





Form- A

FORM OF ORDER SHEET

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

Case No.- \_\_\_\_\_ 900/2022 \_\_\_\_\_


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	08/06/2022	<p>The appeal of Mr. Shafi Ullah resubmitted today by Roeeda 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 <i>RU</i></p>
2-	15.6.22  Noted By counsel	<p>This case is entrusted to Single Bench at Peshawar for preliminary hearing to be put there on <u>28.6.22</u>. Notices be issued to appellant and his counsel for the date fixed.</p> <p style="text-align: right;"> CHAIRMAN</p>
28.06.2022	<del>28.06.2022</del> 15/6/2022	<p>Learned counsel for the appellant <del>and</del> requested for adjournment on the ground that she has not prepared the brief in order to properly assist the court. Request accepted. <del>to come up for</del>. To come up for preliminary arguments on 09.08.2022 before S.B.</p> <p style="text-align: right;"> (Fareeha Paul) Member (E)</p>
9.8.2022		<p>Due to the Public Holidays the case is Adjourned to 29-9-2022</p> <p style="text-align: right;"> Reader.</p>

The appeal of Mr. Shafiullah son of Habib Khan Chowkidar r/o Shahak Khel Badaber Peshawar received today i.e. on 02.06.2022 is incomplete on the following score which is returned to the counsel for the appellants for completion and resubmission within 15 days.

- 1- Check list has not been dully filled in.
- 2- Affidavit may be got attested by the Oath Commissioner.
- 3- Annexure-B of the appeal is incomplete which may be completed.
- 4- Annexures of the appeal are not in sequence which may be annexed serial wise as mentioned in the memo of appeal.

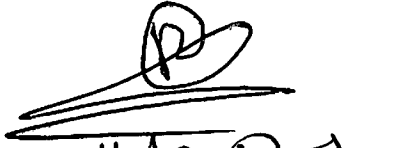
No. 1215 /S.T,

Dt. 02/6 /2022

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Roeeda Khan Adv. Pesh.

objections No 1 To 4  
has been furnished

  
8/6/2022

**BEFORE THE HON'BLE SERVICE TRIBUNAL PESHAWAR**

**CHECK LIST**

1.	Case title <u>Shafi W. Khan vs Public Health</u>		
2.	Case is duly signed.	Yes	No
3.	The law under which the case is preferred has been mentioned.	Yes	No
4.	Approved file cover is used.	Yes	No
5.	Affidavit is duly attested and appended.	Yes	No
6.	Case and annexure are property paged and numbered according to index.	Yes	No
7.	Copies of annexure are legible and attested. If not, then better copies duly attested have annexed.	Yes	No
8.	Certified copies of all requisite documents have been filed.	Yes	No
9.	Certificate specifying that no case on similar grounds was earlier submitted in this court, filled.	Yes	No
10.	Case is within time.	Yes	No
11.	The value for the purpose of court fee and jurisdiction has been mentioned in the relevant column.	Yes	No
12.	Court fee in shape of stamp papers affixed. For writ Rs. 500 , for other as required}	Yes	No
13.	Power of attorney is in proper form.	Yes	No
14.	Memo of addressed filed.	Yes	No
15.	List of books mentioned in the petition.	Yes	No
16.	The requisite number of spare copies-attached { Write petition- 3, Civil appeal(SB-2) Civil Revision (SB-1, DB-2)	Yes	No
17.	Case (Revision /appeal/petition etc) is filled on a prescribed form.	Yes	No
18.	Power of attorney is attested by jail authority (for jail prisoner only)	Yes	No

It is certified that formalities /documentations as required in column 2 to 18 above, have been fulfilled.

Name:- **Roeeda Khan**  
Advocate High Court  
Peshawar

Signature: - 

Dated: - \_\_\_\_\_

**FOR OFFICE USE ONLY**

Case: - \_\_\_\_\_

Case received on \_\_\_\_\_

Complete in all respect: Yes/No, (If NO, the grounds) \_\_\_\_\_

Signature \_\_\_\_\_

(Reader)

Dated: - \_\_\_\_\_

Countersigned: - \_\_\_\_\_

(Deputy Registrar)

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

Appeal No. 900 of 2022

Shafi Ullah S/o Habib Khan (Chowkider) R/o Shahak  
Khe' Badaber Peshawar  
..... Appellant

**VERSUS**

- 1) Executive Engineer Public Health, ENGG, Division Peshawar.
- 2) Superintending Engineer PHE, Circle Peshawar.
- 3) Accountant General KPK Peshawar.

..... Respondents


**INDEX**

S.No.	Description of documents	Annexure	Pages
1.	Memo of Appeal with verification		1-4
2.	Application for condonation of delay		5&6
3.	Addresses of the parties		7
4.	Affidavit		8
5.	Termination order & acquittal order	A&B	9 To 26
6.	Copy of reinstatement order	C	27
7.	Copy of Payroll and arrear list	D&E	28 To 30
4.	Copy of Departmental Appeal	F	31 To 32
5.	Copy of order dated		
6.	Copy of representation		
	Wakalat Nama		

Dated 01/06/2022

Appellant

Through

  
Koroo Khan  
Advocate

(1)

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

Appeal No. \_\_\_\_\_ of 2022

Shafi Ullah S/o Habib Khan (Chowkider) R/o Shahak Khel  
Badaber Peshawar  
..... Appellant

**VERSUS**

- 1) Executive Engineer Public Health, ENGG, Division Peshawar.
- 2) Superintending Engineer PHE, Circle Peshawar.
- 3) Accountant General KPK Peshawar.  
..... Respondents

**APPEAL UNDER SECTION 4 OF THE  
KPK SERVICE TRIBUNAL ACT, 1974,  
FOR GRANTING OF ARREARS/BACK  
BENEFITS OF SERVICE WITH EFFECT  
FROM 2007 TO 11/06/2019 TO  
APPELLANT ALONG WITH ALL BACK  
BENEFITS OF SERVICE.**

**Prayer:**

On acceptance of this appeal the appellant may kindly be treated accordance to law and rules and the arrears/back benefits of service may kindly be granted with effect from 2007 to 11/06/2019 in favor of the appellant.

**Respectfully Sheweth:**

**FACTS**

The appellant respectfully submits as under:

- 1) That the appellant has been appointed for the post of Pump Chowkider with respondent Department since long time.
- 2) That after appointment the appellant performed his duty with full devotion and hard work and no complaint whatsoever has been made against the appellant.
- 3) That the appellant has been charged in false and fabricated case FIR No. 30 dated 13/01/2013 U/S 302, 427, 348, 149 PPC Police Station Badaber in which the appellant has been suspend by the respondent Department.
- 4) That the appellant has been terminated from service by the respondent Department on 19/12/2016 on the ground off conviction on said criminal case in which later on the appellant has been acquitted by the Hon' able Peshawar High Court Peshawar on 24/04/2019. (Copy of termination order and acquittal are attached as Annexure- A and B).
- 5) That after acquittal the appellant has been reinstated by the respondent Department on 11/06/2019 with effect from 16/07/2013. (Copy of reinstatement order is attached as Annexure-C).

( 3 )

6) That although the appellant has been reinstated by the respondent Department but the arrears/back benefits of service has not been granted to the appellant w.e.f 2007 till 2019. (Copy of Pay Roll and arrear list are attached as Annexure D and E).

7) That after reinstatement the appellant visited to respondent Department for so many time till 2020 but in vain.

8) That the appellant submitted Departmental appeal on 18/02/2022 to respondent Department for arrears/back benefits of service but no response has been given to the appellant by the respondent. (Copy of Departmental appeal is attached as Annexure-F).

### GROUNDS

A). That the appellant has not been treated accordance to law and rules

B) That accordance to the Judgment of the Supreme Court 2021 SMCR Page 962 that Government servant will be given with all back benefits for the period he was suspend or terminated.

(1)

C) That the innocence of the appellant has also been clarified from the acquitted order dated 11/06/2019.

D) That the appellant belongs to a poor family.


It is therefore most humbly prayed that on acceptance of this appeal the appellant may kindly be treated accordance to law and rules and the arrears/back benefits of service may kindly be granted with effect from 2007 to 11/06/2019 in favor of the appellant alongwith all back benefits.

Any other remedy which this august tribunal deems fit that may also onward granted in favor of appellant.

Dated 01/06/2022

  
Appellant

Through

  
Roeeđa Khan  
Advocate, High Court,  
Peshawar.

**Verification:**

Verified that the contents of the above appeal are true and correct to the best of my knowledge and belief.

  
Deponent



151

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

Appeal No. \_\_\_\_\_ of 2022

Shah Ullah S/o Habib Khan (Chowkider) R/o Shahak  
Khel Badaber Peshawar

..... Appellant

**VERSUS**

- 1) Executive Engineer Public Health, ENGG, Division Peshawar.
- 2) Superintending Engineer PHE, Circle Peshawar.
- 3) Accountant General KPK Peshawar.

..... Respondents

**APPLICATION FOR CONDONATION OF DELAY.**


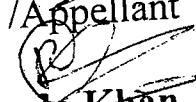
Respectfully Sheweth:

- 1) That the petitioner/appellant has filed the accompanied appeal today in which no date has yet been fixed.
- 2) That petitioner/appellant has a good prima facie case and is hopeful for its success and the grounds mentioned in appeal may be treated as integral part of this application.
- 3) That the appellant visited so many time to respondent Department till 2020 for granting his back benefits but in vain.

- 4) That the dispute of the appellant comes under the definition of recurrence cause of action against which no limitation has been counted.

It is, therefore, most humbly prayed that on acceptance of this application the delay if any may be condoned in the interest of justice.

Dated 01/06/2022

  
Petitioner / Appellant  
Through   
**Rooeda Khan**  
Advocate, High Court  
Peshawar

**AFFIDAVIT**

I, Shafi Ullah S/o Habib Khan (Chowkider) R/o Shahak Khel Badaber Peshawar do hereby solemnly affirm and declare on oath that the content of the above application are true and correct to the best of my knowledge and belief and nothing has been kept secret and concealed from this Hon'ble Tribunal.

  
DEPONENT

(7)

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

Appeal No. \_\_\_\_\_ of 2022

Shafi Ullah S/o Habib Khan (Chowkider) R/o Shahak  
Khel Badaber Peshawar  
..... Appellant

**VERSUS**

- 1) Executive Engineer Public Health, ENGG, Division Peshawar.
- 2) Superintending Engineer PHE, Circle Peshawar.
- 3) Accountant General KPK Peshawar.

..... Respondents

**ADDRESSES OF THE PARTIES**

**Appellant**

Shafi Ullah S/o Habib Khan (Chowkider)

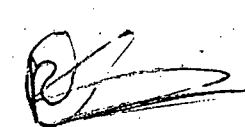
**Respondents**

- 1) Executive Engineer Public Health, ENGG, Division Peshawar.
- 2) Superintending Engineer PHE, Circle Peshawar.
- 3) Accountant General KPK Peshawar

Dated 01/06/2022

  
Appellant

Through

  
**Rooeda Khan**  
Advocate, High Court,  
Peshawar.

3)

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

Appeal No. \_\_\_\_\_ of 2022

Shafi Ullah S/o Habib Khan (Chowkider) R/o Shahak  
Khel Badaber Peshawar

..... Appellant

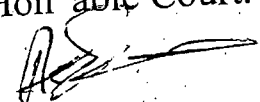
**VERSUS**

- 1) Executive Engineer Public Health, ENGG, Division  
Peshawar.
- 2) Superintending Engineer PHE, Circle Peshawar.
- 3) Accountant General KPK Peshawar.

..... Respondents

**AFFIDAVIT**

I, Shafi Ullah S/o Habib Khan (Chowkider) R/o Shahak Khel  
Badaber Peshawar do hereby solemnly and oath that the contents of the  
instant appeal are true and correct to the best of my knowledge and  
belief and nothing has been concealed from this Hon' able Court.

  
Deponent



(A) (9)  
OFFICE OF THE EXECUTIVE ENGINEER  
PUBLIC HEALTH ENGG: DIVISION PESHAWAR  
PLOT NO. 40, SECTOR B-II PHASE-V, HAYATABAD, PESHAWAR.  
PHONE NO. 091-9217511.

NO. 02/E-S-A DATED PESHAWAR THE 19/12/2016.

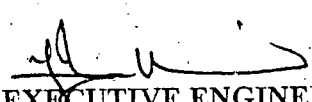
**OFFICE ORDER.**

Due to Sessions Court Judge-I Peshawar (Fazal Sattar Additional Sessions Judge-I), decision vide Case No.05/SC of 2016. Mr. Shafiullah Chowkidar Operation Staff on WSS Shahab Khel is hereby terminated from Govt: Service with immediate effect i,e 16.12.2016.

EXECUTIVE ENGINEER  
PUBLIC HEALTH ENGG: DIVISION  
PESHAWAR.

Copy to:-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. Superintending Engineer PHE Circle Peshawar.
3. Sub Divisional officer PHE Sub Division No-II Peshawar letter No. 01/E-II dated 16.12.2016. for information please.
4. Divisional Account Officer (Local).
5. Official concerned.

  
EXECUTIVE ENGINEER  
PUBLIC HEALTH ENGG: DIVISION  
PESHAWAR.

Opening Sheet for Criminal Appeal (Section 410 Cr.PC)

**IN THE PESHAWAR HIGH COURT PESHAWAR**  
JUDICIAL DEPARTMENT

Appellate Side..... Criminal Case No. 780 P 2016

District	Date of filing Petition/ Appeal	Whether filed by Appellant in person or by Pleader or Agent	Stamp on petition or Appeal
Peshawar	08/12/2016	Syed Abdul Fayaz Advocate Supreme Court of Pakistan	Nil

Shafi Ullah and others..... (Accused/ Appellants)

**VERSUS**

The Stat and another..... (Complainant/ Respondents)

Appeal from the order of: **LEARNED ADDITIONAL SESSION JUDGE-  
I, PESHAWAR.**

Dated: 05/12/2016

Charge Under Section: 302, 427, 148, 149 PPC

Sentence: sentence the appellants U/s 302(b) PPC to Rigorous Imprisonment for life on three counts with fine of Rs.200,000/= each as compensation similarly U/s 427 PPC to 6 month R.I with fine of Rs. 40,000/= in default of payment 2 months S.I each similarly U/s 148 PPC to one year R.I with fine of Rs. 30,000/= in default of payment 2 months S.I each. Benefit of section 382 (b) Cr:PC is extended to the appellants and all the sentences to run concurrently

Prayer: *On acceptance of this appeal the order and judgment dated 05/12/2016 of the learned ASJ-I, Peshawar, may kindly be set aside and the appellants may please be acquitted from the charges mentioned above.*

**(GROUND OF APPEAL ARE ATTACHED)**

*Attested*  
**ATTESTED**  
EXAMINER  
Peshawar High Court  
*Abdul Fayaz*  
**ABDUL FAYAZ**  
Advocate Supreme Court of  
Pakistan

FILED TODAY  
Deputy Registrar  
09 DEC 2016

Criminal Appellate

COURT PESHAWAR

IN THE PESHAWAR HIGH COURT, PESHAWAR

Cr. Appeal. No. 7207/2016



1. Shafi Ullah S/o Habib Khan
2. Roidad S/o Almas Khan
3. Shah Nawaz S/o Madad Khan all are Residents of Shahab  
Khel, District Peshawar.....(Accused/Appellants)

**VERSUS**

1. The State
2. Abbas Khan S/o Saeed Khan R/o Shahab Khel, District  
Peshawar.....(Complainant/Respondents)

CASE F.I.R NO: 30 DATED 13/01/2013 CHARGE U/S 302,  
427, 148, 149 PPC, POLICE STATION BADHABER, DISTRICT  
PESHAWAR.

APPEAL U/S 410 CR.PC AGAINST THE JUDGMENT  
DATED 05/12/2016 OF LEARNED ADDITIONAL  
SESSIONS JUDGE-I, PESHAWAR, WHEREBY THE  
LEARNED TRIAL COURT CONVICTED AND  
SENTENCE THE APPELLANTS

i. U/S 302(b) PPC TO RIGOROUS IMPRISONMENT  
FOR LIFE ON THREE COUNTS WITH FINE OF  
RS 200,000/= EACH AS COMPENSATION

ii. U/S 427 PPC TO 6 MONTH R.I WITH FINE OF RS.  
40,000/= IN DEFAULT OF PAYMENT 2 MONTHS S.I  
EACH.

iii. U/S 148 PPC TO ONE YEAR R.I WITH FINE OF  
RS. 30,000/= IN DEFAULT OF PAYMENT 2 MONTHS  
S.I EACH.

FILED TODAY  
Deputy Registrar  
09 DEC 2016

ATTESTED  
EXAMINER  
Peshawar High Court

Appeal  
of:

Date:

Cha:

Sen

(12) (2)

**BENEFIT OF SECTION 382 (B) CR.PC IS EXTENDED  
TO THE APPELLANTS AND ALL THE SENTENCES TO  
RUN CONCURRENTLY.**

**PRAYER IN APPEAL:**

*Or acceptance of this appeal the order and judgment dated 05/12/2016 of the learned ASJ-1, Peshawar, may kindly be set aside and the appellants may please be acquitted from the charges mentioned above.*

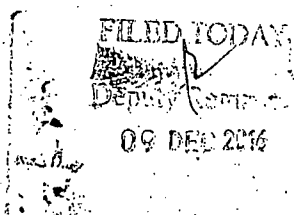
**Respectfully Sheweth:**

1. That the appellants, being charged in the above cited case, were tried whereby convicted and sentenced by the learned Additional Session Judge-1, Peshawar, to the sentence mentioned above vide his order and judgment dated 05/12/2016. (Copy of order and judgment dated 05/12/2016 is attached as annexure "A").

Now the appellants approached this Hon'ble Court against the impugned order/ judgment on the following grounds:

**GROUND:**

- A. That the order/ judgment of the learned Trial Court is against the law, material and facts on record, hence liable to be set aside.



*[Signature]*  
ATTESTED  
EXAMINER  
Peshawar High Court



- (13) (3)
- B. That the persecution has miserably failed to prove the case beyond shadow of doubts. The learned Trial Court while not extending the benefit of doubts has acted against the law and canon of justice.
- C. That there is no circumstantial evidence against the appellants.
- D. That the learned Trial Court deciding the matter/ case has misread and miss-appreciated the evidence on record, hence reached an erroneous decision.
- E. That the learned Trial Court has shown its indifferences to the well celebrated cannons of criminal justice.
- F. That there are material contradictions in the statements of the PW's but the learned Trial Court has not taken into consideration this aspect of the case at all.
- G. That there are numerous loop holes in the prosecution's story, which create serious doubts regarding the prosecution story.

It is, therefore, most humbly prayed that on acceptance of this appeal the order and judgment dated

FILED/TODAY

Deputy Registrar

09 DEC 2016

ATTESTED  
EXAMINER  
Peshawal High Court

**IN THE PESHAWAR HIGH COURT, PESHAWAR**

Cr. M. No. 431/2016

In:

Cr. Appeal No. 280/2016

(14) (5)  
CM Dismissed as such 28.01.17

Shafi Ullah and another.....(Accused/ Appellants)

**VERSUS**

The Stat and another.....(Complainant/ Respondents)

CASE F.I.R NO. 30 DATED 13/01/2013 CHARGE U/S 302, 427, 148, 149 PPC, POLICE STATION BADHABER, DISTRICT PESHAWAR.

APPLICATION U/S 426 Cr.P.C. FOR THE SUSPENSION OF THE SENTENCE AND RELEASE OF THE ACCUSED/ APPELLANT NAMRLY SHAH NAWAZ IN THE ABOVE TITLED CASE TILL THE FINAL DISPOSAL OF THE MAIN CRIMINAL APPEAL.

**Respectfully Sheweth:**

That the petitioners/appellants were tried by learned Additional Session Judge-1, Peshawar vide order dated 05/12/2016 and convicted and sentence the appellants U/s 3C2(b) PPC to Rigorous Imprisonment for life on three counts with fine of Rs.200,000/= each as compensation similarly U/s 427 PPC to 6 month R.I with fine of Rs. 40,000/= in default of payment 2 months S.I each similarly U/s 148 PPC to one year R.I

FILED TODAY

Deputy Registrar

09 DEC 2016

*[Signature]*

ATTESTED  
EXAMINER  
Peshawar High Court

(15) 7  
E. That the grounds of the accompanying appeal may also be considered the grounds of this application:

F. That the petitioners/appellants belong to respectable family and resident of settled area, as such there is no apprehension of their abscondence.

It is, therefore most humbly prayed that on acceptance of this application the sentence imposed upon the petitioners/appellants may kindly be suspended till the final disposal of the main appeal and may kindly be released on bail.

Dated: 08/12/2016

Through

Accused/Appellants

*Adv*  
Syed Abdul Fayaz  
Advocate  
Supreme Court of  
Pakistan.

*B*  
Bashir Ahmad Khan

&

*S*  
Zahir Shah Marwat  
Advocates, High Court  
Peshawar

NOTE: As per instruction of my client appellant which application has earlier been filed before this Hon'ble Court.

*Adv*  
ADVOCATE

FILED TODAY  
Deputy Registrar  
09 DEC 2016

*Adv*  
ATTESTED  
EXAMINER  
Peshawar High Court

IN THE PESHAWAR HIGH COURT, PESHAWAR

(16)

(8)

Cr. Appeal No. 7807 /2016

Shafi Ullah and others.....(Accused/ Appellants)

**VERSUS**

The Stat and another.....(Complainant/ Respondents)

**AFFIDAVIT**

I, **Nehayat Ullah** S/O Habib Khan R/O Shahab Khel, Badhaber District Nowshera (attorney), do hereby solemnly affirm and declare on oath that the contents of the **application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

*Nehayat Ullah*  
**DEPONENT**

17301-1313513-3

Identified by:

*Sadw*  
**Syed Abdul Fayaz**  
Advocate,  
Supreme Court of  
Pakistan

No. <u>13528</u>	Certified that the above was verified on solemnly affirmation before me on this <u>8th</u> day of <u>Dec</u> <u>16</u> at <u>Shahab Khel</u> who was identified by <u>S. Abdul Fayaz</u> who is personally known to me.
<i>[Signature]</i> Oath Commissioner Peshawar District Court, Peshawar	

**CERTIFIED TO BE TRUE COPY**

**FILED TODAY**  
Deputy Registrar  
09 DEC 2016

**13 MAY 2019**  
Peshawar High Court, Peshawar  
Affidavit under Article 177 of the Constitution of Pakistan Order 13528

JUDGMENT SHEET  
PESHAWAR HIGH COURT PESHAWAR  
JUDICIAL DEPARTMENT.

Cr.A. No. 780-P/2016

JUDGMENT

Date of hearing:

24-04-2019

Appellant:

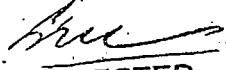
Muhammad Sajid - m/s Syed Abdul Qadir

Respondent:

Sp - Mr. Hussain Ali - Deceased. Sp - Syed Qasim Ali  
Sub - DA.



WAQAR AHMAD SETH, CJ.- The accused-appellants, Shafiullah son of Habib Khan, Roidad son of Almas Khan, Shah Nawaz son of Madad Khan & Ilyas Khan son of Aslam Khan, were put on trial in the Court of learned Additional Sessions Judge-I, Peshawar in case FIR No. 30 dated 13.01.2013 under Sections 427/148/149 PPC registered at Police Station Badhaber, District Peshawar. On conclusion of trial, the accused-appellants were found guilty of the charge and vide judgment/order dated 05.12.2016, they were convicted under Section 302 (b) PPC and sentenced them to rigorous imprisonment for life on three counts with fine of Rs. 200,000/- each, to be paid to the legal heirs of all three deceased in terms of Section 544-A Cr.P.C. or in

  
ATTESTED  
EXAMINER  
Peshawar High Court

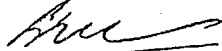
default of payment, it shall be recovered from them as arrears of land revenue. They were further convicted under Section 427 PPC and sentenced them to six months R.I. each with fine of Rs. 40,000/- or in default of payment to undergo two months S.I. They were also convicted under Section 148 PPC and sentenced them to one year R.I. with fine of Rs. 30,000/- each or in default of payment to undergo two months S.I. All the sentences were ordered to run consecutively. Benefit of Section 382-B Cr.P.C. was extended to the accused-appellants.

2. The accused-appellants, being aggrieved of their conviction and sentences, have filed Criminal Appeals No. 780-P & 801-P/2016 whereas the complainant filed Criminal Revision No. 178-P/2016 with the prayer to convert the life imprisonment of convict-respondents into normal sentence of death. As the matters arise out of one and the same FIR and judgment, therefore, the same are disposed of through this single judgment.

  
ATTESTED  
EXAMINER  
Peshawar High Court

(19)

3. According to the F.I.R. (Ex.PA) registered on the basis of Murasila (Ex.PW.2/1), on 13.01.2013 at 1520 hours, complainant Abbas Khan son of Saeed Khan with PW Atlas Khan son of Farid Khan along with other people of locality brought three dead bodies in a pick-up to the Police Post Siphon and reported the matter to the effect that on the same day, he along with his brother Imtiaz had gone to Masho Kheil to offer funeral prayers, on the way back his brother along with Daulat Khan son of Farid Khan, were proceeding ahead in motorcar No. D-2410/Pesh while he/the complainant along with Atlas Khan were following them in another car and at about 1400 hours, when they reached the spot, accused Ilyas, Ikram sons of Aslam, Shafi, Ilyas sons of Habib Khan, Roidad son of Almas Khan & Shah Nawaz son of Madad Khan appeared and started firing at them, as a result of which, his brother Imtiaz, Daulat and one unknown passerby got hit and died on the spot. Besides him, the occurrence was witnessed by

  
ATTESTED  
EXAMINER  
Peshawar High Court

(20)

Atlas Khan son of Farid Khan. Motive is stated to be a previous blood feud enmity.

4. After arrest of accused Shafiullah and Roidad, challan was submitted against them before the competent court of law whereas proceedings under Section 512 Cr.P.C. were initiated against rest of the co-accused. Provision of Section 265-C Cr.P.C. was complied with. Charge was framed against accused Shafiullah and Roidad, to which, they pleaded not guilty and claimed trial. Subsequently, accused Ilyas & Shah Nawaz were arrested, supplementary challan was submitted against them before competent court of law and charge was also framed against them, to which, they pleaded not guilty and claimed trial.

5. To prove its case, the prosecution examined as many as twelve (12) witnesses. On conclusion of prosecution evidence, the accused-appellants were examined under Section 342 Cr.P.C. wherein they while professing their innocence denied the prosecution allegations. However, they neither

  
ATTESTED  
EXAMINER  
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wished to be examined on oath as required under Section 340 (2) Cr.P.C. nor opted to produce defence evidence.

6. On 12.11.2016, proceedings against co-accused Ikram son of Aslam were abated being murdered in case FIR No. 757 dated 24.10.2013 under Section 302/324/34 PPC Police Station Pabbi and statement of Ameer Muhammad DFC was recorded to this effect.

7. On conclusion of trial, the learned trial Court, after hearing the learned counsel for the parties and appraising the evidence, convicted and sentenced the accused-appellants, as stated above.


8. Arguments heard and record perused.

9. The prosecution case is based upon statements of PW-8 and PW-9, who are eye witness and complainant of the case, respectively. PW-8 Atlas Khan son of Farid Khan, in his examination-in-chief, has stated that "On the day of occurrence, I along with my brother namely, Daulat were present in our village in

  
ATTESTED  
EXAMINER  
Peshawar High Court

(22)

the Hujra of one Piran for offering prayer in respect of a funeral ceremony. In the meanwhile, deceased Imtiaz Khan along with complainant Abbas Khan also came there for funeral prayer. After completion of funeral prayer, we left the spot. My brother Daulat Khan seated in the motorcar of Imtiaz whereas in our motorcar complainant Abbas Khan was seated with me and we left the spot towards Shahab Khel". However, in his cross-examination, he stated that "we remained in the said Hujra for Fateha Khawani for about 8-10 minutes". Similarly, PW-9 Abbas Khan son of Said Khan, in his examination-in-chief, has stated that "On the day of occurrence, I along with my brother namely Imtiaz visited village Masho Khel for funeral prayer in the Hujra of one Piran for offering prayer in respect of a funeral ceremony. After funeral prayer, my brother Imtiaz Khan told deceased Daulat Khan to accompanied him to our village where we have arranged a lunch therein. On this deceased Daulat Khan seated in the motorcar of my deceased brother Imtiaz with him

  
ATTESTED  
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Peshawar High Court

7  
[ 231 ]  
whereas I was seated with the PW Atlas in the motorcar  
of deceased Daulat Khan left for our village". However,  
in his cross-examination, he stated that "we remained in  
the place where we went for Fateha for about 15-20  
minutes". If we go through the statements of above said  
two PWs, they are not in line with each other, thus,  
slightest doubt occurred in the prosecution case, its  
benefit must go in favour of accused. Site plan Ex.PB.  
has been prepared by the I.O. at the instance of  
complainant (PW-9) and eye witness (PW-8), according  
to which, the occurrence has taken place at point-A  
while PWs- 8 & 9 have been shown at point-B whereas  
the accused-appellants have been shown at points-2 to 7  
and the distance between point-A & point-B has been  
shown 40/50 paces; thus, in view of such a long distance  
coupled with the fact that there is a turn in between  
point-A and B, how PWs-8 & 9 have identified the  
accused-appellants for firing upon the deceased, is  
totally invisible. Similarly, according to F.I.R., though  
six (06) persons have been charged for the alleged firing

  
ATTESTED  
EXAMINER  
Kashawar High Court

(24)

upon the deceased, but, no specific role of firing whatsoever has been attributed to any one. Moreover, the occurrence took place on 13.01.2013 and as per recovery memo, 36 empties of 7.62 bore have been recovered from the spot and sent to FSL, but, the same were received to it on 16.04.2013 with un-explained delay of more than three months, being not credible, would not be of any assistance to the prosecution against accused. It is well settled that in order to record conviction of an accused, the prosecution has to prove its case beyond all reasonable doubts, which is hallmark of criminal jurisprudence. It is also a century old principle of criminal law that a slightest doubt arising in the prosecution case is sufficient for acquittal of the accused, which principle fully applies to the instant case in respect of the accused-appellants. The learned trial Court has not appreciated the above said evidence in its true perspective and has fallen in error to record conviction of the appellants for which its judgment is not sustainable.

  
ATTESTED  
EXAMINER  
Peshawar High Court

10. In view of the above, both the appeals are accepted, the conviction and sentence recorded by learned Additional Sessions Judge-I, Peshawar dated 05.12.2016 in case vide FIR No. 30 dated 13.01.2013 registered U/Ss 302/427/148/149 PPC of PS Badhaber, District Peshawar is set aside Appellants are acquitted from the charges leveled against them. They be set at liberty forthwith, if not required in any other case.

11. Since the accused-appellants have been acquitted from the charges leveled against them, therefore, the criminal revision filed by the complainant having become infructuous. Dismissed as such.

12. Above are the reasons of our short order of even date.

**Announced**  
27.04.2019



Nawab Shah SCS (DB) Justice Waqar Ahmad Seth CJ & Justice Ijaz Anwar J

CERTIFIED TO BE TRUE COPY

Authorised Under Article 175 of the Constitution of Pakistan

13 MAY 2019

DEPARTMENT OF CANADIAN  
ATTENDANCE ALLOWANCE  
CHARTERED DENTAL  
ANNUAL REPORT

50 Years of Honors: 0223 Days	2012-2013	3000.00
35 Years of Honors: 0223 Days	2012-2013	3000.00
30 Years of Honors: 0223 Days	2012-2013	3000.00
25 Years of Honors: 0223 Days	2012-2013	3000.00
20 Years of Honors: 0223 Days	2012-2013	3000.00
15 Years of Honors: 0223 Days	2012-2013	3000.00
10 Years of Honors: 0223 Days	2012-2013	3000.00
5 Years of Honors: 0223 Days	2012-2013	3000.00
Total Deductions	2012-2013	19,800.00

DEPARTAMENTO DE ATENDIMENTO  
ANUAL REPORT

1000-Home Rent Allowance	1000.00
1200-Covered Allowance 2005	1000.00
1300-Medical Allowance	1000.00
1500-Dress Allowance	1000.00
1600-Travel Allowance	1000.00
1700-Professional Allowance	1000.00
1800-Charitable Allowance	1000.00
1900-Research Allowance	1000.00
2000-Book Allowance	1000.00
2100-Uniform Allowance	1000.00
2200-Per Diem Allowance	1000.00
2300-Subsidy Allowance	1000.00
2400-Relief Allowance (2012)	1000.00
2500-Relief Allowance (2011)	1000.00
2600-Relief Allowance (2010)	1000.00
2700-Relief Allowance (2009)	1000.00
2800-Relief Allowance (2008)	1000.00
2900-Relief Allowance (2007)	1000.00
3000-Relief Allowance (2006)	1000.00
Total Deductions	19,800.00

Paid At: 00000000  
Name: CHARLETTAN  
Dept: CHARLETTAN  
W/E No: 123456789  
Old Interest Applied  
No. of Leave Accrued  
No. of Leave Used

DEPARTAMENTO DE ATENDIMENTO  
ANUAL REPORT  
NAME: CHARLETTAN  
DEPT: CHARLETTAN  
W/E No: 123456789  
Old Interest Applied  
No. of Leave Accrued  
No. of Leave Used

DEPARTAMENTO DE ATENDIMENTO  
ANUAL REPORT  
NAME: CHARLETTAN  
DEPT: CHARLETTAN  
W/E No: 123456789  
Old Interest Applied  
No. of Leave Accrued  
No. of Leave Used

DEPARTAMENTO DE ATENDIMENTO  
ANUAL REPORT  
NAME: CHARLETTAN  
DEPT: CHARLETTAN  
W/E No: 123456789  
Old Interest Applied  
No. of Leave Accrued  
No. of Leave Used

(26)

26



OFFICE OF THE EXECUTIVE ENGINEER  
PUBLIC HEALTH ENGG: DIVISION PESHAWAR  
PLOT NO. 40, SECTOR B-II PHASE-V, HAYATABAD, PESHAWAR.  
PHONE NO. 091-9217511.

NO. 08 /E-5-A DATED PESHAWAR THE 11 /10 /2019.


**OFFICE ORDER.**

Due to Honorable High Court Peshawar on Cr. Appeal No: 780-P of 2016 dated: 24.04.2019. the service of Mr. Shafiullah Chowkidar has been Re-instated with effects from 16.07.2013

EXECUTIVE ENGINEER  
PUBLIC HEALTH ENGG: DIVISION  
PESHAWAR.

Copy to:-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. Superintending Engineer PHE Circle Peshawar.
3. Sub Divisional officer PHE Sub Division No-II Peshawar for information please.
4. Divisional Account Officer (Local).
5. Official concerned.

  
EXECUTIVE ENGINEER  
PUBLIC HEALTH ENGG: DIVISION  
PESHAWAR.

**PAYROLL SYSTEM  
AMENDMENT FORM  
SINGLE EMPLOYEE ENTRY**

OFFICE OF THE Executive Engineer PHE Division Peshawar

FOR THE MONTH OF 12 2019

DDO Code (Cost Center) 

P	R	7	0	2	9
---	---	---	---	---	---

 Description 80717769

Personnel Number 

0	0	0	1	8	1	6	9
---	---	---	---	---	---	---	---

 Employee Name Shafiullah

National ID Card Number \_\_\_\_\_

Grade (Pay Scale Group) 

0	4
---	---

Chowkidar

Salary Status  Start  Stop

TR 207  
5/12/19

Info Type	Field ID	GENERAL DATA CHANGE New Contents	Wage Type	CHANGE IN PAYMENTS / DEDUCTIONS Amount			Effective Date	Remarks
				Rupees	Paisa	Adj		
		<b>B.Pay</b>	0001	23100			1.	Re-instated
		<b>HRA</b>	1000	1413			2.	Monthly pay as par Scale
		<b>MA</b>	2199	1500				
		<b>CA</b>	1210	1785				
		<b>DA</b>	1833	150			3.	Post upgraded to
		<b>WA</b>	1567	150				BPS 2
		<b>ARA 2013 15%</b>	2211	543				BPS 4
		<b>ARA 2015 10%</b>	2224	363				w.e.f 01/12/2015
		<b>ARA 2016 10%</b>	2211	1827				
		<b>ARA 2017 10%</b>	2224	2310				
		<b>ARA 2018 10%</b>	2247	2310				
		<b>ARA 2019 10%</b>		2310				

Prepared By \_\_\_\_\_

Audited/Checked By \_\_\_\_\_

Sd/- Divisional Officer  
Public Health Engg:  
S Divn: No.II Peshawar

Entered / Verified By  
Executive Engineer  
Public Health Engineering  
Divn: Peshawar

	WA	150	0	150	x	6	900
	ARA 2013 15%	543	0	543	x	6	3258
	ARA 2015 10%	363	0	363	x	6	2178
	ARA 2016 10%	1827	0	1827	x	6	10962
	ARA 2017 10%	2178	0	2178	x	6	13068
01.12.2017 to 30.06.2018	B.Pay	22220	0	22220	x	6	133329



**PAYROLL SYSTEM  
AMENDMENT FORM  
MULTIPLE EMPLOYEE ENTRY**

OFFICE OF THE Executive Engineer PHE Division Peshawar

FOR THE MONTH OF 7 / 2019

DDO Code (Cost Center) 

P	R	7	0	2	9
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 Description

(251)

TR 207  
5/12/2019

Date: \_\_\_\_\_  
Page No. 2

EMPLOYEE DETAILS							GENERAL DATA CHANGE <sup>11</sup>		CHANGE IN PAYMENTS / DEDUCTIONS <sup>14</sup>				Stop Sal <sup>18</sup>	Effective Date <sup>19</sup>	Remarks			
Personnel Number <sup>7</sup>			Employee Name <sup>8</sup>				Info <sup>10</sup> Type	Field ID <sup>12</sup>	Wage Type <sup>5</sup>	Amount						Sal <sup>17</sup>		
										Rupees <sup>16</sup>	Paisa	Adj <sup>17</sup>						
0	0	0	1	8	1	6	9	Shafiullah			B:Pay	Adj	5801	797475			1	Arr Pay & Allowance
BPS- 4									HRA	Adj	5002		42408				w.e.f 01.09.2007	
									MA	Adj	5012		52500				to 30.11.2019	
									DA	Adj	5026		5250					
									WA	Adj	5070		5250					
									ARA 2013 15%	Adj	5309		21224			2	post upgraded to	
									ARA 2015 10%	Adj	5964		13852				BPS 2	
									ARA 2016 10%	Adj	5975		64568				BPS 4	
									ARA 2017 10%	Adj	5990		64680				w.e.f 01/12/2015	
									ARA 2018 10%	Adj	5322		38292					
									ARA 2019 10%				11330					
									G.P fund	Adj			36960					
									B. Fet D. case	Adj			14400					

Prepared By

Audited/Checked By

Sub Divisional Officer  
Public Health Engg:  
S/Divn: No.II Peshawar

Entered / Certified By:  
Executive Engg  
Public Health Engg  
Divn: Peshawar

	1827	0	343	6	900
HRA	21780	0	363	x 6	3258
MA	972	0	1827	x 6	2178
DA	1500	0	21780	x 6	10962
WA	150	0	972	x 6	130680
ARA 2013 15%	150	0	1500	x 6	
ARA 2015 10%	517				

Pay as per Scale

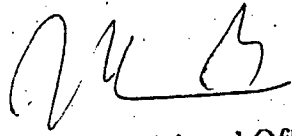
(E)

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**ARREAR LIST OF MR. SAFIULLAH I/R PUBLIC HEALTH ENGINEERING DIVISION  
PESHAWAR**

Period	Particulars	Due	Drawn	Difference	
		4740	4655	85	x 12 1020
01.09.2007 to 30.11.2007	B.Pay	4740	4740	85	x 12 1020
01.12.2007 to 30.06.2008	B.Pay	4825	4740	100	x 12 1200
01.07.2008 to 30.11.2008	B.Pay	5735	5635	100	x 12 1200
01.12.2009 to 30.11.2010	B.Pay	5835	5735	100	x 7 700
01.12.2010 to 30.06.2011	B.Pay	6035	5835	200	x 5 1000
01.07.2011 to 30.11.2011	B.Pay	10000	9660	340	x 12 4080
01.12.2011 to 30.11.2012	B.Pay	10170	9830	340	x 12 4080
01.12.2012 to 30.11.2013	B.Pay	10340	10000	340	x 12 4080
	ARA 2013 15%	1551	1500	51	x 12 612
	B.Pay	10510	10170	340	x 12 4080
01.12.2013 to 30.11.2014	B.Pay	1577	1526	51	x 7 357
	ARA 2013 15%	10850	10340	510	x 7 357
	B.Pay	1628	1551	77	x 7 536
01.12.2014 to 30.06.2015	ARA 2013 15%	13810	13275	535	x 5 2675
	B.Pay	543	517	26	x 5 128
01.07.2015 to 30.11.2015	ARA 2013 15%	1381	1328	53	x 5 268
	ARA 2015 10%	14530	13495	1035	x 7 7245
	B.Pay	972	891	81	x 5 405
01.12.2015 to 30.06.2016	HRA	543	517	26	x 7 179
	ARA 2013 15%	1453	1350	103	x 7 725
	ARA 2015 10%	17900	16655	1245	x 5 6225
	B.Pay	972	891	81	x 5 405
01.07.2016 to 30.11.2016	HRA	543	517	26	x 5 128
	ARA 2013 15%	363	337	26	x 5 129
	ARA 2015 10%	1790	1666	124	x 5 623
	ARA 2016 10%	18270	16930	1340	x 1 1340
01.12.2016 to 31.12.2016	B.Pay	972	891	81	x 1 81
	HRA	543	517	26	x 1 26
	ARA 2013 15%	363	337	26	x 1 26
	ARA 2015 10%	18270	0	18270	x 6 109620
01.01.2017 to 30.06.2017	B.Pay	972	0	972	x 6 5832
	HRA	1500	0	1500	x 6 9000
	MA	150	0	150	x 6 900
	DA	150	0	150	x 6 900
	WA	150	0	150	x 6 900
	ARA 2013 15%	543	0	543	x 6 3258
	ARA 2015 10%	363	0	363	x 6 2178
	ARA 2016 10%	1827	0	1827	x 6 10962
01.07.2017 to 30.11.2017	ARA 2016 10%	1827	0	1827	x 6 10962
	ARA 2017 10%	21780	0	21780	x 6 130680
	B.Pay	972	0	972	x 6 5832
	HRA	1500	0	1500	x 6 9000
	MA	150	0	150	x 6 900
	DA	150	0	150	x 6 900
	WA	150	0	150	x 6 900
	ARA 2013 15%	543	0	543	x 6 3258
	ARA 2015 10%	363	0	363	x 6 2178
	ARA 2016 10%	1827	0	1827	x 6 10962
	ARA 2017 10%	2178	0	2178	x 6 13068
01.12.2017 to 30.06.2018	ARA 2017 10%	2220	0	2220	x 6 133320
	B.Pay	972	0	972	x 6 5832
	HRA	1500	0	1500	x 6 9000
	MA	150	0	150	x 6 900
	DA	150	0	150	x 6 900
	WA	150	0	150	x 6 900
	ARA 2013 15%	543	0	543	x 6 3258
	ARA 2015 10%	363	0	363	x 6 2178
	ARA 2016 10%	1827	0	1827	x 6 10962
	ARA 2017 10%	2220	0	2220	x 6 133320
01.07.2018 to 30.11.2018	ARA 2017 10%	2220	0	2220	x 5 111100
	B.Pay	2220	0	2220	x 5 111100
	HRA	1413	0	1413	x 5 7065
	MA	1500	0	1500	x 5 7500
	DA	150	0	150	x 5 750
	WA	150	0	150	x 5 750
	ARA 2013 15%	543	0	543	x 5 2715
	ARA 2015 10%	363	0	363	x 5 1815
	ARA 2016 10%	1827	0	1827	x 5 9135
	ARA 2017 10%	2220	0	2220	x 5 11100
	ARA 2018 10%	2220	0	2220	x 5 11100

	WA	150	0	150	x	7	1050
	ARA 2013 15%	543	0	543	x	7	3801
	ARA 2015 10%	363	0	363	x	7	2541
	ARA 2016 10%	1827	0	1827	x	7	12789
	ARA 2017 10%	2266	0	2266	x	7	15862
	ARA 2018 10%	2266	0	2266	x	7	15862
01.07.2019 to 33.11.2019	B.Pay	22660	0	22660	x	5	113300
	HRA	1413	0	1413	x	5	7065
	MA	1500	0	1500	x	5	7500
	DA	150	0	150	x	5	750
	WA	150	0	150	x	5	750
	ARA 2013 15%	543	0	543	x	5	2715
	ARA 2015 10%	363	0	363	x	5	1815
	ARA 2016 10%	1827	0	1827	x	5	9135
	ARA 2017 10%	2266	0	2266	x	5	11330
	ARA 2018 10%	2266	0	2266	x	5	11330
	ARA 2019 10%	2266	0	2266	x	5	11330
	Total						1116828
							797475
	B.Pay						42408
	HRA						52500
	MA						5250
	DA						5250
	WA						21224
	ARA 2013 15%						13852
	ARA 2015 10%						64568
	ARA 2016 10%						64680
	ARA 2017 10%						38292
	ARA 2018 10%						11330
	ARA 2019 10%						1116828
	Total.						
	Deduction						
01.01.2017 to 30.11.2019	G.P fund			770	x	48	36960
	B. Fet D. cnse			300	x	48	14400

  
 Sub Divisional Officer  
 Public Health Engg:  
 S/Divn: No.II Peshawar

To,

"F" (31)

The Executive Engineer  
Public Health Engineering  
District Peshawar No-2

Page No. 37  
File: E-4  
Date: 21/02/2022  
PHE Division Peshawar-II

Subject: - SANCTION OF ARREARS OF PAY AND ALLOANCES OF MR. SHAFI ULLAH (CHOWKIDAR)

Respectfully Sir,

The undersigned submits as under:-

1. That the undersigned was appointed for the post of Pump Chowkidar.
2. That the undersigned was terminated due to conviction in a criminal proceeding by the learned Sessions Judge and later on acquitted by Honourable Peshawar High Court and thus reinstated in service via o/o 08/E.S.A dated 11-06-2019. (Copies are attached herewith).
3. That although undersigned was reinstated in service, yet the arrear of pay and allowarices pending from 2007 till 2019 are not sanctioned to the undersigned. (Arrears list is attached herewith).
4. That august Supreme Court of Pakistan in its judgment (2021 SCMR 962) has clearly established that Government servant reinstated will be given all the back benefits for the period, he was suspended or terminated. (Copy of the judgment is attached herewith).
5. That the undersigned is lower wage employee and cannot fulfill the financial obligation of his family in this high time of inflation and if arrears due are not sanctioned, then the Applicant will bear huge financial crises.

(32)

It is, therefore, humbly prayed that the undersign be sanctioned all the arrears and pending allowances till date, or whatsoever due.

The Applicant shall be very thankful to you for this act of kindness.

Yours sincerely,

(SHAFIULLAH)  
S/O Habib Khan  
(Chowkidar WSS Shahabkhel)  
Peshawar  
CNIC # 17301-1312872-1  
Cell # 0333-9336412


Date: 18-12-22




قیمت  
50 روپے

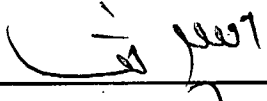

119093



ایڈویکٹ:   
بار کونسل/ایسوسی ایشن نمبر: 2514-09  
رابطہ نمبر: 03330265900

پشاور بار ایسوسی ایشن، خیبر پختونخواہ

بعدالت جناب: 

مخائب: 	دعویٰ:
	علت نمبر:
	مورخہ:
	جرم:
	تھانہ:

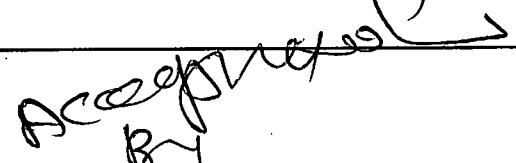
**باعث تحریر آنکہ**

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ

آن مقام 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 کی طرف یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل انگریزی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کاروائی کے واسطے اوز وکیل یا مختار قانونی کو اپنے ہمراہ لے سکتے ہیں اور اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور ان کا ساختہ پر ساختہ منظور و قبول ہوگا دوران مقدمہ میں جو چیز چاہے جانے انوائے 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



المقوم: 

مقام کے لیے منظور ہے۔ 

نوٹ: اس وکالت نامہ کی فونو کالی ناقابل قبول ہوگی۔