, 2022, from Women's Right of Inheritance : http://www.ncsw.gov.pk/prod_images/pub/Right_of_Inheritance.pdf