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# **Government-Opposition Dynamics in Pakistan: Collaboration on the Thirteenth Constitutional Amendment Bill**

## **ABSTRACT**

Working relationship of government and opposition is indispensable for the success of the political system. Pakistan has chequered history on this subject. Both government and opposition never abide by the rules of the game within the parliamentary framework. The government always tried to suppress opposition and in consequence opposition always tried to commune with extra-constitutional powers to bring down the government of the day. Yet there were few instances in the history of Pakistan when both collaborated. Both unanimously passed the Constitution of 1973 and the Thirteenth Constitutional Amendment in the National Assembly. That was the historic moment of the repealing the Article 58(2)b in the Eighth Amendment on 1 April 1997. The present paper is an attempt to explore the circumstances leading to the repeal of the above article and the

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commendable cooperation of both the government and opposition.

Pakistan has witnessed frequent and drastic changes in the form of three successive constitutions and a host of provisional constitutional set-ups. Pakistan has been oscillating between presidential and parliamentary forms of governments throughout its history. The result was instability and unpredictability in relationships between the democratic institutions and a powerful civil-military bureaucracy. Very often, constitutions were used as an instrument for the pursuance of vested interests by the regimes in power through manoeuvring or amending these to suit their short-term objectives. Judiciary, usually, did not help in restraining the authoritarian rulers. In this sense, it was blamed that it failed in its role as custodians of the fundamental law of the land (Abbas, 1997, p. 7).

The first constitution of 1956 envisaged a parliamentary form of government, but some of its grave contradictions led to its failure. The constitution of 1962 conceptualised a presidential form of government but without its fundamental principle of checks and balances. In comparison, the constitution of 1973 was a democratic one debated and agreed upon in a directly elected legislature and unanimously adopted by all the political parties in the National Assembly. (p.10) Although its distortion began with Zulfikar Ali Bhutto himself, the chief architect of the constitution, in the shape of amendments curtailing the power of judiciary (Yusuf, 1980, p. 136), but it was ultimately distorted by General Zia-ul-Haq in 1985 with the introduction of the Eighth Amendment, imposed upon a helpless parliament as a price for the lifting of Martial Law in the country. The Amendment introduced

changes which fundamentally affected the structure and nature of the constitution (Aziz, 8<sup>th</sup> Amendment in *The Nation*, 1989 February 25). Supporters of the Eighth Amendment viewed it as a step towards the eventual balancing of power between the President and the Prime Minister. Its opponents maintained that it had given the President preponderant authority in the country, with most of the powers concentrated in his hands (Aziz, *The Nation*, 1989 February 25). Those in favour justified it as a natural outcome of the events that took place in 1977, leading to the ouster of Bhutto and imposition of the Martial Law. The opponents questioned the very intent and legality of the manner in which the constitution was amended. The Eighth Amendment was not merely an amendment; it was amalgamation of two systems to suit the man in charge, General Zia-ul-Haq (Akhtar, *The Pakistan Times*, 1989 February 18). The Eighth Amendment altered about 67 Articles but the most debated and effective Article was 58 (2) b which destabilized the political system of Pakistan with the dismissal of four elected governments within the short span of one decade. Talbot referred to these dismissals as "constitutional coups" in his book. (Talbot, 2012, p. 144)

The Eighth Amendment was passed by the National Assembly in 1985 to help bring an end to the Martial Law. The Amendment was designed by a military ruler to control and guide the democratic process on the pretext of creating a balance between the powers of the President and the Prime Minister. The then Prime Minister, Muhammad Khan Junejo had to accept it, as he had no other option. General Zia-ul-Haq used this Amendment to dismiss his government and dissolve assemblies in 1988. (Waseem, 1994, p. 444).

Zia-ul-Haq's death in an air crash paved the way for Benazir Bhutto to come into power. Benazir Bhutto's government felt acutely insecure in the presence of Eighth Amendment. It meant that President Ghulam Ishaq Khan, who was elected into his office with the support of PPP's MNAs and MPAs, could, if he so wished, create all sorts of problems for her. He could even oust her from office. Besides, Benazir Bhutto's unnecessary involved its government in bickering with both President and Prime Minister (Akhund, 2000, p. 69). Moreover, Nawaz Sharif and other opposition leaders were facing 160 cases of tax aversion and loan default (Talbot, 2012, p. 149). The Combined Opposition Parties (IJI) including PML, JI, JUI, BNP, MQM and other minor parties moved a no-confidence motion against Benazir Bhutto in November 1989. Though the motion failed (Aziz, 2009, pp. 103-105) but it diminished any chances of cooperation between opposition and government.

The PPP did not have the required two-third majority in the National Assembly to repeal the Amendment and it was hard to bring about a consensus on the issue. The PPP's erstwhile partners in the Movement for Restoration of Democracy (MRD) had toned down their demand for the repeal of the Eighth Amendment, which, in their view could, only have strengthened Benazir Bhutto. The opposition alliance Islami Jamhuri Ittihad (IJI) maintained its old position, i.e., that this Amendment had created a balance between the two offices of the President and Prime Minister. Thus, both Benazir's allies and opposition were not interested in its repeal (Waseem, 1994, p. 444). Benazir Bhutto government's dismissal, after twenty months, demonstrated the inherently problematic nature of the Amendment.

In the 1990 elections, opposition alliance IJI's victory had provided an opportunity to Nawaz Sharif to become the Prime Minister. Nawaz Sharif started his term on a positive note, but the Eighth Amendment did its part, and in the end, both the President and the Prime Minister were at loggerheads. Nawaz Sharif's confrontation with opposition alliance PDA further undermined his position (Talbot, 2012, p. 152). The President threatened Prime Minister with the Amendment (*Nawa-i-Waqat*, 1993, February 4). Nawaz Sharif was constrained to look for opportunities to repeal the Amendment. Though Nawaz Sharif announced on Senate floor on 28 February 1993 that he has started the process to delete Article 58 (2) b (Aziz, 2009, p. 136), but he needed the support of other political parties, especially the then opposition party the PPP. Although Nawaz Sharif appointed Benazir Bhutto the chairperson of Standing Committee for foreign affairs to show a positive gesture for future cooperation but she was not keen to oblige him. The reason was that Benazir Bhutto was facing many charges of misuse of secret service funds and cases against Asif Ali Zardari, her husband including a charge of obtaining a bank loan fraudulently and murder of political opponents. Besides, Benazir was also termed as 'Kafir' and 'terrorist' by the Nawaz Sharif's camp (Talbot, 2012, p. 149). Above all, Benazir Bhutto wanted to exploit this tussle between the President and the Prime Minister to her own advantage. As Talbot described "when in power both leaders had used authoritarian measures to weaken opponents, while those out of office turned to establishment an equalizer" (Talbot, 2012, p. 149).

The President and the Prime Minister did their best to enlist Benazir's support. Nawaz Sharif sent Iftikhar Gillani to ask her to help repeal the Amendment. Similarly Guhlan

Ishaq Khan approached Benazir Bhutto and assured her that he would dismiss Nawaz Sharif government to pave way for fresh elections under a neutral, care-taker government in case she support him in the next presidential elections (Mir, 1996, *The News*, October 22). On her part, Benazir Bhutto watched the ongoing tussle carefully and deliberately. Finally, she decided to side with the President and refused to support Nawaz Sharif in his efforts to get rid of the Amendment. She was convinced that Nawaz Sharif had come into power through a "rigged election". The only way she could get even with him was to have him suffer the same fate she herself had suffered in 1990 though a move "inexcusable for a self proclaimed democrat" (Talbot, 2012, p. 149). The logical outcome of the struggle for power was almost a foregone conclusion. The President had the powers to dissolve the National Assembly and dismiss the government which he, ultimately, did in April 1990. Although his government was restored by the Supreme Court in an unprecedented, historic Judgement, Nawaz Sharif could not continue in office. He had to quit (Khan, 1997, pp. 123-32).

In the 1993 elections, Benazir Bhutto returned to power as Prime Minister, once again. Soon after, her Minister for Law and Parliamentary Affairs announced in the National Assembly that a consensus bill to do away with the Amendment would be tabled in the House (*The Muslim*, 1993, December 22). But then, Benazir Bhutto and her government were not in hurry as her old party "loyalist" Farooq Ahmad Khan Leghari was President this time. She had no fear of him. She could trust him to do her bidding as he had publicly proclaimed: "I would not be a President who encourages intrigues or subverts the democratic process" (Mir, *The News*, 1996, October 22).

However, both government and the opposition resolved on 23 August 1993 to empower the speaker of the National Assembly to constitute a Committee that will deliberate on the constitutional irritants including the Eighth Amendment (*The News*, 1994, August 24). But before any progress could be made, the opposition retracted its offer of co-operation. It insisted that the government must first improve the general political atmosphere of the country as there was widespread victimization of the opposition (*The Nation*, 1994, August 26). The reason behind this move were that the PPP moved a vote of no confidence against Pir Sabir Shah's government in KPK on 16 February 1994 that was carried and proved to be a renewed source of confrontation between the government and opposition. Besides, the PPP government also arrested PML leaders Chaudhry Shujaat Hussain and Sheikh Rashid Ahmad. PML feared that Nawaz Sharif might be arrested by the government. Consequently Nawaz Sharif started Tehrik-i-Najjat in September 1994. Nawaz Sharif's father was also arrested on November 1994 (Aziz, 2009, p. 150).

Despite all odds, the PPP government took steps to activate a committee of legal experts to examine the whole issue carefully. The Law Minister was appointed its chairman. But, apparently, the committee did not work seriously, and thus never submitted its recommendations to the Prime Minister (Abbas, p. 99). The dilemma was that Benazir Bhutto could not repeal the Amendment on her own. And there was some reluctance even on the part of her political allies in the government. For instance, Hamid Nasir Chattah insisted that there was no need to amend the Eighth Amendment (*Pakistan Observer*, 1993 February 8). Another PML (J) stalwart and a Federal Minister, Anwar Saifullah Khan claimed that "the Eighth Amendment has been quite useful and has

prevented Martial Law from being imposed in the country" (Abbas, February 1993, *Herald*). Both Benazir and Nawaz Sharif did not help each other when in opposition "because the assertion of civilian authority was regarded as merely efforts on personal aggrandizements" (Talbot, 2012, p. 149). In the end, Benazir Bhutto could not get rid of the Amendment and fell prey to it, once again, ironically at the hands of her own President, Farooq Ahmad Khan Leghari, in 1997. The opposition leader Nawaz Sharif's role in this dismissal cannot be ignored. As he told in a TV interview that he met with the President and informed him that Benazir's removal from power is a public demand.

The dismissal of four elected government in a span of few years proved that the Amendment was a big impediment in the smooth working of parliamentary democracy in Pakistan. In each instance, the dissolution of the National Assembly was challenged before the courts, although with different outcomes.

In the first instance, the Supreme Court held in the *Federation of Pakistan vs. Haji M. Saifullah Khan* (PLD 1989 SC166) that the grounds contained in the President's order dissolving the National Assembly and dismissing the federal cabinet did not meet the criteria prescribed by the constitution, empowering him to dissolve the National Assembly in his discretion. However, the relief to restore the National Assembly and to reinstate the federal cabinet was not granted because the general elections were then under way.

In the second instance, in *Khawaja Ahmad Tariq Rahim vs. The Federation of Pakistan* (PLD 1992SC 646), the Supreme Court upheld the reasons given in President's order



dissolving the National Assembly and dismissing the federal cabinet.

In the third instance, the Supreme Court declared that the dissolution of the National Assembly and the dismissal of the Nawaz Sharif government by the President on 19 April 1993 were null and void. In the fourth instance, The Supreme Court upheld the dissolution of the National Assembly and dismissal of the Benazir government on 5 November, 1996(Mir, *The Nation*, 1993, October 28).

It can thus be concluded that the Courts did not invalidate the power of the President to dissolve the National Assembly. Indeed, they highlighted the need for judicial review of the exercise of such power by the President. When the Eighth Amendment and presidential power under Article 58(2)b were challenged in the Supreme Court by Mehmood Khan Achakzai, President Pakhtoon Khawa Milli Party, Habib Wahab Al-Khairi and Wukala Mahaz Barai Tahafaz Dastoor Pakistan, the Court dismissed the petition in its short order on 12 January, 1997(*The News*, 13 January 1997). However, in its detailed verdict on 4 April 1997, the Supreme Court emphasized the point that the said Article had brought a balance between powers of the President and Prime Minister, and thus had shut the door on Martial Law for ever. The Court insisted that the Amendment including Article 58(2) b had "come to stay in the constitution as a permanent feature". However, the Court admitted that it was open to Parliament to make amendments as contemplated under Article 239, as long as basic characteristics of federalism, parliamentary democracy and Islamic provisions, as envisaged in the Objectives Resolution/preamble to the constitution of 1973, which now stand as substantive part of the constitution in the shape of Article 2A are not touched

(Mahmood Khan Achakzai vs. Federation of Pakistan, 1997, p. 560).

The Court rejected the argument that the Amendment was brought in by the Parliament, which was not elected on party-basis. The Court pointed out that, since its introduction, three elections had taken place on party-basis in 1988, 1990 and 1993; three successive governments did nothing about it. The Court contended that it was obvious that all the parties had accepted the Amendment which amounts to ratification by implication. There was a faint hope that the controversial Amendment could be done away by the Supreme Court. This did not happen and the ball was back in Parliament's court. In the meanwhile, the opposition took over and Nawaz Sharif once again, became the Prime Minister.

Nawaz Sharif became Prime Minister of Pakistan in 1997 with a landslide victory. But, in spite of tremendous public support, he had to face an assertive President, Farooq Ahmad Khan Leghari, who was hell bent upon his constitutional powers under the Eighth Amendment. To prove the point, he rejected Nawaz Sharif's nominee, Mian Muhammad Azhar, and appointed his own confidant and a former Care-taker Law Minister, Shahid Hamid, as Governor of the Punjab. Similarly, he refused to approve the MQM's choice for governorship of Sindh. On both occasions, the Prime Minister had no choice but to submit to the President's constitutional prerogative (Hussain, 1997, *Newsline*, 23 April, p.25).

The tussle between the two was not confined to the appointment of governors. According to reliable sources, the President kept a strict watch on the functioning of the new government. The appointment of officials became

contentious. The President's increasing assertiveness generated strong resentment within the ranks of the ruling Muslim League, and the Prime Minister came under immense pressure from his party leaders to resist the presidential onslaught.

The problem became even more complicated when the President forced the Prime Minister Nawaz Sharif to nominate his cousin Maqsood Leghari who was earlier defeated in the National Assembly elections, to a seat in the Senate. The decision provoked a virtual rebellion in the Punjab Muslim League. Indeed, Zulfiqar Ali Khan Khosa, General Secretary of the Punjab Muslim League, and an old rival of President Leghari in Dera Ghazi Khan, resigned from his party post. Khosa ultimately agreed to respect the nomination, but it left a lasting bitterness between the President and the ruling Muslim League (*The News*, 1997, March 8).

In addition, there was issue of the formation of the controversial Council for Defence and National Security (CDNS) which the President had already announced during the interim government of Malik Meraj Khalid. Obviously, the idea was to impose it as a fait accompli on the in-coming government. The CDNS was to be headed by the President, with the Chief of the Army Staff (COAS), as one of its ten members (*The News*, 1997 January 14).

The move was not only meant to formalise the role of the armed forces in the political system, but, also to enhance the President's position against the Prime Minister. Most political observers interpreted the creation of CDNS as the beginning of a new era of 'guided democracy'. Indeed, it was speculated that the man behind the idea was the COAS who had stressed it in a two-page Memo sent to the President.

Later, however, the army distanced itself from the formation of the CDNS because of its reservations on some of the subsequent presidential actions (Hussain, p. 24).

In the end, the Prime Minister, Nawaz Sharif, could not take it anymore. In his special address to the nation on 31 March 1997, he announced that he had decided to get rid of the Eighth Amendment. He wanted the sovereignty of the Parliament restored. This announcement caught everybody by surprise, including the President who was informed hours before the dramatic announcement (*The News*, 1997 April 2).

Indeed, Nawaz Sharif's move to curtail President's power came like a bolt from the blue. Even his top party leaders and cabinet ministers came to know about the decision only from his address to the nation telecast live on the television and radio. According to a senior Pakistan Muslim League leader, "the Prime Minister took only five of his close associates into confidence. They were his brother, Shahbaz Sharif, Chaudhary Nisar Ali Khan, Khalid Anwar, Mushahid Hussain and General Abdul Majid Malik" (Hussain, p. 24).

On 1 April 1997, the Parliament decided to take the sting out of the Eighth Amendment. Parliamentary secretary Zafar Ali Shah presented the Bill before the National Assembly. Article 58(2) b of the Amendment was scrapped through the adoption of Thirteenth Constitutional Amendment Bill in the National Assembly unanimously by 190 members (Aziz, 2009, p. 173). Both the government and the opposition members rose in union from their seats to support the motion. The Amendment was subsequently approved by the Senate by 79 votes to nil (*The Pakistan Times*, 1997 April 2). Thus for first time both the Houses passed a Bill in the same day. Minister of Foreign Affairs and In-charge of Law and Justice Department Gouhar Ayub presented the Bill in Senate. The

government had the required strength in the National Assembly, but was short of two-third majority in the Senate. The leading opposition party the PPP, having suffered twice due to the said Article, welcomed its repeal. All its 19 Senators joined hands with the government (Abbass, p. 117). Nawab Akbar Bughti and Ataullah Mengal also supported otherwise two-third majority was not possible in Senate (Aziz, 2009, p. 173). This was the only Amendment in the constitution of 1973 which was approved unanimously by both treasury and opposition benches.

To show support, Benazir Bhutto attended the Senate session and witnessed the proceedings from the visitors' gallery. Khalid Anwar, PM's advisor on law and human rights particularly mentioned her in his vote of thanks. (Dawn, 1997, April 1)

Prime Minister Nawaz Sharif thanked all the political parties and their leaders for extending support to the government in scrapping the controversial parts of the 8th Amendment and particularly praised former prime minister Benazir Bhutto for her cooperation. He hoped that the move would establish the supremacy of parliament. He promised that he would not indulge in confrontation with opponents. Leader of the Opposition Benazir Bhutto expressed her pleasure by saying "My heartiest congratulations to Nawaz Sharif. This decision is a moral victory of every political worker who had given sacrifices for the supremacy of parliament" (Dawn, 1997, April 1). Ghulam Mustafa Jatoi, the former caretaker Prime Minister expressed his pleasure that the nation got rid of "an indirect martial law". He called Eighth Amendment "a black law" and termed "its scrapping a bold and courageous decision on the part of Nawaz sharif". Mir Hazar Khan Bijrani also congratulated the House for

removing “the sword of Democles” hanging on the parliament for the last one decade. He hoped that the goodwill generated between the government and the opposition will be retained and continued. Asfandiyar Wali, chief of ANP in the National Assembly, Hasil Bezinjo of Balochistan National Party, MQM MNA Kunwar Khalid Younus (<https://asianstudies.github.io/area-studies/SouthAsia/SAserials/Dawn/1997/05Apr97.html#bena>).

The legal experts, political leaders, and the people in general hailed the repeal of Article 58(2)b of the Eighth Amendment as a triumph of democracy. They described the Thirteenth Constitution Amendment as the most important step towards restoration of Parliamentary democracy in the country. Prime Minister, Nawaz Sharif, himself was elated. As he put it: “the spirit of Parliamentary Democracy has been revived.” (*The Pakistan Times*, 1997 April 2) The Leader of the Opposition, Benazir Bhutto called it “a moral victory for everyone who fought for democracy in the country. I congratulate the nation on this historical moment which came when we are celebrating the golden jubilee year of Pakistan.” (Dawn, 1997, April 1) Even the foreign press noted that a major source of political instability in the country had been removed with the adoption of the Thirteenth Amendment. On the other hand, some criticised that “such an important amendment in the constitution should not have been made in so much haste, after suspending the normal rules and procedures. It was, in fact, passed in only a matter of minutes” without any debate (Shah, 2001, p. 343).

Article 58(2) b had given the President the extraordinary power of dissolving the National Assembly. Precisely, to recapitulate, it said: ‘The President shall dissolve the National Assembly where in his opinion a situation has arisen in which

the government of the federation cannot be carried on in accordance with the provisions of the constitution and an appeal to the electorate is necessary'. The Thirteenth Amendment omitted the entire clause of the Article from the Constitution (The Constitution (Thirteenth Amendment) Act, 1997, [Act No. 1 of 1997], *Gazette of Pakistan, Extraordinary, Part 1*, 4April1997).

Article 101(1) of the Eighth Amendment, which dealt with the appointment of provincial governors stated: "There shall be a Governor for each province who shall be appointed by the President after consultation with the Prime Minister." The Thirteenth Amendment amended the Article in a way that the words "after consultation with the Prime Minister" were replaced with the words "on the advice of the Prime Minister." In this sense, the Amendment withdrew the discretionary powers of the President to appoint the provincial governors. Now, he is required to act on the advice of the Prime Minister. (Khan, 2005, p. 464)

The Article 112(2) b dealt with the Governor's powers to 'dissolve the provincial assembly if a situation has arisen in which the government of the province cannot be carried on in accordance with provisions of the constitution and an appeal to the electorate is necessary'. This clause was completely omitted in the Thirteenth Amendment. The advice of the Chief Minister was made "necessary" for the Governor to dissolve the provincial assembly.

Article 243(2) dealt with the command of the armed forces and stated: 'The President shall, subject to law, have powers to appoint (in his discretion) the Chairman, Joint Chiefs of Staff Committee, the Chief of the Army Staff, the Chief of the Air Staff and the Chief of the Naval Staff and determine their salaries and allowances'. The words 'in his

discretion' were omitted in the Thirteenth Amendment. The President was now required to make the above appointments subject to law.

Indeed, the Thirteenth Amendment finally eliminated the cumbersome burden of presidential seal over the parliamentary form of government, since 1985. The constitutional pendulum had swung back in favour of the Prime Minister ensuring "a certainty in the system of government" (Belokrenik by & Moskalenko, 2013, p. 347). With the balance of power restored in favour of the Prime Minister. The role of the army, which had largely acted through the President, was also limited.

A petition against the Thirteenth Amendment was filed by Syed Iqbal Haider, Chairman of the Muslim Welfare Movement (MWM) under Article 184(3) of the constitution, in the Supreme Court of Pakistan. The petitioner had submitted that due to enactment of this Amendment, the President was not powerful enough to play an effective role in resolving the continuing constitutional crisis in the country. In fact, he argued that by stripping the President of his power to dissolve the National Assembly under Article 58(2) b, the present government had exposed the country to the threat of Martial Law, once again. He contended that the 'deletion of 58(2) b in the constitution was whimsical, capricious and arbitrary, as no discussion took place in the Parliament'. On the contrary, he claimed, the Eighth Amendment was passed after detailed discussion in the National Assembly (*Dawn*, 21 November 1997).

Haider further argued that the Article, 58(2) b was inserted in the constitution after the country had experienced three martial laws. Its incorporation had worked as a safety valve against the imposition of Martial Law in the



future. Being the Chairman of a political party, he was simply interested in promoting the rights of the citizens as if Martial Law was ever imposed again, the constitution would be abrogated, and fundamental rights of the citizens would thus be suspended. He insisted that the deleted Article 58(2) b of the constitution provided for peaceful change of power, avoiding possible anarchy, loss of precious lives, and other difficulties.

Haider also referred to the Supreme Court's judgement in Mehmood Khan Achakzai case in which the said Court had held that Article 58(2) b had shut the door for Martial Law. He, therefore, pleaded to the Supreme Court to declare the Thirteenth Amendment as ultra vires to Article 5, Article 238, and Article 239 and special oath of the members of Parliament under schedule III of the constitution.

Strangely enough, Syed Iqbal Haider did not pursue the petition at the hearing stage. Indeed, Z. A. Zaidi, Advocate-on-Record, told the Court that in view of the lack of interest shown by the petitioner, he was constrained to seek withdrawal of the petition. Syed Sharifuddin Pirzada, Advocate, who appeared on behalf of government, demanded that, in case of dismissal of the petition, the Court should also bind the petitioner to pay the cost of the case to the respondent federation. The full Bench of the Court, headed by the Chief Justice, Ajmal Mian, dismissed the petition and ordered the petitioner to pay Rs.10, 000 as cost of the case within one month (*The Muslim*, 17 March 1998). After this ruling, the Thirteenth Amendment was finally part of the constitution.

The above discussion clearly indicates that the government and the opposition acted as opportunists when in power, furthering their agenda of increasing their space

and power while collaborating with other forces. Both learnt their lesson through the hard way after getting stung by the Article 58(2b), joined hands to get rid of the undesired article. History repeats itself. PPP also proposed to repeal articles 62 and 63 of the constitution through the Eighteenth Amendment, but PML(N) refused. Once again Nawaz Sharif was deposed through these articles. Now PML(N) government is offering opposition that it is ready to review these articles.

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