


Service Appeal No. 425/2018

22.02.2019

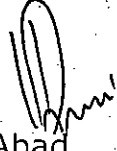
None present on behalf of the appellant. Notice be issued to appellant and his counsel for attendance and preliminary hearing for 18.04.2019 before S.B at Camp Court Abbottabad.


(Muhammad Amin Khan Kundi)
Member
Camp Court Abbottabad

18.04.2019

Appellant in person present.

Due to general strike on the call of Pakistan Bar Council, the matter is adjourned to 17.06.2019 for preliminary hearing before S.B at camp court, Abbottabad


Chairman
Camp court, A/Abad

17.06.2019

Counsel for the appellant and Mr. Muhammad Bilal, DDA for the respondents present.

Learned counsel for the appellant states that as the appellant has been reinstated into service he is under instructions to request for withdrawal of instant appeal.

Dismissed as withdrawn. File be consigned to the record room.


Member


Chairman
Camp Court A/Abad

Announced:
17.06.2019

19.09.2018

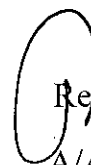
Since 21st September, 2018 has been declared as public holiday on account of Moharram, therefore, case is adjourned to 14.11.2018 for preliminary hearing before the S.B at camp court, Abbottabad.



Chairman
Camp court, A/Abad

14.11.2018

None for the appellant present ... Due to retirement of the Hon'ble Chairman the Service Tribunal is incomplete. Tour to Camp Court Abbottabad has been cancelled. To come up for the same on 17.01.2019 at camp court Abbottabad.



Member
A/Abad

17.01.2019

Appellant absent. Learned counsel for the appellant absent. Adjourn. To come up for preliminary hearing on 22.02.2019 before S.B at Camp Court Abbottabad.

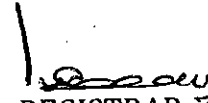




Member
Camp Court A/Abad

Form-A
FORM OF ORDERSHEET

Court of _____

Case No. 425/2018

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	30/03/2018	<p>The appeal of Mr. Yasir Khawaja received today by post through Mr. Abdul Aziz Khan Tanoli Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR 30/3/18</p>
2-	11-4-18	<p>This case is entrusted to Touring S. Bench at A. Abad for preliminary hearing to be put up there on <u>29-6-18</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
29.06.2018		<p>Mr. Hamayun Khan, Advocate present and submitted wakalat nama on behalf of the appellant. He requested for adjournment. Granted. To come up for preliminary hearing on 21.09.2018 before S.B at camp court, Abbottabad.</p> <p style="text-align: right;"> Chairman Camp court, A/Abad</p>

**BEFORE THE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR**Diary No. 464Dated 30/03/2018Service Appeal No. 425 /2018

Yasir Khawaja son of Khawaja Muhammad Sharif, Ex-Constable No.1429,
Police Station Bakot, resident of Orush Colony, Nawanshehr, Tehsil &
District, Abbottabad.

...APPELLANT

VERSUS

Inspector General of Police, Khyber Pakhtunkhwa, Peshawar & others.

...RESPONDENTS

SERVICE APPEAL**INDEX**

S.#	Description	Page No.	Annexure
1.	Service appeal along with affidavit	1 to 8	
2.	Copy of charge sheet and statement of allegation	9 to 10	"A"
3.	Copy of reply to the charge sheet	-11-	"B"
4.	Copy of final show cause notice	12 to 13	"C"
5.	Copy of impugned order	-14-	"D"
6.	Copy of departmental appeal	15 to 16	"E"
7.	Copy of order	-17-	"F"
8.	Wakalatnama		

...APPELLANT

Through

Dated: 29-03-2018

(ABDUL AZIZ KHAN TANOLI)
Advocate High Court, Abbottabad

**BEFORE THE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR**

Service Appeal No. 425/2018

Yasir Khawaja son of Khawaja Muhammad Sharif, Ex-Constable No.1429,
Police Station Bakot, resident of Orush Colony, Nawanshehr, Tehsil &
District, Abbottabad.

...APPELLANT

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 464

Dated 30/3/2018

VERSUS

1. Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
2. Regional Police Officer, Hazara Region, Abbottabad.
3. District Police Officer, District Abbottabad.

...RESPONDENTS

**SERVICE APPEAL UNDER ARTICLE 4-OF
KPK SERVICE TRIBUNAL ACT, 1974,
AGAINST THE IMPUGNED ORDER OB NO.2
DATED 04/01/2018, WHEREBY,
RESPONDENT NO.3 HAS IMPOSED MAJOR
PENALTY OF DISMISSAL FROM SERVICE
OF APPELLANT UNDER WRONG LAW AND**

Filed to-day

Registrar
30/3/18

ORDER NO.824 DATED 26/02/2018 WHICH WAS RECEIVED ON 01/03/2018, WHEREIN, RESPONDENT NO.2 DISMISSED THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHOUT GIVING SUFFICIENT REASON AND WITHOUT HEARING THE APPELLANT.

PRAYER: ON ACCEPTANCE OF THE INSTANT SERVICE APPEAL, IMPUGNED ORDER NO.92-94 DATED 09/01/2018 AND ORDER NO.824 DATED 26/02/2018 MAY GRACIOUSLY BE SET ASIDE AND APPELLANT BE REINSTATED IN SERVICE WITH ALL SERVICE BACK BENEFITS IN THE INTEREST OF JUSTICE.

Respectfully Sheweth:-

That the facts forming the backgrounds of the instant service appeal are arrayed as under;-

1. That the appellant was appointed in Police Department as a Constable on 21/01/2008.

2. That the length of service of the appellant in his department is 10 years till removal/dismissal.
3. That respondent No.3 issued a charge alongwith statement of allegation to the appellant on 06/12/2017, wherein, allegation was made to appellant for involved in selling of drugs through Ghufran son of Haroon, resident of Jalal Baba Chowk, Abbottabad. Copy of charge sheet and statement of allegation is annexed as Annexure "A".
4. That the appellant submitted his reply for charge sheet on 11/12/2017 before respondent and denied the allegation mentioned in the charge sheet. Copy of reply to the charge sheet is annexed as Annexure "B".
5. That according to law, rule, where the accused officially denied the allegation against him. Regular inquiry is absolutely

necessary but the respondents without conduct of any regular inquiry a final show cause notice was issued to appellant on 29/12/2017 and the said final show cause notice was received to the appellant on 02/01/2018 wherein time was given to appellant for submission of reply on receipt of notice in 07 days. Copy of final show cause notice is annexed as Annexure "C".

6. That respondent No.3 with malafide intention against the law, rules, prior to completion of time which was given to appellant in final show cause notice for submission of reply before received of reply impugned order of dismissal from service against the appellant was passed on 04/01/2018. Copy of impugned order is annexed as Annexure "D".

7. That the appellant filed departmental appeal against the impugned order before respondent No.2 on 17/01/2018. Copy of departmental appeal is annexed as Annexure "E".

8. That the respondent No.2 without any sufficient reason or hearing of the appellant departmental appeal of the appellant decided vide order No.824 dated 26/02/2018 and said order was received by the appellant on 01/03/2018. Copy of order is annexed as Annexure "F".
9. That feeling aggrieved from both the orders, filed instant appeal, on the following grounds amongst others;-

GROUND S;-

- a) That the impugned order is against the law, facts, norms of natural justice and materials on the record, hence, not tenable and liable to be set aside.
- b) That the appellant has not been treated in accordance with law and rules by the respondents department on the subject noted above and as

such the respondents violated Article 4 and 25 of the Constitution.

- c) That the respondents without conducting regular inquiry, impugned order of dismissal from service passed against the appellant and this fact respondent No.3 himself admitted in impugned order.
- d) That the appellant denied the allegation, which was made by the respondents in charge sheet and final show cause notice according to the law when accused officially denied the allegation then regular inquiry absolutely necessary but respondents did not conduct any regular inquiry.
- e) That neither any FIR was registered against the appellant regarding selling of drugs through any person nor any drugs was recovered from the appellant. Moreover, there is no evidence or statement of any person

with the respondents for selling of drugs.

- f) That the respondents mentioned the name of a person in charge sheet, that the appellant selling the drugs through Ghufraan son of Haroon, resident of Jalal Baba Chowk, Abbottabad. Respondents prepared the concocted story through plan against the appellant.
- g) That no chance of defence or personal hearing was given to the appellant before issuing of impugned order.
- h) That the action taken by the respondents department is under a wrong law, therefore, the same is void ab-initio and has no legal effect in the eyes of law.

- i) That the appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is, therefore, respectfully prayed that on acceptance of the instant appeal, impugned order and order of appellate authority may graciously be set aside and appellant be reinstated in service with all service back benefits. Any other relief, which this Honourable Tribunal deem fit may also be granted in the interest of justice.

Dated: 29-03-2018

Through


...APPELLANT


(ABDUL AZIZ KHAN TANOLI)
Advocate High Court, Abbottabad

VERIFICATION:-

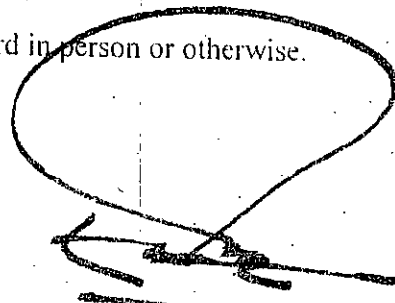
Verified on oath that the contents of foregoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.


...APPELLANT

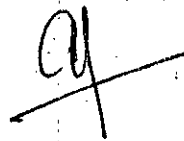
CHARGE SHEET

- 1). I Syed Ashfaq Anwar (PSP) District Police Officer Abbottabad as competent authority hereby charge you Constable Yasir Khawaja No. 1429 as explained in the attached statement of allegations.
- 2). You appear to be guilty of misconduct under Police disciplinary Rules 1975, and have rendered yourself liable to all or any of the penalties specified in the said Police Disciplinary Rules.
- 3). You are therefore, directed to submit your written defense within seven days on the receipt of this Charge Sheet in the Enquiry Officer.
- 4). Your written defense, if any shall reach the Enquiry Officer within the specified period, failing which it shall be presumed that you have no defense to put in and in that case ex-parte action shall follow against you.
- 5). Intimate whether you desire to be heard in person or otherwise.
- 6). A statement of allegations is enclosed.

Attested
mm
29-3-18



SYED ASHFAQ ANWAR (PSP)
District Police Officer
Abbottabad



DISCIPLINARY ACTION

10

I Syed Ashfaq Anwar (PSP) District Police Officer Abbottabad as Competent Authority of the opinion that you Constable Yasir Khawaja No. 1429 rendered yourself liable to be proceeded against as you committed the following act/omission within the meaning of Police Disciplinary Rules 1975.

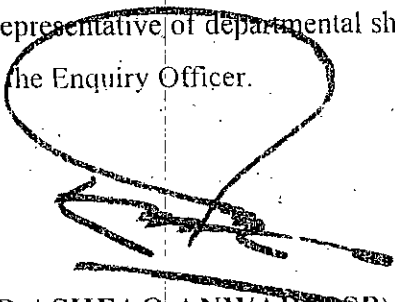
STATEMENT OF THE ALLEGATIONS

1). That you while posted ~~at~~ Police Post Bakot, Reportedly ~~you~~ are involved in selling of drugs through Chafan S/O Haroon R/O Jalal Baba Chowk. Your this act is defaming entire force in the eyes of general public, which is tantamount to gross misconduct

2). For the purpose of scrutinizing your conduct with reference to the above allegations, Mr. Ishtaiq Ahmed, DSP Cantt. is appointed as Enquiry Officer.

3). The Enquiry Officer shall in accordance with the provision of this ordinance, provide reasonable opportunity of hearing to the accused, record finding and make within 25 days of the receipt of this order, recommendation as to punishment or the appropriate action the accused.

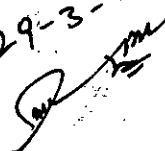
4). The accused a well conversant representative of departmental shall in the proceedings on the date, time and place fixed by the Enquiry Officer.


SYED ASHFAQ ANWAR (PSP)
District Police Officer
Abbottabad

No: 605 /PA, Dated Abbottabad the 06/12/2017.

CC:

1. Constable Yasir Khawaja No. 1429 with the direction to submit his defense within 07 days of the receipt of this statement of allegations and also to appear before the Enquiry Officer of the date, time and place fixed for the purpose of departmental proceedings:

Attested
29-3-18


جناب عالی

605/PP

بحوالہ مشمولہ چارج شیٹ، ڈی سی اینری ایکشن شیٹ
 مورخہ 12/11/2017ء کو حروف حق خدمت ہوں۔ میں نے نہ کبھی کسی قسم کی
 کوئی ادویات بھیجی ہیں۔ نہ میں نے کبھی کسی قسم کی ادویات
 رکھی ہیں۔ نہ میں نے کبھی ادویات استعمال کی ہیں نہ
 میں اس حکمرانہ و صندے کو پسند کرتا ہوں۔ نہ میں نے
 کبھی پولیس کی بدنامی کا کوئی کام کیا، میرے خلاف جس
 آدمی نے یہ گھناؤنا جھوٹا الزام لگایا ہے، براہ کرم اس
 کو سامنے لا کر کلام پاک پر ناکھ لگا کر اس سے پوچھا
 جائے۔ حضور والاد:۔ میرے خلاف یہ سراسر جھوٹا اور
 غلط اور من گھڑت الزام ہے۔

مشرف
 استدعا ہے چارج شیٹ و ڈی سی اینری ایکشن
 داخلہ فتر فرمائی جاوے۔

المقوم 12/11/2017

المقام
 یا سرخواجہ کیشل 429 متعینہ تقمانہ بلوٹ

Attested
 29-3-18

Annexure 'C'

(12)

OFFICE OF THE DISTRICT POLICE OFFICER, ABBOTTABAD

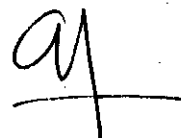
No: 637/PA, Dated Abbottabad, the 29 / 12 / 2017.

FINAL SHOW CAUSE NOTICE
(Unit Rule (3) KPK Police Rules, 1975)

1. That you Constable Yasir Khawaja No. 1429, rendered yourself liable to be proceeded under Rule 5 (3) of the Khyber Pakhtunkhwa Police Rules 1975 for following misconduct;
 - I. That you while posted in Police Station Bakot, reportedly ~~was~~ involved in selling of drugs through Ghafran S/O Haroon R/O Jalal Baba Chowk.
 - II. During proper departmental enquiry the allegations have been proved against you.
2. That by reason of above, as sufficient material is placed before the undersigned therefore it is decided to proceed against you in general Police proceedings without aid of enquiry officer:
3. That the misconduct on your part is prejudicial to good order of discipline in the Police force.
4. That your retention in the police force will amount to encouragement of inefficient Police officers;
5. That by taking cognizance of the matter under enquiry, the undersigned as competent authority under the said rules, proposes stern action against you by awarding one or more of the kind punishments as provided in the Rules.
6. You are, therefore, called upon to Final Show Cause as to why you should not be dealt strictly in accordance with the Khyber Pakhtunkhwa Police Rules, 1975 for the misconduct referred to above.
7. You should submit reply to this Final Show Cause Notice within 07 days of the receipt of the notice failing which an ex parte action shall be taken against you.
8. You are further directed to inform the undersigned that you wish to be heard in person or not.
9. Grounds of action are also enclosed with this notice.



District Police Officer
Abbottabad

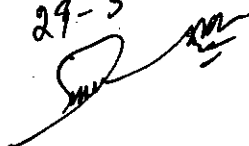


Received by _____

Dated ____ / ____ / 2017.

Attested

29-3-18



13

OFFICE OF THE DISTRICT POLICE OFFICER, ABBOTTABAD

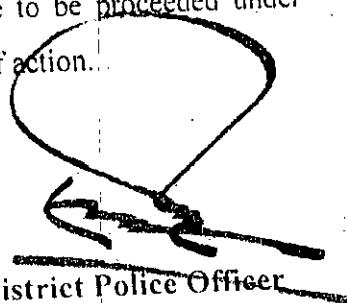
No: 637 /PA, Dated Abbottabad, the 29 / 12 / 2017.

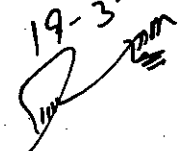
GROUND OF ACTION

That you Constable Yasir Khawaja No. 1429, committed following misconduct:-

- I. That you while posted in Police Station Bakot, reportedly ~~you~~ involved in selling of drugs through Ghafran S/O Haroon R/O Jalal Baba Chowk.
- II. During proper departmental enquiry the allegations have been proved against you.

By reasons of above you have rendered yourself liable to be proceeded under Khyber Pakhtunkhwa Police Rules, 1975, hence these grounds of action.


District Police Officer
Abbottabad

Attested
19-3-2018


Yasir
Khan

1429

Annexure D

14

ORDER

This office order will dispose of the departmental enquiry against **FC Yasir Khawaja No. 1429 Police Station Bakot**. That he while posted in Police Station Bakot, reportedly got involved in selling of drugs through Ghafran S/O Haroon R/O Jalal Baba Chowk.

He was issued Charge Sheet along with statement of allegations. **Mr. Muhammad Ishtiaq DSP Cantt: Abbottabad** was appointed as Enquiry Officer. He conducted proper departmental enquiry against the delinquent officer and recorded statements of all concerned. He was provided ample opportunity to defend himself and rebut the allegations leveled against him. After conducting proper departmental enquiry, the Enquiry Officer submitted his findings, wherein allegations have been proved. Consequently he was issued Final Show Cause Notice. He was summoned to appear in Orderly Room on 04-01-2018. He was given a patient hearing but he had nothing plausible to state in his defence.

Therefore, in exercise of the powers vested in the undersigned under rules 2 (iii) of Police Disciplinary Rules-1975, I, **Syed Ashtaq Anwar PSP, District Police Officer, Abbottabad** as a competent authority, am constrained to award him the punishment of **Dismissal from service** with immediate effect.

Order announced.

ABN 2
4-1-18

~~Signature~~
9/1/18
District Police Officer
Abbottabad

No. 92-94/PA 9-1-2018

- CC.
1. Establishment Assistant.
 2. Pay Officer, DPO Office Abbottabad.
 3. OASI DPO Office alongwith complete Enquiry File containing 18 pages for completion of record.

Attested
29-3-18
Signature

Annexure (E)

محضور جناب D.I.C صاحب پولیس نوازہ ریجن ایبٹ آباد۔

اپیل نوازہ میں حکم صدرہ بحوالہ آرڈر نمبر 2
مورخہ 04/04/2018 و چیٹی انگریزی نمبر 92-94/2018
مورخہ 09/04/2018 جس کے ذریعے جناب D.P.O صاحب
ایبٹ آباد نے مجھے میری دس سالہ ملازمت
سے بغیر کسی انکوائری کے اور بغیر کسی
صفائی کے محروم کرنے کیلئے ملازمت سے
ڈسمس فرما دیا۔

استدعا پیش کردہ براہ کرم منصفانہ طور پر فرمایا
جا کر سائل کی اپیل نوازہ منظور فرمائی جا کر
سائل کے خلاف جاری شدہ ڈسمس
آرڈر مندرجہ بالا منسوخ و کالعدم فرمایا
جا کر سائل کو تاریخ ڈسمس سے ملازمت
پر بحال فرمایا جاوے۔

attested
29-3-18
[Signature]

جناب بجالی موجبات اپیل عرض ذیل ہیں۔

1. یہ کہ سائل مورخہ 04/04/2018 کو محکمہ پولیس ضلع ایبٹ آباد میں بھرتی
ہو کر بعد پاس کرنے ریکروٹ کورس پولیس لائسنس کی کارڈ
اور چوکیات اور تعاضبات میں دیانتداری اور دلجمعی سے
خدمات سرانجام دیتا رہا۔ جو میرا ریکارڈ ملازمت تھا
و شفاف ہے۔

2. یہ کہ سائل عرصہ قریب چار سال تعاضبات کی کینیٹ اور
میرپور میں تعینات رہا۔ جہاں پر فحشیات فروشوں کے

کے خلاف متعدد مقدمات درج کروا کر انہیں سزا دیں اور انہیں

۳۔ یہ کہ ان بزبان زمانہ غشیات فروشوں نے اپنے اثر رسوخ سے میرے خلاف گناہ ڈاکٹریاں دلو کر میرے خلاف انکو ڈاکٹریاں کروانی شروع کیں۔ جن کے نتیجے میں مجھے تھانہ بلکوٹ میں تبدیل کروانے کے بعد میرے خلاف جعدٹا الزام خفیہ ذرائع جو کہ خود اس گناہوں نے جرائم میں ملوث ہیں۔ سے خفیہ شکایات لگو کر مجھے بغیر کسی انکو ڈاکٹری کے اور بغیر کسی ثبوت کے اور بغیر کسی دفاع کا موجودہ دیکھے بغیر ملازمت سے ڈسمل کروا دیا گیا۔ جو میری غیر قانونی اور غیر منطقی انکو ڈاکٹری ہیں نا انصافیوں اور سیکٹرفہ اور بلا ثبوت ڈسمل کا ریکارڈ موجود ہے۔

Attested
29-3-2018
S. J. M.

اسد علی بیگ میری انکو ڈاکٹری مائل منگوائی جا کر لا قانونیت سے جاری شدہ حکم ڈسمل کو کا عدم و منسوخ فرمایا جا کر مسائل کو ملازمت پر تاریخ و عمل سے ہمہ مفاد کے بحال فرمایا جا کر انصاف و باجاء۔

انکو ڈاکٹری 17/03/2018

الکرام
یا سرخواجہ سابق کونسل 1429 تھانہ بلکوٹ
ولد خواجہ محمد شریف سکھ اور شی کا لونی نواسی شہر
تحصیل و ضلع ایبٹ آباد
رابطہ و بیل : 9453326 - 0344

811 Annexure (F)

ORDER

This order is hereby passed to dispose off departmental appeal under Rule 11-A of Khyber Pakhtunkhwa Police Rules 1975 submitted by Ex-Constable Yasir Khawaja No: 1428 of Abbottabad District against the order of punishment i.e. **Dismissal from service** awarded by the DPO Abbottabad vide his OB No.2 dated 04.01.2018.

Facts leading to his punishment are that he while posted in PS Bakot, reportedly got involved in selling of drugs through Ghafran s/o Haroon r/o Jalal Baba Chowk.

After receiving his appeal, comments of DPO were obtained, which were examined /perused. The undersigned called him in OR on 14.02.2018 and heard in person where he failed to explain any plausible reason in his defence. Therefore the punishment awarded to him by the DPO Abbottabad i.e **Dismissal from service** seems to be genuine, hence his appeal is *filed*.

[Signature]
REGIONAL POLICE OFFICER
Hazara Region Abbottabad

No. *834* /PA Dated Abbottabad the *26/2* /2018.

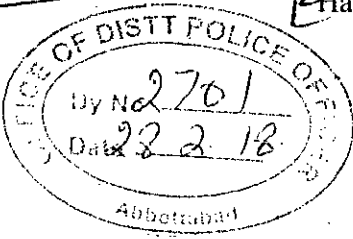
Copy of above is forwarded to the DPO Abbottabad w/r to his office letter No: 331/ dated 08.02.2018 for information and necessary action.

Fauji Missal containing enquiry file is returned for your office record.

[Signature]
REGIONAL POLICE OFFICER
Hazara Region Abbottabad

PA, by office, EA and OASI

FW of return bk



[Signature]
28/2/2018

attested
21-3-2018
[Signature]

وکالت نامہ

کورٹ فیس

بعدالت صاحب سروسز سول سٹریٹ پی کے ایشیا اور

عنوان: ماسٹر فریم بنام انڈیا جنرل انشورنس کمپنی لمیٹڈ

منجانب: ایس پی ہند

نوعیت مقدمہ: سروسز ایس پی

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کاروائی متعلقہ آل مقام

عبدالعزیز خان تنویری ایڈووکیٹ (پبلک ٹھوسٹ ایس پی ہند) کے نام پر

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا نیز وکیل

صاحب موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری

کرانے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت

ضرورت مقدمہ مذکور کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی

بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا

ساختہ پرداختہ مجھ کو منظور و قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے

مستحق وکیل صاحب ہوں گے۔ نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا

حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں

کوئی جز و بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراد

استجارت نالاش بصیغہ مفلسی کے دائر کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

المرقوم: 29-3-2018

Accepted by me

بمقام: 29-3-2018

وکالت نامہ

کورٹ فیس

بعدالت جناب سرور (سرپرست) خیر عینو خواہ اسپت آباد پنج

عنوان: پسر خواجہ نام آئی۔ جی پولیس وغیرہ

منجانب: اسٹیشن (پسر خواجہ)

نوعیت مقدمہ: سرورسی اسٹیٹ

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے بیرونی و جواب دہی کل کاروائی متعلقہ آن مقام

فضل اللہ خان، جلالون خان، اندر و کپتانی اسپت آباد

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا نیز وکیل صاحب موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ بر طرف دہینے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے اجراء وصولی چیک روپیہ و مرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا محکمہ صاحب قانونی کو اپنے ہمراہ اپنی بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا ساختہ پر داخہ مجھ کو منظور قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوں گے۔ نیز بتایا تم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ بیرونی مقدمہ مذکورہ کریں اور اگر محکمہ مقرر کردہ میں کوئی جزو بتایا ہو تو وکیل صاحب موصوف مقدمہ کی بیرونی کے پابند نہ ہوں گے۔ نیز درخواست براد استجارت ناٹش بمقتضیٰ کے دائرہ کرنے اور اس کی بیرونی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

Attached

المقوم: Accepted, Fazlullah Khan Adv.

بمقام: اسپت آباد

Adv.

Adv.

پسر خواجہ محمد رفیق (اسٹیشن)