


6<sup>th</sup> September, 2022 Counsel for the appellant present. Mr. Muhammad Adcel Butt, Addl: AG for respondents present.

Written reply/comments not submitted. Learned AAG seeks time to contact the respondents for reply/comments. Last opportunity granted. To come up for written reply/preliminary hearing on 18.10.2022 before S.B.

  
(Kalim Arshad Khan)  
Chairman

24.02.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 25.05.2022 for the same as before.



Reader.

25.05.2022

Learned counsel for the appellant present and requested for adjournment on the ground that he has not prepared the brief. Adjourned. To come up for preliminary hearing on 04.07.2022 before S.B.

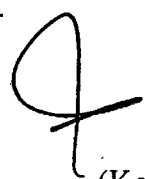


(Mian Muhammad)  
Member (E)

4<sup>th</sup> July, 2022

Learned counsel for the appellant present.

Let per-admission notice be issued to the respondents for reply/comments. To come up for preliminary hearing on 06.09.2022 before S.B.



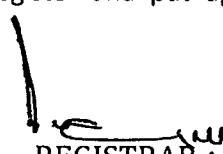

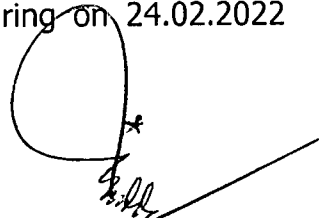
(Kalim Arshad Khan)  
Chairman

Form- A

FORM OF ORDER SHEET

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

Case No. - 7593 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	28/10/2021	<p>The appeal of Mr. Shabbir Ahmad presented today by Roeda 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</p>
2-		<p>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put there on <u>15/12/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
	15.12.2021	<p>Junior to counsel for the appellant present.</p> <p>Former requests for adjournment on the ground that senior counsel is busy before the august Peshawar High Court. Adjourned. To come up for preliminary hearing on 24.02.2022 before S.B.</p> <p style="text-align: right;"> (MIAN MUHAMMAD) MEMBER (E)</p>

BEFORE THE HON'BLE SERVICE TRIBUNAL  
PESHAWAR.

In Re S.A No. 7693 /2021

Shabbir Ahmad

VERSUS

Police Department Govt of KPK

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S#	Description of Documents	Annexure	Pages
1.	Grounds of Petition.		1-5
2.	Affidavit.		6
3.	Addresses of parties		7
4.	Application for Condonation of Delay		8-9 10
5.	Copy of transferred posted order	"A"	11 & 12
6.	Copy of medical prescription	"B"	13
7.	Copy of impugned order, departmental appeal and rejection order	"C" "D" & "E"	14 TO 16
8.	Copy of revision petition and rejection order	"F & G"	
9.	Wakalatnama		

*Shabbir Ahmad*  
APPELLANT

Through

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

Dated: 27/10/2021

①

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

In Re S.A No. \_\_\_\_\_/2021

Shabbir Ahmad Ex Traffic Warden No. LHC 261 at  
District Peshawar.

Appellant

*VERSUS*

1. Senior Superintendent of Police Traffic Peshawar.
2. Regional Police Officer Mardan
3. Inspector General of Police KPK Peshawar.
4. District Police Officer Nowshera.

Respondents

APPEAL U/S-4 OF THE KHYBER PAKHTUNKHWA  
SERVICES TRIBUNAL ACT 1974 AGAINST THE  
ORDER DATED 14-03-2016, WHEREBY THE  
APPELLANT HAS BEEN AWARDED MAJOR  
PUNISHMENT OF DISMISSAL FROM SERVICE  
AND AGAINST WHICH THE APPELLANT FILED  
DEPARTMENTAL APPEAL WITHIN ONE MONTH  
FROM THE COMMUNICATION OF THE  
IMPUGNED ORDER ON DATED 25.06.2016  
WHICH HAS BEEN REJECTED ON 03/02/2017 ON  
NO GOOD GROUNDS.

PRAYER:-

ON ACCEPTANCE OF THIS APPEAL  
THE IMPUGNED ORDERS DATED

(2)

14/03/2016, 03/02/2017 & 08.05.2017 MAY  
KINDLY BE SET ASIDE AND THE  
APPELLANT MAY KINDLY BE  
REINSTATED IN SERVICE ALONG WITH  
ALL BACK BENEFITS. ANY OTHER  
REMEDY WHICH THIS AUGUST  
TRIBUNAL DEEMS FIT THAT MAY  
ALSO BE ONWARD TRIBUNAL DEEMS  
FIT THAT MAY ALSO BE GRANTED IN  
FAVOUR APPELLANT.

Respectfully Sheweth,

1. That the Appellant was appointed as Constable on 2008 at District Nowshera.
2. That the appellant performed his duty regularly and with full devotion and no complaint whatsoever has been made against the appellant.
3. That the appellant has been transferred and posted to Traffic Warden from District Nowshera to District Peshawar on 31.03.2015. (Copy of transferred posted order is attached as annexure "A").
4. That while performing his duty with respondent department, the appellant become ill and due to several illness the appellant was unable to perform his duty with respondent department. (Copy of medical prescription is attached as annexure "B").

5. That the appellant properly submitted an application for leave to respondent department due to the reason mentioned in Para 3.

6. That the appellant has been dismissed from service by the respondent department on the ground of the said absentee on 14.03.2016 but the said impugned order has been communicated to the appellant on 27.05.2016 against which the appellant submitted departmental appeal within one month from the communication of impugned order on 25.06.2016 which has been rejected on 03.02.2017. (Copy of dismissal order, departmental appeal and rejection order are attached as annexure "C", D" & "E").

7. That the said rejection order 03.02.2017 has been communicated to the appellant on 06.03.2017 and the appellant submitted revision petition within one month from the date of communication of the rejection dated 03.02.2017 which has been rejected on 08.05.2017 and the said rejection order has been communicated to the appellant at the end of October 2021. (Copy of revision petition and rejection order are attached as annexure "F & G").

8. That feeling aggrieved the Appellant prefers the instant service appeal before this Hon'ble Tribunal on the following grounds inter alia:-

(4)

**GROUND:-**

- A. That the impugned order 14/03/2016 and rejection orders dated 03/02/2017 and 08.05.2017 are void and ab-initio order because it has been passed without fulfilling codal formalities in this respect the appellant relied upon a judgment reported on 2007 SCMR Page 834.
- B. That no showcause notice has been issued or served to the appellant before imposing major penalty.
- C. That the impugned order is also void because no regular or departmental inquiry was conducted against the appellant which is mandatory before imposing the major penalty and no opportunity of personal hearing and defense has been provided to the appellant relied upon a judgment reported on 2003 PLC (CS) Page 365 on 2021 PLC (CS) page 235 as well as judgment of this Tribunal in service appeal No. 1181/2018 decided on 17.09.2021.
- D. It is a well settled principle of law no one can be condemned unheard because it is against the natural justice of law in this respect the appellant relied upon a judgment reported on 2008 SCMR page 678.
- E. That no opportunity of cross examination has been provided to the appellant. In this respect the appellant relied upon a judgment reported on 2016 SCMR Page 108.
- F. That the impugned order is also void because it has been passed from the retrospective effect as well as passed by incompetent authority.



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G. That the punishment has been awarded to the appellant comes under the definition of harsh one relied to upon a judgment reported on 2008 is SCMR page: 214 as well as judgment of this Hon'ble Tribunal in Service Appeal No. 627/2017 decided on 13.10.2020.

H. That any other ground not raised here may graciously be allowed to be raised at the time full of arguments on the instant service appeal.

*It is therefore, most humbly prayed that on acceptance of this appeal the impugned orders dated 14/03/2016, 03/02/2017 & 08.05.2017 may kindly be set aside and the appellant may kindly be reinstated in service along with all back benefits. any other remedy which this august tribunal deems fit that may also be onward tribunal deems fit that may also be granted in favour appellant.*

*Any other relief not specifically asked for may also graciously be extended in favour of the Appellant in the circumstances of the case.*

*Shubul*

APPELLANT

Through

*Roeed Khan*

Roeed Khan

Advocate, High Court  
Peshawar.

Dated: 27/10/2021

NOTE:-

As per information furnished by my client, no such like appeal for the same petitioner, upon the same subject matter has earlier been filed, prior to the instant one, before this Hon'ble Tribunal.

*Roeed Khan*  
Advocate.

(6)

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

In Re S.A No. \_\_\_\_\_/20201

Shabbir Ahmad

VERSUS

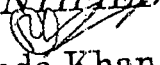
Police Department Govt of KPK

**AFFIDAVIT**

I, Shabbir Ahmad Ex Traffic Warden No. LHC 261 at District Peshawar. do hereby solemnly affirm and declare that all the contents of the instant appeal are true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Hon'ble Court.

  
**DEPONENT**

***IDENTIFIED BY:***

  
Roeeeda Khan  
Advocate High Court  
Peshawar.

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BEFORE THE HON'BLE SERVICE TRIBUNAL  
PESHAWAR

In Re S.A No. \_\_\_\_\_/20201

Shabbir Ahmad

VERSUS

Police Department Govt of KPK

ADDRESSES OF PARTIES

PETITIONER.


Shabbir Ahmad Ex Traffic Warden No. LHC 261  
at District Peshawar.

ADDRESSES OF RESPONDENTS

1. Senior Superintendent of Police Traffic Peshawar.
2. Regional Police Officer Mardan
3. Inspector General of Police KPK Peshawar.
4. District Police Officer Nowshera.

  
APPELLANT

Through

  
Roeda Khan  
Advocate, High Court  
Peshawar.

Dated: 27/10/2021

(8)

BEFORE THE HON'BLE SERVICE TRIBUNAL  
PESHAWAR

In Re S.A No \_\_\_\_\_/20201

Shabbir Ahmad

VERSUS

Police Department Govt of KPK

APPLICATION FOR CONDONATION OF DELAY (IF ANY)

Respectfully Sheweth,

Petitioner submits as under:

1. That the above mentioned appeal is filing before this Hon'ble Tribunal in which no date is fixed for hearing so far.
2. That the appellant has been dismissed from service by the respondent department on the ground of absentee on 14.03.2016 but the said impugned order has been communicated to the appellant on 27.05.2016 against which the appellant submitted departmental appeal within one month from the communication of impugned order on 25.06.2016 which has been rejected on 03.02.2017.
3. That the said rejection order 03.02.2017 has been communicated to the appellant on

(9)

06.03.2017 and the appellant submitted revision petition within one month from the date communication of the rejection dated 03.02.2017 which has been rejected on 08.05.2017 and the said rejection order has been communicated to the appellant at the end of October 2021.

GROUND:

A. That the impugned order is void and illegal and no limitation run against the void orders because the impugned order has been passed without fulfilling the codal formalities.

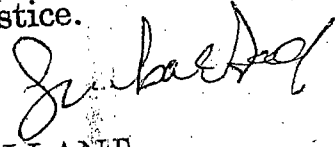
B. That there are number of precedents of the Supreme Court of Pakistan which provides that the cases shall be decided on merits rather than technicalities.

C. That there are many judgment of the superior court as well as specific provision of service law that limitation has been counted from the date of communication/knowledge.

D. That the impugned order is also void because it has been passed from the retrospective effect as well as passed by incompetent authority.

15

It is, therefore, requested that the limitation period (if any) may kindly be condoned in the interest of justice.



APPELLANT

Through



Roeeda Khan  
Advocate, High Court  
Peshawar.

Dated: 27/10/2021



OFFICE OF THE  
INSPECTOR GENERAL OF POLICE  
KHYBER PAKHTUNKHWA  
Central Police Office,  
Peshawar

ORDER

The following upper and lower subordinates of different districts Police noted against each of their names are hereby transferred and posted to Traffic Warden Capital City Peshawar (being selected by selected committee) with immediate effect.

S/NO	NAME RANK & NO	DISTRICT
1.	SI Ajmal No. 324	Mardan ✓
2.	ASI Gohar Ali No. 1077	Charsadda ✓
3.	ASI Wajid Ali No. 811	Mardan ✓
4.	HC Bakht Munir No. 1122	Peshawar
5.	HC Rehman Gul No. 1022	Mardan ✓
6.	HC Abid Khan No. 3917	Peshawar
7.	HC Ihsanullah No. 311	Mardan ✓
8.	HC Muhammad Kabir No. 651	Peshawar
9.	HC Zahid Ali No. 2988	Peshawar
10.	HC Tahir Muhammad No. 324	Charsadda ✓
11.	HC Shahab Alam No. 914	Charsadda ✓
12.	HC Wakeel Khan No. 309	Mardan ✓
13.	HC Aman Gul No. 2639	Peshawar
14.	HC Javed Hussain No. 281	Chitral
15.	HC Naséer Ahmad No. 251	Chitral
16.	LHC Shahzad Khan No. 612	Peshawar
17.	LHC Aminullah No. 2657	Peshawar
18.	LHC Wahid Ali No. 1283	Charsadda ✓
19.	LHC M. Anwar No. 2508	Peshawar
20.	LHC Wahid Riaz No. 764	Hangu
21.	LHC Wasi Ullah No. 1368	Charsadda ✓
22.	FC Habib Ullah No. 1170	FRP
23.	FC Muslim Khan No. 2107	Mardan ✓
24.	FC Waqar Ahmad No. 4811	Peshawar
25.	FC Zahid Muhammad No. 2649	Peshawar
26.	FC Fazal Qadus No. 2963	FRP Range

List of Traffic Wardens

Office of the DPO Moushore

Ms 5945-48/EC dt. 08/11/2015

Copy for reference to the :-

- 1) DAO Moushore
- 2) Accountant
- 3) OHT

o/c

Inspector General of Police

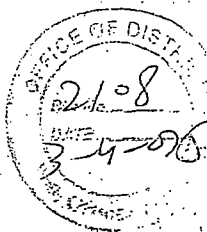
27.	FC Khalid Jan No. 893	FRP/HQ
28.	FC M. Ali shah No. 1141	FRP/HQ
29.	FC Shehzad No. 2548	
30.	FC Ismail No. 2025	Peshawar
31.	FC Murad No. 936	FRP/HQ
32.	FC Ismail Khan No. 1034	CCP
33.	FC Maroof Jan No. 1402/2477	CCP
34.	FC Adnan Gul No. 717	CCP
35.	FC Abid Khan No. 5311	CCP
36.	FC Shehzad Ullah No. 149	Nowshera ✓
37.	FC Shabir Ahmad No. 85	Nowshera ✓
38.	FC Ahmad Habib No. 661	CCP
39.	FC Idrees No. 4408	CCP
40.	FC Musawer No. 1826	FRP
41.	FC Zubair Ullah No. 32	FRP
42.	FC Muhammad Adil No. 3250	FRP
43.	FC Sohail No. 2927	FRP
44.	FC Irfan Ali No. 581	FRP

Recd/08  
 n. a  
 (Contd. # 575 / 614/5)

*Syed Fida Hassan Shah*  
 (SYED FIDA HASSAN SHAH)  
 AIG/Establishment,  
 For Inspector General of Police,  
 Khyber Pakhtunkhwa,  
 Peshawar.

No. 4053-65/E-IV, dated Peshawar the 31/03/2015

Copy of above is forwarded for information and necessary action



to:-

1. Addl. IGP/HQs: Khyber Pakhtunkhwa Peshawar.
2. Addl. IGP/Commandant FRP: Khyber Pakhtunkhwa Peshawar.
3. Deputy Inspector General of Police HQs: Khyber Pakhtunkhwa Peshawar.
4. Capital City Police officer, Peshawar.
5. Regional Police Officers Mardan, Malakand & Kohat.
6. Deputy Inspector General of Police Traffic: Khyber Pakhtunkhwa Peshawar.
7. District Police Officers Charsadda, Mardan, Chitral, Hangu & Nowshera.

List of Traffic Wardens

No - 2044-47/ES.  
 Dt - 2-4-15

*EC*  
 Addl. IGP in Mardan  
 for information  
 Mardan  
 21/9/2015



MIAN RASHID HUSSAIN SHAHEED  
MEMORIAL HOSPITAL PABBI

(13)

No: 562401

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Date: \_\_\_\_\_

Clinical Findings/Investigations/Treatment Referred/ Test Findings

HOP  
entire body  
radiation to both lower  
limbs  
L5/S1 DDD  
Advised bed rest  
for 2 months

(Add on) lumbar  
e-both hips  
3m  
26. Konekhan  
1st  
2nd  
3rd  
4th  
5th  
6th  
7th  
8th  
9th  
10th  
11th  
12th

210

Medical Officer  
MIAN RASHID HUSSAIN SHAHEED  
MEMORIAL HOSPITAL PABBI

ORDER

This is an order on the departmental enquiry initiated against Constable Shabbir Ahmad No.261-T/85-NSR for absents himself from duty with effect from 05.11.2015 till date without leave/permission of the competent authority. He was issued charge sheet and statement of allegations and DSP/Cantt Traffic Mr. Johar Shah was nominated as enquiry officer to conduct formal departmental proceedings and submit his report in this regard. Charge Sheet along with Statement of Allegation was served upon him on 11.02.2016 who submitted his written reply stating therein that he is seriously ill due to which absented himself from duty.

The Enquiry Officer summoned the accused constable time and again on his cell No.0336-8841741 to attend the enquiry proceedings who always promised that he will attend the proceedings but failed. The enquiry officer therefore, recommended him for major punishment as he proves himself as unwilling worker for not attending the enquiry proceedings and bothering to report his arrival for duty.

On 29.02.2016 the accused constable was called for personal hearing who appeared before the undersigned but failed to produce cogent reason in support of his prolonged and continuous absence. On the day of personal hearing, the accused constable was directed to report his arrival for duty but inspite of going to Roznamcha for reporting his arrival and resuming his duty, he straight away went to his home. He was issued final show cause notice for his continuous and prolonged absence which he received on the day of personal hearing (29.02.2016) but he again failed to submit his written reply within the stipulated period which shows that the accused constable is not interested to perform his duties.

Keeping in view the recommendations of the Enquiry Officer as well as his continuous and prolonged absence for about 04-months & 10-days, accused constable Shabbir Ahmad No.261-T/85-NSR is awarded major punishment of dismissal from service under the Khyber Pakhtunkhwa Police Rules-1975 from the date of his absence i.e. 05.11.2015.

Order announced.

(SADIQ HUSSAIN) PSP  
Senior Superintendent of Police,  
Traffic, Peshawar

No. 184-88/PA, Dated Peshawar the 14/3/2016  
Copies for information and necessary action to:-

1. The District Police Officer, Nowshera.
2. DSP/Hqrs. Traffic, Peshawar.

To,  
The D.I.G

Morhan.

Subject: Restoration of Service having valid, legal reasons against order  
No. 84/88/PA dated Peshawar 14-03-2016 dismissal order.

Respected Sir,

1) That, LHC Traffic Warden Shabbir Ahmad, Belt No. 251-T/85/NSR has been dismissed under above quoted order.

2) That, dismissal from service has been ordered without keeping in view the certain facts as:-

a) That, applicant/LHC had not only seriously ill but injured internally bodily; but inquiry officer not paid attention to the serious body defect, at all.

b) That, LHC has reported to inquiry officer and stated valid reasons but he had not considered the reasons and got it light malafidely.

c) That, due to internal bodily injuries LHC was unable to move or moment of body, so absentee automatically prolonged it was not intentional action.

d) That, the absentee was not intentional entirely but due to injuries internal bodily at great extent due to which applicant remained, non-sense, so, did not made contact or physical approach.

e) That, on restoration in sense, the authorities has been processed all essentialities of dismissal from service so, applicant remanded un-heard, sp, genuinely of the occurrence proven ill-commenced/mis-understood.

Therefore, humbly requested that keeping in view the facts, compulsions, applicant may be please be restored on humanitarian based.

Dated :- 25<sup>th</sup> July, 2016.

The applicant

Shabbir Ahmad LHC 261

Peshawar Traffic Warden, Peshawar.

CNIC# 17201-4330233-5

Mobile No. 03368941741

E (16)

ORDER

This order will dispose-off the appeal preferred by Ex-I.HC Shahbir Ahmad No. 261/1785 N&R of Nowshera District Police against the order of SSP Traffic, Peshawar, wherein he was awarded Major punishment of dismissal from service vide endorsement No. 184-38/PA dated 14.03.2016.

Brief facts of the case are that departmental enquiry initiated against Ex-Constable Shahbir Ahmad No. 261/1785 N&R for absenting from duty with effect from 15.11.2015 till date of dismissal without leave/permission of the competent authority. He was issued charge sheet and statement of allegations and DSP Genl. Traffic Mr. Jofar Shan was nominated as enquiry Officer to conduct formal departmental proceedings and submit his report in this regard. The enquiry Officer summoned the accused Constable time and again to attend the proceedings but failed to attend the enquiry proceedings who always promised that he will prove himself as unwilling worker for not attending the enquiry proceedings and bothering to report his arrival for duty. On 29.02.2016 the accused Constable was called for personal hearing who appeared before the SP Traffic, Peshawar but failed to produce cogent reason in support of his prolonged and continuous absence. On the day of personal hearing the accused Constable was directed to report his arrival for duty but in spite of going to Roznamcha for reporting his arrival and resuming his duty, he straight away went to his home. He was issued Final Show Cause Notice for his continuous and prolonged absence which he received on the day of personal hearing (29.02.2016) but he again failed to submit his written reply within the stipulated period which shows that the accused Constable is not interested to perform his duties. Therefore recommendations of enquiry Officer as well as his continuous and prolonged absence for about 04 Months & 10 days awarded him major punishment of dismissal from service by SSP, Traffic, Peshawar.

On perusal of record the undersigned, find no grounds to interfere the order passed by the SSP Traffic, Peshawar. Therefore the appeal is rejected being time barred.

ORDER ANNOUNCED

*(Signature)*  
**(IAZ AHMAD) PSP**  
Regional Police Officer,  
Mardan

No. 964-66 /ES, Dated Mardan the 03/02-2017.

Copy forwarded to the:-

1. Capital City Police Officer, Peshawar for information w/r to his office Memo: No. 158/CRC dated 03.01.2017.
2. SSP Traffic, Peshawar for information.
3. District Police Officer, Nowshera for information and necessary action w/r to his office Memo: No. 6413/PA dated 22.09.2016. The Service Record is returned herewith.

(\*\*\*\*\*)

*(Signature)*  
**Office Sndt:**

INSPECTOR LEGAL, SWABI

CNIC# 17201-4330233-5

362841741

خدمت جناب IGP صاحب خیر پختونخوا

جناب عالی!

استدعا ہے کہ سائل 2008ء میں محکمہ پولیس ضلع نوشہرہ میں بھرتی ہوا۔ سائل کو 04/11/2015 میں محکمہ سے بوجہ غیر حاضری پر خاست کیا گیا جس کی اپیل من سائل نے کر کے لیکن بحال نہ ہو سکا سائل ایک غریب خاندان سے تعلق رکھتا ہے۔ جب کہ سائل گھر میں واحد کفیل ہے اور تو گری سے پر خاست ہونے پر سائل بہت زیادہ مشکلات کا شکار ہو کر بہت زیادہ کافی دیاؤ کا شکار ہے۔

بذریعہ درخواست استدعا کی جاتی ہے کہ میرے جملہ حکمانہ کاغذات منگوا کر از سر نو نظر ثانی کیا جائے۔ سائل تاحیات دعا گو رہے گا۔

الحاضر

مورخہ 18-03-2019

آپ کا تابع فرمان شبیر احمد بلٹ نمبر 261/LHC ولد مسلم خان سکنہ ڈھیر کی میاں اسحاق سی

موبائل نمبر 0336-8841741

ORDER

This order is hereby passed to dispose of departmental appeal under Rule 11-A of Khyber Pakhtunkhwa Police Rule-1975 submitted by ICP Shabbir Ahmad No. 261-E/85-NSR. The appellant was dismissed from service w.e.f. 05.11.2015 by SSP Traffic Peshawar vide order Endst: No. 184-SS:PA, dated 14.03.2016 on the charge of absence from duty for 04 months and 10 days.

His appeal was rejected by Regional Police Officer, Mardan vide order Endst: No. 954-SS:ES, dated 03.02.2017.

Meeting of Appellate Board was held on 20.04.2017 wherein petitioner was heard in person. During hearing petitioner contended that his absence was not deliberate but he was ill. He produced medical certificates.

Perusal of record reveals that petitioner was dismissed from service on charges of wilful and deliberate absence from duty. He failed to advance any plausible explanation behind his absence besides his service record contains 08 bad entries. The petition is also time barred. Therefore, the Board decided that his petition is hereby rejected.

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

(MASOOD AHMAD KHILALI)  
AIG/Establishment  
For Inspector General of Police,  
Khyber Pakhtunkhwa,  
Peshawar.

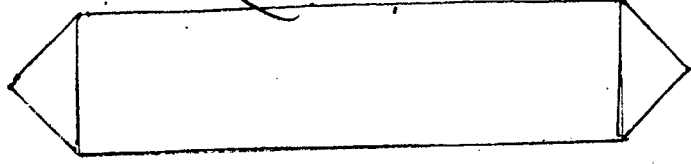
No. S/ 2768-75 /17.

Copy of the above is forwarded to the:

1. Regional Police Officer, Mardan.
2. Senior Superintendent of Police, Traffic, Peshawar.
3. PSO to IGP/Khyber Pakhtunkhwa, CPO, Peshawar.
4. PA to Addl. IGP/Trqs, Khyber Pakhtunkhwa, Peshawar.
5. PA to DIG/Trqs, Khyber Pakhtunkhwa, Peshawar.
6. PA to AIG/Legal, Khyber Pakhtunkhwa, Peshawar.
7. Office Supdt. E-IV, CPO Peshawar.
8. Central Registry Cell, CPO.

ط اسٹوننگ

بعد ازاں صاحب راج سندھ



اللہ تعالیٰ  
وہی اعلم

2021 پنجاب

سید احمد بنام

مورخہ  
مقدمہ  
دعویٰ  
جرم

### باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی متعلقہ  
آن مقام سلف کیلئے دوسرے کلے

مقرر 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 پر حلف دیئے جواب دہی اور اقبال دعویٰ اور  
بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ عرضی دعویٰ اور درخواست ہر قسم کی تصدیق  
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی  
اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا۔ از بصورت ضرورت  
مقدمہ مذکور 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 بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے  
اور اس کا ساختہ پرداخت منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے  
سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب یا بندہ ہوں  
گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھد یا کہ سندر ہے۔

ماہ اکتوبر 2021ء

الرقوم 27

العبد گواہ العبد

کے لئے

Acceptance  
By

مقام سلف