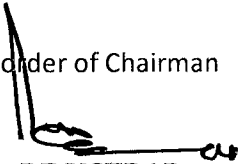


Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- _____ 1386/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	21/09/2022	<p>The appeal of Mst. Fozia Akram presented today by Mr. Zia-ud-Din Khan Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____. Notices be issued to appellant and his counsel for the date fixed.</p> <p style="text-align: right;">By the order of Chairman  REGISTRAR</p>

BEFORE THE HON'BLE SERVICE TRIBUNAL KHYBER PAKHYUNKHWA PESHAWAR

Service Appeal No. 1386/2022

Fozia Akram

VERSUS

DIG Bannu Police

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5	Copy of Re-instatement Order dated 03/05/2013	<u>C</u>	12
6	Copy of Dismissal Order dated 06/08/2018	<u>D</u>	13
7	Copy of Re-instatement Order dated 16/11/2018	<u>E</u>	14
8	Copy of Charge-Sheet & documents	<u>F</u>	15 - 17
9	Copy of Compulsory Retirement dated 16/07/2021	<u>G</u>	18
10	Copy of Departmental Appeal along with Order of Rejection	<u>H</u>	19 - 20
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Dated: 19/09/2022

Appellant

Through

Zia-Ud-Din Khan
Advocate High Court

Attested
Federal Sharia Court
Advocate
High Court Federal Sharia
Court of Peshawar

Office: INSAF LAW CHAMBER Flat No. 34-B, Super Market Phase-I Hayatabad
Township Peshawar City, Khyber Pakhtunkhwa Province the Islamic Republic
of Pakistan.

Cell. No. 0345-9110368/0303-5893180

E-mail: Ziakhan_12@yahoo.com

BEFORE THE HON'BLE SERVICE TRIBUNAL KHYBER PAKHYUNKHWA PESHAWAR

Service Appeal No. 1386/2022

Fozia Akram Ex-Lady Constable (BPS- 07) Police District Bannu
Khyber Pakhtunkhwa.

[Appellant]

VERSUS

- 1) The Regional Police Officer (RPO) Bannu Region, Central Police Lines District Bannu Khyber Pakhtunkhwa.
- 2) The District Police Officer (DPO) District Bannu, District Headquarter of Police Bannu Khyber Pakhtunkhwa.
- 3) The Inspector General of Police Khyber Pakhtunkhwa, Central Police Lines Peshawar.

[Respondents]

.....

**APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL ACT 1974**

AGAINST THE IMPUDGNE OFFICE ORDER NO. 2063-68/PA, DATED BANNU THE 27/07/2021, WHEREBY MAJOR PENALTY OF COMPULSORY RETIREMENT FROM SERVICE HAS BEEN IMPOSED ON THE APPELLANT BY RESPONDENT NO (2)/THE DISTRICT POLICE OFFICER BANNU. WHILE, THE APPELLATE AUTHORITY RESPONDENT NO (1)/THE REGIONAL POLICE OFFICER (RPO) THROUGH OFFICE ORDER NO. 5126-/ES/DATED BANNU, THE 23/08/2022, WHEREBY THE DEPARTMENTAL APPEAL DATED: 26/07/2022 OF THE APPELLANT WAS REJECTED.

Respectfully Sheweth;

BRIEF FACTS

- 1) That the Appellant is a respectable Law-abiding citizen of Pakistan and belongs to a respectable family. Moreover, the appellant was initially appointed/recruited as a 'Lady Constable' in the Khyber Pakhtunkhwa Police on 06/11/2008 at her dwelling District Bannu, where she rendered her services with honesty, zeal and zest to the entire satisfaction of her superiors (respondents).

{Copy of Appointment Order dated 06/11/2008 annexed Annexure- A}

- 2) That on dated 15/12/2008, husband of the appellant confidentially submitted 'Resignation Letter along with an Affidavit' before the then District Police Officer (DPO) Bannu without taking any proper consent of

the present appellant. Hence, the appellant was kept in complete ignorance regarding the subject matter resignation etc. The DPO Bannu passed an order of approval regarding the subject matter resignation of the appellant.

{Copy of Order dated 15/12/2008 annexed Annexure- B}

- 3) That the Appellant submitted her 'Mercy Petition' against the above-mentioned order dated 15/12/2008 of DPO Bannu before the then 'Regional Police Officer (RPO) Bannu' which was inquired through proper channel and after lapse of more than four years on 03/05/2013, the appellant was reinstated to service without any back benefit.

{Copy of Re-instatement Order dated 03/05/2013 annexed Annexure- C}

- 4) That the then District Police Officer Bannu on 06/08/2018 imposed major penalty on the appellant and issued an 'Order of Dismissal' from service on the ground of absentia.

{Copy of Dismissal Order dated 06/08/2018 annexed Annexure- D}

- 5) That the Appellant submitted her 'Departmental Appeal' against the above-mentioned order dated 06/08/2018 of DPO Bannu before the then 'Regional Police Officer (RPO) Bannu' which was inquired through proper channel. Consequently, the on 16/11/2018, the appellant was reinstated to service.

{Copy of Re-instatement Order dated 16/11/2018 annexed Annexure- E}

- 6) That the Respondents on 02/07/2021 again conducted an inquiry against the present appellant for absentia from duty. The respondent through proper channel made 'Charge Sheet' along with 'Summary of Allegations' against the appellant.

{Copy of Charge-Sheet & documents annexed Annexure- F}

- 7) That the Appellant on 12/04/2021, submitted her 'Mercy Petition' against the above-mentioned departmental proceedings of the respondents. Consequently, the respondents through proper channel inquired the matter and make their final findings along with imposing of 'Major Penalty' against the appellant of 'Compulsory Retirement' from service through vide office Order No. 5492-98/SRC dated Bannu, the 16/07/2021.

{Copy of Compulsory Retirement dated 16/07/2021 annexed Annexure- G}

- 8) Subsequently, the appellant after her 'Compulsory Retirement' submitted 'Departmental Appeal' dated 21/06/2022 before Respondent No (1)/the Regional Police Officer (RPO) Bannu. But unfortunately, the respondent

(4)

rejected the departmental appeal/mercy petition of the appellant on 28/07/2022 without providing any opportunity of proper hearing.

{Copy of Departmental Appeal & Order of Rejection annexed Annexure- H}

- 9) That after rejection of the above departmental appeal, the appellant on 02/08/2022 filed 'Mercy Appeal' before the Respondent No (3)/the worthy Inspector General Khyber Pakhtunkhwa.

{Copy of Mercy Appeal dated 02/08/2022 annexed Annexure- I}

- 10) That the Respondent No (3)/the worthy Inspector General Khyber Pakhtunkhwa Police through vide Office Order No. 5/1906/22, dated Peshawar the 23/8/2022 refused the revision petition of the appellant as the same has been declared time barred.

{Copy of Order dated 23/08/2022 annexed Annexure- J}

- 11) It is pertinent to mention here that the appellant had earlier on 01/08/2022 submitted an application before the respondents for furnishing copies of appeal rejection, compulsory retirement and all other relevant record.

{Copies of Applications dated 01/08/2022 & 31/08/2022 Annexure- K}

- 12) It is pertinent to mention here that the Respondents neither served any 'Show-Cause Notice' to the present appellant nor informed about any inquiry proceedings or report of whatever nature has been conducted despite the fact that it was mandatory under the Law for the respondent to oblige.

- 13) That the Respondents haven't conducted/initiated the so-called departmental inquiry/proceedings against the appellant in accordance to Law. The respondent's allegation of absentia from duty against the appellant is not true because the reason of appellant absence from duty was her serious illness. While, the appellant in her 'Departmental Appeal' before the 'Respondent No (4)/the Inspector General of Police' also put of the same plea.

- 14) That the Respondents didn't communicated and served any Show-Cause Notice to the appellant which was mandatory for the respondents under the Rules and neither the appellant was informed through any source of communication or through any publish 'Advertisement' etc in any reputed Newspaper. Hence, this act of the respondents is against the famous principle that 'none could be condemned unheard'. The Hon'ble Supreme

Court of Pakistan in Civil Appeals No.1122, 1123, 1107 of 2013 & 173 and 174 of 2015; clarified that;

'For reasons to be recorded later these appeals are partially allowed and the impugned judgments of the High Court are set aside to the extent of setting aside the order of dismissal of the respondents by the Commandant Frontier Constabulary. However, since the procedure laid down in Rule 18 of the NWFP Frontier Constabulary Rules, 1958 had not been followed during the inquiry conducted against the respondents, a denovo inquiry according to the said Rule may be conducted against the respondents. In order to hold the inquiry, the respondents have to be reinstated. Since three inquiries have already been held, the fresh inquiry shall be concluded within a period of four months'.

15) The Appellant refuted the allegations of absentia put up by the respondents in the subject matter case. While, it is pertinent to mention here that this Hon'ble Court/Tribunal as well as the Superior Judiciary frequently directed that no one should be condemned unheard and the case should be decided in its true letter and spirit according on merit. Reliance could be made on the judgment of the Hon'ble Peshawar High Court (PLD 2011 Page 47) wherein the Principle of Natural Justice elucidates that;

'Order passed by an authority against the interest of a person without providing him opportunity of hearing would be an illegal order'.

16) That being aggrieved by the said unlawful acts of the respondents and finding no other alternate remedy, the appellant had left with no other option but approach this Hon'ble Court/Tribunal through the appeal in hand inter-alia on the following grounds:

GROUND

- A) That the impugned Order No. 5492-98/SRC dated Bannu, the 16/07/2021 which was issued by the 'Respondent No. 2/the District Police Officer (DPO)' whereby major penalty of 'Compulsory Retirement' from service has been imposed upon the appellant, is not only based on their malafide intention, ill-will, unlawful and trying to deprive the appellant of her Fundamental Constitutional Right of livelihood but also against the Law, Rules and Principles of Natural Justice.
- B) That the Appellant has not been treated in accordance with Law, nor she has been granted any proper, fair and meaningful opportunity of self-defense and thus the alleged charges of absentia against the appellant are baseless and devoid of merits, hence not tenable in the eyes of Law. Reliance could

(6)

be made on the judgment of the Hon'ble Supreme Court of Pakistan (2017 SCMR, Page 356) as under;

'Inefficiency---Major Penalty---Dispensation of regular enquiry---Legality--- Fact finding enquiry--- Supreme Court observed that it would be lawful, appropriate and fair that a regular enquiry was conducted to the extent of responsibility of the appellant for his alleged misconduct and if culpable, the lawful penalty that may be imposed on him---Supreme Court set-aside the major penalty of dismissal from service imposed on the appellant and remanded his case to the department for holding regular enquiry after giving him full opportunity of representation in accordance with Law'.

- C) That the 'Departmental Appeal' of the present appellant was rejected by the Respondent No (2)/the Regional Police Officer (RPO) through vide Office Order No. 2987/FC, dated Bannu the 27/07/2022, which is against the Principles of Natural Justice. Reliance could be made on the judgment of the Hon'ble Supreme Court of Pakistan (2003 SCMR, Page 207), wherein it has been precisely stated that;

'Natural Justice, principles of---Applicability---Opportunity of defence to civil servant---Scope---Proper inquiry is to be conducted wherein Government servant is to be provided an opportunity of defence and personal hearing and if regular inquiry is proved then action against the public servant is to be taken'.

- D) It is also important to be noted that the reason behind the Appellant absentia from duty was her serious illness as well serious domestic problems. While, the appellant also informed the concerned officials regarding the same. But unfortunately, the same wasn't considered positively. The Hon'ble Lahore High Court in (2016 PLC (C.S 296) clearly stated that;

'Whenever any discretion was given to an authority it had to be exercised not arbitrarily, but honestly, justly and fairly in consonance with the spirit of law after application of judicious mind and for substantial reasons--- Discretion had to be exercised with due care and caution keeping in mind the principles of natural justice, fair trial and transparency---Authority should record reasons with regard to dispensing with regular inquiry---Where recording of evidence was necessary to establish charge then departure from regular inquiry would amount to condemned unheard---Serving of Show-Cause notice and reply thereto in denial of allegations would not amount to affording the employee reasonable opportunity of showing cause'.

{Copies of Medical Certificates/Transcripts annexed Annexure- L}

- E) That the Appellant has been condemned unheard and has not been treated in accordance with Law. No opportunity of personal hearing and defense has been provided to the appellant which is against the Law, hence the impugned order is void and illegal. It is further averred that Constitutional Provisions containing fundamental rights and the powers of the Courts to enforce them also received a broader interpretation after the judgment of Benazir Bhutto case. Similarly, the appellant being a low paid Government Servant, having no other alternate source of income and deserving to be treated leniently. Therefore, the impugned order being harsh and vindictive liable to be Set-aside.
- F) That the Appellant shall be allowed to add any other ground(s) during arguments.

PRAYER IN APPEAL

- i) On acceptance of this Appeal, the impugned Office Order No. 5492-98/SRC dated Bannu, the 16/07/2021 of the 'Respondent No (2)/the District Police Officer (DPO)' regarding the 'Compulsory Retirement' from service is illegal and unlawful, may please be Set-aside and the appellant shall be 'Re-instated' to service with all back benefits.
- ii) On acceptance of the appeal in hand, the inquiry proceedings conducted by the respondents against the appellant shall be declared null and void as the same are against the Law and Principles of Natural Justice and the appellant shall be treated on humanitarian grounds.
- iii) Any other relief deems proper in the circumstances of this case may also be granted in favor of the appellant.

Dated: 19/09/2022

[Handwritten Signature]

Appellant

Through

Zia-Ud-Din Khan
Advocate High Court

&
Federal Sharia Court
ZIA-UD-DIN KHAN
Advocate
High court, Federal Sharia
Court of Pakistan

AFFIDAVIT

I, Fozia Akram Ex-Lady Constable (BPS- 07) Police District Bannu Khyber Pakhtunkhwa, do hereby solemnly affirm and declare on oath that the contents of this 'Appeal' are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Tribunal/Court.

Fozia Akram

DEPONENT

Service Appeal No. _____ -P/2022

Fozia Akram

VERSUS

DIG Bannu Police

APPLICATION FOR CONDONATION OF DELAY

Respectfully Sheweth:

- 1) That the above titled case has been filed by the applicant/appellant wherein no date for hearing has yet been fixed.
- 2) That the reason behind delay in filing of the 'Departmental Appeal' before the 'Appellate Authority' was due to serious domestic problems as well zero knowledge of the applicant/appellant regarding the period of limitation.
- 3) That the delay in filing of the above title appeal is neither willful, nor intentional, but due to the above stated reason.
- 4) There are plethora of judgments of the Superior Courts that cases must be decided on merits and technicalities should be avoided. The applicant is diligently pursuing her case therefore; the case deserves to be decided on merits.

It is therefore, most humbly prayed that on acceptance of this application, the delay in filing the above mentioned 'Departmental Appeal' may kindly be condoned in the best interest of justice.

Dated: 19/09/2022

Fozia
Appellant

Through

Zia-Ud-Din Khan
Advocate High Court

&

Federal Shari'a Court
ZIA-UD-DIN KHAN
Advocate
High Court, Peshawar, Shari'a

AFFIDAVIT

I, Fozia Akram Ex-Lady Constable (BPS- 07) Police District Bannu Khyber Pakhtunkhwa, do hereby solemnly affirm and declare on oath that the contents of this 'Application' are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Tribunal/Court.

Fozia
DEPONENT

Amex. A
ENLISTMENT ORDER

(10)

Recruit lady constable Fozia Akram

Muhammad Akram Khan R/O House No.3/E Wollen Mills Police Station Saddar

Subject Bannu is hereby enlisted as recruit lady constable in BPS (5) w.e.f. 01-11-2008

and allotted constabulary No. 1396 Height. 5x1 1/2 Education 10th

Date of Birth 06-07-1984 age on enrolment 24 years 03 Months and 25 days.

Her service is purely on temporary basis liable for termination at any time without any notice.

OB No 1043

Dated 06/11/2008

[Signature]
District Police Officer
Bannu.

No. 17119 /Dated Bannu, the 17/12/2008.

Copies to all concerned.

SRC

Annex - B

(11)


ORDER

Lady Constable Fozia Ikram No.1396 of Police Lines, Bannu submitted an application along with affidavit requesting therein for resignation from service.

Therefore, her application for resign from service is hereby ordered to be approved.

GB No. 1180

Dated 15 / 12 / 2008.


District Police Officer,
Bannu.

No. 17119 / Dated Bannu, the 17/12/2008.
Copies to all concerned.

SPC

ORDER.

My this order will dispose off the Mercy Petition, submitted by Ex: Lady Constable Fozia Akram No. 1396 for setting aside the order of DPO/Bannu, by virtue of which, the said Ex:Lady Constable has been invalidated out of service vide OB: No. 1180 dated 15.12.2008 on the basis of her application along with an oath for resignation from service.

Mr. Azmat Ali Khan SDPO/Saddar, Circle, Bannu was appointed as an Enquiry Officer by the then Worthy Regional Police Officer, Bannu Region. The Enquiry Officer conducted enquiry in to the matter and submitted his findings, wherein ha has stated that the Ex: Lady Constable, namely, Fozia Akram was appointed as Lady Constable In Police Department on 01.11.2008. On information of her appointment, her husband submitted an application along with an affidavit for resignation on her behalf due to the prevailing law and order situation in the Region and customs of the locality, which was accepted.

The Enquiry Officer has further stated that according to Police Rules 14.11 "an enrolled Police Officer who intends to resign from the Police Service shall give notice to that effect in writing and ordinary shall not be permitted to withdraw himself from duty until two months have elapsed from the date on which his resignation was tendered" and according to Police Order 2002 article 116(2) "No Police Officer shall resign his office unless he has given to his superior officer notice in writing for a period of not less than two months of his intention of resign" but once the application has been submitted on 29.11.2008 with out of here intention, has been accepted at once merely after elapse of 16-days, on 15.12.2008 by the DPO/Bannu, speaks of illegality in the subject resignation.

Therefore, I Azad Khan, Regional Police Officer, Bannu Region Bannu, in exercise of the powers vested in me, am agree with the findings of the Enquiry Officer, hereby accept the subject Mercy Petition and re-instate Ex: Lady Constable Fozia Akram with immediate effect without back benefits.

Order announced.

(AZAD KHAN) TST,PSP
Regional Police Officer,
Bannu Region, Bannu.

No. 1061-62 /EC, dated. 03/05/2013.

Copy to :-

- The District Police Officer, Bannu for information & n/action.
- Mrs. Fozia Akram daughter of Mohammad Akram Khan r/o Bannu Wollen Mills, Poloice Station Saddar, Bannu.

(AZAD KHAN) TST,PSP
Regional Police Officer,
Bannu Region, Bannu.

PP 3/5/13.

Annex - D

(13)

ORDER

This order of the undersigned will dispose of the departmental proceedings against accused Lady Constable Fozia Akram No. 543 under Police Rule 1975 (As amended vide Khyber Pakhtunkhwa gazette Notification, No.27th of August 2014) by issuing charge sheet and statement of allegation to her for committing the following commissions/omissions.

- > That Lady Constable Fozia Akram No. 543 absented herself from lawful duty without any sanctioned leave or prior permission of the competent authority w.e.f. 04.05.2018 till date vide DD No. 79, dated 04.05.2018 Police Lines Bannu. Her pay was stopped to this effect.
- > Such act on your part is against service discipline and amounts to gross misconduct/negligence in duty.

Charge sheet and statement of allegation were issued to her and DSP/Cantt, Bannu was appointed as Enquiry Officer to scrutinize the conduct of the official. The Enquiry Officer submitted finding report and reported that the allegations leveled against the accused Lady Constable have been proved and statement of her nephew namely Junaid Khan stated that she has left the service, placed on file.

Final Show Cause Notice was issued to the accused official and properly served upon her. The accused official submitted unsatisfactory reply, placed on file.

In the light of the departmental enquiry proceedings, finding report of enquiry officer and proved allegations against her and found guilty of the charge. From the perusal of service record the accused official is habitual absentee, hence, I, MUHAMMAD KHURRAM RASHID, District Police Officer Bannu, in exercise of the power vested in me under Police Rule 1975 (As amended vide Khyber Pakhtunkhwa gazette Notification, No.27th of August 2014), she is hereby awarded major punishment of "Dismissed from Service w.e.from the date of absence i.e. 04.05.2018" with immediate effect.

(MUHAMMAD KHURRAM RASHID)PSP
District Police officer,
Bannu.

OB No. 694
Dated: 06-08 /2018.

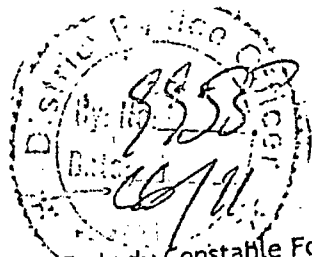
No. 10/35-69 /SRC dated Bannu, the 07/08 /2018.

Copy of above to:

1. Reader, Pay officer, SRC, OASI for compliance.
2. Fauji Missal Clerk along with enquiry file for placing it in the Fauji Missal of the

Specialist, I
Specialist II
E-mail:mtb

Annex - E



BANNU REGION

POLICE DEPARTMENT

ORDER

My this order will dispose off departmental appeal preferred by Ex-Lady Constable Fozia Akram No.54 of Bannu District Police, wherein, she has prayed for setting aside the major punishment of "dismissal from service" imposed upon her by DPO Bannu vide OB No.694 dated 06.08.2018.

As a result of her appeal, service record and departmental inquiry file were summoned from DPO Bannu vide this office Endst: No.3196/EC dated 24.10.2018 which were submitted vide his office letter No.14476/EC dated 01.11.2018.

Inquiry file of the appellant perused and it was found that the appellant while posted to Police Line Bannu, absented herself from official duty w.e.f 04.05.2018 till the order of dismissal i.e 06.08.2018 (03 months & 02 days). Resultantly, she was proceeded departmentally under Police Rules 1975 (amended with 2014) for the above misconduct. After conducting inquiry into the allegations, the lady constable was still absented from police lines Bannu. She was summoned through DFC of the police station but as per explanation of Mukaram Khan (brother of the appellant), she deserted the police force. In the last, the E.O submitted its findings to the competent authority for appropriate action. After issuance of final show cause notice, the appellant was awarded the aforesaid punishment. Service record of the appellant also depicts that she has served in Police force for about 09 years & 03 months.

After going through her appeal and service record, the undersigned has reached to the conclusion that the quantum of punishment awarded i.e dismissal from service is disproportionate to the quantum of misconduct committed by the appellant.

Therefore, I, Abdullah Khan, Regional Police Officer, Bannu Region Bannu, in exercise of the powers vested in me under Rule, 11(4) (c) of Khyber Pakhtunkhwa Police Rules, 1975 (amended 2014) hereby modify the punishment of dismissal from service into minor punishment of forfeiture of two years approved service and she is hereby reinstated in service with immediate effect. Period of absence of 03 months & 02 days is converted into earned leave while out of service period i.e from 06.08.2018 to the date is considered as leave without pay.

Order announced

(ABDULLAH KHAN) PSP
Regional Police Officer,
Bannu Region, Bannu

No. 3482/EC, dated Bannu the 16/11/2018

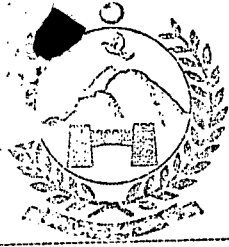
Copy to the District Police Officer, Bannu w/r to his office letter number quoted along with service record containing the inquiry file for record in office which may be acknowledged. The appellant may be reinstated into service.

S.P.C. / O.A.S.I. / P.O.
For information &
action. M.A.

(ABDULLAH KHAN) PSP
Regional Police Officer,
Bannu Region, Bannu

Annex - F (15-17)

15



OFFICE OF THE
SUPERINTENDENT OF POLICE,
INVESTIGATION, BANNU.

Phone No: 6928-9270178.

No. 2723 Inv. Dated Bannu the: 02/07/2021.

To: The District Police Officer,
Bannu.

Subject: - DEPARTMENTAL ENQUIRY AGAINST LFC FOZIA AKRAM NO. 543.

Memo: Kindly refer to your office Charge Sheet & statement of allegations
No. 153/SRC, dated 21.06.2021.

Finding Report of Departmental Enquiry conducted against Lady
Constable Fozia Akram No. 543, containing pages (18) are submitted herewith for
further order, please.

Superintendent of Police,
Investigation, Bannu.



OAS:

PR - Summons her in OR
14/7.

Heard in OR.
Suo requested
for compulsory
retirement. Approved.
15/7/21.

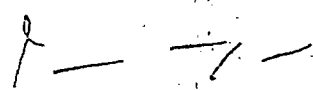
CHARGE SHEET:

I, IMRAN SHAHID, District Police Officer, Bannu, as competent authority, hereby charge you, Lady Constable Fozia Akram No. 543 Police Lines Bannu for the purpose of departmental enquiry proceedings as follows:-

- That you Lady Constable Fozia Akram No. 543 posted to Police Lines Bannu deliberately absented yourself from official duty without any sanctioned leave or prior permission of the competent authority w.e.f 06.05.2021 to 31.05.2021 (Total 25-Days) vide DD No. 53, dated 31.05.2021 Police Lines Bannu. Your Pay has been stopped to this effect vide OB No. 575, dated 18.05.2021.
 - Such an act on your part is against service discipline and amounts to gross misconduct/negligence in duty.
1. By reason of the above you appear to be guilty of misconduct under the Police Rules 1975 (As amended vide Khyber Pakhtunkhwa gazette Notification, No.27th of August 2014) and have rendered yourself liable to all or any of the penalties specified in the said rules.
 2. You are therefore, directed to submit your defense within 07 days of the receipt of this Charge Sheet to the enquiry officer.
 3. Your written defense, if any, should reach to 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 be taken against you.
 4. You are directed to intimate whether you desire to be heard in person.
 5. A statement of allegation is enclosed.

E

u


 (IMRAN SHAHID) PSP
 District Police officer,
 Bannu.

(17)

SUMMARY OF ALLEGATIONS:

I, IMRAN SHAHID, District Police Officer, Bannu as competent authority, am of the opinion that Lady Constable Fozia Akram No. 543 Police Lines Bannu, has rendered herself liable to be proceeded against as she has committed the following misconduct within the meaning of Police Rules (As amended vide Khyber Pakhtunkhwa Gazette Notification, No.27th of August 2014).

SUMMARY OF ALLEGATIONS:

➤ That Lady Constable Fozia Akram No. 543 posted to Police Lines Bannu deliberately absented herself from official duty without any sanctioned leave or prior permission of the competent authority w.e.f 06.05.2021 to 31.05.2021 (Total 25-Days) vide DD No. 53, dated 31.05.2021 Police Lines Bannu. Her Pay was stopped to this effect vide OB No. 575, dated 18.05.2021.

➤ Such an act on his part is against service discipline and amounts to gross misconduct/negligence in duty.

1. For the purpose of scrutinizing the conduct of the said accused with reference to the above allegations SP/Inv. is appointed as Enquiry Officer.

2. The Enquiry Officer shall provide reasonable opportunity of hearing to the accused, record statements etc and findings within the targeted days after the receipt of this order.

3. The accused shall join the proceedings on the date, time and place fixed by the Enquiry Officer.

(IMRAN SHAHID) PSP
District Police officer,
Bannu.

No. 153-54/SRC 21/6/2021

Copies to :-

1. The Enquiry Officer
2. The Accused Officer/Official.

ORDER

Annex - 4

(18)

This order of the undersigned will dispose of the departmental proceedings against accused Lady Constable Fozia Akram No. 543 Police Lines Bannu under Police Rule 1975 (As amended vide Govt: of Khyber Pakhtunkhwa Gazette Notification of even No: dated 27th of August 2014) by issuing charge sheet and statement of allegation to her for committing the following commissions/omissions:-

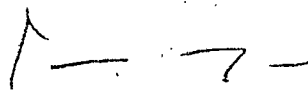
- That Lady Constable Fozia Akram No. 543 posted to Police Lines Bannu deliberately absented herself from official duty without any sanctioned leave or prior permission of the competent authority w.e.f 06.05.2021 to 31.05.2021 (Total 25-Days) vide DD No. 53, dated 31.05.2021 Police Lines Bannu. Her Pay was stopped to this effect vide OB No. 575, dated 18.05.2021.

Charge sheet and statement of allegation were issued to him and SP/Investigation, Bannu was appointed as Enquiry Officer to hold a regular departmental enquiry under Police Rule 1975 (As amended vide Govt: of Khyber Pakhtunkhwa Gazette Notification of even No: dated 27th of August 2014). The SP/Investigation, Bannu (E.O) in his enquiry report vide letter No. 2723/Inv, dated 02.07.2021 submitted that defaulter official is a habitual absentee. Though, she produced medical papers showing complete bed rest for 07 days advised by the Doctor from 05.05.2021 and complete bed rest for 10 days from 20.05.2021. As per conclusion, the lady constable absented herself for 25 days. During these days, the defaulter official got 17 days medical rest advised by the Doctor but she failed to adopt the legal procedure regarding medical rest. Therefore, her absence period of 17 days medical rest is recommended to be treated as Medical Leave on humanitarian grounds while the remaining 08 days absence period may be treated as leave without pay by awarding Major Punishment of compulsory retirement, placed at file.

She was heard in person in orderly room on 15.07.2021, wherein, she requested for compulsory retirement.

Keeping in view of the above, the undersigned meticulously perused all the relevant record, enquiry report and other circumstances of the case and come to the conclusion that the allegation leveled against the said official has been proved. The undersigned agreed with the findings of the enquiry officer. Hence, I, IMRAN SHAHID, District Police Officer, Bannu, in exercise of the power vested in me under Police Rule 1975 (As amended vide Govt: of Khyber Pakhtunkhwa Gazette Notification of even No: dated 27th of August 2014), hereby awarded her Major Punishment of "Compulsory Retirement" with immediate effect. Absence Period of 17 days treated as Medical Leave while 08 days treated as Leave without pay.

OB No. 786
Dated: 16-07 /2021.


(IMRAN SHAHID) PSP
District Police Officer,
Bannu.

No. 5492-98 /SRC dated Bannu, the 16 /07/2021.

Copy of above for necessary action to:

1. Reader, Pay Officer, SRC, OHC & PC
2. Fauji Misal Clerk along with enquiry file for placing it in the Fauji Missal of the concerned official.

بخدمت جناب ریجنل پولیس آفیسر صاحب بنوں ریجن بنوں

(19)

ایڈیل رحم درخواست بابت بحال کے جانے ملازمت و منسرفی سزا جبری ریٹائرمنٹ بحوالہ آرڈر ایک نمبر 736

تہ عنوان:-

مورخہ 16.07.2021 بحالیہ جناب ڈسٹرکٹ پولیس آفیسر صاحب ضلع بنوں

جناب عالی:

سائلہ آجناب کے حضور ذیل گزارشات کرنا چاہتی ہے۔

01. یہ کہ سائلہ محکمہ پولیس میں بچہ لیڈی کنستبل ماہ جولائی 2021ء تک اپنے فرائض جانفشانی سے سرانجام دیتی رہی۔ سائلہ بیماری کے باعث اور بہ امر مجبوری مورخہ 03.05.2021 تا 31.05.2021 کل 25 یوم غیر حاضر ہوئی جس پر سائلہ کے خلاف چارج شیٹ جاری کی گئی جس پر من سائلہ کی انکوائری ہو کر سائلہ کی 25 یوم کی غیر حاضری میں سے 17 یوم میڈیکل لیو جبکہ بقایا 08 یوم بلا مشورہ کیا گیا۔ چونکہ سائلہ ان ایام میں سخت بیمار تھی اور کئی خانگی مسائل (سسرال اور بچوں کے ساتھ تنازعات) کا سامنا کر رہی تھی اس لئے دلبرداشتہ ہو کر سائلہ نے انکوائری افسر صاحب کو جبری ریٹائرمنٹ کی درخواست کی۔ جس پر من سائلہ کو آرڈر ایک نمبر عنوان بالا جبری ریٹائر کیا گیا۔

02. یہ کہ من سائلہ کے خاوند اور بچوں نے سائلہ سے علیحدگی اختیار کر کے سائلہ کو یک تنہا چھوڑ دیا ہے جس کی وجہ سے سائلہ در بدر کی

ٹھوکریں کھانے پر مجبور ہے۔ اس دنیا میں خدائے واحد کے سوا دیگر کوئی آسرا نہیں ہے اور نہ ہی کوئی ذریعہ معاش نہیں ہے۔

03. یہ کہ سائلہ مندرجہ بالا وجوہات اور محکمانہ قواعد و قوانین کے بارے میں کم علمی کی بناء پر بروقت اپنی محکمانہ اپیل داخل نہ کر سکی۔

04. یہ کہ دوران سروس کی گئی غیر حاضری سائلہ نے تصدراً عمداً نہیں کی بلکہ بیماری اور گھریلو تنازعات کی بناء پر سرزد ہوئی ہے۔

لہذا آجناب سے استدعا کی جاتی ہے کہ مندرجہ بالا معروضات پر ہمدردانہ غور فرماتے ہوئے من سائلہ کو دوبارہ ملازمت پر بحال کئے جانے کے احکامات صادر فرما کر سائلہ کو برسر روزگار ہونے کا ایک موقعہ دیا جاوے۔ سائلہ ایمانداری اور جانفشانی کے ساتھ اپنی ڈیوٹی سرانجام دیگی۔

سائلہ آجناب کی ماتحت پروری کے لئے تاحیات دعا گو رہیگی۔

مورخہ 21.06.2022

العارضی

سائلہ:- فوزیہ اکرم EX: لیڈی کنستبل نمبر 543 محکمہ پولیس ضلع بنوں۔

شناختی کارڈ نمبر:- 11101-7101611-0 رابطہ نمبر:- 0331-9956361

D/c Bannu

Per comments & Enquiry file
S-Record.

سائلہ

Per comments & Enquiry file
S-Record.

ORDER:

This order will dispose of departmental appeal/mercy petition, preferred by Ex-Lady Constable Fozia Akram No.543 of District Police Bannu, wherein she has prayed for setting aside the order of major punishment of "Compulsory retirement", imposed upon her by DPO Bannu vide OB No.786 dated 16.07.2021 on the following allegations:-

- That Lady Constable Fozia Akram No.543 posted to Police Lines, Bannu, deliberately absented herself from official duty without any sanctioned leave or prior permission of the competent authority w.e.f 06.05.2021 to 31.05.2021 (total 25-days) vide DD No.51 dated 31.03.2021 Police Lines Bannu. Her Pay was stopped to this effect vide OB No.575 dated 18.05.2021.

She moved mercy petition on 21/06/2022 after lapse of considerable time. Comments from DPO Bannu vide his office letter No.3253/SRC dated 01/07/2022 was received and it has been clearly mentioned by DPO-Bannu at Para-4 "She was heard in person in orderly room on 15.7.2021, wherein, she requested for compulsory retirement". The appellant was also heard in person in orderly room held in RPO Office Bannu on 21.07.2022. She was told to depart from the department on her own free will. Now she wants to rejoin. It is not justified. She has made a mockery of the government job. Moreover, her appeal is time barred and also lacks locus standi.

Therefore, I, Syed Ashfaq Anwar, PSP, Regional Police Officer, Bannu Region Bannu, in exercise of the powers vested in me under Khyber Pakhtunkhwa Police Rules, 1975 (amended in 2014) hereby reject her appeal/mercy petition.

ORDER ANNOUNCED

OB No. 263
Dated: 27/07/2022.

Regional Police Officer,
Bannu Region,
Bannu

No. 2987 /EC, dated Bannu the 27/07/2022
Cc:

DPO-Bannu for information and necessary action w/r to his office letter No. cited above along with Enquiry File & Service Roll of Ex-Lady Constable Fozia Akram No.543 of District Police Bannu for record in your office which may be acknowledged, please.

Regional Police Officer,
Bannu Region,
Bannu

بخدمت جناب IGP صاحب خیبر پختونخوا پشاور

عنوان: اپیل رحم درخواست برائے بحالی ملازمت و منسوخی (Appeal Reject) آرڈر بحوالہ OB نمبر 263 مورخہ

27.07.2022 مجاریہ جناب ریجنل پولیس آفیسر صاحب بنوں ریجن، بنوں

جناب عالی!

سائلہ انجناب کے حضور ذیل گزارشات کرانا چاہتی ہے۔

01:- یہ کہ سائلہ محکمہ پولیس میں 02.11.2008 بچہ لیڈی کانسٹیبل بھرتی شدہ ہے اور ماہ جولائی 2021 تک اسپینے فرائض جانشانی اور

خوش اسلوبی سے سرانجام دیتی رہی۔ سائلہ طائفہ فائبر پیماری کے باعث، با امر مجبوری مورخہ 06.05.2021 تا

31.05.2021 کل 25 یوم غیر حاضر ہوئی۔ جس پر سائلہ کے خلاف چارج شیٹ جاری کی گئی اور افسران بالہ نے بعد انکو ازری

سائلہ کو 25 یوم غیر حاضری میں سے 17 یوم میڈیکل لیو جبکہ بقایا 8 یوم بلا تخوان کرنے کا حکم صادر کیا۔ چونکہ سائلہ ان آیام میں سخت

بیمار تھی اور کئی خانگی مسائل جیسا کہ (سرال اور بچوں سے علیحدگی، طلاق کے تنازعات) کا سامنا کر رہی تھی اس لئے دل برداشتہ ہو کر

سائلہ نے انکو ازری آفیسر صاحب کو جبری ریٹائرمنٹ کی درخواست کی جو من سائلہ کو بحوالہ OB نمبر 786 مورخہ

16.07.2021 مجاریہ جناب ڈی پی او صاحب بنوں ریٹائرڈ کرنے کا حکم ہوا۔

02:- یہ کہ سائلہ، خاوند سے طلاق اور بچوں سے علیحدگی کی وجہ سے تہارہ گئی ہے۔ بدیں وجہ سائلہ در بدر ٹھوکریں کھانے پر مجبور ہوں۔ اس

دنیائے خدا واحد کے سوا کوئی دیگر اسرا نہیں ہے۔ اور نہ ہی کوئی ذریعہ معاش ہے

03:- یہ کہ سائلہ مندرجہ بالا وجوہات اور حکمانہ قواعد، قوانین کے بارے میں کم علمی کی بنا پر بروقت محکمانہ اپیل داخل نہ کر سکی۔

04:- سائلہ نے جناب ریجنل پولیس آفیسر صاحب کی خدمت میں درخواست رحم اپیل بابت بحالی ملازمت گزارا جو کہ بحوالہ OB نمبر

عنوان بالا خارج ہو چکی ہے۔

05:- یہ کہ دوران سروس کی گئی غیر حاضری سائلہ نے قصداً عذر نہیں کی ہے بلکہ طائفہ فائبر پیماری اور گھریلو تنازعات کی بنا پر سرزد ہوئی ہے۔

لہذا انجناب سے بذریعہ رحم اپیل استدعا کی جاتی ہے کہ مندرجہ بالا معروضات، عورت ذات، اور صنف نازک اور کمزور ہونے کے

ناٹے ہمدردانہ غور فرماتے ہوئے سائلہ کو دوبارہ ملازمت پر بحال کئے جانے کے احکامات صادر فرمائے تاکہ سائلہ باعزت طور پر اپنی

گزاراوقات کر سکیں۔

ما تحت پردری ہوگی۔

مورخہ: 02.08.2022

السار صنفہ

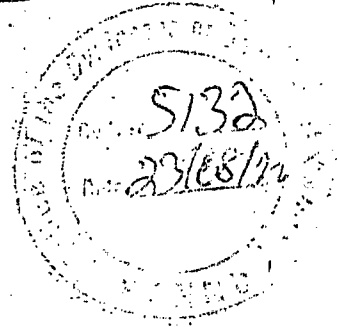
سائلہ فوزیہ اکرم EX لیڈی کانسٹیبل نمبر 543 محکمہ پولیس ضلع بنوں

شناختی کارڈ نمبر: 0-11101-7101611

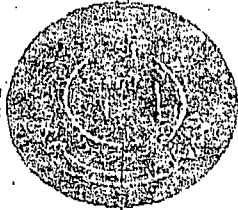
رابطہ نمبر: 0331-9956361

Annex - J

22



For Fax



OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
Central Police Office, Peshawar.
22, dated Peshawar the 23/8/2022.

No. SI/ 1906

To: The Regional Police Officer,
Bannu.

Subject: REVISION PETITION.

Memo:

The Competent Authority has examined and filed the revision petition submitted by Ex-Lady Constable Fozia Akram No. 543 of Bannu district Police against the punishment of compulsory retirement from service awarded by District Police Officer, Bannu vide OB No. 786, dated 16.07.2021, being time barred.

The applicant may please be informed accordingly.

No. 3309/EC
24/08/2022

dt: D/o Bannu

(AFSAR JAN)
Registrar,
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

SRE/OASI

for n/a compliance

District Police Officer
BANNU

25/8/2022

جناب عالی

خود با تہ گزارش بعد سٹا کو بغرض اپیل کرنے اپنا جواب
 کو اپنے حق میں مندرجہ شدہ اپیل خارج شدہ، جبراً شہادت
 شدہ کا ہی کوئی نوٹو شیٹ دینے انکوائری صادر فرمائیں،
 شکایت دہانہ رہیں۔
 عین گزارش ہے۔

Date -
 08
 01/02/22

الفاریس

سٹا سے لٹری کانٹریبٹ فونڈ، آرڈر نمبر 543
 سنہ 2022

O.P.S.
 for n/a & further process.

District Police Officer
 BANNU
 01-08-2022.

جناب کالا!

و دوباره گزارشہا کیلئے بھیجے بغرض اپیل کرنے سے روکنا نہیں
 کیلئے جو جہا نقل براؤنچ سے ذیل کاغذات کا فوٹو کالیا درکار
 ہے لہذا بذریعہ درخواست اسٹریٹ پاسنگ فرمیشن سے کاغذات فوٹو کالیا
 دلوانے کے حکم صادر فرمائیں،
 میں فواز سہاگرنی

Date

31/08/22

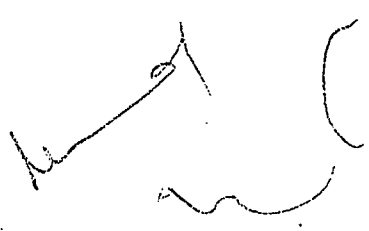
العاوض

EX لٹریچر کانسٹیبل فوڑیہ آرمڈ بر 543

- 1 ✓ جاری شدہ کالیا
- 2 ✓ سپر آف ایگنیشن کالیا
- 3 ✓ آٹو انٹری رپورٹ کالیا
- 4 ✓ فائرنگ شوکار فوٹس کالیا
- 5 ✓ ایس ٹی ڈی ڈی کالیا
- 6 ✓ ایس ٹی ڈی ڈی کالیا

Sir,
 Submitted for f/o
 orders please.

Head Clerk
 To OPD Bannu
 31/8/2022.



25-3

25

Dr. Saad Ali Saddiqui

Assistant Professor Neurology (FCPS)
Neurologist
LADY READING HOSPITAL

Consultant Physician and

Name Fozia
Age 88 yrs
Gender Female
Date 22-12-2020

جالی

- Body Ache
- Low back pain
- Temp. 102°
- Sore throat
- 160/98
- Pulse 98/m
- Shivering
- Weakness

- Cefixim 400mg
- 1+1
- Paracetamol
- 11+1+11
- Rifaximin
- 5/11
- Multibionta-m
- 1/1
- Norvasc 5mg
- 1/1
- Traveler's Diarrhea
- 1/1

- Risk low

Notes Complete
bed Rest
700 of month

Checkup Fee:

060



DR. GHULAM MUHAMMAD KHAN

FCPS (Neurology) FCPS (Neurology)
MCh (Neurology)

Name: Fozia

Age/Sex: 38y/f Date: 02/12/2020

recurrent VRTT
ORAL ulceration

R

aj Transi
1/2 SSI

Knee ache

Case (06)

Gas MASACOT
12121

ESKOT

1.27g Mesonam 107 1/2
0.08 x 500 - 2up (ATD) 1/2

exam:

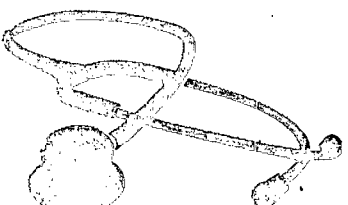
CXR PA view (Rsp)

Gas Nassa 15mf
11 1

CPE ESR / ECG

C-ANCA / P-ANCA / 18D

profile / ACE level 12121



Gas Alimoflop
1.00g FIP
1.00g FLAS (1000)



Regd: 03113

MAJEEED

MEDICAL LABORATORY

District Headquarter Hospital Opp, Gate No.1 Bannu

Name	Fozia	Age & Sex	F
Ref.by	DR GHULAM MUNIR SB	Date Time	12/2/2020
Request for	Blood Complete,	Specimen	BLOOD

TEST	RESULT	UNITS	NORMAL
TLC	12,200	/Cmm	4000 - 10000
RBC	5.03	$\times 10^6 / \mu\text{L}$	3.5 - 6.0
HEAMOGLOBIN	13.4	gm/dl	M14-18 F12-16
HCT	42.3	Vol %	36 - 48
M.C.V	84.1	fl	80 - 99.
M.C.H	26.6	pg	27 - 32
M.C.H.C	31.7	gm/dl	30 - 35
PLATELET COUNT	421000	/cmm	150000 - 4,500000
LYMPHOCYTES	32.3	%	20 - 40
MONOCYTE	3.7	%	02 - 10
NEUTROPHILS	64.0	%	40 - 75
EOSINOPHILS	00	%	01 - 06
LYM#	3.9	$\times 10^3 / \mu\text{L}$	0.6--4.1
MXD#	0.5	$\times 10^3 / \mu\text{L}$	0.1 - 1.8
NEUT#	7.8	$\times 10^3 / \mu\text{L}$	2.0--7.8
RDW -- Cv	12.4	fl	
RDW -- SD	41.7	Vol%	

Lab Technologist

SAVE HUMANITY

We Provide Specific Accurate, Reliable & timed Services to our Valuable Clients
For Any Suggestion or proposal Mob. 0332-3860560

Dr. Saad Ali Saddiqui

Assistant Professor Neurology (FCPS)
Neurologist
LADY READING HOSPITAL

Consultant Physician and

Name Fozia

Age 38 Yrs

Gender F

Date 14-07-2021

(Handwritten signature)

- Sciatic Pain
- Neuropathic Pain
- Pain in L3/4
- Stomach upset
- 150/88
- Pulse 90/min

- Voltrol SR
1 + 1

- Tirovel Dly
1 + 1

- Peann Cep
1 + 1

- Dolapab Wng
1 + 1

- Neuroset Quamy
1 + 1

Notes Bedrest
for 02
week

(Handwritten signature)

Checkup
Fee:

15

28

M.T.I. DHO TEACHING HOSPITAL, BANNU

Out patient Department

Name: P. J. N. 13

OPD NO: _____

Date: _____

Complaints

NVCTI

Brain Pain Cap
Wore pain
P. Activity
Pain Radiating
to both legs
Bp 120/80
D/G 120/80
Scent

Tab Tono-flea

Cap Espon-Mibang

Tab Calceol

Tab Mithazol

Cap Synactin

Two weeks Complete Bedrest

1/1/91
2/1/91
3/1/91

M.T.I. DHO TEACHING HOSPITAL, BANNU

Out patient Department

Name: M. J. S. 7

OPD NO: 78154

Date: 2/5/18

C/O Bannu
Pain
Radiating
to
both legs
Bp 120/80
P. Act

Tab Xerom

Cap Espon-Mibang

Tab Cogan-D

Tab Actin

Two weeks Complete Bedrest

M.T.I. DHQ TEACHING HOSPITAL, BANNU

Out patient Department

Name: M/16/18
OPD NO: 50652
Date: 20-5-18

Not valid
to court, transfer

Ado
E can't
Atoam
3305190
334
Receipt
Dentist
Needlest
secondary

M.T.I. DHQ TEACHING HOSPITAL, BANNU

Out patient Department

Name: M/16/18
OPD NO: 38615
Date: 20/5/18

Pain
Rach
B/Legs
Sensation

Tab Nubend forte
1 + 1
Tab Calced
1 + 1
Cap ESSO Long
Tab Multicare

Ado @2
Two weeks Complete Bed rest

M.T.I. DHO TEACHING HOSPITAL, BANNU

Out patient Department

Name: (Signature)

OPD NO: 50318

Date: 2/8/18

c/o Bannu
 Radiating to
 Pain over
 P. Anchy

NVCIT
 Tab Multisafe
 Tab Xtram
 Cap EspoAmilong
 Tab Coc-1000
 Adv 2 weeks Complete Bedrest

M.T.I. DHO TEACHING HOSPITAL, BANNU

Out patient Department

Name: (Signature)

OPD NO: 5687

Date: 2/15/18

c/o Bannu
 Radiating to
 Lower legs
 Weakness
 Numbness in both
 Sides of feet
 BP 130/80
 Post Diabetic
 Sciatica

NVCIT
 Cap EspoAmilong
 Tab Xtram
 Cap Synactive
 Tab Activ-8
 Tab I-pink
 Adv 2 weeks Complete Bedrest

M.T.I. DHQ TEACHING HOSPITAL, BANNU ✓

Out patient Department

Name: 11/15/18

OPD NO: 31635

Date: 15/11/18

NVCT

of Back Pain
Radiating to
Both legs
Pain
Worse with activity
Evening Swelling
in Both legs

Tab Nuberal forte

r.t

Cap Rizek long

r.t

Tab Cac 1000

Tab Metyal

Tab Calced

Adv. [Ⓢ] Two weeks Complete Bedrest

M.T.I. DHQ TEACHING HOSPITAL, BANNU

Out patient Department

Name: 11/15/18

OPD NO: 42308

Date: 10/11/18

NVCT

of Back Pain
Radiating to
Both legs
Pain
Worse with activity

Tab Xtra

r.t

Cap Espo Ami long

Tab Metyal 5mg

Adv. 2 weeks Complete Bedrest

M.T.I. DHQ TEACHING HOSPITAL BANNU

Out patient Department

Name: (Signature)

OPD NO: 53403

Date: 25/11/18

NUCT

to Bannu
Pain worse with
P. Activity
Pain
8

Tab Casu 2

Cap Pump Long
Loxi 1

Tab Synactin
1 P 1

Tab Mitha Fard

Adv 2 weeks Complete Bed rest
Two

M.T.I. DHQ TEACHING HOSPITAL BANNU

Out patient Department

Name: (Signature)

OPD NO: 46659

Date: 27/12/18

NUCT

to Bannu
Pain worse with
P. Activity
Pain
8




Tab Nuberal forte
1

Tab Cal-1000
1

Cap ESS Long
1

Tab Metha Fard
1

Adv 2 weeks Complete Bed rest
Two

قیمت 50 روپے	40			
ایڈویٹ: ضیاء الدین خان		پشاور بار ایسوسی ایشن، خیبر پختونخواہ		
بار کونسل/ ایسوسی ایشن نمبر: BC-10-9856				
رابطہ نمبر: 0345-9110368/0303589318				

بعدالت جناب: جسٹس محمد حسین صاحب، جج ایڈووکیٹ جنرل، پشاور

مخاطب: فوزیہ الہم	دعویٰ:
<p>بنام</p> <p>ڈیپٹی ایڈووکیٹ جنرل، خیبر پختونخواہ</p>	علت نمبر:
	مورخہ:
	جرم:
	تھانہ:
باعت تحریر آئیکہ	

503

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ سسرٹیفکیٹ کو رکن
 آن مقام پشاور کیلئے ضیاء الدین خان ایڈووکیٹ کو وکیل مقرر کرنے کے لیے درخواست
 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 ازہر 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 کر کے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار 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 اختیارات حاصل ہوں گے اور اس کا ساختہ پر داخستہ 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: 19




2022

ضیاء الدین خان

مقام پشاور

Acceptance
 ZIA-UD-DIN KHAN
 Advocate
 General Sharia
 Peshawar
 Pakistan

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

قیمت 50 روپے	37940			
ایڈوکیٹ: ضیاء الدین خان		پشاور بار ایسوسی ایشن، خیبر پختونخواہ		
بار کونسل/ایسوسی ایشن نمبر: BC-10-9856				
رابطہ نمبر: 0345-9110368/03035893185				

بعدالت جناب: جسٹس صاحب، کھنڈر پختونخواہ سروسز کمپنی لمیٹڈ

منجانب: فوزیہ انور	دعویٰ:
	علت نمبر:
	مورخہ:
	جرم:
	تھانہ:

باعث تحریر آنکہ

فوزیہ انور
F03

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ اسٹریٹجی کو راجح
 آن مقام کیلئے ضیاء الدین خان ایڈووکیٹ کو وکیل مقرر کرنے کا فیصلہ کیا گیا ہے۔
 کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو
 راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست ازہر قسم کی تصدیق
 زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور سببوں کی، نیز
 دائر کر کے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی
 کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب
 مقرر شدہ کو وہی اجملہ مذکورہ یا اختیار حاصل ہوں گے اور اس کا ساختہ پر دائرہ منظور و قبول ہوگا
 دوران مقدمہ میں جو خرچہ ہر اجانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے
 باہر ہو تو وکیل صاحب یا ہندسہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے
 المرقوم:

اعمال صدارتی


 ZIA-UD-DIN KHAN
 Advocate
 High Court Federal Sharia
 Court of Pakistan

نوٹ: اس وکالت نامہ کی نوٹو کاپی ناقابل قبول ہوگی۔
 Acceptance
 ZIA-UD-DIN KHAN
 Advocate
 High Court Federal Sharia
 Court of Pakistan