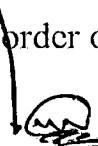


Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- _____ 1528/2022

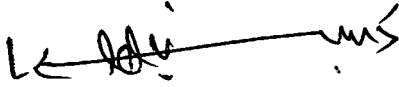
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	24/10/2022	<p>The appeal of Mr. Zahoor Rehman received by post through today by Mr. Inamullah Khan Kundi Advocate. It is fixed for preliminary hearing before touring Single Bench at D.I.Khan on _____. Notices 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 Mr. Zahoor-ur-Rehman 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 appellant 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. 2748 /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. 1528 /2022**Zahoor Rehman
(Appellant)****VERSUS****PPO KPK etc
(Respondents)****I N D E X**

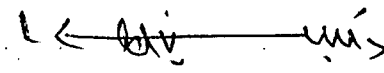
S.No.	Description of documents	Annexure	Pages
1.	Memorandum of Appeal and affidavit	--	1 - 8
2.	Copy of CNIC	A	9 - 10
3.	Copies of show cause notice & charge sheet	B & C	11 - 12
4.	Copies of letter No. 829 dated 15/11/2021 and Naqalmad dated 16/11/2021	D & D/1	13 - 14
5.	Copy of the impugned order dated 06/12/2021	E	15
6.	Copies of departmental appeal and impugned order dated 08/09/2022	F & F/1	16 - 17
7.	Vakalatnama	--	18

Dated: 29/09/2022

Your humble appellant


Zahoor Rehman

Through counsel


Inam Ullah Khan Kundi
 Advocate High Court

(with 6 copies)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. 1528 /2022

Khyber Pakhtunkhwa
Service Tribunal
District No. 1477
Dated 30/9/2022

Zahoor Rehman son of Azim Shah caste Mahsud r/o village Ladha, District South Waziristan. Ex-Constable#449 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. 3246-51/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 5966/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.

Let Adv. u/s

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 and appellant's length of service is more than 07 years in his credit. 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 "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 Naqalmad 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 Naqal mad 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. 3240-45/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 5969/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

← mis

(5)

of the event. The inquiry officer even did not bother to record statements of any other persons.

- 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.

L & A → ms

- 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. 3246-51/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.

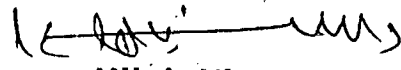
Any other relief deemed appropriate in circumstances of the case may also be allowed in favour of appellant in the large interest of justice.

Dated: 29/09/2022

Your humble appellant


Zahoor Rehman

Through counsel


Inam Ullah Khan Kundi
Advocate High Court.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

In service Appeal No. _____/2022

Zahoor Rehman
(Appellant)

VERSUS

PPO KPK etc
(Respondents)

CERTIFICATE

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

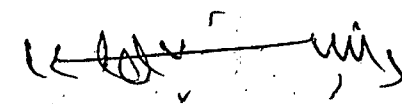
Dated 29/09/2022


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

Zahoor Rehman
(Appellant)

VERSUS

PPO KPK etc
(Respondents)

AFFIDAVIT

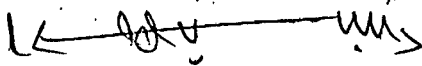
I, **Zahoor Rehman**, appellant herein, do hereby solemnly affirm on oath:-

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.

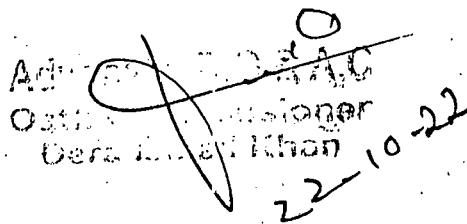
Dated 29/09/2022

3/6
DEPONENT

Identified By:-



Inam Ullah Khan Kundi
Advocate High Court


Omer Iqbal Khan
22-10-22

INX - A - 9



حکومت پاکستان
ذاتی شناختی کارڈ
21702-5679540-5
علی ارشد گل
15/06/1992



Attested to
Adv

← Adv →

10



Y7S5GK 21702-5573540-6

سید محمد امجد علی، ڈاکٹر، جامعہ اسلامیہ، جامعہ اسلامیہ، جامعہ اسلامیہ



31/03/2023 25/04/2011

پروفیشنل ایجوکیشن بورڈ، لاہور



Anx - B - (11)

SHOW CAUSE NOTICE.

I. **KHAN ZEB (PSP)**: District Police Officer, South Waziristan Tribal District as Competent Authority Under Khyber PakhtunKhwa Police Rules 1975 with Amondments- 2014, has found that you Constable Zahoor Rehman No. 449 rendered yourself liable to be proceeded against under Khyber PakhtunKhwa, Police Rules 1975 for the following misconduct:-

The undersigned has come accross 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.

2/1/19

3/1/19
449 Zahoor Rehman

Attested to
Adv
← Adv →

CHARGE SHEET

I Khan Zeb (PSP) District Police Officer, South Waziristan as Competent Authority, hereby charge you Constable Zahoor Rehman No. 449 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

2, 059

3/10
419
Zahoor

Attested to
Adv

← Adv →



OFFICE OF THE
 DISTRICT POLICE OFFICER
 SOUTH WAZIRISTAN TRIBAL DISTRICT

Anx. D.

(13)

No. 829 /OHC SWTD the dated: 25-11 /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	S. Iqbal Ullah	at Tank	at Tank
02	217	C-321 Rehman	-do-	-do-
03	449	Z. Iqbal Rehman	Police Line SWTD at Tank	-do-

DISTRICT POLICE OFFICER
 South Waziristan Tribal District
 District Police Officer
 SWTD

Attested to

Adv

~~Adv~~

14
Anx. D.I

صالح بن محمد بن فرید محمد بن...

محمد بن فرید محمد بن...

محمد بن فرید محمد بن...

محمد بن فرید محمد بن... 16 11/2 وقت 9:00 ص 5

محمد بن فرید محمد بن... 461 تا نماز صبح 217

محمد بن فرید محمد بن... 15-11-21

محمد بن فرید محمد بن... 15-11-21

محمد بن فرید محمد بن...

محمد بن فرید محمد بن...
Muharrar
Police Station
Makin SWTD

Attested to

Adv
← Adv mis



Anx. E

(15)

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

ORDER

My this order will dispose of departmental proceedings initiated against Constable Zahoore Rehman No.449 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. 3246-51 /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

06/12/21

Attested to

Adv

← Adv →

بھنور والا شان ڈپٹی انسپکٹر جنرل آف پولیس ڈیرہ اسماعیل خان

عنوان :- درخواست بھراو بحال کے جانے / اپیل

جناب عالی!

جیو: ڈسمل آرڈر (Dismissal Order) بھراو یہ جناب ڈی پی او صاحب ساؤتھ وزیرستان نمبری 3246-51/EC مورخہ 06-12-2021 معروض ہوئے۔ سائل کو باہم عمل نکمانہ کارروائی محکمہ پولیس سے برطرف کیا گیا ہے۔ جن اثرات کے مد نظر سائل کو برخاست کیا ہے۔ دوسرا سائل ہے۔ کیونکہ جو آرڈر جاولڈ ٹائپ کیا گیا ہے۔ نہ تو سائل نے دفتر ہڈا یا کس اور جگہ سے نکھایا ہے اور نہ ہی دفتر مجاز کی جگہ پر از خود دستخط کیا ہے۔ کی گئی انکوائری سرسرنٹا ہے۔ انکوائری آفیسر کو حقیقت کا مکمل علم ہے۔ لیکن سزا برخواستی میں وہی مٹی ہے۔ لہذا استدعا بذریعہ درخواست اپیل ہے کہ من سائل کو دوبارہ محکمہ پولیس میں بحال کرنے کے احکامات صادر فرمائے جائیں کیونکہ نہ تو انکوائری اصل بنیاد پر ہوئی ہے۔ اور اصل حقائق کو پس پرور رکھا گیا ہے۔

تایجاد!

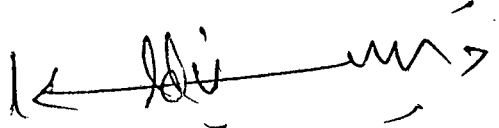
اگر ہمارا کوئی قصور ہے تو صرف اتنا ہے کہ ہم نے جاولڈ کی خواہش ضروری ہے جو کہ ہمارا حق ہے۔ باقی آرڈر ٹائپ کرنا آفیسر مجاز کے سامان کرنا اس سے من سائل ناواقف ہوں۔
یعنی نوازش ہوگی۔

تاریخ مورخہ 2021/1/

الارض

سائل ظہور رحمن ولد عظیم شاہ قوم محسود سکند لدا
تحصیل و ضلع ساؤتھ وزیرستان
موبائل نمبر 0344-5470059

Attested to.

Adv = 



OFFICE OF THE
REGIONAL POLICE OFFICER,
DERA ISMAIL KHAN REGION

☎ 0926-9280791 Fax # 9280790
☎ 0211-9280791

ANX F.E. (17)
DISTRICT POLICE OFF
DYN No. 3663
27-9-22
27/09/2022

No. /ES

Dated D.I. Khan this

ORDER

This order disposes of departmental appeal filed by Ex-Constable Zahoor Rehman No. 107 of District Police South Waziristan against the order of Major Punishment-(Dismissal from Service)- by the DPO South Waziristan passed vide his office No. 3246-51/EC dated 06.12.2021, on the following allegations:

"He is found involved in forgery by making fake transfer order of himself from Police Station Makeen to Police Lines 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. Sherif Ullah Khan SDPO Sarwakt, 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. 3246-51 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 Letter No. 5384/ES dated 14.12.2021. DPO South Waziristan, vide his office memo: No. 107/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 Makeen to Police Lines SWTD at Tank. He further held that the fake & forged orders were prepared by 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. Muhammad Imran No. 602, Mr. Shahid Ullah No. 461 & 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. 2022/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 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 Khurshid Khan No. 162 & Ex-Constable Muhammad Imran No. 605.

7. 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. 3246-51 dated 06.12.2021.

S.P.C.

No. 5866 /ES.

District Police Officer
SWTD

EC
for n/ action, please.
12/09/22

(SHAUKAT ABBAS) PSP
Regional Police Officer
Dera Ismail Khan

(SHAUKAT ABBAS) PSP
Regional Police Officer
Dera Ismail Khan

Attested to
Adv
ms



INAM ULLAH KHAN

Advocate
No-12-3/9
Date of issue: May 2022
Valid up to: May 2025



ADVOCATE HIGH COURT

وکالت

کورٹ
فیس

Secretary
KP Bar Council

بعدالت جناب فیروز خان کوٹواہ سروسز کمپنی پرائیویٹ لمیٹڈ

منجانب ظہور رحمن

ظہور رحمن
PPO KPK etc نام

دعویٰ یا جرم

(سروسز کمپنی)

تفصیل دعویٰ یا جرم

باعث تحریر آئنگے

Dik

مقدمہ مندرجہ بالا عنوان میں اپنی طرف واسطہ بیرونی وجہاً دہی برائے ڈیٹا یا تصفیہ مقدمہ بنام
الفتم اللہ خان کنڈل مینڈی ویکسٹ پرائیویٹ کورپوریشن

کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں پیشی پر خود یا بذا 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 میری غیر منفری 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 کچہری کے علاوہ یا کچہری کے اوقات سے پہلے یا بیچے یا بروز تعطیل بیرونی کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ صدر کچہری کے علاوہ یا بروز تعطیل یا کچہری 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 مجھ کو کھل ساختہ پر وادختہ صاحب موصوف مثل کردہ ذات خود منظور قبول ہو گا اور صاحب موصوف کو عرض دکوئی یا جواب دکوئی یا درخواست اجراء اسانے ذکر کی نظر ثانی اپیل گمرانی و ہر قسم درخواست ہر قسم کے بیان دینے اور بر تالی یا راضی نامہ و فیصلہ بر حلف کرنے اقبال دعویٰ کا بھی اختیار ہو گا اور بصورت مقرر ہونے تاریخ پیشی مقدمہ مقرر بیرون از کچہری صدر بیرونی مقدمہ مقرر نظر ثانی اپیل و گمرانی و برآمدگی مقدمہ یا منسوخی ذکر کی یک طرفہ یا درخواست حکم امتناعی یا قرق یا گرفتاری قبل از فیصلہ اجراء ذکر کی بھی صاحب موصوف کو بشرط ادائیگی ٹینڈہ مختار بیرونی کا اختیار ہو گا اور تمام ساختہ وادختہ صاحب موصوف مثل کردہ از خود منظور و قبول ہو گا اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہو گا کہ مقدمہ مزاد یا اس کے کسی جزو کی کاروائی یا بصورت درخواست نظر ثانی اپیل گمرانی یا دیگر معاملہ و قدمہ مذکورہ کسی دوسرے وکیل یا بیرنٹر 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 جانب التواہ 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 پروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا

لہذا وکالت نامہ لکھ دیا ہے تاکہ سند رہے
27
2022

مضمون وکالت نامہ من لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے

Accepted by

ظہور رحمن

[Signature]

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0340-7864258