



Admissibility of Recordings of Evidence through Video Conferencing in the Eye of Law

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Abstract: The digital landscape is bringing drastic changes in every sphere of the life throughout the world, and it is getting harder for nations to stay up with information technology. This makes it even harder for developing nations to deal with the problem. Legal field is not an exception, however, lawmakers are not expected to foresee the future, laws intended to achieve a particular goal may not work when a new circumstance emerges. When it comes to digital evidence, Pakistan's legal community, the executive, legislature, and judiciary all face the same challenges because many aspects of digital evidence are not covered in the body of prior legislation on the law of evidence. Prior to 2002, there were no regulations in Pakistan governing the use of digital evidence in court. This article contains surveys, in-depth case studies, and an overview of known cases in order to research the idea of using modern devices to record evidence.

Keywords: Admissibility, Recordings, Evidence, Conferencing

1. Introduction

Evidence encompasses any statement documented or materials submitted within a court of law, including electronic records. Qanoon e Shahadad Order, 1984, of Pakistan explicitly acknowledges in article 164 admissibility of evidence acquired through contemporary devices and methodologies. Evidence derived from modern devices is considered primary evidence, as defined in Article 73 of the Qanoon e Shahadad Order, 1984². Evidence that may be generated, transferred, or stored electronically is considered digital evidence. These kinds of evidence are being used extensively in the decision-making process for criminal cases.

Today's world is considerably more dependent on technology, and one of the most notable sources of unprocessed data and information media is the internet. A significant portion of communication nowadays takes place online, and data is digitally preserved. This significant shift also implies that material of unquestionable validity and that was previously retain physically; it is no longer necessary to be physically present. This development in technology also has an impact on global justice administration.

The Electronic Transactions ordinance 2002 (ETO) was passed by the Pakistani legislature in an effort to curb the rise in cybercrime and allay worries about the admissibility of digital evidence in court. The Ordinance significantly altered the conventional law of evidence. It is appropriate for both criminal and civil cases. To put it simply, the ordinance declared the major evidence being digital or electronic. It also confirmed the uniqueness of electronic records, transactions, information, and papers, thereby eliminating the belief that data transferred or kept digitally constitutes hearsay evidence. Second, the ordinance emphasized that digital evidence meets the

requirements for the Best evidentiary threshold.

Significant changes were made to the already existing evidence rules in both criminal and civil trials by the decree. The ordinance acknowledged in its core the superiority of digital evidence over the conventional physical evidence. The Information stored on paper is no more reliable than information found in records and transactions. The rapid pace at which information and communication technology and devices are developing will not be ignored by the global legal system. Paper files, written document exchanges, and in-person hearings were once the mainstays of judicial proceedings, but these issues are rapidly evolving. The use of IT applications in case filing is growing before the court, organizing hearings, presenting cases in court, and creating and making judicial rulings public. Every province in Pakistan is working hard to increase access to the internet to the process of executing justice. Getting access to technology is one of the primary goals for Pakistan's Justice System for the past ten years. Due to advancements in technology, witnesses, particularly those who are vulnerable, can now record their testimony via video conferencing (or "VCF") with higher audio and visual quality than ever before. Virtual Meetings & Online Courts are this contribution's main focus. The expansion and increased application of videoconferencing while hearing experts, eyewitnesses, or witnesses who are at risk of a different section of the activity plan³.

In order to hold offenders accountable, the criminal justice system places a high priority on unquestionable proof. The methods and strategies of gathering evidence have gotten more varied in the current era of technical innovation and emotional intelligence, ranging from video conferencing to e-evidence. The Qanoon-e- Shahdat order of 1984, Article 164 admits that the availability of the proof is due to modern devices. Modern devices include audio cassettes, cellphones, CCTV images, emails, DNA evidence, finger prints, and video recordings, Locations via GPRS, browser history, etc.

There are some situations in which a witness is not able to present in court during legal procedures. These include cases involving terrorism, child abuse, and witness unavailability due to travel expenses, physical limitations, time constraints, and social circumstances. Take the example of COVID pandemic In such situation, the law, not being a stagnant pool of water, and apex courts of the various jurisdictions of the world make the rules to record the version of absentee observe through video conference. Globalization has caused legal systems to change everywhere in the world is shifting to E-judicial systems. From the start of legal action to its eventual completion, technology is now used for evidence recording, summons, and drafting.

Much work has been done in the UK, India, and the USA to control and channel the VCF. The Delhi High Court has established guidelines that must be followed in order to use the video conferencing function. These consist of coordinator nominations and minimal requirements, presence of an e-conference room, sensitive microphones, internet service providers, and government representatives or, in the event of an overseas witness, an embassy member who attest that the necessary arrangements have been addressed to.

2. Digital Evidence and QSO 1984

Article 46-A, and Article 78-A of (QSO), and Electronic Transaction ordinance, 2002, have recognized digital evidence as primary evidence. Similarly, under Article 73 of QSO says that evidence can be produce from the previously saved data in the shape of copies; it can be interpreted that these articles are about data generated by a computer and not data kept on computer. However, interpretation by the apex courts play important role due to a recent ruling of Lahore High Court, by Judge Mr. Shahid Karim, which states that electronic documents which are primary documents but still subject to cross-examination and will be treated as evidence. For electronic evidence to be accepted internationally, certain requirements must be satisfied: authenticity, dependability, and admissibility. Furthermore, a chain of custody needs to be created in order to prevent evidence from being lost or altered and to satisfy these standards.

The writings of Zaman and others discussed in their article, an overview of the criminal judicial system on Article 2 of the 1984 order QSO revised in 2002 to include the Electric Transactions Ordinance(ETO). Nevertheless, ETO is appropriate in spite of the uncertainty surrounding the unsigned digital evidence supplied by the producers⁴.

According to Pakistan's Digital Evidence Ordinance and Electronic Transactions: A Study of Article on Digital Evidence and the criminal justice system as defined by the fundamental against digital evidence is not that it requires more proof, like printed, but instead because it isn't direct or first-hand data which is taken out from a device. Following adoption of the ETO, in the year 2002 and As per the updated ETO, electronically received data in all its forms and formats could not be disregarded based on its electronic format. It has covered both audio and visual recordings, in addition to file transfers and verbal conversation.⁵ These regulations were updated in

2002 by amending Article 5 of the ETO. According to this Article of ETO, in the event that electronic evidence has offered that has not changed in any way, it will be acknowledged in the eye of law as, even if modifications were executed unintentionally. These modifications are all being made to comply with the requirements of contemporary life, where massive transactions including those involving payments are carried out electronically, and agreements are either accepted or recognized as being legally obligatory on everyone involved⁶.

3. Need of Video Conferencing in modern world

The world has become a global village due to recent technological advancements. It is difficult to dispute or deny the value of audio-visual links, commonly referred to as video conferencing (VCF), for court attendance and procedures. One tool is video conferencing (VCF). It can improve the administration of justice while simultaneously saving time, efforts and finance of courts, parties, the government, etc. The Apex Court of Pakistan in its Salman Akram Raja's case historical judgment, reported as 2013 SCMR 203, observed that the following points may be approved and the concerned official authorities be directed to consider them during the course of investigation and prosecution of all rape matters in Pakistan

“Evidence especially of victims of rape be recorded, through video /conferencing so that the victims, primarily young victims, need not to be present in court.”⁷

In addition to this the Supreme court further stipulated that when it was asked from the learned Advocate-General and Prosecutor General, Punjab as to whether they had any objection, if the petition is decided in the light of the above said recommendations/ prayer? They stated

4. Difficulties faced due to video-conferencing

Digital evidence presents special challenges for forensic analysts since it is a type of physical evidence. This type of proof is particularly difficult due to its filth and slickness. Only a portion of the whole collection may be relevant to a particular circumstance, hence it's important to choose the essential data, and arrange things in a comprehensible manner. A hard drive platter's information is composed of web of bits and bytes which have evolved into layered and tangled with the each passing day.

As per the writing of Murtuza, the writer of 'Digital Evidences and Their Circumstances,' he is of the opinion that it is challenging to track down internet activity to a one person due to the nature of the circumstantial electronic proof. Video conferencing proof cannot take place of another kind of evidence in place of another complete investigation. Electronic proof, including computer files' date, time and stamps can be advantageous; however they can't be the sole proof in a instance. Further proof is required in order to be gathered from this reference. Even if there isn't any proof provided, one could contend that another at the moment, utilizing the computer, some computers are protected by systems, however these can be broken, and a great deal of others don't need a without a password, leaving them accessible to everybody. Furthermore, for instance, the defense claims that essential part of no criminating video evidence were not gathered from a specific system. The stance will shake the credibility of case without independent evidence of crime which has already had limited credibility. This would only be useful in an extremely extraordinary situation.

5. Admissibility and weight of Video Conferencing

The adjustment of the Electronic Transactions Ordinance (ETO) to accommodate the increasing recognition of digital evidence is a positive development. However, it is worth noting that these adaptations do not address the issue of the weight or significance attributed to such evidence.

To ensure that digital evidence is taken into consideration in the legal review process in Pakistan, it is essential for the courts to provide clear guidelines on this matter. It stands to reason that, in a country like Pakistan, which has a legal system rooted in common law principles, only certain aspects of the law are codified into statutes. Common law jurisdictions require citizens to reference judicial precedents to fully comprehend the meaning of statutory language. While the ETO subsequent changes to Qanone shadat (QSO) made videoconferencing primary position of electronic evidence, specific criterion for assessing its weight are still under determination. In light of this situation, it is of utmost importance to establish a clear procedure for admitting digital evidence in court. Clarity in this regard will not only facilitate the effective utilization of digital evidence but will also strengthen the reliability and consistency of the legal system, serving the interests of justice in Pakistan.

Protocols for carrying out proceedings between the court which has the jurisdiction and the court where a witness will record video:

1. In cases where the case is not decided and witness attendance is required, trial court may direct or permit the examination of a witness through video link.
2. At any point, either upon application by a party or at the court's discretion, the trial court may order the recording of a witness's testimony, whether they are within the same province, in another province, or overseas.
3. To see court's direction for recording a witness's evidence through video link, a formal application must be filed promptly, providing valid reasons for the witness's inability to appear in person. Notice of this application must be served to the opposing party or counsel, and a discussion may be held if both parties agree. In case of disagreement, the trial judge will issue a written order after hearing both parties.
4. The video conference proceedings must adhere to the same decorum and legal protocols as in-person court hearings. All relevant procedural and penal codes, including the Qanun-e-Shahadat Order, apply to video-recorded evidence, except for proceedings under the provision of 164 of the (Cr.P.C).
5. Both trial court and the court where the witness is appearing must have coordinators. Coordinator of trial court will be the judge of that court, while the coordinator at the location of the witness may be:
 - a. For in-province witnesses: The officer of the court of equivalent power of trial court or Sessions Judge of the district at the location of the witness, or any court officer not lower than an Additional Sessions Judge.
 - b. For out-of-province witnesses like GB, Azad Kashmir, and Capital territory: An officer of the same power of the session court or the Sessions Judge of district where witness resides, or another nearby district if there is no internet/video link facility.
 - c. For overseas witnesses: A court of trial coordinates with the ministry of Foreign affairs to appoint officer from the High commissioner or the embassy of Pakistan as coordinator, responsible for witness supervision and oath administration.
 - d. For witnesses in jails: The jail superintendent must produce the witness before the Sessions Judge of the district where the witness is incarcerated. For juvenile or female witnesses in special facilities, their respective In charges must follow the directions of the Sessions Judge.
 - e. For witnesses in hospitals: The coordinator (Sessions Judge of the concerned district) can personally visit the hospital or appoint a judicial officer as commissioner to record the patient's statement. Necessary internet facilities should be provided at the hospital, and the Medical Superintendent or In charge must cooperate with court of Sessions or any other person nominated by him.
 - f. For the witness other than these, as ordered by court of Session at location of witness.

Judge of the Sessions court must ensure the witness's attendance through legal means, with the assistance of prosecutors.

6. The prosecution is in charge of giving the witness certified copies of the whole record in situations where the witness is included in it. When permitting the prosecution to arrange for witness production and document availability at the witness's location, the trial court must document that it has instructed the prosecution to do so.
7. If there is any problem for witness in understanding language of court, it is duty of prosecutor to notify trial court, and District Prosecutor at witness's location should arrange for a translator or interpreter, who must provide a certificate upon completion of the witness's statement.
8. For overseas witnesses, the prosecution must provide the record, and the coordinator at the witness's location should arrange for a translator or interpreter through the foreign ministry of Pakistan, as mentioned in the previous point. The prosecution is in charge of verifying the witness's precise location and willingness to be questioned over video link when they are scheduled to testify in court. Defense attorneys need to verify the witness's whereabouts and the availability of video link capabilities if the witness is an accused person.
9. The trial court will make the necessary orders and directions for recording the statement of an accused person through the link of video and when confidential contact between the accused person and their attorney is necessary.
10. In the best interest of the witness, the trial court should pass suitable directions to secure the Privacy of witness, looking into the fact how old the witness, sex of the witness, and physical appearance.
11. The trial court is responsible for recording and preparing the entire procedure, including writing and creation of copies of the statements of and marking. Soft copies may be transmitted digitally to the Session Judge at location of witness for changing into hard ones.
12. Audio and video records may be saved in the computer system at the trial court, to be retained until the case

or appeal is concluded.

13. An IT expert can be present during the witness's statement, provided they are not called as a witness themselves. The IT expert must manage the connection and ensure clear visibility and audibility at the both end.

14. The witness is required to identify themselves to the court or coordinator at the witness's location prior to initiating the video link. The oath should be given in a visible and audible manner, and a picture of their passport, national identity card, or place of residence should be shown on the screen for identification purposes.

15. The recording of the witness's statement via video link should continue without interruption or adjournment, if possible, once it commences.

16. The Sessions Judge or coordinator may record any remarks or observations regarding the witness's demeanor and transmit them electronically to the trial court, if necessary.

17. District courts must be equipped with essential electronic and digital equipment, such as computers, laptops, video cameras, microphones, speakers, display units, document visualizers, scanners, and printers, as well as uninterrupted, high-speed internet connections.

18. These guidelines are directory and not exhaustive. In cases where no specific provision is made, court of trial for the ensuring justice and equity, it may adopt effective and efficient ways and mood, as long as they do not conflict with these guidelines.⁹

6. Video Conferencing and in Digital landscape

In contemporary times, the use of electronic devices has witnessed an extraordinary surge across various activities. For instance, communication primarily occurs through emails and instant messages, replacing traditional means. Similarly, digital images have supplanted conventional photography methods, and contractual terms and acceptances are now articulated in digital documents. Nevertheless, there exists a fundamental distinction between digital activities and in-person activities. The fundamental distinction lies in the traceability of actions taken in digital activities, as they leave behind a trail that can be followed.

In the present case, which pertains to the year 2019, it is imperative to undergo technological forensic verification and testing prior to introducing an audio or video recording as admissible evidence in a court of law. This requirement aligns with the provision of Article 164 of the Punjab Forensic Science Agency Act (PFSAA), which has been examined for the purpose of this article. It is crucial to complete this verification process before presenting the recording before a legal authority. It's worth noting that all the changes made to the QSO (Electronic Transactions Ordinance) in response to the ETO 2002, primarily focus on the admissibility of evidence, rather than its substantive significance. This emphasis on computer-generated proof reinforces the argument.

Both the QSO and ETO have clarified it explicitly that digital evidence can be presented in court. However, the court still requires tangible confirmation in order to admit this evidence. Evidently, within the Pakistani legal system, the probative value of digital evidence is progressively taking precedence over its mere admissibility. The amendments introduced by the ETO 2002 to the QSO exclusively address the aspect of admissibility and do not touch upon the weight or relevance of the evidence¹⁰. For instance, even if a file is deleted from a computer, it remains retrievable. The act of deletion merely frees up storage space on devices like hard disks, USB drives, or floppy disks. This trace can be identified either through online storage platforms like the cloud or by network administrators. In essence, every action undertaken on a digital device can be traced back to its source. Conversely, when physical actions are taken, it is possible to erase all traces of one's actions. This stark contrast emphasizes the growing significance of digital evidence since the advent of the 21st century. This transition leads us to the necessity of defining digital evidence.

According to the article, expert testimony in Pakistan's judicial system holds value when it aligns with the stipulations set forth in PLD 2019 SC 675 and complies with the legal requirements governing the introduction of evidence. Even when video or audio recordings are presented as evidence, the court still insists on establishing their authenticity. It remains crucial to demonstrate the accuracy of these recordings to dispel any doubts regarding potential alterations. In order for audio or video recordings to be considered admissible evidence, they must represent an accurate and unaltered record of the conversation or incident as it occurred at the time of creation¹¹.

In a recent judgment delivered in the case titled "Application by Hussain Nawaz Sharif" C.M.A. No.3986 in C.M.A. No.2939 of 2017 in Constitutional Petition No.29 of 2016, decided on June 20, 2017¹², the Honorable Supreme Court emphasized the importance of incorporating modern technology in the following manner:

"In the era of computers, where nearly all communication and various types of businesses are conducted online, insistence on adhering to practices from as far back as 1898 would disregard the progress of scientific and

technological advancements. These advancements have not only reduced physical labor but have also made tasks more convenient. Many countries, both in the East and the West, have adapted and redefined their laws accordingly."

Similarly, in the case "Mian Muhammad Nawaz Sharif v. The State"¹, the esteemed Islamabad High Court permitted the recording of witness testimony via video link or Skype from the United Kingdom in the presence of an authorized attorney and representative of the accused. The pertinent section of the judgement is as follows:

"The statements of the aforementioned two witnesses will be recorded using video link technology. These witnesses will be present at the Office of the High Commission in London. The High Commissioner of Pakistan in London will ensure that the witnesses are not subjected to any form of pressure, coercion, or undue influence at the time of their testimony, and will also verify their identities."

The National Database and Registration Authority (NADRA) and the Supreme Court of Pakistan collaborated to create a live video link in May 2019 between the Islamabad main seat and its four branch registries and benches located in Karachi, Lahore, Peshawar, and Quetta. This creative setting eliminates the need to attend the principal seat arguing that through video conferencing from registries, attorneys and litigants can participate in case proceedings.

7. E-Courts in Pakistan

E-courts in Pakistan have made some progress with the concept of video conferencing. The Supreme Court (SC) for the first time in May 2019 started the use of video conferencing in appeal hearings. By combining the advanced digital instruments, the courts are ready to move towards online trials. This change is expected to take much time and resources of the state which will consequently reduce the time it takes to prosecute the case to the benefit of the litigants.

In E-court trials, the legal documents are in digital form on systems that are linked online. These documents could also be easily used in the courtroom so that lawyers do not spend most of their time looking for and flipping between two pages. There are many benefits associated with the electronic approach as compared to the conventional manual trials.

Both in straightforward and complex cases, video conferencing facilitates the presentation of documents, and thereby enables the courtroom participants to access materials quickly and conveniently, and apply themselves to their documents without the tortuous exercise of exchanging or moving around hard copies of documents, or aligning different people with the same frame of reference. Thus this allows the occurrence of efficient court proceedings than the time-consuming conventional system.

In any event, the result is the more effective use of technology to obtain documents as expeditiously and inexpensively as possible for the litigants. Thus, the use of electronic court proceedings is possible and appropriate for the consideration of any type of legal proceedings. If the success of online hearings is maintained then it will be a success for not only the legal profession but the parties as well as it will bring change in the judicial system in a manner to meet the needs of the people of Pakistan. It is believed that such a change will definitively help to save time and relieve the participants in the proceedings, which will lead to the improvement of the effectiveness of the work of the judicial system as a whole.

8. Conclusion

E-Courts in Pakistan have made a great deal of advancement, especially in terms of bringing technical advancements to legal proceedings. In May 2019, the Supreme Court started appeals through videolink, which helped to advance the legal process. The availability of modern digital devices has led to the adoption of online trials, with an assurance of efficiency in terms of time and cost. Trial exhibits have now become easy to obtain through computers hence can be shown electronically in a court of law. This strategy has many perks, such as fewer meetings spent actively searching for documents and physical pages during hearings.

In addition, one has noted that research has used videoconferencing technology in various circumstances such as criminal trials. This has been done with positive effects like protecting the vulnerable witness and the help in presenting the witness who is either far away or has composed health issues to get to the court. Improvement in efficiency and cost reduction has also been achieved, mainly when the defendants and plaintiffs are from other

countries. However, although it is technologically possible to conduct several activities through videoconference, its proper use is of paramount importance to ensure it meets its legitimate aim and to respect the rights of the defense.

Generally, the increased availability of video-conference calls should be treated with a considerable amount of consideration, as over-embarking on large-scale mechanization of the administration of justice also has negative impacts on the quality of such processes. Any accused or defendant who may consider video conferencing to have a negative impact may therefore consider the quality of the proceedings to be doubtful and consequently challenge the entire system of justice. To address this, it is highly advisable to offer to give special knowledge concerning the usage of videoconferencing in legal practice to the judges, prosecutors, and advocates. This should involve the evaluation of the quality of interpreter assistance as a component of higher training.

On the one hand, the admission of electronic evidence is possible and helpful but, on the other hand, admitting electronic evidence is not an easy thing to do. The justice system needs to maintain the standards of Electronic Evidence, which include the principle criteria such as authenticity, credibility, and consistency. There are general rules on the admissibility of electronic evidence in the Supreme Court to ensure good and Perry the same identification and inspection to guard the acceptance of such evidence.

Some jurisdictions permit courts to take evidence on video link. Where witnesses give evidence through audio-video links, they shall be under the control of a judicial or other executive officer so that order may be preserved in the court as well as to ascertain the identity of the witness. It makes certain that the witness fulfills all the rules and requirements of a witness who is physically present in court.

Where a witness is confined within the territorial jurisdiction of the nation, every time the evidence should be taken on the record and in the presence of the media to arrest any problem that may arise to ensure a smooth process. If a witness is unable to attend the trial in person due to some exceptional circumstances the prosecution must file a request immediately to record the witness' testimony through video conference.

The current day digital and technological amenities have been introduced in all courts of District Judiciary in Khyber Pakhtunkhwa. The fact that fiber optic equipment has been installed in all courts across the district makes it easy to record witness evidence in any of the districts. For witnesses who live in other provinces or districts, that can be provided through the Registrar of the Court of that province. If a witness resides in another country, the Registrar and the Ministry of Foreign Affairs use a video conference in a Pakistani Embassy, High Commission, or similar facility. This is through the establishment of Virtual Court Room which is moderated by an officer from the Embassy/Consulate or a professional in the technical field to avoid compromised etiquette of the witness. He gives this responsible officer the power of a trial court.

The use of videoconferencing is especially useful where it is incorporated in criminal proceedings because of the following advantages. It also solves the problems of witness unavailability and distance and simplifies legal proceedings. Videoconferencing can greatly minimize the time that is lost due to the unavailability of a witness this usually occurs when the witness has been transferred or is located in another country. It does away with vain barriers that slow down the process of judicial determination. Consequently, it becomes easier to achieve the ideals about the quick efficiency of the criminal justice system.

Case turnover is therefore relevant and more so bearing in mind that criminal statutes come with specific timelines. To that extent, videoconferencing is helpful in responding to challenges occasioned by witness constraints and enhancing case disposal. The risks and the measures must not, however, deter the application of the new gadgets and technologies to get a more efficient Court and judicial system.

Nowadays video communications have become important during the COVID-19 pandemic and video conferencing is useful for doing remote judicial proceedings. Of course, additional research is needed to assess the impact of Virtual Hearings in the entire scenario of court cases and to analyze the pros and cons of the administration of justice for this kind of approach.

Finally, as for the system of trials carried out in Pakistan, the courts have been recently paying much attention to the use of video conferencing. This shift towards the adoption of technology has the capability of bringing to an end legal processes, decreasing the time taken in the legal procedures, and improving efficiency. However, a great deal of precaution must be taken to avoid reducing the quality of justice we want to produce. While courts have been moving towards embracing video conferencing, the courts should consult with as many stakeholders from the broad legal spectrum including; practicing lawyers, victims' organizations, and academicians to have clear and covering policies on virtual proceedings. In this manner, the judicial system can harness the dint of technology and address the dynamism of the Pakistani people, and speed up justice delivery.

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