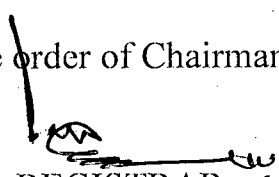


Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 1527/2022

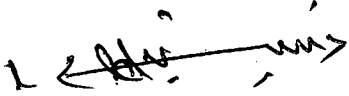
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	24/10/2022	<p>The appeal of Mr. Shahidullah received by post through today by Mr. Inamullah Khan Kundi Advocate. It is fixed for preliminary hearing before touring Single Bench at D.I.Khan on _____. Notices be issued to appellant and his counsel for the date fixed.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

The appeal of Shahidullah son of Mansoor Ali Ex-Constable no. 217 SW District received today i.e. on 30.09.2022 is incomplete on the following score which is returned to the counsel for the appellatant for completion and resubmission within 15 days.

- 1- Check list is not attached with the appeal.
- 2- Appeal has not been flagged/marked with annexures marks.
- 3- Affidavit may be got attested by the Oath Commissioner.
- 4- Annexures of the appeal may be attested.
- 5- Chamber/email address and contact number of the counsel is not mentioned on the index/wakalat nama.
- 6- Approved file cover is not used.
- 7- One copy/set of the appeal along with annexures i.e complete in all respect may also be submitted with the appeal in file covers.

No. 2747 /S.T,

Dt. 5/10 /2022



Mr. Inamullah Khan Kundi Adv.
High Court D.I. Khan.

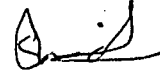

REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**PESHAWAR**In service Appeal No. 1527 /2022**Shahid Ullah
(Appellant)****VERSUS****PPO KPK etc
(Respondents)****I N D E X**

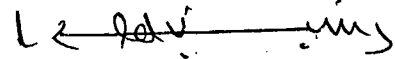
S.No.	Description of documents	Annexure	Pages
1.	Memorandum of Appeal and affidavit	--	1 - 8
2.	Copy of CNIC	A	9 - 10
3.	Copies of show cause notice & charge sheet	B & C	11 - 12
4.	Copies of letter No. 829 dated 15/11/2021 and Naqalmad dated 16/11/2021	D & D/1	13 - 14
5.	Copy of the impugned order dated 06/12/2021	E	15
6.	Copies of departmental appeal and impugned order dated 05/09/2022	F & F/1	16 - 17
7.	Vakalatnama	--	18

Dated: 29/09/2022

Your humble appellant

**Shahid Ullah**

Through counsel

**Inam Ullah Khan Kundi**
Advocate High Court

3 copies 1

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**PESHAWAR**Service Appeal No. 1527 /2022Khyber Pakhtunkhwa
Service TribunalCase No. 1475Dated 30/9/2022

Shahid Ullah son of Mansoor Ali caste Mahsud r/o village
Ladha, District South Waziristan. Ex-Constable#461 Tribal
District South Waziristan.

(Appellant)**VERSUS**

1. Provincial Police Officer, (IGP), Khyber Pakhtunkhwa Central Police Office Peshawar.
2. Deputy Inspector General of Police/Regional Police Officer, Region Dera Ismail Khan.
3. District Police Officer South Waziristan.

..... **(RESPONDENTS)**

APPEAL UNDER SECTION 4 OF THE KPK SERVICES TRIBUNAL ACT, 1974, AGAINST, FIRSTLY THE IMPUGNED ORDER NO. 3234-39/EC DATED 06/12/2021 ISSUED BY THE RESPONDENT#3, WHEREBY THE APPELLANT WAS AWARDED MAJOR PUNISHMENT OF DISMISSAL FROM SERVICE AND FINALLY, AGAINST THE IMPUGNED ORDER OF APPELLATE AUTHORITY, NO 5968/ES DATED 08/09/2022 VIDE WHICH THE DEPARTMENTAL APPEAL OF THE APPELLANT WAS REJECTED AND AGAINST THE INDECISION OF THE LEARNED REVISIONAL AUTHORITY/RESPONDENT#1 WHEREBY THE REVISION PETITION OF THE APPELLANT HAS NOT BEEN DECIDED.

Filed to-day

W.
Registrar
30/9/2022

Note: Addresses given above shall suffice the object of service. All necessary and proper parties have been arrayed in the panel of respondents.

Respectfully Sheweth;

1. That the appellant was inducted into Levies Police in 2014 and served the levies police with zeal & zest.
2. That, in 2019, after merger of FATA/PATA into Khyber Pakhtunkhwa, the services of levies police were transferred into Police Department Khyber Pakhtunkhwa (SWTD) and since then appellant had been performing his duties with honesty and with great zeal. Copy of the CNIC is annexed as **Annexure-A**.
3. That the appellant served the police department at different police stations of SWTD and has been completed different departmental courses/trainings successfully and during this period left no stone un-turned towards his high-ups.
4. That the official respondents made baseless allegations against the appellant and issued a show cause notice and with charge sheet. Copies of show cause notice & charge sheet are annexed herewith as **Annexure-B & C**.
5. That the District Police Officer SWTD (respondent#3) issued statement of allegations and charge sheet on the allegations that *← Adv. us* "He was found involved in forgery by making fake transfer order of himself from police Station Makin to Police Line South Waziristan Tank". Although the same transfer order was issued by the competent authority i.e. DPO SWTD which is evident from the Naqalmaid dated 16/11/2021 in which it is clearly written that this transfer is made in pursuance of letter No. 829 dated 15/11/2021 issued by the District Police Officer SWTD. Copies of letter No. 829 dated 15/11/2021 and Naqalmaid dated 16/11/2021 are annexed as **Annexure-D & D/1**.

6. That the inquiry officer, without properly probe into the matter and without taking any pain submitted the inquiry report to the District Police Officer SWTD.
7. That the respondent#3 issued the IMPUGNED ORDER NO. 3234-39/EC DATED 06/12/2021, wherein the appellant was awarded major punishment of dismissal from service. Copy of the impugned order dated 06/12/2021 is annexed as **Annexure-E**.
8. That appellant preferred a departmental appeal to the respondent#2 being appellate authority and narrated all the true facts. The appellate authority vide impugned office order No 5968/ES DATED 08/09/2022 rejected the appeal of the appellant. Copies of departmental appeal and impugned order dated 08/09/2022 are annexed as **Annexure-F&F/1**.
9. That dismissal order and subsequently impugned order of the appellate authority as well as indecision of the revisional authority were based on mala fide and against the law and procedure, against the efficiency and discipline Rules and police rules, thus, the appellant left with no other remedy, the appellant approaches this honourable tribunal for setting aside impugned orders on gracious acceptance of the instant appeal on grounds hereinafter preferred.

G R O U N D S

- a. That the orders passed by the DPO SWTD, departmental authorities, impugned hereby are arbitrary, discriminatory, legally and factually incorrect, ultra virus, void ab initio

and militate against principle of natural justice, thus, are liable to be set aside and malafide.

- b. That the appellant is innocent and has been subjected to the penalty for no fault on his part. The Inquiry Officer failed to follow the prescribed procedure and conducted hasty proceedings and also failed to regulate the departmental inquiry in accordance with law and procedures described for the purpose and as such erred at the very outset of the proceedings, thus, causing grave miscarriage of justice as well as prejudice to the appellant in making his defence.
- c. That it is a matter of record that appellant has been vexed in clear defiance of law and principle laid by the superior courts as well as the tribunals as could be gathered from the facts and circumstances of the case.
- d. That the appellant was innocent, the allegations and charges levelled against him were baseless and by merely relying upon a story, the 07 year unblemished service record of the appellant has been overlooked and appellant was awarded major punishment of dismissal from service.
- e. That as evident from the inquiry report, it transpires that the inquiry was conducted in hasty manner and the inquiry office did not take any pain for scrutinizing the true facts of the event. The inquiry officer even did not bother to record statements of any other persons.

Handwritten signature/initials

f. That apparently the appellant has been victimized and made a scapegoat for no fault on his part. There is nothing on records to sustain the allegation of forgery on part of the appellant yet the respondents blatantly ignored the fact that the transfer of the appellant is made upon the directions of District Police officer SWTD.

g. That the punishing authority also erred in proper appraisal of the records and while being adamant on causing mischief and harm to the appellant in person, in repute and in service conveniently ignored that the Charge mentioned in Show Cause Notice was neither sustained nor proven. Inflicting of such a harsh punishment of Removal from Service onto the appellant by the respondent No. 3 and that too, without any lawful justification and without observing the coded formalities/procedures thus amounting to mockery of law, rules, regulations and good order of public service. Hence warranting your kind interference to set-aside and nullify the wrong so done to the appellant.

h. That the impugned dismissal from service order is illegal, against rules and fundamental rights and against principle of natural justice and is thus liable to be ignored and to be struck down.

i. That appellant being citizen of Pakistan deserves to be dealt in accordance with law and the treatment meted out to him is in violation of Article 4 of our Constitution.

- j. That this honourable Tribunal is competent and has ample powers to adjudge the matter under reference/appeal.
- k. That counsel for the appellant may graciously be allowed to raise additional grounds at the time of arguments.

It is therefore, humbly prayed that on acceptance of this appeal, impugned Order No. 3234-39/EC DATED 06/12/2021 issued by respondent No.3 may please be reversed and set-aside and the respondents be directed to reinstate the appellant in service with all back benefits.

Any other relief deemed appropriate in circumstances of the case may also be allowed in favour of appellant in the large interest of justice.

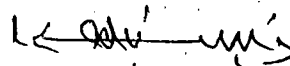
Dated: 29/09/2022

Your humble appellant



Shahid Ullah

Through counsel



Inam Ullah Khan Kundi
Advocate High Court.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

In service Appeal No. _____/2022

Shahid Ullah
(Appellant)

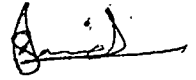
VERSUS

PPO KPK etc
(Respondents)

CERTIFICATE

Certified that appellant have not filed an appeal regarding the subject controversy, earlier in this august Tribunal.

Dated ___/09/2022

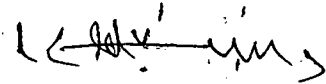


Appellant

NOTE

Appeal with annexure along-with required sets thereof are being presented in separate file covers.

Dated 29/09/2022



Appellant's counsel

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

In service Appeal No. _____/2022

Shahid Ullah
(Appellant)

VERSUS

PPO KPK etc
(Respondents)

AFFIDAVIT

I, **Shahid Ullah**, appellant herein, do hereby solemnly affirm on oath:-

1. That the accompanying appeal has been drafted by counsel following our instructions;
2. That all para-wise contents of the appeal are true and correct to the best of my knowledge, belief and information;
3. That nothing has been deliberately concealed from this Honourable Court, nor anything contained therein, based on exaggeration or distortion of facts.

Dated 29/09/2022

DEPONENT

Identified By:-

Inam Ullah Khan Kundi
Advocate High Court

Advocate P.O.A.C
Oath Commissioner
Dera Ismail Khan

22-10-22

CMIC /

nx-A (9)



حکومت پاکستان
قومی شناختی کارڈ
21702-9182796-7



نام: شاہد اللہ

جنس: مرد

والد کا نام: سید رحیل

شناختی ادارت: دائرہ انتخاب برائے

05/03/1991

اسٹیز ناچور

دستور دستور جنرل

دستخط مال کارڈ

Attes beel
Adv

← Adv →

10

Y5S92K خانہ نمبر: 21702-9182796-7

شخصی نمبر: 21702-9182796-7


موجودہ پتہ: شہنشاہ عبدالغفور، ڈاکخانہ ادعا، تحصیل ادعا

ضلع ساواتہ، وزیرستان، خیبر پختونخوا

تاریخ اجراء: 22/12/2014

تاریخ ترمیم: 22/12/2024

محکمہ کارڈنگ برقی لیٹرکس میں ڈال دیں



SHOW CAUSE NOTICE.

I, KHAN ZEB (PSP), District Police Officer, South Waziristan Tribal District as Competent Authority Under Khyber Pakhtunkhwa Police Rules 1975 with Amendments-2014, has found that you Constable Shahid Ullah No. 461 rendered yourself liable to be proceeded against under Khyber Pakhtunkhwa, Police Rules 1975 for the following misconduct:-

The undersigned has come across fake/forged office order bearing fake signature of the undersigned and the same fake order was about your transfer from police station Makin to police line SWTD at Tank.

This gross misconduct on your part is illegal, against the existing laws/police rules and prejudicial to good order and discipline in the Force.

You are, therefore called upon to show cause as to why you should not be dealt with strictly in accordance with the Khyber Pakhtunkhwa, Police Rules 1975 for the misconduct referred to above.

You should submit your reply to this show cause notice within 07 days of the receipt of the notice failing which an ex-parte action shall be taken against you.

You are therefore directed to inform the undersigned that whether you want to avail of the chance of personal hearing or not.

(Khan Zeb)PSP
District Police Officer,
South Waziristan Tribal District.

3/11/20

461 N/A/C

Attested to
Adv

← Adv →

CHARGE SHEET

I Khan Zeb (PSP) District Police Officer, South Waziristan as Competent Authority, hereby charge you Constable Shahid Ullah No. 461 as follows:-

- i) The undersigned has come across fake/forged office order bearing fake signature of the undersigned and the same fake order was about your transfer from police station Makin to police line SWTD at Tank.
- ii) Being a part of uniformed force your this act shows gross misconduct on your part.

By reason of the above, you appear to be guilty of misconduct under Police Disciplinary Rules, 1975 with amendments 2014 and have rendered yourself liable to all or any of the penalties specified in the Rules:-

- 2) You are, therefore required to submit your written defense within 7 days of the receipt of this Charge Sheet to the Enquiry Officer as the case may be.
- 3) Your written defense, if any, should reach to the Enquiry Officer within the specified period failing which it shall be presumed that you have no defense to put in and in that case, ex parte action will be taken against you.
- 4) You are also at liberty, if you wish to be heard in person.
- 5) Statement of allegation is enclosed.

(Khan Zeb)PSP
District Police Officer,
South Waziristan Tribal District

Edes

Amid

461 Shahid Ullah

Attested to Adv

← [Signature] →

Ant - D

(13)



OFFICE OF THE
DISTRICT POLICE OFFICER
SOUTH WAZIRISTAN TRIBAL DISTRICT

No. 829 /OHC SWTD the dated: 15/11 /2021.

OFFICE ORDER

The following transfer/posting between the Lower Subordinates are hereby ordered with immediate effect.

S.No	Belt No.	Name	From	To
01	461	Salih Ullah	at Tank	at Tank
02	217	Asif Rehman	-do-	-do-
03	449	Zahoor Rehman	Police Line SWTD at Tank	-do-

DISTRICT POLICE OFFICER
South Waziristan Tribal District
District Police Officer
SWTD

Attested to Adv
[Signature]

صالح بن محمد بن عثمان

شماره 15

مکانی

موضوع: ... 16 11/2 وقت 9:00

... 17 ... 15-11-21 ...

...

Muharrar Police Station Makin SWTD

Attested to Adv



Anx- E (15)

OFFICE OF THE
DISTRICT POLICE OFFICER,
SOUTH WAZIRISTAN TRIBAL DISTRICT.

1674

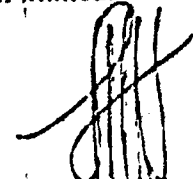
ORDER

My this order will dispose of departmental proceedings initiated against Constable Shahid Ullah No. 461 of this District Police on the score of allegations that he is found involved in forgery by making fake transfer order of himself from Police Station Makin to Police Line SWTD at Tank.

He was Charge Sheeted vide this office letter No.3169-70 /SWTd, dated, 22.11.2021 Mr. Sharif Ullah Khan SDPO Sarwakai SWTD has been nominated as enquiry officer to conduct proper departmental enquiry into the matter. The enquiry officer conducted proper departmental enquiry and submitted his report wherein the above mentioned Constable has been found guilty for Major Punishment.

In light of findings/recommendations of the Enquiry Officer and available record on file against the above mentioned official, I Khan Zeb, (PSP) District Police Officer, South Waziristan Tribal District being a Competent Authority, hereby award "MAJOR PUNISHMENT OF DISMISSAL FROM SERVICE" with immediate effect.

OB No. _____
Dated: _____



District Police Officer
South Waziristan Tribal District.

Dated 06/12/2021.

No. 3234-39 /EC.

Copy of above is submitted to:-

2. The Regional Police Officer, DI Khan Region for favour of information.
2. Acctt: PA, Reader, SRC and OHC for information and further necessary action.


District Police Officer
South Waziristan Tribal District

Att as bed 06/12/21
to Adv

to Adv mis

محضور والا شان ڈپٹی انسپکٹر جنرل آف پولیس ڈیرہ اسماعیل خان

عنوان :- درخواست برآمد بحال کے جانے اپیل

جناب عالی!

بحوالہ ڈسمل آرڈر (Dismissal Order) جاریہ جناب ڈی پی او صاحب ساؤتھ وزیرستان نمبری 3234-39/EC مورخہ 06-12-2021 معروض ہوئے کہ مسائل کو باکمل حکمانہ کارروائی محکمہ پولیس سے برطرف کیا گیا ہے۔ جن الزامات کے مد نظر مسائل کو برخاست کیا ہے۔ دوسرا سرنٹا ہے۔ کیونکہ جو آرڈر تبارہ ٹاپ کیا گیا ہے۔ نہ تو مسائل نے دفتر بذایا کیس اور جگہ سے نکمے اور نہ ہی دفتر مجاز کی جگہ پر از خود دستخط کیا ہے۔ کی گئی انکو آڑی سراسرنٹا ہے۔ انکو آڑی آفسر کو حقیقت کا مکمل علم ہے۔ لیکن سزا برخواستگی میں دی گئی ہے۔ لہذا استدعا ہے کہ یہ درخواست اپیل ہے کہ سن مسائل کو دوبارہ محکمہ پولیس میں بحال کرنے کے احکامات صادر فرمائے جائیں کیونکہ نہ تو آٹو آڑی اصل بنیاد پر ہوئی ہے۔ اور اصل حقائق کو جس پر وہ رکھا گیا ہے۔

تالیجاہ!

اگر ہمارا کوئی قصور ہے تو صرف اتنا ہے کہ ہم نے تبارہ کی خواہش ضرور کی ہے جو کہ ہمارا حق ہے۔ باقی آرڈر ٹاپ کرنا آفسر مجاز کے سامان کرنا اس سے سن مسائل ناواقف ہوں۔
عین نوازش ہوگی۔

تاریخ مورخہ 1/2021

ارضی

سائل شاہد اللہ ولد منصور علی قوم محسود مکینہ لدھا

تحصیل ضلع ساؤتھ وزیرستان

موبائل نمبر 0335-8436301

Attested to

Adv

← [Signature]



Amr F/1 (17)

OFFICE OF THE
REGIONAL POLICE OFFICER,
DERA ISMAIL KHAN REGION

0966-9280291 Fax # 9280290
estt.rpo.dik@gmail.com

DISTRICT POLICE OFFICER
Dy No. 3665
Dt 12-9-22
8/09/2022

No. /ES dated D.I.Khan the

ORDER

This order disposes of departmental appeal filed by Ex-Constable Shahid Ullah No.461 of District Police South Waziristan against the order of Major Punishment-(Dismissal from Service)-by the DPO South Waziristan passed vide his office No.3234-39/EC dated 06.12.2021, on the following allegations:

"He was found involved in forgery by making fake transfer order of himself from Police Station Makin to Police Line South Waziristan at Tank"

2. DPO South Waziristan served the appellant with the charge sheet. Enquiry into the matter was got conducted into through Mr. Sharif Ullah Khan SDPO Sarwakai, who concluded that allegation stand proved against the appellant and that found guilty of the charges leveled against him. The Enquiry Officer further recommended for Major Punishment against the appellant. The appellant was also served with Final Show Cause Notice issued by DPO SWTD. Hence, the appellant was awarded major punishment of Dismissal from Service vide the impugned order No.3234-39/EC dated 06.12.2021.

3. The appellant preferred an appeal against the impugned order on 14.12.2021. His appeal was sent to DPO South Waziristan for comments and provision of his service record vide this office Endorsement No.5382/ES dated 14.12.2021. DPO South Waziristan, vide his office memo: No. 108/EC dated 25.01.2022, furnished comments on the subject appeal wherein he stated that the punishment awarded to the appellant is legal and within the parameter of existing rules/law.

4. The appellant appeared before the undersigned, in orderly room held on 09.03.2022 and heard in person. The record was perused. He pleaded that he was innocent in making of his own fake transfer order from Police station Maken to Police Lines SWTD at Tank. He further held that the fake & forged orders were prepared by appellant Ex-Constable Khurshid Khan No.162 & Ex Constable Muhammad Imran No. 605 had put Diary No. on it. However, the other appellants (named Mr. Qazi Rehman No.217, Mr. Zahoor Rehman No.449, Mr. Muhammad Imran No.602 & Mr.Khurshid Khan No.162), on the other hand, hold him as motivator and executor of the said forged order.

5. In this regard, SP FRP DI Khan was directed to conduct a de novo enquiry on the following terms of reference (TOR): and submit his findings within 30-days, vide this office letter No.2028/ES dated 31.03.2022.

- i. Fix responsibility on the one who initiated & forged the said transfer orders.
- ii. As to whether the appellant involved in making the said forged order or not.

6. SP FRP DI Khan, vide his office letter No.1223/FRP, dated 30.06.2022, has intimated that, the delinquent Ex Constable has been found guilty of the charges leveled against him in making the fake transfer order of himself from Police Station Makeen to Police lines SWTD at Tank in connivance with the delinquent Ex-Constable Khursheed Khan No.162 & Ex-Constable Muhammad Imran No.605.

Read at 5/7/22
for n/action

Keeping in view the above, I, **SHAUKAT ABBAS, PSP**, Regional Police Officer, Dera Ismail Khan, in the exercise of powers conferred on me under Rule-11, clause-4 (a), of the Police Rules 1975, do not intend take a lenient view owing to allegations stand proved beyond any shadow of doubt. I, therefore, **REJECT** his appeal and uphold the impugned order of major punishment of **Dismissal from Service** passed by the DPO South Waziristan office order No. 3234-39/EC dated 06.12.2021.

(SHAUKAT ABBAS)PSP
Regional Police Officer
Dera Ismail Khan

No. 5964/ES,

Copy to the DPO South Waziristan. (Encl: Fauji Missal). The Official concerned may be informed accordingly.

District Police Officer
SWTD

for n/action, please.
12/09/2022

(SHAUKAT ABBAS) PSP
Regional Police Officer
Dera Ismail Khan

Attested to
Adv
← Adv →

وکالت

INAM ULLAH KHAN

Advocate
cc-12-3/9
Date of issue: May 2022
Valid up to: May 2025



کورٹ
فیس

بعدالت جناب جسٹر جسٹوٹخواہ سوس ٹریبیونل بشاور

مجناب شاہد اللہ

شاہد اللہ

نام PPO KPIC 44

دعوی یا جرم

دس کی اپیل

تفصیل دعوی یا جرم

باعث تحریر آنکہ

کلیے
ڈسٹرکٹ بار
ڈیپوٹیشن

Dial

مقدمہ مندرجہ بالا عنوان میں اپنی طرف اسٹے بیرونی وجواب دہی برائے ڈسٹرکٹ باقیہ مقدمہ نام

العام اللہ خان کنڈم، ایڈووکیٹ ہائی کورٹ

کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں پیشی پر خود یا ہذا بذریعہ رو برو عدالت حاضر ہوتا رہوں گا اور ہر وقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا اگر پیشی پر منظر حاضر نہ ہو اور مقدمہ بیرونی غیر ماخوری کی وجہ سے کسی طور میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صدر مقام پکھری کے علاوہ یا پکھری کے اوقات سے پہلے یا بیچے یا بروز تعطیل بیرونی کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ صدر پکھری کے علاوہ اور جگہ سماعت ہونے یا بروز تعطیل یا پکھری کے اوقات کے آگے یا بیچے پیش ہونے پر منظر کوئی نقصان پہنچے تو اس کے ذمہ دار یا اسکے واسطے کسی معاوضہ کے ادا کرنے یا سخت نہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے بھہ کوکل ساختہ پر داخستہ صاحب موصوف مثل کردہ ذات خود منظور قبول ہو گا اور صاحب موصوف کو عرض دعوی یا جواب دعوی یا درخواست اجراء اسٹے ذکرہ نظر ثانی اپیل کمرانی و ہر قسم درخواست ہر قسم کے بیان دینے اور پر ثالثی یا راضی نامہ و فیصلہ برہان کرنے اقبال دعوی کا بھی اختیار ہو گا اور بصورت مقرر ہونے تاریخ پیشی مقدمہ مقرر بیرون از پکھری صدر بیرونی مقدمہ مقرر نظر ثانی اپیل و کمرانی و ہر قسم مقدمہ یا منسوفی ذکرہ یک طرفہ یا درخواست علم انتہائی یا قرنی یا گرفتاری قبل از فیصلہ اجراء ذکرہ بھی صاحب موصوف کو بشرط ادائیگی شدہ محتاج بیرونی کا اختیار ہو گا اور تمام ساختہ پر داخستہ صاحب موصوف مثل کردہ از خود منظور و قبول ہو گا اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہو گا کہ مقدمہ مقررہ یا اس کے کسی جزو کی کاروائی یا بصورت درخواست نظر ثانی اپیل کمرانی یا دیگر معاملہ و قدمہ مذکورہ کسی دوسرے وکیل یا ہیر منبر کو اپنے بجائے یا اپنے ہمراہ مقرر کریں اور ایسے مشیر قانون کو بھی ہر امر میں وہی اور ویسے اختیارات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ میں جو کچھ ہر جانہ التواء پڑے گا وہ صاحب موصوف کا حق ہو گا مگر صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہو گا کہ مقدمہ کی پیروی نہ کریں اور ایسی صورت میں ہیرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا

لہذا وکالت نامہ لکھ دیا ہے تاکہ سند رہے

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مضمون وکالت نامہ سن لیا ہے اور انجی طرح کچھ لیا ہے اور منظور ہے

Accepted by =

شاہد اللہ

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