



جامعة الحكمة، إيلورن - نيجيريا

AL-HIKMAH
UNIVERSITY

LAW JOURNAL



Vol. 1 No.1, 2015



EDITORIAL BOARD

Editor-in-Chief

Dr. Hakeem Ijaiya

Editor

Dr. H.A. Hammed

Secretary

Mrs. K.O. Mohammedlawal

Editors

Dr. Hakeem Ijaiya

Prof. J.O. Adedoyin- Raji

Prof. A.T. Shehu

Dr. H.A. Hammed

Mrs. K.O. Mohammedlawal

Mr. A.A. Yusuph

Consulting Editors

Prof. P.E. Bondzi-Simpson

Prof. (Dr.) Manoj Kumar Sinha

Prof. M. Baderin

Prof. A. Zubair

Prof. W.O. Egbewole

Prof. M.M. Akanbi

Prof. A.A. Popoola

Prof. M.I. Sa'id

Prof. I. Chiroma

Prof. M.T. Abdulrasaq

Prof. M.T. Landan

University of Cape Coast, Ghana

National University of Juridical Sciences, Kolkata, India

University of London

University of Ilorin

University of Ilorin

University of Ilorin

Obafemi Awolowo, University, Ile-Ife

Usmanu Danfodiyo University, Sokoto

Nigeria Law School, Yola

Lagos State University, Ojo

Ahmadu Bello University, Zaria

CONTENTS

Title Page.....	i
Editorial Board.....	iii
Instruction to Contributors.....	iv
Contents.....	vi
 NIMASA's Approach to Terrorism, Sabotage and Climate Change in Maritime Security and Administration in Nigeria Dr. Bibobra Bello Orubebe	 1-21
 Conceptual and Empirical Justification for Domestication of CEDAW in Nigeria Dr. (Mrs.) Ganiat Mobolaji Olatokun	 22-37
 Judicial Attitude to Fundamental Rights Protection in Nigeria Folorunsho Ahmad Hussein & Mrs. Akanbi, Khairat Oluwakemi	 38-54
 The Human Rights Dimensions of Counter-Terrorism Strategy in the Nigerian Terrorism (Prevention) Act 2011 Mrs. Kolawole, Adeejat Kubra Adenike	 55-80
 Non- Statutory Adoption and its Implications on Hereditary Rights of Informally Adopted Children in Nigeria Mrs. Mohammedlawal K.O & Adedayo T.I	 81-95
 Organ Transplant and its Acceptability: An Appraisal of Medical and Islamic Law Perspectives Dr. Ayinla, L.A, Mrs. Bilikis Ayinla Ahmad & Ibraheem-Gambari A.S	 96-110
 The Institutional and Legal Control of Gas Flaring in the Niger Delta Region of Nigeria Dr. Ijaiya, H.O., Mrs. Bayero-Jimoh & Mrs. Abdulsalam-Lakadir	 111-122

Legal Mechanisms for the Protection of Internally Displaced Persons in Sub-Saharan Africa Dr Foluke Dada	125-151
Challenges to the Sustainability and Management of Public Utility in Nigeria M. K. Imam-Tamim & K. K. Eleja	152-173
Doctrine of Necessity and Emergence of Goodluck Ebele Jonathan as President of Nigeria in 2015 General Elections Abdullahi S. AbdulRauf, Dr. Hanafi A. Hammed & Dr. AbdulQadir I. Abikan	174-190
The Significance of Rules of Natural Justice in Administration of Justice Abdulrazaq Adelodun Daibu	191-206
The Role of Non-Governmental Organisations and the Economic and Social Council (ECOSOC) in the Promotion and Protection of Human Rights: Lessons for Regional Bodies. Mu'azu, Abdullahi Saulawa	207-221
Managing Conflicts and Other Challenges of Nationhood in Nigeria: Experimenting with Good Taxing System as a Paraphernalia Dr. Olokooba S.M & Mrs. Suliat R. A.	222-235
Enforcement of Subscribers' Rights in the Nigerian Telecommunications Industry: Issues and Challenges Dr. Ariyoosu D.A & Mrs. Akangbe S.O	236-255
Arabic Language: A Tool for Understanding the Sharia'h (Islamic Law) Isa Olawale Solahudeen & Jamiu Musibau Akanbi Dosunmu	256-270
The Euthanasia of an 80 Year Old Woman; A Negation of the Dutch (Netherland) Euthanasia and Assisted Suicide Laws Dr. B.A. Omipidan	271-291

The Evolution of Nigerian Federalism: Historical Perspective Kamal Alhaji Da'ud	292-307
A Comparative Analysis of the Doctrine of Separation of Powers under the 1999 Nigeria Constitution and the Shariah Legal System Dr. N.A.O. Ijaiya	308-329
Mediation as an Effective Dispute Resolution in Islamic Family Law in Nigeria Mrs. Barakat Raji	330-338
Female Suicide Bombers in Nigeria: Issues and Perspective Onikosi Ahmeed Adedeji & Abdulraheem Abdulwahid Yusuph	339-365
Aviation Security: Airline Passengers' Roles in Combating Air- Terrorism in the 21 st Century Dr. Ismail Adua Mustapha	366-381
Debt Relief Packages: How Effective on the Developing Countries in Africa. Dr. Abdul-Lateef Adekunle Owoade & Adam Ali Adam	382-391
Proof of Rules of Customary Law in Nigerian Courts: Issues and Perspectives Adekunle Ademola Aminu & Sulaiman Mustapha	392-405
Towards Effective Environmental Protection Laws in Nigeria: Problems and Prospects Murtala Ganiyu Murgan	406-418
Legalizing Gay-Marriage in the Contemporary Society: The Hoax and the Truth Abdulsalam Lukman Oladele & Adewara Tajudeen Zubair	419-435
Court-Connected ADR and Industrial Conflict Resolution: Lessons from other Jurisdictions Sola Animashaun & Ridwan I. Olagunju	436-457

MEDIATION AS AN EFFECTIVE DISPUTE RESOLUTION IN ISLAMIC FAMILY LAW IN NIGERIA

Barakat Raji

Department of Jurisprudence and International Law, Faculty of Law, University of Ilorin.

E-Mail baraj2007@gmail.com.

Phone 08069708591

Abstract

The divorce rate is becoming more alarming among the Muslim Couples in Nigeria despite the legal framework for family dispute resolution mechanism provided by the existing laws. This therefore, calls for a re-examination of the methods used for resolving disputes arising from the relationship between Muslim couples. It is a known fact that dispute has become part of human activities in life but this can be positively managed and controlled through the use of right mechanism. Dispute among the Muslim couples can be managed and controlled using mediation process as practised during the time of the Prophet (saw) and his companions, however, the involvement of mediators as mentioned in the Holy Quran for maintaining peace among the couples is worthy of precise role clarification.

Keywords: Divorce, Dispute Resolution, Mediation

1. Introduction

The rate of divorce among the Muslim couples is not encouraging and as such, the need to take adequate measure to address this unwelcoming attitude becomes highly imperative. This is because Allah enjoins marriage and reluctantly permits divorce. Marriage in Islam is a life contract and anything that will jeopardize its existence must be prevented. Disputes are unavoidable in the life of man, most especially when both a man and a woman are coming from a different background with different ideas. Thus, Islam encourages peaceful co-existence and discourages oppression among Muslim couples. This is very clear from the holy Qur'an when Allah says: "If two parties of the disbelievers quarrel, make peace between them....."¹ This verse enjoins amicable settlement among disputing parties and encourages the use of mediation (conciliation) for this purpose. Mediation is a settlement technique through which people strengthen their relationship. This is as long as the procedure does not

¹ *Al-Qur'an, Al-Hujurat (49):9*

contravene the teachings of Islam and the words of Allah.² There is tendency for a woman to be the first to note a negative reaction or a change in her husband's attitude, where this happens, Allah enjoins her to seek for reconciliation thus:

And if a woman fears ill-usage or desertion on the part of her husband, there is no blame on them, if they effect a reconciliation between them, and reconciliation is better, and avarice has been made to be present in the (people's) minds; and if you do good (to others) and guard (against evil), then surely Allah is aware of what you do.³

From the above quotation of the Holy Quran, it is evident that Allah enjoins reconciliation and peaceful settlement of disputes among Muslim couples where the need arises. Divorce is the last resort to be adopted or opted for in Islam where there is ill-luck in the course of settlement of dispute among couples. Muslim couples are enjoined not to allow dispute to hamper their love and unity among them nor allow for severance of the good relationships among them. It is on this premises that this paper examines the existing legal framework for dispute resolution in divorce cases between Muslim couples in Nigeria.

Re-Examination of the Legal Framework for Family Dispute Resolution in Nigeria

The most popular religions in Nigeria are the African Traditional Religion, Islam and Christianity. This has greatly influenced the legal framework for family dispute resolution in Nigeria. For instance, the customary law is put in place to care for marital disputes emanating from those practicing the traditional religion and custom, matrimonial causes Act guides the marriages conducted under the statute, while Islamic law is applicable for regulating marriages among the Muslims. However, the focus of this paper is on the marriages conducted in accordance with the Islamic law.

There are two types of marriage in Islam namely: Sunnatic marriage and Nikai Mutiah (temporary marriage) Sunnatic marriage is the most popular and accepted as authentic way of coming together of a Muslim man and a Muslim woman to live together as husband and wife. This is pristine on the practice of the Holy Prophet Muhammad (saw). This is the ideal constituting a life contract and encourages amicable settlement when dispute arises between the couple. Nikai Mutiah on the other hand is a temporary marriage. This kind of marriage is not encouraged in Islam. However, it was practiced at certain circumstances by the early Muslims. It is no

² Bouheraoua Said, Foundation of Mediation in Islamic Law and Its Contemporary Application, (4th Asia-Pacific Mediation Forum Conference, Harum Hashim Law Centre, Ahmad Ibrahim Kuliyah of Laws, International Islamic University Malaysia 2008)16-18. See also Abu-Nimer M. 'An Islamic Model of Conflict Resolution: Principle and Challenges', (2010) Crescent and Dove: Peace and Conflict Resolution in Islam, 74

³ *Al-Qur'an, An-Nisa* (4):128

longer encouraged because of its temporary nature which allows women to be married and dumped at the will of their husbands. This is because marriage is viewed in Islam to be a permanent transaction especially to safeguard the custody of children involved.

The mode of settlement of disputes among the Muslim couples is through the use of mediation (Sulh) as prescribed in the holy Quran with the aid of court to adjudicate where the need arises. There are many verses in the Holy Quran pointing to significance of mediation in resolving family disputes. For instance, Allah in the holy Qur'an says:

Whosoever intercedes for a good cause will have the reward thereof, and whosoever intercedes for an evil cause will have a share in its burden. And Allah is Ever All-Able to do (and also an All-Witness to) everything.⁴

Allah enjoins peace making among two quarreling parties thus:

If two parties among the Believers fall into a quarrel make ye peace between them: but if one of them transgresses beyond bounds against the other then fight ye (all) against the one that transgresses until it complies with the command of Allah; but if it complies then make peace between them with justice and be fair: for Allah loves those who are fair (and just).⁵

Another instance is found surah Nisai where Allah is addressing a mediator thus:

And if you fear a breach between the two, then appoint judge from his people and a judge from her people.....⁶

Allah also revealed in the same surah but in another ayah that:

.....if you quarrel about anything, refer it to Allah and the Apostle, if you believe in Allah and the last day; this is better and very good in the end.⁷

There is another ayah evidencing the usage of mediation for resolving family disputes among the Muslim couples. Allah says:

But lo! By your Lord! They do not believe until they make you a judge of that which has become a matter of disagreement among them, and then do not find any straightness in their

⁴ Al-Qur'an, An-Nisa (4): 85

⁵ ibid:9

⁶ ibid:35

⁷ ibid:59

hearts as to what you have decided and submit with entire submission."⁸

The last two surahs above was the backbone for all the actions taken by the Prophet of Allah, Muhammad (saw) for serving in the capacity as a judge as recorded in the siroh of the sahabahs. The Prophet was reported to have acted in several capacities as a mediator as well as a judge during his time in Medina. He often mediating and arbitrating disputes between members of the community. The Prophet further said:

*He who makes Peace (Sulh) between the people by inventing good information or saying good things, is not lair*⁹

He was also reported to have said, "There is a sadaqah be given for every joint of the human body and for every day on which the sun rises there is a reward for the sadaqah for the one who establishes mediation (conciliation) and justice among the people."¹⁰

Importance of Mediation to Muslim Couple

The importance of mediation in the life of Muslims cannot be overemphasized. The use of litigation for Islamic family dispute resolution has not brought much peace and harmony to the couples. Mediation is a flexible process which takes into consideration the different needs of family and differing attitudes and position of the parties. Mediation is most effective and appropriate technique for conflicts that have multiple parties or long-term relationships that the parties wish to preserve.¹¹ Mediation is the most preferred method used for revitalizing any breakdown among couples, prevents divorce, and provides for child maintenance and right of access. Where there is a dispute in the family relationship, a mediator helps the parties concerned to identify and explore options to enable them discuss and negotiate for settlement within a reasonable time. Mediation (wassatah), it is a benevolent and non-binding procedure to end a dispute. A situation where a mediator is unable to get the dispute resolved, he can send for two trustworthy persons, one from the husband and the wife with a view of finding solution to the problem. These two persons are expected to bring peace and amicable settlement among the disputing couple. This is very clear from the holy Quran when Allah says: "And if you fear a breach between the two, then appoint a trustworthy person from his people and a trustworthy person from her people, if they both desire agreement, Allah will effect harmony between them, surely Allah is Knowing, Aware".¹² There are procedures in Islam guiding mediation. For instance, a preliminary step in mediation technique is

⁸ Ibid: 65

⁹ *Sahih Al Bukhari* (Muhammad Muhsin Khan(trs), Dar Al Arabia, Beirut,)vol.3, 533

¹⁰ *Sahih al-Bukhari* hadith vol. 3, p.857.

¹¹ Ernest E. Uwazie, 'Alternative Dispute Resolution in Africa: Preventing Conflict and Enhancing Stability'. (2011) (16)Africa Security Brief, A Publication of the Africa Centre for Strategic Studies, 3

¹² *Al-Qur'an ,An-Nisa* (4): 35

the act through which a mediator influences the couple to get them prepare for a fruitful discussion that will lead to settlement.¹³ By this, a spirit of compromise is instilled in the minds of the couple so that settlement can be reached within a reasonable time. Prophet Muhammad (saw) was reported to have said "Whoever arbitrates between two parties and they are pleased with him, even though he has not actually done justice between them, is accursed."¹⁴ This shows how serious a judge should handle any matter before him. He must be independent and not biased against any of the parties. The main concern should be how disputes be resolved among the couples. The guiding principle is that "if they both wish for peace, Allah will cause their reconciliation."¹⁵ However, Allah specifically mentioned arbitrators in another verse thus: "If you fear a breach between the two, appoint (two) arbitrators, one from his family and the other from her's; if they both wish for peace, Allah will cause their reconciliation. Indeed Allah is Ever All-Knower, Well-Acquainted with all things." This verse further corroborates the need for peaceful settlement of disputes between couples.

Issue of Jurisdiction

The Area Court has jurisdiction to adjudicate on dispute arising between the Muslim couples. While appeals lie with the Shari'ah court of Appeal. The procedure is for either a wife or the husband to file a complaint at the Area Court. The couples will be enjoined to call two trusts worthy men who will serve as mediators in their case. One man from the husband's side and the other from the woman's sides. The judge will give these men the free hand to settle the dispute among the couple within three weeks. Where this fails, the couple can now return to court to reopen their case and this can go on for three months. The case is settled only if the parties are willing. Sometimes the court suo motu orders the disputing parties to settle where there is fear of maintenance on the part of the husband if the court should dissolve the marriage. The courts have been successful on many occasions in this regard. However, courts do feel reluctant in dissolving marriage between the Muslim couple because God Himself was not in support of it. The court is expected to do all humanly possible to bring peace among the couple and only where this fails that court reluctantly dissolve the relationship. In fact, there was a report from Aishah (RA) that whenever she is angry with her husband (the Prophet, (S.A.W.)), she used to abandon her husband's name. The Prophet, peace and blessings be upon him, once told Aisha:

I know when you are pleased with me and when you are angry with me she asked: How do you know that?" He replied : when you are pleased with me you say 'No by the God of Muhammad'

¹³ Umar Aimhanosi Oseni, "The Legal Framework for ADR in Courts with Shari'ah Jurisdiction in Nigeria, Malaysia and Singapore", (PhD Thesis, IIUM, 2011)343

¹⁴ Abu al Hassan Ali bn Mohammad bn Habib al -Mawarah, *Adab al Qadi*, (4th edn, Baghdad: Dar Ihya al-Turath al-Islami, 1392/ 1972) vol.2, 382

¹⁵ *Al-Qur'an .An-Nisa (4) :58*

*but when you are angry with me you say 'No by the God of Ibrahim' She said: Yes, O God's Prophet I leave not but abandon your name.*¹⁶

The above hadith showed that in the house of the Prophet, there used to be misunderstanding between him and his wives. There had been some occasion where his marriage with Aisha almost collapsed but Allah intervened and the union became stronger again. Mediation and Arbitration techniques are the best modes for dispute settlement among the Muslim couples.

Causes of marriage disputes among the Muslim Couples

Disputes occurring between Muslim couples are caused to happen by some of these factors namely:

a. Wrong selection of a partner

Most Muslim couples are far away from the teachings of Islam on how to make a right choice in the selection of a partner. Most Muslim girls and boys build their marriages on the wrong selection of partner. The Prophet (saw) was reported to have said that a Muslim boy should look out for these four attributes in a lady when selecting a partner. A man should consider the beauty of a lady, her nobility, her wealth and her religion but religion should be preferred as can be seen in the following saying of the Prophet (S.A.W.):

This hadith was narrated from Abu Hurairah (may Allah be pleased with him) from the Prophet (peace and blessings of Allah be upon him) who said: "A woman may be married for four things: her wealth, her lineage, her beauty and her religious commitment. Seek the one who is religiously-committed, may your hands be rubbed with dust (i.e., may you prosper)."¹⁷ Disappointedly, today, many of the couples chose either nobility, wealth or in most cases beauty is preferred above all. They forget that not all glitters are gold and when this beauty vanishes the love goes away with it and you find the couple not enjoying themselves again. It befits a Muslim who is religiously-committed to base his or her actions on religious guidance, especially on matters that are of great consequence and have lasting effects such as marriage.

b. Lack of education on marriage by couples

A boy (man) and a girl who are coming together as husband and wife need to be thoroughly trained and get prepared for the task ahead. This is because marriage entails a lot of troubles and enjoyment. A man should be trained and thought the way a man should relate with his wife in line with Prophet's doings. Prophet was reported to have related with his wives as companions, he treat them equally, took bath with

¹⁶

Sahih Bukhari (Vol.7, No.62)155

¹⁷

This is an authentic Hadith reported by both Bukhari and Muslim.

them, helped them in the house core, console them when they are sad, play with them. On this note, Aisha was reported to have said that she used to race with her husband and win him when she was strong but that Prophet raced with her and won when she became a little bit fatter. These lessons need to be instilled and demonstrated to a man who is about getting married by a scholar who is also an expert in this respect to prepare the man for future challenges ahead which he must not be found wanting. In addition, the Prophet was reported to have said that the best of you is he who is best to his wife.¹⁸ The aspect of the activities and the roles played by the women of the Prophet must also be instilled in the heart of the woman to prepare her for a better home. Even Prophet (peace be upon him) used to encourage a husband as to what he could do when she is menstruating. He said: "Engage in everything except sexual intercourse itself."¹⁹ Ibn Abbâs (r.a) said: "Indeed, I like to dress up for a woman in the same way as I like it for a woman to dress herself up for me. This is because Allah says: 'And they have upon you similar rights to those you have upon them in good dealings.' And I do not like to exact from her every right to which I am entitled, since Allah says: 'and for the man there is a degree over them.'"²⁰ These are some of the virtues expected to be found among the Muslim couples as demonstrated by the Prophet (saw) and his companions. Where this training becomes part and parcel and practiced, misunderstanding leading to dissolution of marriage will have no place in the lives of the Muslim couples.

c. Lack of communication

Lack of communication among the Muslim couples are so rampant because a man has pride himself to be an alpha and omega in the house thereby suppressing the feelings of his wife. He must always remember what Allah says in the Holy Quran about a wife being like a garment to the husband and vice versa.²¹ A marriage in Islam should be seen as a garment of pleasure which brings to the body and soul comfort and tranquility. Marriage in Islam should not lead to emotional depression and worry. A woman should be allowed to purge out her mind likewise the husband and settle their dispute amicably as laid down in the Holy Quran. There should a regular forum through which they review their relationship and mend their ways when necessary. This fosters their relationship.

d. Inadequate maintenance on the part of the husband

Economic depression in the country has rendered some men incapable of catering well for the needs at home. Maintenance of a wife is the main pillar of a marriage in Islam. Allah says in the Holy Quran that: "Men are the protectors and maintainers of women because Allah has given the one more strength than the other and because

¹⁸

¹⁹

²⁰

²¹

This is one of the admonition given by the Prophet during his welfare sermon at the Mountain of Arafah. This can be found in the Sahih Muslim. *Tafsir al-Tabari*, vol.1, p.625. Sec Q 2 V 187.

they support them from their means..."²² the authority given to man in this respect does not connote total slavery of his woman. Man must use his good judgment well in dealing with his wife and be full of patient. He must accommodate and regard his wife's opinions and accord her with dignity. He is expected to provide for his wife according to his ability. A man must consider his pocket before choosing a partner. An average man should go for an average lady who he will be able to cope with according to his ability.

e. Misapplication of polygamy

Polygamous system of marriage is highly encouraged in Islam for so many reasons among which community obligation towards orphans and widows, to address the social problems of prostitution and extra marital relationship as commonly found in the West, women outliving men as a result of war and so on. This practice is conditioned with a strong warning for those who cannot deal justly with women. Allah says in the Quran that:

*And if you fear that you cannot act equitably towards orphan, then marry such women as seem good to you, two and three and four; but if you fear that you will not do justice (between them), then (marry) only one or what your right hands possess; this more proper, than you may not deviate from the right path.*²³

It is evident in the above verse that Allah warned those who are weak among men not to dabble into practicing polygamy for the safety of their religion so that they may not deviate and go wrong. This system is supposed to be an added advantage and a way to earn the pleasure of Allah therefrom.

Way Forward

Muslim couples are therefore encouraged to seek for assistance only from their family members, a trustworthy person, each from the wife side and the husband side should dispute arises between them, these two trustworthy persons are to negotiate to bring about an equitable outcome.²⁴ This must be done in such a way that couples will reason as to why they must reconcile and live in peace thereafter. The mediators must completely be neutral and leave the expertise and power of decision-making in the hands of the disputing parties themselves.

Conclusion

²² See Q 4 v 34.

²³ Al-Qur'an, An-Nisa (4) :3

²⁴ Ayla Karmali, 'The influence of Sharia Norms of Dispute Settlement and International Law: The International Court of Justice, Room for Accommodation?' (2009) 75(309) The International Journal for Arbitration, Mediation and Dispute Management, 317-319

Maqasid al sharī'ah is one of the provisions that takes care of the welfare of Muslim couples in Islam in relation to their marriage and other mundane activities. Maqasid sharī'ah provides enabling environment for a couple to explore the Islamic teachings and the exemplary life of the Prophet (S.A.W), this will strengthen their union and abstain them from things that may cause injury or loss between them. Prophet was recorded to have practiced monogamy as well as polygamy and there has never been a time in history where he was recorded to have divorced any of his wives. He used to have misunderstandings with his wives and yet he did not give room for divorce because of the resultant effect on the children, the deen, and the ummah (society, community) in general. It is also pertinent to state here that there has never been a time where Prophet raised his hands on any of his wives. If he did not practice beating how come did he recommend beating of wives to his ummah? This is a pure misconception about the teachings of Islam regarding the relationship among the Muslim couples. Prophet was a shining example to be followed when it comes to the practice of monogamy or polygamy and his relationship with Khadija (RA) speaks volume of how a Muslim couple should treat one another. A man must guide his wife against anything that can harm her reasoning, properties, faith, and live happily with her till death do them part. Maqasid al sharī'ah encourages good relationship between Muslim couples as this will transcend unto their offspring and the community in general. This is because when couples live in peace and harmony, the society itself will be at peace but where couples live in fear and acrimony society also suffers for it. Therefore, this paper recommends that since dispute is inevitable among couples, mediation should always be resorted to for resolving their disputes and live must go on. Muslim couples should try as much as possible to avoid anything that will break them apart because it is not good for them and also not good for the children between them and the society at large. They should learn to accommodate each other and manage their differences. Muslim couples should learn from the life history of our beloved Prophet and when there is a misunderstanding between them they should resolve same through the use of mediation process. It also recommends that those practicing polygamy among our men should be more cautious and ready to bear the brunt. The best example is always found in the life of Prophet Muhammad (SAW) for us to attain success in this life and the next world.