

**Adverse Possession's Regime in
Pakistan after *Maqbool Ahmed v.
Hakoomat-e-Pakistan* (1991): A
Critique of its Rationale and Socio-
Legal Effects**

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Abstract

In 1991 the landmark case of Maqbool Ahmed v. Hakoomat-e-Pakistan (the Maqbool case) changed the entire law on adverse possession in Pakistan. The Federal Shariat Court in its judgement declared the laws on adverse possession to be repugnant to the provisions of Islam and expunged it from the legal system of Pakistan. This essay analyses the judgement of the Court in the Maqbool case, to ascertain its sound application of Islamic principles to the norms in question. It will be shown that Islamic principle on the use of property can be construed either as favouring or excluding adverse possession. It will be consequently argued that the Federal Shariat Court kept in view a specific social effect it intended to achieve, namely the protection of the title holder against trespassers. After examining whether the resulting Pakistani laws on adverse possession provide sufficient protection to the title holder, it will be argued that the socio-legal effects of the decision are not in line with the results the Court may have envisaged while deciding the Maqbool case, as the title holder is still not provided sufficient protection. The essay ends by arguing that the Federal Shariat Court should have indicated the potentially un-Islamic outcomes of adverse possession and, instead of removing the provisions altogether, it should have directed the legislator to amend the norms in such a way that their results could be consistent with the injunctions of Islam.

Introduction

In 1991 the landmark case of *Maqbool Ahmed v Hakoomat-e-Pakistan (the Maqbool case)*¹ changed the entire law on adverse possession in Pakistan. The Federal Shariat Court in its judgement declared the laws on adverse possession to be un-Islamic and fixed 31 August 1991 as the day after which the provisions on adverse possession would cease to produce their legal effects.²

This essay will firstly introduce and explain the concept of adverse possession as it has developed at common law, with reference to UK and Pakistani courts decisions. It will then analyse the judgement of the Court in the *Maqbool* case, to ascertain its sound application of Islamic principles to the norms in question. It will be shown that Islamic principle on the use of property can be construed either as favouring or excluding adverse possession.³ It will be consequently argued that the Federal Shariat Court, rather than on religious principles which appear to be flexible on the topic, adopted its decision on grounds of policy. The Court kept in view a specific social effect it intended to achieve, namely the protection of the title holder against trespassers.⁴ The following part of the paper will examine whether the resulting Pakistani laws on adverse possession provide sufficient protection to the title holder as it was intended to be achieved. It will be argued that the socio-legal effects of the decision are not in line with the results the Court may have envisaged while deciding the *Maqbool* case, as the title holder is still not provided sufficient protection, and some alternative ways will be

¹ *Maqbool Ahmed v Hakoomat-e-Pakistan* (1991) SCMR 2063.

² *Id.*, 2083, Order of the Court.

³ Bashir A.H.M, *Property rights, institutions and economic development: An Islamic perspective* (2002) 18 *Humanomics* 75, 78.

⁴ *The Maqbool case* (n 1) 2068, A.

suggested which could have been used by the Court in dealing with the case, in order to better achieve the desired results.

A. Definition of Adverse Possession and its Justification

Before discussing Pakistani laws on adverse possession, it is appropriate to briefly define adverse possession at common law. Ownership of an estate or interest in land can be acquired through conveyance, or transfer and registration. Another way of acquiring this is through adverse possession. Adverse possession is a set of rules that confer a mere trespasser the right to acquire a better title to land than the person to whom it was formally conveyed. Using adverse possession, a squatter who has no formal ownership acquires a better title to the land than the true owner.⁵

Adverse possession is sometimes perceived by the public as aggressive squatter's rights, whose wrongful possession is given validity by passage of time.⁶ Adverse possession operates negatively and extinguishes a better competing title of the true owner. A squatter can get the ownership of land simply by possessing it for certain period of time without paying any consideration to the true owner.⁷

⁵ See generally: Martin Dixon, *Modern Land Law* (London: Routledge) (11th ed., 2018) 460-493 and Kevin Gray and Susan Francis Gray, *Elements of Land Law* (Oxford: OUP) (5th ed. 2009) 1158-1196.

⁶ Law Reform Commission of Hong Kong, *Consultation Paper on Adverse Possession* (December 2012) <https://www.hkreform.gov.hk/en/docs/adversepossession_e.pdf> accessed 8 April 2019.

⁷ Edmond Cheung, *Adverse Possession and Possessory Title*, *Hong Kong Land Surveyor* (9 June 2012) <<https://hklandsurveyor.wordpress.com>

The land must be ordinarily possessed by the squatter ‘without the consent of the owner’, as highlighted by Lord Browne-Wilkinson in *Pye v Graham*,⁸ the case that presently recapitulates common law rules for adverse possession in England and Wales.

In order for adverse possession to operate the following two elements are necessary:

- 1) Factual possession by the squatter for the required period of time without the consent of the owner;⁹
- 2) The intention of the squatter to possess to the exclusion of all others.¹⁰

In Pakistan the Supreme Court has been adamant that apart from proving possession, two more requirements are needed for a squatter to successfully claim adverse possession:

- 1) Possession should be open and hostile;
- 2) Possession should be against the owner of the land and to its knowledge (notorious).¹¹

1. The debate on adverse possession’s rules.

There exists academic debate surrounding why adverse possession should be tolerated and why it should not be tolerated. One justification for the rule is that, as Professor Martin Dixon suggests, ‘adverse possession is an expression of policy that denies legal

/2012/06/09/adverse-possession-and-possessory-title/> accessed 9 April 2019.

⁸ *Pye (JA) (Oxford) Ltd. V Graham* [2002] UKHL 30, 36.

⁹ *Pye* (n 8) 41.

¹⁰ *Pye* (n 8) 42-43.

¹¹ *Muhammad Afsar v Rab Nawab* (2015) SMCR 301, at 10

assistance to those who sleep on their rights'.¹² This reflects the typical preference common law accords to procedural over substantive rules, to the point that 'loss of a remedy sometimes amounts to loss of a right'.¹³ Moreover, adverse possession rules facilitate people who use land efficiently because land is a limited resource and use over disuse of land is preferred. As explained by Dixon, 'the principles of adverse possession can help to ensure land's full economic and/or social utilization'.¹⁴ These laws are used to discourage those who buy land and leave it unattended and unused from doing so. Therefore, those who make good use of land are encouraged through laws of adverse possession which provide them with the possibility to establish a valid legal claim to title in the land. This gives them a sense of security that once they bring the land back to use no one would take it away from them, by showing old property papers of which no memory had been kept.¹⁵

Further, Professor Dixon points out that adverse property rules are meant to ensure there is an end to dispute concerning ownership of land.¹⁶ This means that where there's a dispute as to who the owner is anyone who has possessed the land for a sufficiently long period simply needs to prove that possession and then obtain the title. Because of which such disputes can be resolved in a way that ensures

¹² Dixon, (n 5) 462 quoting *RB Policies at Lloyd's v Butler* [1950] 1 KB 76.

¹³ Jeffrey E. Stake, *The Uneasy Case for Adverse Possession*, (2001) 89 Georgetown Law Journal 2419-2474, 2420.

¹⁴ Dixon (n 5) 462 cites *Hounslow Borough Council v Baroness Minchinton* [1997] P & CR 221, where the plaintiff (the Council), had allowed the respondent to treat a strip of land owned by the Council as part of the respondent's own estate since 1959 and was therefore not successful in its claim.

¹⁵ Beliveau Law Firm, *Someone Else Might Own your Land if They Use it Long Enough* (2011) Real Estate Articles <<https://www.beliveaulaw.net/2011/04/someone-else-might-own-your-land-if-they-use-it-long-enough/>> accessed 9 April 2019.

¹⁶ Dixon, (n 12) *ibid*.

certainty, because the law and the factual situation will tend to correspond.

On the other hand, several arguments can be made against adverse possession: one made by professor Stake is that it goes against a general sense of fairness as it does not differentiate between just and unjust claims, and sometimes the rightful owner may be unfairly deprived of its title.¹⁷ Further, a fundamental policy underlying property law is the notion that property cannot be taken away against the owner's wishes. Adverse possession is against this very notion as the property is not only taken without the owner's wishes but also without any sort of compensation.

B. Adverse Possession in Pakistan

1. The pre-1991 scenario

Keeping in view the aforementioned advantages and disadvantages, many countries in the world allow adverse possession like United Kingdom but there are others like Pakistan that do not. Adverse possession was once valid in Pakistan under its domestic Limitation Act¹⁸ which stated that where a person who could have sued for possession of property allowed the period of limitation prescribed by the suit to expire, his title was destroyed. This meant that the title holder who allowed the 12 year limitation period¹⁹ to expire gave a good title to the squatter by losing his title since he/she

¹⁷ Jeffrey E. Stake (n 13) 2448.

¹⁸ Limitation Act 1908, section 28.

¹⁹ Article 144 of the Limitation Act 1908 sated the limitation period to be 12 years.

could no longer take legal action in regards to the dispossession. In the case of *Muhammad Amin v. Islamic Republic of Pakistan*²⁰ and other cases this stance was confirmed. Further, S.28 of this Act stated that the acquisition of the title by the wrongdoer is the corresponding effect of the true owners right to the property being extinguished; if one does not take place the other does not. This means that the wrongdoer gets the title because the actual title holder loses his thus both effects having a consequent effect. Before the 1991 judgement in Pakistan squatters could establish successful claims against the true owners under the provisions of the Limitation Act. However, in the case of *Maqbool Ahmed v. Hakoomat-e-Pakistan* the court declared this law on adverse possession as un-Islamic and held that S.28 was against the injunctions of Islam, 'insofar as the same provided for extinguishment of right in the property.'²¹ The legislator went probably well beyond the scope of the Federal Shariat Court's decision, as it simply completely omitted both Section 28 and Article 144 from the Limitation Act by way of subsequent legislation.²² The consequences of this legislative choice will be fully considered in Chapter 3 of this paper.

2. Analysis of the decision in *Maqbool Ahmed v Hakoomat-e-Pakistan*

Pakistan is an Islamic state and its Constitution states that the state religion is Islam,²³ which may create the prima facie impression that all the laws in Pakistan are in accordance with Quran and Sunnah, which are together referred to as 'the injunctions of Islam'. In reality

²⁰ *Muhammad Amin v. Islamic Republic of Pakistan* (1981) PLD FSC 23.

²¹ *The Maqbool case*, 2083, Order of the Court.

²² Sections 2 and 3, Limitation (Amendment) Act (Act II of 1995)

²³ Constitution of the Islamic Republic of Pakistan 1973 (hereinafter referred to as 'the Constitution'), Article 2.

the Constituent fathers of 1973 were aware that the process of alignment between existing laws and the injunctions of Islam would need to be gradual and consequently Article 227(1) of the Constitution states that ‘All existing laws shall be brought in conformity with the injunctions of Islam...’, while clause (3) states that ‘Effect shall be given to the provision of clause (1) only in the manner provided in this Part [Part IX].²⁴ Part IX of the Constitution provides for the creation and defines the powers of the Council for Islamic Ideology. Nevertheless another tool that was later inserted in the Constitution at the hand of the then military dictator Zia-ul-Haq, and that is the Federal Shariat court.²⁵ The newly created court was given the power to adjudicate on conformity of any law with the Quran and the Sunnah, and to declare them repugnant with the injunctions of Islam, in which case the provision/s would cease to produce their legal effects from the moment the decision of the Court took effect.²⁶ The conformity of Section 28 of the Limitation Act 1908 with the injunctions of Islam was questioned in the case of *Maqbool Ahmed v. Hakoomat-e-Pakistan*. The Federal Shariat Court found that adverse possession laws contradicted various verses of the Quran. While giving this judgement Shariat court quoted a number of verses from the Quran showing this contradiction such as:

‘And eat not up your property among yourselves in vanity, nor seek by it to gain the hearing of the judges that ye may knowingly devour a portion of property of others wrongfully.’²⁷

²⁴ Constitution of Pakistan (n 22) Article 227.

²⁵ Section 3 of the Constitution (Amendment) Order 1980, P.O. No. 1 of 1980, substituted Chapter 3A, inclusive of Art. 203A of the said chapter, in its present form, (w.e.f. June 5, 1980), in place of chapter 3A inserted by section 2 of the Constitution (Amendment) Order, 1979 P.O. No. 3 of 1979, (w.e.f. February 10, 1979).

²⁶ Constitution of Pakistan (n 22) Articles 203A, 203C and 203D.

²⁷ *The Holy Quran*, Surah Al Baqrah (The Cow) 188.

Furthermore, Quranic verses like:

*'O ye who believe! Squander not your wealth among yourselves in vanity, except it be a trade by mutual consent, and kill not yourselves, Lo! Allah is ever merciful onto you.'*²⁸

were also used as the rationale for the decision. From these verses it was argued that it is clearly prohibited in Islam to take one's property forcefully without any compensation and this was the reasoning given by the court while giving this judgement. The judges were of the view that taking someone's property without consent and consideration was un-Islamic and wrong so it should not be allowed. Since any laws that contravene with the injunctions of Islam are *ultra vires* hence the laws on adverse possession were declared to be so. The example the Court had in mind was that of a *zabardast* (powerful) person *ghasbana* (extortionately) seizing the property of a poor or weak owner.²⁹

It is argued that declaring the entire law on adverse possession incompatible with the injunctions of Islam based on the unjust results it could yield in the specific circumstances contemplated by the court was probably excessive. The decision of the Court failed to take into consideration other Islamic principles on property that would have allowed for a more articulate view on adverse possession's compatibility with the injunctions of Islam. Dr. Abdel Hameed Bashir illustrates several instances where the Prophet (PBUH) clearly 'disapproved leaving productive assets (land) idle and urged those who own land to cultivate it or leave it to those who can do so'.³⁰ He

²⁸ *The Holy Quran*, Surah Al Nisa (Women) 29.

²⁹ Judgement of Justice Pir Muhammad Karam Shah in *Maqbool Ahmed v Hakoomat-e-Pakistan* (1991) SMCR 2063, 2068, para A.

³⁰ Bashir (n 3) 87. *But see* Amin S.H., 'Wrongful Appropriation in Islamic Law' (Royston, 1983) 3 who contends that Islamic law has fiercely opposed adverse possession from the outset, although some minority scholars

also quotes the following Hadith of the Holy Prophet (PBUH): ‘There is no right of ownership to be claimed on the land if the owner does not reasonably exploit it after three years of possession’.³¹

In light of the above, a distinction could have been made by the Federal Shariat Court. Insofar that the provisions on adverse property favour a proactive occupier over an idle title holder, as for example may be the case where a proactive farmer cultivates land belonging to an apathetic landlord, the rules on adverse possession are not in conflict with the injunctions of Islam. Insofar as the rules on adverse property allow land grabbing mafia to seize lucrative urban plots from their legitimate owners who could not properly monitor their properties due to the complexities of modern life, the provisions are repugnant to the injunctions of Islam. This would have allowed for a partial operation of the rules on adverse property in all those cases where those rule are in line with Islamic guidance on the use of land.

It is here maintained that the Federal Shariat Court had in mind the specific policy outcome, namely protecting the rights of the title holders. As will be shown in the next chapter, even this was not entirely attained.

belonging to the Maliki and Hanafi schools considered it compatible with divinely revealed principles on property.

³¹ Bashir (n 3) 87.

C. The post-*Maqbool Ahmed v. Hakoomat-e-Pakistan*'s adverse property regime in Pakistan

While declaring them as un-Islamic, the Federal Shariat Court gave an order stating that the Court is unanimous in holding that Section 28 and Article 144 of the Limitation Act, 1908 are repugnant to the injunctions of Islam in so far as they provide for extinguishment of the right in the property at the determination of the period prescribed for instituting a suit for possession of the said property. It was also held that this decision shall take effect from 31 of August 1991, and on this date section 28 aforesaid shall also cease to have effect. This meant that after 31 of August 1991 no one could claim title to the land by proving their adverse possession of that land.

From this order it is clear that this judgement was passed to be in favour of the title holder that is to protect him from losing his title against an adverse possessor. The courts have protected the title holder, but created a problem in situations where there could be valid claims of adverse possession in disputes concerning ownership of land. The case of the Okara farms could be taken as an example of this. The Okara farms (17,013 acres) were dense forests when they were given to the peasants in 1908 by the British government. The peasants were asked to cultivate it and promised ownership rights by 1914. In 1913 the Army took control over the land under a lease agreement with the Punjab government. This lease expired in 1933 and was renewed for another five years. At the end of this period lease was not renewed. The land was occupied by Pakistan Army in 1947. Since then it has not sought renewal of the lease and has been a trespasser and an illegal occupant. It has not paid the Punjab government for the share it has received from the peasants under the *batai* system.³² The peasants were reported to be oppressed and

³² The *batai* system is a traditional share-cropping system used in rural areas of Pakistan, where the tiller gives one-half of the crops to the owner.

tortured because they had started a movement known as *Malki ya Maut* (ownership or death) claiming title to these lands. This case could have been resolved very easily if the Federal Shariat Court had not declared adverse possession as un-Islamic. Farmers in Okara have been cultivating these lands for over a hundred years and since the Pakistan Army did not have any rights to the land as well, farmers seem more deserving to get the title.³³ As stated above, adverse possession could have provided an easy and a quick solution to disputes regarding the Okara farmer case, which gave rise to more than 80 court cases against farmer on various charges.³⁴ It can be deduced that the *Maqbool* case has had a negative impact on those person's claims that have had a significant long term usage of the land. After *Maqbool* Ahmed case the title holder did not lose his title to the adverse possessor. This effect of limitation period on title holder was removed. This means that the title to the land remains with the true owner even after the squatter has occupied the land for twelve years. Though the title holder has this protection of not losing the title to the squatter, he/she still needs to be vigilant because the title holder who lets the limitation period expire cannot go to court to evict the

³³ One obstacle to the operation of adverse possession's rules is that the farmers had also paid shares from their crops to the Army. This fact inhibits the applicability of the rules of adverse possession towards the Army. It remains to be seen if and how the rules could have been triggered by considering that the Army was also an illegal occupier after 1938 at least and after 1947 for sure. In which case, the farmers could claim that they have a better claim than the Army towards the Government which is still the title holder. See Ahmad Salim, *Peasant Land Rights Movements of Pakistan, Sustainable Development Policy Institute (SDPI) (2008)* <https://sdpi.org/research_programme/Files/wlr_Peasants%20Land%20Rights_final.pdf> accessed 6 April 2019.

³⁴ Including crimes under the Anti-Terrorism Act 1997. Zafar Iqbal Kalanuri, *The Okara Farm Issue* (2001) <<http://www.zklawassociates.com/wp-content/uploads/2012/03/The-Okara-Farms-Issue.pdf>> accessed 5 April 2019.

squatter.³⁵ In this case it was not only decided that the squatter could never get the title but also that the limitation period still existed in connection with the title holder going to court to get the squatter evicted; this entails that the squatter who may not have the title to land may use the land as his own even after the decision as the title holder would not be able to do anything to prevent it.

Conclusion

Islamic provisions on property are open to be interpreted either in favour or against adverse property, as shown in the debate existing on the matter since the beginning of Islamic *fiqh*.³⁶ The judgement in *Maqbool Ahmed v Hajoomat-e-Pakistan* failed to

³⁵ After Section 28 and Article 144 of the Limitation Act 1908 were omitted by the Limitation (Amendment) Act 1995, title holders suing have two alternative ways to recover possession: if they were dispossessed or their possession discontinued, then Article 142 of the Limitation Act 1908 would be applicable and the limitation period of twelve years would run from the time of dispossession or discontinuance of possession. See the judgement of the Supreme Court of Azad Jammu and Kashmir in *Muhammd Azam v Muhammad Shafique* (2015) YLR 843 at 11. The Lahore High Court had previously specified that the same would apply to cases of permissive possession: *Muhammad Hussain v Muhammad Gulzar* (2001) PLD 390 at 8. In cases where the case is not of dispossession or discontinuance in possession, the Karachi High Court clarified that the only way for the owner to 'get relief of possession [is] to secure relief of declaration of ownership. Such suit would be governed by Art. 120 of Limitation Act, which applies to declaration of ownership': Judgement of Justice Gulzar Ahmed in *Mrs. Shamim Akhtar v Sultana Mazhar Baqai* (2003) CLC 1521 Karachi, where he quoted the Supreme Court's decision in *Allah Bux v Dr. Abdul Waheed* (1996) PLD Karachi 458. The time limit for the residual suit based on Article 120 of the Limitation Act 1908 is six years.

³⁶ Amin (n 30).

appreciate the complexity and flexibility of Islamic *fiqh* on the matter and completely eliminated adverse possession rules from the legal system of Pakistan. This, while providing security to the true owners of their title remaining with them, still expects the title holders to be vigilant and not sleep on their rights. Indeed, the title holder is still insufficiently protected even after the decision in *Maqbool Ahmed* as he has no remedy to evict the squatter after the expiration of limitation period. However, after the *Maqbool Ahmed* judgement the title holder is protected from extinguishment of his title, and this can be said to be a step in favour of the title holder, as ownership remains with the actual owner and not the trespasser. Nevertheless, it is clear from the previous analysis that the decision in *Maqbool* has failed to achieve its desired aims. It only partially protects the title holders, who cannot evict the squatter although they retain property rights, and it does not cater for those situations, like the Okara farms' case, where industrious people who toiled on the land for more than 100 years clearly deserve much more than mere possession. If the goal of the judgement was to achieve social justice according to the principles of Islam as stated in the Preamble of the Constitution of Pakistan,³⁷ it clearly failed to do so. A more flexible and effective approach would have been for the Federal Shariat court to adopt an outcome-based line of reasoning. To explain, that is, which outcomes of the operation of adverse property rules could be considered compatible with the injunctions of Islam and which ones could not. This would have given the legislator more scope of manoeuvre in reframing Sections 28 and 144 of the Limitation Act 1908. The concurrent goals of favouring industrious farmers over idle feudal lords and protecting urban plots owners against land grabbing mafia could have been explicitly mentioned by the court and left for the legislator to achieve.

³⁷'Wherein the principles of democracy, freedom, equality, tolerance and social justice as enunciated by Islam, shall be fully observed'.

Bibliography

Primary sources

Constitution

1. Constitution of the Islamic Republic of Pakistan, 1973
2. Constitution (Amendment) Order 1979 P.O. No. 3 of 1979
3. Constitution (Amendment) Order 1980 P.O. No. 1 of 1980

Legislation

4. Limitation Act, 1908
5. Limitation (Amendment) Act, 1995

Case law

Pakistan

6. Allah Bux v Dr. Abdul Waheed (1996) PLD Karachi 458
7. Maqbool Ahmed v. Hakoomat-e-Pakistan SMCR 1991 FSC 2063
8. Mrs. Shamim Akhtar v Sultana Mazhar Baqai (2003) CLC 1521 Karachi
9. Muhammad Ameen v. Islamic Republic of Pakistan PLD 1981 FSC 23
10. Muhammd Azam v Muhammad Shafique (2015) YLR 843
11. Muhammad Hussain v Muhammad Gulzar (2001) PLD 390

UK

12. Hounslow Borough Council v Baroness Minchinton [1997] P & CR 221
13. RB Policies at Lloyd's v Butler [1950] 1 KB 76
14. Pye (JA) (Oxford) Ltd. V Graham [2002] UKHL 30 at 36

Secondary sources

Books

15. Amin S.H., *Wrongful Appropriation in Islamic Law* (Royston, 1983)
16. Dixon M., *Modern Land Law* (11th edn, Routledge, 2018)
17. Gray k. and Gray S.F., *Elements of Land Law* (Oxford: OUP) (5th ed. 2009)

Articles from Journals

18. Bashir, A.H.M, *Property rights, institutions and economic development: An Islamic perspective*, 18 *Humanomics* 3/4 (2002) 75-91
19. Stake J. E., *The Uneasy Case for Adverse Possession*, (2001) 89 *Georgetown Law Journal* 2419-2474

Articles from Newspapers and other Online Sources

20. Beliveau Law Firm, *Someone else might own your land if they use it long enough*, (2011) *Real Estate Articles* < <https://www.beliveaulaw.net/2011/04/someone-else-might-own-your-land-if-they-use-it-long-enough/>>
21. Cheung E., *Adverse Possession and Possessory Title*, *Hong Kong Land Surveyor* (9 June 2012) <<https://hklandsurveyor.wordpress.com/2012/06/09/adverse-possession-and-possessory-title/>>
22. Kalanuri Z. I., *The Okara Farm Issue* (2001) <<http://www.zklawassociates.com/wp-content/uploads/2012/03/The-Okara-Farms-Issue.pdf>>
23. Law Reform Commission of Hong Kong, *Consultation Paper on Adverse Possession* (December 2012) <https://www.hkreform.gov.hk/en/docs/adversepossession_e.pdf>

24. Salim A., *Peasant Land Rights Movements of Pakistan*, Sustainable Development Policy Institute (SDPI) (2008) <https://sdpi.org/research_programme/Files/wlr_Peasants%20Land%20Rights_final.pdf>