



WITHOUT PREJUDICE

Dated 15-02-2022

CEO Packages Mall,
Packages Mall, Main Walton Road,
Lahore

Legal Notice

Dear Sir,

Under the instructions from and behalf of Our client, Mrs. Uzma Haroon wife of Mr. Mir Haroon Rasheed, I do hereby serve upon you with the following Legal Notice:-

1. On 12th February 2022, around 7 pm, Our Client, aged 50 years, along with her grandson and nephew, was visiting your Mall for shopping when she suddenly hit by a golf car being driven by one of your female employees. The driver then ran away without looking back at the situation, whereas the nearby Mall staff did not help the victim, and instead laughed. The incident was witnessed by many people, and is also recorded by the cameras installed inside the mall.
2. Our client was severely hit, she fell flat on ground, her wrist got fractured due to the impact of the hit-and-run incident. Her nephew took her to the hospital and she underwent a surgery on next day. She suffered immense physical harm due to this situation, and is now undergoing surgery, which was a result of the criminal negligence of the staff and management of the Packages Mall. Moreover, there was no one to provide emergency treatment at the Mall to our client. Additionally, a large number of people also saw the incident and as a result our Client suffered shame and ridicule due to the awkward situation she was in.
3. It is also important to mention that the lady driver of the golf car was untrained and driving in speed amidst the weekend crowd. In addition, no one at the Mall's management was willing to look into this situation or provide any form of assistance. It is clear that the Mall Staff should have handled the situation and prevented such an accident in the first place, however they did not do so, thus showing the Mall's criminal and willful negligence.
4. It is pertinent to bring on the record that you are vicariously liable for all negligent acts of your employees, which they commit in the line of duty. In the instant case an employee of the mall drove a vehicle owned by the mall and hit a customer who came to shop at the mall and therefore you are liable to pay damages to our client as detailed below.
5. That Our client claims general and special damages on account of injury and mental torture/physical agony, medical expenses, and loss of reputation caused to her. The details of the same are mentioned below as under:

General Damages

- a. Physical Injury = Rs. 5,000,000/-
- b. Mental torture and physical agony = Rs. 5,000,000/-
- c. Medical Expenses = Rs. 1,500,000/-



Legal Assistance

d. Legal Expenses = Rs. 1,000,000/-

Grand Total = Rs. 12,500,000/-

Through this instant legal notice, you are hereby advised to pay Rs. 12,500,000/- as damages to Our client within 7 days after the issuance of this instant legal notice. Our client will be compelled to take action either to you in criminal or civil law entirely at your risk and costs. Moreover, institutionalize training of your staff. A copy of this notice has been preserved in Our office for record and future course of action.

Yours faithfully,

Justice (R) M Bilal Khan
Advocate Supreme Court of Pakistan
Pakistan

Barrister Umar Riaz Sheikh
Advocate Supreme Court of

Ch. Imtiaz Elahi
Advocate Supreme Court of Pakistan

Mir Haroon Rasheed
Advocate High Court

Obaid Ullah
Advocate High Court

Usama Khawar
Advocate High Court