

SA 10/2022

19<sup>th</sup> April, 2022

Learned counsel for the appellant present and requested for withdrawal of the appeal. As a token of admission of his submission he signed the margin of the order sheet.

2. This appeal is, therefore, dismissed as withdrawn in view of request of the learned counsel for the appellant. Consign.

3. *Pronounced in open court in Peshawar and given under my hand and seal of the Tribunal this 19<sup>th</sup> day of April, 2022.*

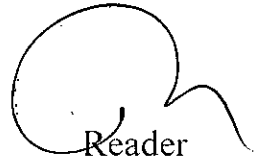


  
(KALIM ARSHAD KHAN)  
Chairman



16.02.2022


Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 03.03.2022 for the same as before.

  
Reader

3-3-2022

Due to retirement of Honorable Chairman the case is adjourned to come up for same as before on 19-4-2021

  
Reader

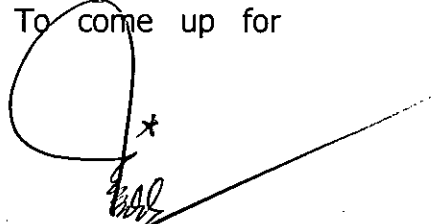
  
M. Alavi  
Advocate

18.01.2022

Counsel for the appellant present. Preliminary arguments heard.

Learned counsel for the appellant argued that the appellant is serving as Divisional Head Draftsman (BS-14) in the respondent-department and is aggrieved of the impugned order dated 30.11.2021. Under the said office order the appellant was transferred from remodeling of warsak canals system Peshawar to Small Dams Directorate Irrigation Department Peshawar against the vacant post. The same order has however, been held in abeyance vide subsequent office order dated 15.12.2021 on the ground of local government elections (first phase) as per instructions of the Regional Election Commissioner Peshawar circulated on 02.12.2021. It was further contended that the appellant has not been transferred by the competent authority i.e Secretary irrigation but by the chief engineer who is not competent to issue his transfer order without concurrence of the Secretary Irrigation. A previous reference dated 31.05.2017 was quoted in support of his arguments. His departmental appeal dated 01.12.2021 was not responded to and being matter of transfer, the appellant approached the Service Tribunal on 05.01.2022.

The appeal is admitted to regular hearing subject to all just legal objections including limitation. The appellant is directed to deposit security and process fee within 10 days. Thereafter notices be issued to respondents for submission of reply/comments. To come up for reply/comments on 16.02.2022 before S.B.



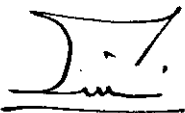
  
(Mian Muhammad)  
Member(E)

Form- A

## FORM OF ORDER SHEET

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

Case No.- \_\_\_\_\_ 10/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	05/01/2022	<p>The appeal of Mr. Khushdil presented today by Mr. Mian Imad 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</p>
2-	14.01.2022	<p>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put up there on <u>14/01/22</u></p> <p style="text-align: right;"> CHAIRMAN</p> <p>Learned counsel for the appellant present.</p> <p>Being Chairman of Departmental Selection Committee, I am busy in Administrative work regarding recruitment, therefore, to come up for preliminary hearing on 18.01.2022 before the S.B.</p> <p style="text-align: right;"> (Salah-Ud-Din) Member (J)</p>

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

CHECK LIST

Case Title:

Khushdil Khan vs Secretary etc

S/N	CONTENTS	YES	NO
1	This Appeal has been presented by: <u>M. Nazir</u>		
2	Whether Counsel/Appellant/Respondent/Deponent have signed the requisite documents?	✓	
3	Whether appeal is within time?	✓	
4	Whether the enactment under which the appeal is filed mentioned?	✓	
5	Whether the enactment under which the appeal is filed is correct?	✓	
6	Whether affidavit is appended?	✓	
7	Whether affidavit is duly attested by competent Oath Commissioner?	✓	
8	Whether appeal/annexures are properly paged?	✓	
9	Whether certificate regarding filing any earlier appeal on the subject, furnished?	✓	
10	Whether annexures are legible?	✓	
11	Whether annexures are attested?	✓	
12	Whether copies of annexures are readable/clear?	✓	
13	Whether copy of appeal is delivered to AG/DAG?	✓	
14	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	✓	
15	Whether numbers of referred cases given are correct?	✓	
16	Whether appeal contains cutting/overwriting?	+	x
17	Whether list of books has been provided at the end of the appeal?	✓	
18	Whether case relate to this court?	✓	
19	Whether requisite number of spare copies attached?	✓	
20	Whether complete spare copy is filed in separate file cover?	✓	
21	Whether addresses of parties given are complete?	✓	
22	Whether index filed?	✓	
23	Whether index is correct?		
24	Whether Security and Process Fee deposited? On		
25	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? On		
26	Whether copies of comments/reply/rejoinder submitted? On		
27	Whether copies of comments/reply/rejoinder provided to opposite party? On		

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name: M. Nazir

Signature: [Signature]

Dated: 5-1-2012

BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PUKHTUNKHWA,  
PESHAWAR

Service Appeal No 10 /2022

Khushdil Khan.....(Appellant)

V E R S U S

Secretary Irrigation and others.....(Respondents)


I N D E X

S NO	DESCRIPTION OF DOCUMENTS	ANNEX	PAGE
1.	Grounds of Appeal	-	1-5
2.	Affidavit	-	6
3.	Application for interim relief with affidavit	-	7-9
4.	Addresses of the parties	-	10
5.	Copy of the CNIC	'A'	11
6.	Copy of the impugned transfer order and general order	'B & C'	12-13
7.	Copy of the letter dated 02-12-2021	'D'	14-
8.	Copy of the office order dated 15-12-2021	'E'	15-18
9.	Wakalat Nama (In original)	-	

Appellant

Through:

  
(MIAN IMAD)  
&

  
(MUHAMMAD NAZIR)  
Advocates,  
High Court Peshawar  
Cell # 0341-9065809

Dated: -05-01-2022

BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PUKHTUNKHWA,  
PESHAWAR

Khyber Pakhtunkhwa  
Service Tribunal

Service Appeal No 10 /2022

Diary No. 12  
Dated 05/01/2022

Khushdil Khan Divisional Head draftsman Irrigation Department  
Peshawar KP.....(Appellant)

V E R S U S

1. Secretary Irrigation, Peshawar Khyber Pakhtunkhwa
2. Chief Engineer, South Irrigation Department Peshawar,  
Warsak Road, Peshawar
3. Project Director, Remodelling of Warsak Canal, Warsak  
Road, Peshawar.....(Respondents)

Appeal under Section 4 of Khyber Pakhtunkhwa Service Tribunal Act, 1974 read with other enabling provision of law applicable to the matter against impugned order dated 30-11-2021 whereby through impugned transfer order of the Appellant has been illegally, without any lawful authority, transferred from Project Remodeling Warsak Canal Peshawar to Small Dams Directorate Irrigation Department by Respondent No 2 without any rhymes, reasons and obtaining proper approval from competent authority against which the departmental representative/ appeal dated 01-12-2021 received on 01-12-2021 has not been responded till-date within expiry of statutory period, hence the instant appeal

Filed to-day

Registrar

5/1/2022

2

Respectfully Sheweth:-

Brief facts leading to this service appeal are as under:-

1. That the Appellant is a law abiding citizen of Pakistan and having good reputation among the locality. (Copy of the CNIC is attached as Annex 'A').
2. That the Appellant was appointed as Head Draftsman in Irrigation Department and later on posted to Remodeling Warsak Canal System Project Directorate, Warsak Road, Peshawar for the period of 04 years.
3. That after transferring the Appellant also performed his duty for the period of 02 years 01 months with full zeal and devotion and no adverse entry is made against the Appellant by any competent officer.
4. That the Appellant neither involved or conduct in any unlawful activities against the institution nor infringe any public or private person right. Furthermore, all the efforts or services of the Appellant are for the institution and for better reform in the institution.
5. That it is pertinent to mention here that the only the Secretary Irrigation is authorized for transfer of Appellant, whereas the Chief Engineer has illegally transferred the Appellant vide order dated 30-11-2021. (Copy of the impugned transfer order and general order of Secretary Office is attached as Annex 'B & C').



6. That the Respondent No 3 issued a letter for transfer of the Appellant to the Respondent No 2 on dated 26-10-2021 and the Election Commission of Pakistan issued direction to the all concerned department about the bane of transfer/posting of the individuals vide letter dated 25-10-2021, where the Appellant has illegally transferred to the Small Dams Directorate Irrigation, KP Peshawar.
7. That after transfer of the Appellant, the Regional Election Commission Peshawar issued letter dated 02-12-2021 to the Respondent No 3 for revised schedule for conduct of Local Government Election. (Copy of the letter dated 02-12-2021 is attached as Annex 'D').
8. That in continuation of Election Commission letter dated 02<sup>nd</sup> December, 2021; the Respondent No 3 issued office order dated 15-12-2021, in which the Respondent No 3 stated that the transfer order dated 30-12-2021 is hereby kept held abeyance till the publication of official result of Local Government. (Copy of the office order dated 15-12-2021 is attached as Annex 'E').
9. That it is also pertinent to mention here that the said project will completed in the year 2023 and Divisional Head draftsman's post is sanction one.
10. That the Appellant being aggrieved from the impugned order dated 30-11-2021, filed departmental appeal before the competent authority, which departmental appeal has not yet been entertained; than the Appellant has been constrained to

knock the door of the competent forum for the redressal of his grievances on the following grounds, inter-alia:-

8  
4

GROUNDS:-

- A) That the Appellant is law abiding citizen of Pakistan and is employee at Irrigation Department KP Peshawar.
- B) That the Respondents have acted beyond its jurisdiction and thus committed gross illegality.
- C) That the impugned order of transfer is illegal and the same is not tenable in the eyes of law and procedure as well as the dictums of the apex Court of Pakistan.
- D) That Appellant, with good record of service for more than 20 years, fully aware of his official responsibilities and being a disciplined official have not committed any wrong, therefore, no any single iota of evidence is available in this regard.
- E) That the transfer order was not a speaking order as against the Section 24-A of the General Clause Act, 1897, which stipulates that every order should be speaking one and well-reasoned. Any order passed by the executive authority must be speaking one and shall be well reasoned". Therefore, the transfer order being against the Section 24-A of the General Clauses Act, 1897 is liable to be set aside.
- F) That any other ground, not raised specifically may graciously be allowed to be raised at the time of arguments.

PRAYER:-

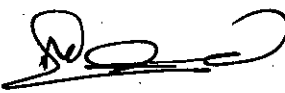
6

It is, therefore, most respectfully prayed that on acceptance of this Appeal, the impugned transfer order dated 30-11-2021 of the Appellant may kindly be set aside and the Appellant may kindly be retained on his post till the completion of project.

Any other relief, which this Honourable Tribunal deems proper in the circumstances of the appeal, may also be granted in favour of Appellant.

Appellant 

Through:

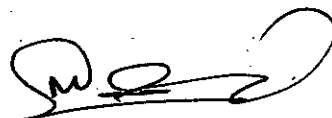
  
(MIAN IMAD)  
&

(MUHAMMAD NAZIR)  
Advocates,  
High Court Peshawar

Dated: -05-01-2022

NOTE:-

No such appeal for the same Appellant has earlier been filed by me before this Honourable Tribunal prior to instant one.

  
Advocate

BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PUKHTUNKHWA,  
PESHAWAR

(6)


Khushdil Khan.....(Appellant)

V E R S U S

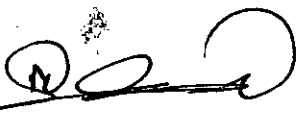
Secretary Irrigation and others.....(Respondents)

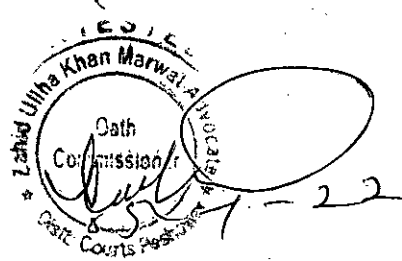
A F F I D A V I T

I, Khushdil Khan Divisional Head draftsman Irrigation Department Peshawar KP, do hereby solemnly affirm and declare on oath that all the contents of accompanying Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Honourable Court.

DEPONENT   
CNIC # 17301-1344190-5  
Cell # 0333-9151049

Identified by:-

  
(MIAN IMAD)  
Advocate  
High Court, Peshawar



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Khushdil Khan.....(Appellant)

VERSUS

Secretary Irrigation and others.....(Respondents)

Application for interim relief to the effect that the Respondents may kindly be directed to suspend the impugned order dated 30<sup>th</sup> December, 2021 passed by the Respondent No 2 till the final disposal of the instant appeal. Furthermore, the Appellant may kindly be retained on his post at Remodelling Warsak Canal System Irrigation Department, Peshawar

Respectfully Sheweth: -

- 1) That the captioned appeal has been filed and admitted for full hearing before this Honourable Court, wherein no date of hearing has yet been fixed.
- 2) That the contents of the appeal may kindly be considered as integral part and parcel of this application.
- 3) That due to the grounds set out in the main service appeal, the Petitioner/Appellant has got good prima facie case in his favour and is hopeful of its success.
- 4) That if the impugned transfer order mentioned above is not suspended, then the Petitioner/Appellant would suffer extreme irreparable loss.

⑨

5) That due to the peculiar circumstances of the case in hand, balance of convenience also lies in favour of allowing this application. ⑧

It is, therefore, respectfully prayed that on acceptance of this Application, the impugned office order 30<sup>th</sup> November, 2021 passed by the Respondent No 2 may kindly be suspended till the final disposal of the instant appeal.

Applicant/Appellant

Through:



(MIAN IMAD)

&



(MUHAMMAD NAZIR)

Advocates,  
High Court Peshawar

Dated: -05-01-2022

BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PUKHTUNKHWA,  
PESHAWAR

9/10

Khushdil Khan.....(Appellant)

VERSUS

Secretary Irrigation and others.....(Respondents)

AFFIDAVIT

I, Khushdil Khan Divisional Head draftsman Irrigation Department Peshawar KP, do hereby solemnly affirm and declare on oath that all the contents of accompanying Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Honourable Court.



DEPONENT Khushdil Khan  
CNIC # 17301-1344190-5  
Cell # 0333-9151049

Identified by:-



(MIAN IMAD)  
Advocate  
High Court, Peshawar



BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PUKHTUNKHWA,  
PESHAWAR

Khushdil Khan.....(Appellant)

V E R S U S

Secretary Irrigation and others.....(Respondents)

MEMO OF ADDRESSES

APPELLANT

Khushdil Khan Divisional Head draftsman Irrigation Department  
Peshawar KP

RESPONDENTS

1. Secretary Irrigation, Peshawar Khyber Pakhtunkhwa
2. Chief Engineer, South Irrigation Department Peshawar,  
Warsak Road, Peshawar
3. Project Director, Remodelling of Warsak Canal, Warsak  
Road, Peshawar

Through:

Appellant

  
(MIAN IMAD)

&

  
(MUHAMMAD NAZIR)

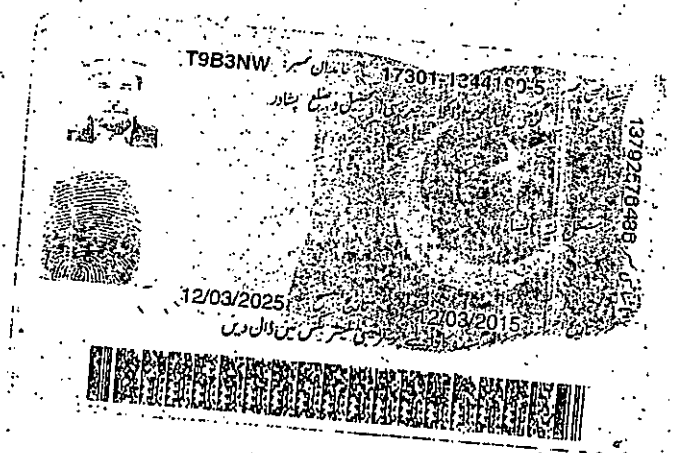
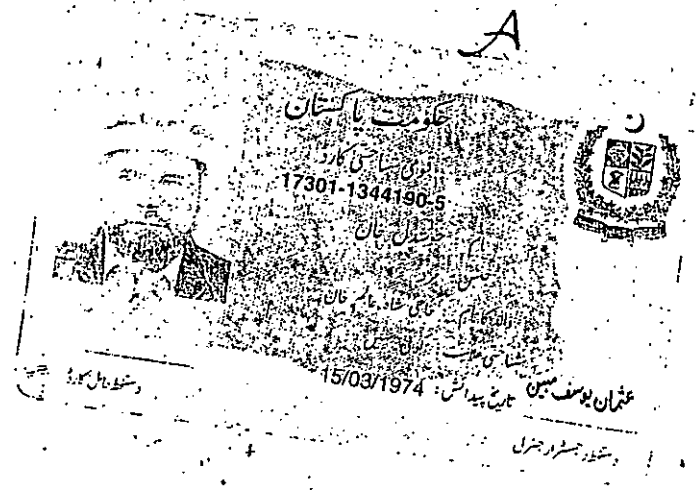
Advocates,  
High Court, Peshawar

Dated: -05-01-2022



(11)

A



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OFFICE OF THE CHIEF ENGINEER (SOUTH)  
GOVT: OF KHYBER PAKHTUNKHWA  
IRRIGATION DEPARTMENT PESHAWAR

Ph: 091-9212116 Fax No. 091-9212152 E-Mail: chiefoffice@yahoo.com

Transfer order

E

No. 7029/A-4/87-E,

Dated Peshawar the: 30/11/2021

(12)

**OFFICE ORDER**

Mr. Khushdil Khan Divisional Head Draftsman attached to Remodeling of Warsak Canals System Peshawar is hereby transferred and posted in Small Dams Directorate Irrigation Department Peshawar against the vacant post with immediate effect in the best public interest.

CHIEF ENGINEER

C.C:

- 1) Accountant General Khyber Pakhtunkhwa Peshawar.
- 2) Director General, Small Dams Irrigation Department Peshawar.
- 3) Deputy Secretary (Admn:) Irrigation Department Peshawar.
- 4) Project Director, Remodeling of Warsak Canals System Peshawar w/r to his letter No. 979/RWCP/12-E, dated 26-10-2021 for information.
- 5) Official concerned.

CHIEF ENGINEER

Alfred  
Jessa



GOVERNMENT OF KHYBER PAKHTUNKHWA  
IRRIGATION DEPARTMENT

Annex (C)

No. SO(E)/Irr/4-5/2006/Vol-II/RWCS  
Dated Peshawar the 31<sup>st</sup> May, 2017

To

The Chief Engineer (South),  
Irrigation Department, Peshawar.

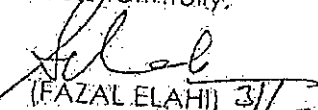
Subject: OFFICE ORDER

Dear Sir,

I am directed to refer to your office order No. 2672/IB/A/3-E dated 22.05.2017 on the subject noted above whereby Mr. Noor Dad Sub Engineer (OPS) was transferred from Remodeling of Warsak Canals System Project, Peshawar with the direction to report to Secretary Irrigation and Mr. Zoenullah was posted in his place. The competent authority for posting/transfer of the project staff is Secretary Irrigation.

I am, therefore, directed to request that report in the matter may kindly be furnished at the earliest as to why did the Chief Engineer (South) Irrigation issues orders without approval of the competent authority.

Yours faithfully,

  
(FAZAL ELAHI) 3/5  
Section Officer (Est.)





No.F.12 (31)/2021-LG-M (REC-P)  
**OFFICE OF THE  
 REGIONAL ELECTION COMMISSIONER  
 PESHAWAR**

**Top Priority  
 LG Elections  
 Matter**

(14)

Nowshera, the 2<sup>nd</sup> December, 2021.

To

The Chief Engineer (South),  
 Govt of Khyber Pakhtunkhwa,  
 Irrigation Department,  
Peshawar

△  
*Election  
 base*

Subject - **REVISED SCHEDULE FOR CONDUCT OF LOCAL GOVERNMENT  
 ELECTION (FIRST PHASE) IN KHYBER PAKHTUNKHWA**

With reference to the subject cited above and to say that the Election Commission of Pakistan (ECP) in order to ensure conduct of Local Government Elections honestly, justly and fairly in accordance with law and guard the corrupt practices, directed as under:

iii. Districts in respect of which election schedule of Local Government Elections has been issued, no transfers/postings of the Government Officers and Officials including Autonomous Bodies/Authorities shall be made without prior approval of the Commission till the publication of election results;

2. Whereas, it has recently been brought in knowledge of the undersigned that Mr. Khushdil Khan, Divisional Head Draftsman, Warsak Canal System, Peshawar has been transferred vide your office Notification No.7028/A-4/87-E, dated 30<sup>th</sup> November, 2021 (copy enclosed) which is a sheer violation of the aforesaid directions of the ECP.

3. In view of the above, it is directed to withdraw aforesaid transfer order immediately under intimation to this office and no further posting/transfer be made in future in district Peshawar till the culmination of ongoing election process otherwise the matter will be put in knowledge of the Hon'ble Election Commission to proceed further.

Encl: As Above.

*Ahmed*

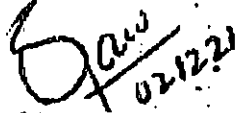
(SAEED AHMED KHAN)  
 Regional Election Commissioner/  
 District Monitoring Officer  
 Peshawar

Contd... P/2



Copy forwarded for information to

- i. The Secretary, Election Commission of Pakistan, Islamabad.
- ii. The Provincial Election Commissioner, Khyber Pakhtunkhwa, Peshawar.
- iii. The Chief Secretary, Government of Khyber Pakhtunkhwa, Peshawar.
- ✓iv. The Deputy Commissioner/District Returning Officer, Peshawar.
- v. The District Election Commissioner, Peshawar.

  
(SAEED AHMED KHAN)  
Regional Election Commissioner/  
District Monitoring Officer  
Peshawar



OFFICE OF THE CHIEF ENGINEER (SOUTH)  
GOVT. OF KHYBER PAKHTUNKHWA  
IRRIGATION DEPARTMENT PESHAWAR

Ph: 091-9212116 Fax No. 091-9212652 E-Mail: chiefoffice@yahoo.com

*Kept held order*

*E (15)*

No. 73257A-4/87-E(i)

Dated Peshawar 15/12/2021

**OFFICE ORDER**

On the direction of Regional Election Commissioner/ District Monitoring Officer Peshawar, the Posting/Transfer order of Mr. Khushdil Khan, Divisional Head Draftsman from Remodeling of Warsak Canals System Peshawar to Small Dams Directorate Irrigation Department Peshawar issued vide this office No. 7028/A-4/87-E dated: 30-11-2021 is hereby kept held in abeyance till publication of the result of Local Govt. Election (first phase) in Khyber Pakhtunkhwa.

  
CHIEF ENGINEER

1. Director General Small Dams Irrigation Department Peshawar.
  2. Deputy Secretary (Admin) Irrigation Department Peshawar.
  3. Project Director Remodeling of Warsak Canals System Peshawar.
  4. District Monitoring Officer o/o the Regional Election Commissioner Peshawar w/r to his letter dated 02-12-2021.
  5. Official concerned.
- For information and necessary action.

  
CHIEF ENGINEER

*Recd  
ya*



**GOVERNMENT OF KHYBER PAKHTUNKHWA**  
**PROJECT DIRECTOR, REMODELING OF WARSAK CANAL SYSTEM**  
**IN DISTRICT PESHAWAR & NOWSHERA, IRRIGATION DEPARTMENT,**  
 Canal Colony, Warsak Road, Peshawar. Ph: 091-9222774-9 Fax: 991-57010

No. 979 /RIVCP/12-E

Dated Peshawar the 26/10/2021

16

To

✓ The Chief Engineer (South),  
 Irrigation Department,  
 Peshawar.

Subject: TRANSFER OF DIVISIONAL DRAFTSMAN.

Kindly refer to the subject noted above and to state that Remodeling of Warsak Canal Project has full time consultants. At present the work load is also small. Some of the staff is completely sitting idle having no activities at all, particularly the post of Draftsman is completely redundant.

Hence, the services of Mr. Khushdil-Khan Draftsman is not required in this Directorate and he may be posted somewhere else to usefully utilize his services and save the Government exchequer from wasteful expenditure. please.

*[Signature]*  
 PROJECT DIRECTOR

Copy to the Project Manager, Remodeling of Warsak Canal Project, Peshawar for information.

PROJECT DIRECTOR

IRRI DEPT.	26/10
9656	27/10
1897	
S.B	
S.A	✓
SG	SR

*[Signature]*

*[Signature]*



OFFICE OF THE CHIEF ENGINEER (SOUTH)  
GOVT: OF KHYBER PAKHTUNKHWA  
IRRIGATION DEPARTMENT PESHAWAR

Ph: 091-9212116

Fax No. 091-9212652

E-Mail: chiefoffice@yahoo.com

Transfer order  
from Mardan

(17)

No. 4698 /B/A-4/87-E

Dated Peshawar 18/9/2019

OFFICE ORDER

Mr. Khushdil Khan Divisional Head Draftsman attached to Mardan Irrigation Division Mardan is hereby transferred to Remodeling of Warsak Canal System Project Peshawar against the vacant post with immediate effect in the public interest.

CHIEF ENGINEER

1. Secretary to Government of Khyber Pakhtunkhwa Irrigation Department.
2. Chief Engineer (North) Irrigation Department Peshawar
3. Project Director Remodeling of Warsak Canal System Peshawar.
4. Superintending Engineer Mardan Irrigation Circle Mardan.
5. Executive Engineer Mardan Irrigation Division Mardan
6. District Accounts Officer Mardan.
7. Official concerned.

A. W. S.  
10/9/19

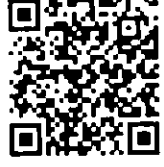
CHIEF ENGINEER





قیمت  
50 روپے

111135



ایڈویکٹ: Al Noor

بار کونسل/ ایسوسی ایشن نمبر: ۱۶-۱۱۶۶

رابطہ نمبر: ۸۵۶۱۹۰۶۵۸۵۶

پشاور بار ایسوسی ایشن، خیبر پختونخواہ

بعدالت جناب: سرمہن ٹریبونل کراچی

مخاطب:	دعویٰ:
موضوع:	علت نمبر:
جرم:	مورخہ:
تھانہ:	

**باعت تحریر آنگہ**

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ  
آن مقام کراچی ٹریبونل کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو  
راضی نامہ کرہنے و تقرر ثالث و فیصلہ بر حلف دینے جو اب دعویٰ آقبال دعویٰ اور درخواست از ہر قسم کی تصدیق  
زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یک طرفہ یا اپیل کی برآمدگی اور منسوخی، نیز  
دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی  
کارروائی کے واسطے اوز وکیل یا مختار قانونی کو اپنے ہزارہ یا اپنے بجائے لقرر کا اختیار ہوگا اور صاحب  
مقرر شدہ کو وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور این کا ساختہ پرواختہ 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 سندر ہے

الرقوم: محمد علی احمد  
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پشاور بار ایسوسی ایشن

مقام کے لیے منظور ہے۔

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