

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,  
PESHAWAR

Appeal No. 1469/2018

Date of Institution ... 05.12.2018

Date of Decision ... 14.01.2019

Irfan Ali Shah Ex-Constable No. 2025 R/O Hassan Khel Essa Khel, Tehsil and District Bannu. ... (Appellant)

VERSUS

Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar and 5 others. ... (Respondents)

MR. JEHANGIR KHAN,  
Advocate.

... For appellant

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MR. HAMID FAROOQ DURRANI,

... CHAIRMAN

JUDGMENT

HAMID FAROOQ DURRANI, CHAIRMAN:-

The facts as laid down in the memorandum of appeal in hand are that the appellant joined Khyber Pakhtunkhwa Police Department as Constable in July, 2007. He was removed from service on 28.05.2009 on account of absence from duty. Thereafter, departmental appeal of appellant was rejected vide order dated 01.08.2009. On 10.11.2016 the appeal under Rule 11-A of Khyber Pakhtunkhwa Police Rules, 1974 was also dismissed on the ground of limitation as well as merits, hence the instant service appeal.

2. I have heard learned counsel for the appellant who questioned the impugned order dated 28.05.2009 mainly on the ground that it was given retrospective effect, therefore, was void. The period of limitation for filing of appeal was, therefore, not to

run against such order. He, in the said regard, relied on judgment pronounced by this Tribunal in Service Appeal No. 1108/2016.

3. It is undeniable fact that the appellant absented himself from duty w.e.f 30.11.2008. On the said count, he was proceeded against departmentally under the provisions of Khyber Pakhtunkhwa Removal from Service (Special Power) Ordinance, 2000 and notices of his absence were published in two daily newspapers on 20.02.2009. A show cause notice was sent to his residence which was received by him on 22.04.2009. The impugned order dated 28.05.2009, imposing major penalty of removal from service was, therefore, passed against the appellant on account of absence of more than five months. The order was though given effect from the date of absence of appellant.

The record is also depictive of the fact that an appeal against the order of removal was submitted by the appellant purely on the ground of absence due to domestic issues which was rejected on 01.08.2009. The appellant, thereafter, went into slumber for more than seven years and then preferred departmental appeal/review under Rule-11-A of Khyber Pakhtunkhwa Police Rules, 1975. Upon rejection of said appeal on 10.11.2016, once again, the appellant remained indolent and brought the appeal in hand on 05.12.2018. Here, it shall not be out of place to note that owing to the proceedings taken against the appellant under the Khyber Pakhtunkhwa Removal from Service (Special Power) Ordinance, 2000, he was barred from submitting any review petition under Rule 11-A of Khyber Pakhtunkhwa Police Rules, 1975 after rejection of his departmental appeal.

4. In view of the above facts it becomes abundantly clear that the appeal in hand is hopelessly barred by time. The judgment of this Tribunal relied upon by the appellant is also distinguishable due to the fact that codal requirements were not fulfilled<sup>in</sup> the referred case during proceedings against the appellant therein which was not the case in the instant appeal. It also requires to be noted that the retrospective

operation of order of removal dated 28.05.2009 would not vitiate the proceedings against the appellant as the error in the order is curable, as such, the same is modified to have effect from the date of its issuance i.e. 28.05.2009 and not from 30.11.2008. With the said modification the appeal in hand is dismissed in limine.

File be consigned to record room upon completion.



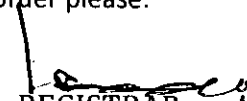

(HAMID FAROOQ DURRANI)  
CHAIRMAN

ANNOUNCED  
14.01.2019

Form- A  
FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No. 1469/2018

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	07/12/2018	<p style="text-align: center;">The appeal of Mr. Irfan Ali Shah resubmitted today by Mr. Jehangir Khan 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 7/12/18</p>
2-	13/12/2018.	<p style="text-align: center;">This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>14/01/2019</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

The appeal of Mr. Irfan Ali Shah Ex-Constable No. 2025 r/o Hassan Khel Essa Khel District Bannu received today i.e. on 05.12.2018 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Copy of revision petition mentioned in the memo of appeal is not attached with the appeal which may be placed on it.
- 2- Copy of order dated 10.11.2016 is illegible which may be replaced by legible/better one.
- 3- Annexures of the appeal may be attested.

No. 2357 /S.T,


Dt. 05/12 /2018.

Mr. Jahangir Khan Adv. Pesh.

  
REGISTRAR -  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.


Respected Sir,

Re-submitted after the  
needfull.

  
7/12/18

Respected Sir,

no revision has been  
referred - in instant Appeal.

  
2

BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PUKHTUNKHWA,  
PESHAWAR

Service Appeal No 1469/ 2018

Irfan Ali Shah

V E R S U S


P.P.O KP and others

I N D E X

S NO	DESCRIPTION OF DOCUMENTS	ANNEX	PAGE
1.	Grounds of Appeal alongwith Affidavit	-	01 - 06
2.	Addresses of the parties	-	07
3.	Copy of the order dated 28-05-2009	'A'	08
4.	Copy of the application and order dated 01 <sup>st</sup> August, 2009	'B'	09
5.	Copy of the departmental appeal and order dated 10-11-16	'C'	10
6.	Wakalat Nama (In original)	-	11

Appellant

Through:

  
(JEHANGIR KHAN)  
Advocate,  
High Court, Peshawar  
Office: C-2 Rehman Plaza  
Khyber Bazar, Peshawar  
Cell # 0334-1600044

Dated: -05-12-2018

(1)

BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PUKHTUNKHWA,  
PESHAWAR

In Re: Service Appeal No 1469/ / 2018

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 1731

Dated 05/12/2018

Irfan Ali Shah Ex-Constable No 2025 R/O Hassan Khel Essa Khel,  
Tehsil and District Bannu.....(Appellant)

V E R S U S

1. Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar
2. Commandant FRP, Khyber Pakhtunkhwa, Peshawar
3. Superintendant of Police, Khyber Pakhtunkhwa, Peshawar
4. Capital City Police Officer, Peshawar
5. AIG/Establishment Khyber Pakhtunkhwa Police, Peshawar
6. District Police Officer, Bannu.....(Respondents)

Filed to-day  
Registrar  
5/12/18

Re-submitted to -day  
and filed.

Registrar  
2/12/18

Appeal under Section 4 of the Khyber Pakhtunkhwa Services Tribunal Act, 1974 against the impugned order dated 10-11-2016, whereby the review petition of the Appellant has been rejected against the order dated 01-08-2009; whereby the punishment of removal from service as major punishment was awarded/confirmed by the Respondent No 2 for no good ground, which is against the law, constitution and norms of natural justice; hence the same is void ab-initio

PRAYER IN APPEAL:-

On acceptance of instant appeal, the order dated 10<sup>th</sup> November, 2016, 01<sup>st</sup> August, 2009 and 28<sup>th</sup> May, 2009 may be kindly be set aside the Respondents may be directed to reinstate the Appellant into his service as with all back and consequential benefits, any other remedy which this this Honourable Tribunal deem fit and appropriate may also be awarded to the Appellant.

Respectfully Sheweth:-

The Appellant humbly submits as under:-

- 1) That the Appellant joined the Khyber Pakhtunkhwa Police Department as constable in July, 2007 and then the Appellant performed his duties with full zeal and devotion.
- 2) That then the Appellant was removed/dismissed from service on the ground of absence from duty without any show cause notice and without giving an opportunity of hearing to the Appellant by the Respondent No 6 vide order dated 28-05-2009. (Copy of the order is attached as Annex 'A').
- 3) That thereafter, the Respondent No 2 confirmed the order of the Respondent No 3 vide order dated 01-08-2009 and then the Respondent No 2 also failed to comply with the provision of law as neither the Appellant was provided



proper opportunity of hearing nor the Respondent No 2 properly appreciated the documentary evidence provided by the Appellant. (Copy of the order is attached as Annex 'B').

- 4) That thereafter, the Respondent No 5 vide order dated 10<sup>th</sup> November, 2016 dismissed the departmental appeal of the Appellant on the ground of limitation. (Copy of the order dated 10-11-2016 is attached as Annex 'C').
- 5) That feeling extremely aggrieved from the order dated 10<sup>th</sup> November, 2016, 01<sup>st</sup> August, 2009 and 22<sup>nd</sup> May, 2009; the Appellant approaches this Honourable Tribunal on the following grounds inter-alia:-

GROUND:-


- A) That the orders mentioned above are against the law, facts, norms of justice and material available on record, hence not tenable.
- B) That the Respondents passed the impugned orders in total haste without complying with the provisions of relevant laws and constitution, hence liable to be set aside.
- C) That the Respondents, while passing the impugned orders have committed grave injustice by not giving any show cause notice and opportunity of hearing to the Appellant, hence the impugned orders are void ab-initio.

- D) That the Respondents did not decide the case of the Appellant in accordance with the prescribed procedure as no proper chance of defence was provided to the Appellant as neither the statement were recorded in presence of the Appellant nor give him opportunity of defence which show that the Appellant was condemned unheard throughout, thus the impugned orders are liable to be set aside on this score alone.
- E) That the allegation leveled against the Appellant have not been proved through any cogent evidence and they Inquiry Officer has recommended the punishment on the basis of surmises and conjecture which are not permissible under the law of the land.
- F) That the Appellant has not been given proper chance of personal hearing before imposing the penalty which is against the norms of justice.
- G) That the Appellant has not been dealt in accordance with law, rules and principles of justice and fair play, therefore the impugned orders are liable to be set aside.
- H) That the other grounds not here specifically raised may also graciously be allowed to be raised at the time of arguments.

5

PRAYER:-

It is, therefore, most respectfully prayed that on acceptance of this Appeal, the order dated 10<sup>th</sup> November, 2016, 01<sup>st</sup> August, 2009 and 28<sup>th</sup> May, 2009 may be kindly be set aside the Respondents may be directed to reinstate the Appellant into his service as with all back and consequential benefits, any other remedy which this this Honourable Tribunal deem fit and appropriate may also be awarded to the Appellant.

Appellant  
Through:   
(JEHANGIR KHAN)  
Advocate,  
High Court Peshawar

Dated: -05-12-2018

NOTE:-

No such like appeal for the same Appellant has earlier been filed by me before this Honourable Tribunal prior to instant one. *as per the instruction of appellant.*

Advocate 

6

BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PUKHTUNKHWA,  
PESHAWAR

Irfan Ali Shah  
VERSUS  
P.P.O KP and others

AFFIDAVIT

I, Irfan Ali Shah Ex-Constable No 2025 R/O Hassan Khel Essa Khel, Tehsil and District Bannu, do hereby solemnly affirm and declare on oath that all the contents of accompanying Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed OR withheld from this Honourable Court.

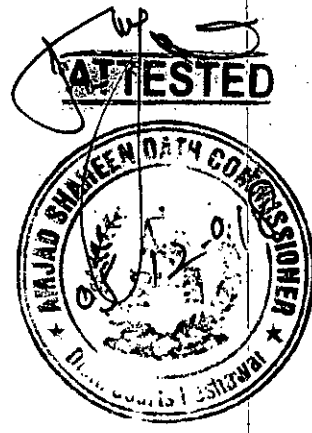
عرفان علی شاہ

DEPONENT

Identified by:-

*Jehangir Khan*

(JEHANGIR KHAN)  
Advocate  
Peshawar





2

ATTESTED



1/2

7

BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PUKHTUNKHWA,  
PESHAWAR

Irfan Ali Shah

V E R S U S

P.P.O KP and others

ADDRESSES OF THE PARTIES

APPELLANT

Irfan Ali Shah Ex-Constable No 2025 R/.O Hassan Khel Essa Khel,  
Tehsil and District Bannu

RESPONDENTS

1. Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar
2. Commandant FCR, Khyber Pakhtunkhwa, Peshawar
3. Superintendant of Police, Khyber Pakhtunkhwa, Peshawar
4. Capital City Police Officer, Peshawar
5. AIG/Establishment Khyber Pakhtunkhwa Police, Peshawar
6. District Police Officer, Bannu

Appellant

Through:



(JEHANGIR KHAN)

Advocate,  
High Court, Peshawar

Dated: 05-12-2018


8  
Ammer A

ORDER


Constable Irfan Ali Shah No.2025 absented himself from lawful duty w.e.f 30-11-2008 till today without any leave/permission of the competent authority. He was informed through Daily Newspapers "Ausaf" & Mashriq" on 20-02-2009 but the delinquent Police Constable did not pay any heed. Consequently, a Show-cause Notice in accordance with Removal from Service (Special Powers) Ord: 2000 was sent at his home address which was properly received by him on 22-04-2009 but he did not bother to report his arrival for duty or to submit his reply to Show-cause Notice. The delinquent constable had remained absent from duty for more than 05 months which inter-alia suggests that there is no likelihood of his return for duty as such he is not likely to become a good Police Officer, therefore, I, ABDUL QAYYUM JAN Superintendent of Police, FRP Bannu Range Bannu, in exercise of the power conferred upon me under the NWFP Removal from Service (Special Powers) Ord:2000, the delinquent constable Irfan Ali Shah No.2025 is hereby removed from Service from the date of his absence.

OB No. 367

Dated 28 / 05 / 2009

  
Superintendent of Police  
FRP, Bannu

ATTESTED TO  
BE TRUE COPY

  
7/12/13





9-2  
Annex B

ORDER.

This order shall dispose off the appeal of Ex-Constable Irfan Ali Shah No.2025 of FRP Bannu Range

Brief facts of the case are that w. he absented himself from duty w.e.f.30.11.08 till the date of removal from service for a total period of 178 days without any leave/permission of the competent authority. He was issued charge sheet/statement of allegation and LO-II FRP Bannu was appointed as Enquiry Officer. After conducting proper enquiry the Enquiry Officer recommended the defaulter constable for major punishment. Therefore he was removed from service by the SP FRP Bannu Range vide his OB No.367 dated 28.05.09.

However, from the perusal of record and findings of Enquiry Officer, there are no cogent reasons to interfere in the order of SP FRP Bannu Range Bannu. Therefore his appeal is rejected.

  
COMMANDANT  
FRONTIER RESERVE POLICE  
NWFP PESHAWAR.


No. 5889-90/EC dated Peshawar the 11/8/09.

Copy of above is sent for information and n/a to:-

1. Superintendent of Police FRP Bannu Range Bannu w/r to his Memo: No.1284 dated 20.07.09. His service roll and Fuji missal are returned herewith for record in your office.

2. Ex constable Irfan Ali Shah No.2025 S/o Noor Ali Shah R/o Village Hassan Khel Issaki Distt & Tehsil Bannu.

ATTESTED TO  
BE TRUE COPY

  
2/12/18



OFFICE OF THE  
INSPECTOR GENERAL OF POLICE  
KHYBER PAKHTUNKHWA  
PESHAWAR.

No. SI/ 7172 - - /16, dated Peshawar the 10/11/2016

10

Amended

ORDER

This order is hereby passed to dispose of departmental appeal under Rule 11-A of Khyber Pakhtunkhwa Police-Rule-1975 submitted by Ex-Constable Irfan Ali Shah No. 2025. The appellant is removed from service w.e.f 30.11.2008 by SP/FRP Bannu vide OB No. 367, dated 28.05.2009 on the charge of absence from duty for 05 months and 28 days.

His appeal was rejected by Commandant, FRP, Khyber Pakhtunkhwa, Peshawar vide order No. 5839-90/EC, dated 01.08.2009.

Meeting of Appellate Board was held on 06.10.2016 wherein appellant was heard in person. During hearing petitioner contended that his mother was ill who later on died.

The impugned order of removal from service of petitioner was passed vide order dated 28.05.2009 and his appeal was rejected vide order dated 01.08.2009. The instant review petition filed on 10.11.2016 is badly time barred. Thus his appeal is rejected on grounds of limitation and merit as well.

This order is issued with the approval by the Competent Authority.

*Najeeb*

(NAJEEB-UR-REHMAN BUGVI)  
AIG/Establishment,  
For Inspector General of Police,  
Khyber Pakhtunkhwa,  
Peshawar.

7173-79/16.

Copy of the above is forwarded to the:

1. Commandant, FRP, Khyber Pakhtunkhwa, Peshawar.
2. Supdt. of Police, FRP, Bannu.
3. PSO to IGP/Khyber Pakhtunkhwa, CPO Peshawar.
4. FA to Addl. IGP/HQrs: Khyber Pakhtunkhwa, Peshawar.
5. FA to DIG/HQrs: Khyber Pakhtunkhwa, Peshawar.
6. Office Supdt: E-IV CPO Peshawar.
7. Central Registry Cell, CPO.

ATTESTED TO  
BE TRUE COPY

*JK*  
*2/12/16*

Better Copy

(10)

OFFICE OF THE  
INSPECTOR GENERAL POLICE  
KHYBER PAKHTUNKHWA  
PESHAWAR

No S 7172/16 dated Peshawar the 10/11/2016

**ORDER**

This order is hereby passed to dispose of departmental appeal under Rule 11-A of Khyber Pakhtunkhwa Police Rule 1975 submitted Ex-Constable Irfan Ali Shah No 2025. The appellant was removed from service w.e.f 30.11.2008 by SP/FRP Bannu vide OB No 367 dated 28.05.2009 on the charge of absence from duty for 05 months and 28 days.

His appeal was rejected by Commandant, FRP, Khyber Pakhtunkhwa, Peshawar vide order Indst No 5889-90/EC dated 01.08.2009.

Meeting of Appellate Board was held on 06.10.2016 wherein appellant was heard in person. During hearing petitioner contended that his mother was ill who later on died.

The impugned order of removal from service of petitioner was passed vide order dated 28.05.2009 and his appeal was rejected vide order dated 01.08.2009. The instant review petition filed on 23.02.2016 is badly time barred. Thus his appeal is rejected on grounds of limitation and merit as well.

**This order is issued with the approval by the Competent Authority.**

(NAJEEB-UR-REHMAN BUGVI)  
AIG/Establishment  
For Inspector General of Police,  
Khyber Pakhtunkhwa  
Peshawar

NO/S/7173-79/16

Copy of the above is forwarded to the:

1. Commandant FRP, Khyber Pakhtunkhwa Peshawar
  2. Supdt: of Police FRP Bannu
  3. PSO to IGP/Khyber Pakhtunkhwa CPO Peshawar
  4. PA to Addl: IGP/HQrs: Khyber Pakhtunkhwa Peshawar
  5. PA to DIG/HQrs: Khyber Pakhtunkhwa, Peshawar
- Office Supdt: E-IV CPO Peshawar  
Central Registry Cell, CPO

DFA

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,  
PESHAWAR

Appeal No. 1469/2018

Date of Institution ... 05.12.2018

Date of Decision ... 14.01.2019

Irfan Ali Shah Ex-Constable No. 2025 R/O Hassan Khel Essa Khel, Tehsil and District Bannu. ... (Appellant)

VERSUS

Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar and 5 others. ... (Respondents)

MR. JEHANGIR KHAN,  
Advocate.

... For appellant.

MR. HAMID FAROOQ DURRANI,

... CHAIRMAN

JUDGMENT

HAMID FAROOQ DURRANI, CHAIRMAN:-

The facts as laid down in the memorandum of appeal in hand are that the appellant joined Khyber Pakhtunkhwa Police Department as Constable in July, 2007. He was removed from service on 28.05.2009 on account of absence from duty. Thereafter, departmental appeal of appellant was ~~was~~ rejected vide order dated 01.08.2009. On 10.11.2016 the appeal under Rule 11-A of Khyber Pakhtunkhwa Police Rules, 1974 was also dismissed on the ground of limitation as well as merit, hence the instant service appeal.

2. I have heard learned counsel for the appellant who questioned the impugned order dated 28.05.2009 mainly on the ground that it was given retrospective effect, therefore, was void. The period of limitation for filing of appeal was, therefore, not to

run against such order. He, in the said regard, relied on judgment pronounced by this Tribunal in Service Appeal No. 1108/2016.

3. It is undeniable fact that the appellant absented himself from duty w.e.f 30.11.2008. On the said count, he was proceeded against departmentally under the provisions of Khyber Pakhtunkhwa Removal from Service (Special Power) Ordinance, 2000 and notices of his absence were published in two daily newspapers on 20.02.2009. A show cause notice was sent to his residence which was received by him on 22.04.2009. The impugned order dated 28.05.2009, imposing major penalty of removal from service was, therefore, passed against the appellant on account of absence of more than five months. The order was though given effect from the date of absence of appellant.

The record is also depictive of the fact that an appeal against the order of removal was submitted by the appellant purely on the ground of <sup>absence due to</sup> domestic issues which was rejected on 01.08.2009. The appellant, thereafter, went into slumber for more than seven years and then preferred departmental appeal/review under Rule-11-A of Khyber Pakhtunkhwa Police Rules, 1975. Upon rejection of said appeal on 10.11.2016, once again, the appellant remained indolent and brought the appeal in hand on 05.12.2018. Here, it shall not be out of ~~the~~ place to note that owing to the proceedings taken against the appellant under the Khyber Pakhtunkhwa Removal from Service (Special Power) Ordinance, 2000 <sup>he</sup> ~~the appellant~~ was barred from submitting any review petition under Rule 11-A of Khyber Pakhtunkhwa Police Rules, 1975 after rejection of his departmental appeal.

4. In view of the above facts it becomes abundantly clear that the appeal in hand is hopelessly barred by time. The judgment of this Tribunal relied upon by the appellant is also distinguishable due to the fact that codal requirements were not fulfilled in <sup>the referred case during</sup> ~~that case while~~ proceedings against the appellant therein which was not the case in the instant appeal. It also requires to be noted that the retrospective

<sup>operatum</sup>  
~~application~~ of order of removal dated 28.05.2009 would not vitiate the proceedings against the appellant as the error ~~contained~~ in the order is curable, as such, the same is modified to ~~had~~ <sup>have</sup> effect from the date of its issuance i.e. 28.05.2009 and not ~~with~~ ~~effect~~ from 30.11.2008. With the said modification the appeal in hand is dismissed in limine.

File be consigned to record room upon completion.

(HAMID FAROOQ DURRANI)  
CHAIRMAN

ANNOUNCED  
14.01.2019

قیمت  
50 روپے

58496



کال

ایڈوکیٹ:

بار کونسل ایسوسی ایشن نمبر: BC-10-7904

رابطہ نمبر: 03341600044

پشاور بار ایسوسی ایشن، خیبر پختونخوا

بعدالت جناب:

منجانب:	دعویٰ:
کرفان علی شاہ	علت نمبر:
بنام	مورخہ:
حکومت	جرم:
	تھانہ:

### باعث تحریر آگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ  
آن مقام کے لئے صاحب کار کے لئے مقرر  
کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو  
راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق  
زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز  
دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی  
کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب  
مقرر شدہ کو وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا  
دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے  
باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المرقوم:

المقام:

نوٹ: اس وکالت نامہ کی نوٹو کاپی ناقابل قبول ہوگی۔

کرفان علی شاہ  
11/10-7406424-9