

21.09.2022

Appellant present through counsel.

Preliminary arguments heard. Record perused.

Points raised need consideration. The appeal is admitted for regular hearing subject to all legal objections. Appellant is directed to deposit security and process fee within 10 days. Where-after, notices be issued to the respondents for submission of reply/comments. To come up for reply/comments on 17.11.2022 before S.B at Camp Court, Abbottabad.

Rs 160  
Appellant Deposited  
Security & Process Fee

-27/9-



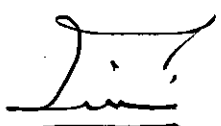
(Rozina Rehman)  
Member (J)  
Camp Court, A/Abad

Form- A

FORM OF ORDER SHEET

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

Case No.- 880/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	03/06/2022	<p>The appeal of Mr. Azam Shahzad resubmitted today by Mis. Sehrish Habib Dilazak 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-	14-7-22	<p>This case is entrusted to touring Single Bench at A.Abad for preliminary hearing to be put there on <u>20-7-22</u>. Notices be issued to appellant and his counsel for the date fixed.</p> <p style="text-align: right;"> CHAIRMAN</p>
	20.07.2022	<p>Appellant in person present and sought adjournment on the ground that his counsel is busy in the august Peshawar High Court, Abbottabad Bench. Adjourned. To come up for preliminary arguments on 21.09.2022 before the S.B at Camp Court Abbottabad.</p> <p style="text-align: right;"> (Salah-Ud-Din) Member (J) Camp Court Abbottabad</p>

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR  
CHECK LIST**

**CASE TITLE:** \_\_\_\_\_

**V/S** \_\_\_\_\_

S#	CONTENTS	YES	NO
1	This Appeal has been presented by:	✓	
2	Whether Counsel/Appellant/Respondent/Deponents 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?	x	✓
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: \_\_\_\_\_

**AZAM SHAHZAD**

Signature: \_\_\_\_\_

*(Handwritten Signature)*

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

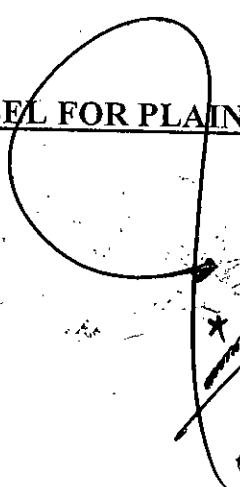
**03-06-2022**

**PROFORMA ANNEXED WITH PLAINT/ APPEAL/ APPLICATION**

**AT THE TIME OF INSTITUTION**

S. No.	DESCRIPTION	
1.	Title of case	Azam Shahzad V/S DPO etc
2.	Nature of case	Service Appeal
3.	Jurisdiction of Court	Service Tribunal
4.	Name of Plaintiff/ Appellant/ Petitioner/ Complainant	Azam Shahzad
5.	Contact No. of Plaintiff/ Appellant/ Petitioner/ Complainant	0313-5825648
6.	Name of defendant/ respondent/ accused (Before Trial Court)	DPO etc
7.	Contact No. of Defendant/ Respondent/ Accused (Before Trial Court)	-----
8.	Contact No. of Counsel for Plaintiff/ Appellant/ Petitioner/ Complainant	0311-5536528
9.	Contact No. of Counsel for Defendant/ Respondent/ Accused	-----

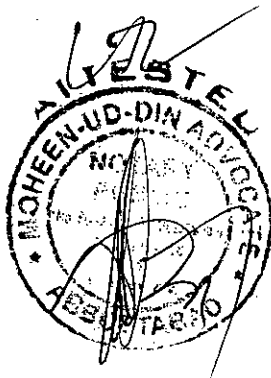
**SIGNATURE OF COUNSEL FOR PLAINTIFF/ APPELLANT**

  
**Ms Sebrish Habib Dilbaz**  
Advocate High Courts  
Chamber 11&01 Hayat Sherpara Lawyers  
Faza District Courts Abbottabad KPK  
Ph: 0992-333524 / 0331-5529371

The Worthy Registrar,  
Khyber Pakhtunkhwa, Service Tribunal,  
Peshawar.

Subject: - OBJECTIONS.

With reference to pre-filing objections on service appeal of Azam Shahzad, it is submitted that objections at Serial No. 1 to 3 and 7 have been removed. So far as Objection at Serial No. 4 to 6 are concerned, it has already been mentioned that neither such documents were ever provided to the appellant nor the concerned departments are providing such documents after hectic efforts by the appellant. Hon'ble Tribunal, however, has ample power to summon the said record from respondents, if required for just decision of the case and in order to avoid any delay in filing of appeal, which may be detrimental to fundamental rights of the appellant, it is requested that appeal may kindly be allowed to be filed, in the best interest of justice, please.



**SEHRISH HABIB DILAZAK**  
Advocate High Court,  
Abbottabad,  
Contact No.0311-5636528

**Mrs Sehrish Habib Dilazak**  
Advocate High Courts  
Chamber 11&01 Eaya Sherpawo Lawyers  
Plaza District Courts Abbottabad KPK  
Ph: 0992-333524 / 0331-5529371

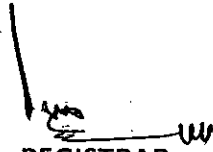
The appeal of Mr. Azam Shahzad son of Muhammad Aslam Ex-Constable No. 1027 Platoon no. 45 District Police A.Abad received today i.e. on 20.05.2022 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- ① Check list is not attached with the appeal.
- ② Memorandum of appeal may be got signed by the appellant.
- ③ Copies of leave application and sanctioned order of leave mentioned in the memo of appeal are not attached with the appeal which may be placed on it.
- ④ Copy of rejection order of departmental appeal dated 09.5.2022 mentioned in the heading of the appeal is not attached with the appeal which may be placed on it.
- ⑤ Copies of charge sheet, statement of allegations, show cause notice, enquiry report and replies thereto are not attached with the appeal which may be placed on it.
- ⑥ Copy of order dated 21.12.2021 mentioned in the heading of appeal is not attached with the appeal which may be placed on it.
- ⑦ Copy of dismissal order is illegible which may be replaced by legible/better one.

No. 1048 /S.T,

Dt. 20/05 /2022

Sehrish Habib Dilazak Adv.  
High Court A.Abad.

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

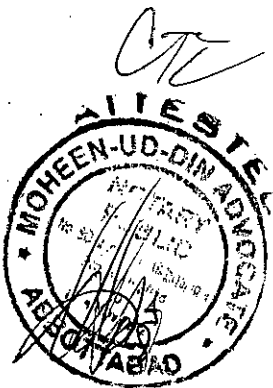


The Worthy Registrar,  
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**SEHRISH HABIB DILAZAK**  
Advocate High Court,  
Abbottabad,  
Contact No.0311-5636528





Appeal No 880/22

1

**BEFORE THE HON'BLE KHYBER**  
**PAKHTUNKHWA SERVICE TRIBUNAL,**  
**PESHAWAR.**

*Azam Shahzad S/o Muhammad Aslam resident of Mandi Lal  
Roop, Abbottabad. Ex-Constable No. 1027 Platoon No. 45,  
District Police, Abbottabad.*

....Appellant

**VERSUS**

1. District Police Officer, Abbottabad.
2. Commandant, Frontier Reserve Police, Khyber  
Pakhtunkhwa, Peshawar.
3. Commandant, Elite Force, Khyber Pakhtunkhwa,  
Peshawar.
4. Deputy Commandant, Elite Force, Khyber  
Pakhtunkhwa, Peshawar.
5. Superintendent of Police, Elite Force HQr, Peshawar.
6. Superintendent of Police, Elite Force Hazara.
7. RI/Accountant, Elite Force Khyber Pakhtunkhwa,  
Peshawar.
8. Incharge Kot/OASI/SRC, Elite Force, Khyber  
Pakhtunkhwa, Peshawar.

...Respondents.

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SERVICE APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNALS ACT, 1974 ALONG WITH ALL OTHER ENABLING PROVISIONS OF LAW AGAINST ORDER PASSED BY RESPONDENT NO. 4, COMMUNICATED TO THE APPELLANT TELEPHONICALLY ON 09.05.2022, WHEREBY DEPARTMENTAL APPEAL FILED BY THE APPELLANT WAS DISMISSED AS WELL AS ORDER DATED 21.12.2021 OF RESPONDENT NO. 4, WHEREBY, WHILE PROCEEDING EX-PARTE AGAINST THE APPELLANT, WITHOUT HIS PROPER SERVICE OR PROVIDING HIM ANY OPPORUTNITY OF HEARING, MAJOR PENALTY IN THE SHAPE OF DISMISSAL FROM SERVICE WAS IMPOSED AGAINST THE APPELLANT.

=====

Respectfully Sheweth:-

1. That the appellant was enrolled as constable in the Respondents' Department vide order dated 18.03.2008.

2. That after his appointment, the appellant has served the department with utmost zeal and zest and left no stone unturned to perform his duties in the best interest of his department.
3. That during his tenure of service, appellant remained posted at various Districts of Khyber Pakhtunkhwa and performed his duties with clean and clear service record and there was not even a single adverse entry in his entire service record.
4. That till 2013, appellant remained in Frontier Reserved Police and served to the satisfaction of his high-ups therefore, keeping in view the brilliant service record of the appellant, he was posted as Instructor in I.B Training Centre on deputation.

5. That appellant performed his duties as Instructor satisfactorily and thus was granted appreciation certificates as well.
6. That in the year 2019, appellant was ordered to join his services at Abbottabad as instructor where too, the appellant performed his duties with stainless record.
7. That quite from the date of his appointment in the year 2008, till 06.02.2022, the appellant was having his credit, a brilliant service record and during his tenure of entire service, he almost remained posted at important positions mostly as an instructor.
8. That during entire service career of the appellant, there was no complain to his high-ups, rather he had earned appreciation of high ups time and again.

9. That in February, 2020 the appellant was facing domestic issues due to insufficient space in his residential house, where all the family members were residing together, therefore, in order to construct his house and to meet the financial constraints, appellant applied for ex-Pakistan leave.
10. That appellant was informed from the office that his application has been sanctioned and meanwhile he succeeded to get visa for Qatar, thus left for Qatar in order to meet financial constraints and to enable himself for constructing a house for taking peaceful shelter.
11. That unfortunately, due to Covid-19 Pandemic, the appellant got stuck in Qatar as all the international flight operations were halted during the Pandemic and could return back after

flight operations got normal in March 2022.

12. That when the appellant came back, he approached his office and came to know that in his absence, he was only granted leave for 30 days and thereafter disciplinary proceedings were initiated against him in absentia, followed by a so called inquiry, a final show cause notice and dismissal from service, regarding which neither the appellant was ever served nor was provided any opportunity of hearing.
13. That coming into know these facts, the appellant forthwith approached his high-ups and filed an application for reinstatement, mentioning the entire facts therein that his absence from duty was not wilful, rather due to pandemic which affected almost entire world, the appellant was unable to come back and

soon he got the chance, he flew to his homeland and marked his attendance on his duty, which though was refused due to aforesaid partially conducted so called inquiry etc.

14. That the application of the appellant was not adhered to, thus he approached the competent authority through departmental appeal against order of his dismissal dated 21.12.2020, vide appeal dated 30.06.2021, copy of which is annexed as Annexure "B". The Respondent No. 4, however, did not deem it appropriate to provide any opportunity of hearing to the appellant nor to pass an order upon his appeal.
15. That appellant kept on waiting for any response from the respondent No. 4 on his departmental appeal, but in vain and thus filed another application dated 26.04.2022, seeking decision of his

departmental appeal. Copy of said application is annexed as Annexure "C".

16. That on 09.05.2022, the appellant was verbally informed from the office of respondent No. 4 telephonically that his application as well as departmental appeal has been turned down, however, no written order in this respect has yet been communicated to the appellant.

17. That the appellant has now approached this honourable Tribunal for redressal of his grievances, inter-alia on the following grounds:-

GROUND:

- a. That the appellant had at his credit a clean and brilliant service record, who had remained posted at responsible positions during entire tenure of his long (more than 12 years) service and had nothing adverse against him during entire service record.



- b. That the appellant was technically knocked out in his absentia, knowing the fact that it was beyond the abilities and control of the appellant to travel back to homeland due to pandemic.
- c. That malafide on the part of respondents gets support from the so called record i.e. diary dated 06.02.2020 of the Office of OAS/Elite Force, District Peshawar, whereby the appellant was wrongly shown to have been granted leave for 30 days and memo dated 10.08.2020 of the Office of Deputy Superintendent of Police, Elite Force, Abbottabad, whereby a so called notice of absence was issued to the appellant on 10.08.2020. Had the appellant not been granted ex-Pakistan leave, such notice of absence should have been issued to him in mid of March, 2020, however, issuance of such notice after five long months and thereafter, completing entire proceedings against him

prior to 21.12.2020 in haste and ex-partily, speaks of malafide, illegalities and irregularities committed by the respondents.

- d. That respondents were in such haste, that they forgot that actually the appellant was appointed as constable in Frontier Reserved Police and was performing his duties in Elite Force on deputation basis, thus he could not be proceeded against departmentally by the respondent No. 4, rather it was respondent No. 2, who being competent authority, have had the authority to proceed against the appellant, on the basis of any so called disciplinary flaws.
- e. That since the appellant was serving under Respondent No. 4 on deputation basis, therefore, entire proceedings conducted by respondent No. 4 culminating into impugned dismissal order of the appellant, were beyond jurisdiction of respondent No. 4.

f. That had there been any complain against the appellant, not only the appellant was required to have personally been served with a notice, but his competent authority i.e. Respondent No. 2 should have also been informed and if deemed appropriate, it was respondent No. 2 alone, who had the authority to proceed against the appellant departmentally. Thus entire proceedings carried out by the respondent No: 4, due to lack of authority, are null and void in the eyes of law.

g. That even otherwise, it was fundamental right of the appellant to be provided with an opportunity of hearing, before passing such harsh penalty against him, but no positive effort was carried out by the respondents for personal service of the appellant, rather the proceedings were carried out in sheer violation of law, malafidely and in haste, just to deprive the appellant from his fundamental rights.

- h. That the respondents have also never taken into account the previous service record of the appellant, which shows that appellant had served the department for 12 long years, with up to the mark zeal and zest, earning good name for his department and performing duties and important positions like instructor.
- i. That depriving the appellant from his legal and natural right of hearing and imposition of major penalty on the basis of ex-parte proceedings, despite clean and clear long 12 years service record of the appellant, is not sustainable under the law.
- j. That, if at all the respondents had decided to proceed against the appellant, the fact of clear service career of the appellant should have been taken into account, in view whereof, on sole ground of absence, major penalty in the shape of dismissal from service, was not warranted.

k. That the Superior Courts of the country have held time and again that where a civil servant has successfully completed his qualifying service for pension i.e. 10 years of service, without any adverse entry in his service record, then imposition of major penalty of dismissal from service on the basis of sole charge of absence from duty is a harsh penalty and department should have resorted to minor penalty in such circumstances such as withholding of increment, compulsory retirement, leave without pay or any such minor penalty, but imposition of harsh penalty in the shape of dismissal from service, has been deprecated by the Superior courts in plethora of judgments. In this particular case, appellant was even deprived from the funds to which he contributed during his long 12 years service, i.e. G.P fund, gratuity etc, which is against the norms of justice.

l. That the appellant has already exhausted the other available remedies in the shape of department appeal, which has also been turned down in hast without providing opportunity of hearing to the appellant or providing copy of any such order, therefore, the appellant seeks kind and graceful indulgence of this honourable Tribunal in the matter, in the best interest of justice.

m. That keeping in view the nature of charge against the appellant, the proceedings carried out in his absentia by respondent No.4 who had no authority under the law to proceed against the appellant, coupled with clear service career of the appellant as well as the fact that absence of the appellant from duty was not wilful, rather was the result of Covid-19 pandemic, which affected entire society, the appellant is entitled to be re-instated into service with all back benefits.

n. That further points would be addressed at bar with kind permission of this Honourable Tribunal.

*It is, therefore, humbly prayed that on acceptance of the instant appeal, the impugned order passed by the respondent No. 4 may kindly be set aside and the appellant may kindly be re-instated into service with all back benefits, in the best interest of justice. Any other relief, deemed appropriate by this Honourable Tribunal, may also be granted/passed in favour of the appellant.*

*[Signature]*  
Appellant

Dated 19/5/2022

Through

*[Signature]*

(Sehrish Habib Dilazak)  
Advocate High Courts  
*Mis Sehrish Habib Dilazak*  
Advocate High Courts  
Chamber 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 215, 216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, 230, 231, 232, 233, 234, 235, 236, 237, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 252, 253, 254, 255, 256, 257, 258, 259, 260, 261, 262, 263, 264, 265, 266, 267, 268, 269, 270, 271, 272, 273, 274, 275, 276, 277, 278, 279, 280, 281, 282, 283, 284, 285, 286, 287, 288, 289, 290, 291, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 326, 327, 328, 329, 330, 331, 332, 333, 334, 335, 336, 337, 338, 339, 340, 341, 342, 343, 344, 345, 346, 347, 348, 349, 350, 351, 352, 353, 354, 355, 356, 357, 358, 359, 360, 361, 362, 363, 364, 365, 366, 367, 368, 369, 370, 371, 372, 373, 374, 375, 376, 377, 378, 379, 380, 381, 382, 383, 384, 385, 386, 387, 388, 389, 390, 391, 392, 393, 394, 395, 396, 397, 398, 399, 400, 401, 402, 403, 404, 405, 406, 407, 408, 409, 410, 411, 412, 413, 414, 415, 416, 417, 418, 419, 420, 421, 422, 423, 424, 425, 426, 427, 428, 429, 430, 431, 432, 433, 434, 435, 436, 437, 438, 439, 440, 441, 442, 443, 444, 445, 446, 447, 448, 449, 450, 451, 452, 453, 454, 455, 456, 457, 458, 459, 460, 461, 462, 463, 464, 465, 466, 467, 468, 469, 470, 471, 472, 473, 474, 475, 476, 477, 478, 479, 480, 481, 482, 483, 484, 485, 486, 487, 488, 489, 490, 491, 492, 493, 494, 495, 496, 497, 498, 499, 500, 501, 502, 503, 504, 505, 506, 507, 508, 509, 510, 511, 512, 513, 514, 515, 516, 517, 518, 519, 520, 521, 522, 523, 524, 525, 526, 527, 528, 529, 530, 531, 532, 533, 534, 535, 536, 537, 538, 539, 540, 541, 542, 543, 544, 545, 546, 547, 548, 549, 550, 551, 552, 553, 554, 555, 556, 557, 558, 559, 560, 561, 562, 563, 564, 565, 566, 567, 568, 569, 570, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587, 588, 589, 590, 591, 592, 593, 594, 595, 596, 597, 598, 599, 600, 601, 602, 603, 604, 605, 606, 607, 608, 609, 610, 611, 612, 613, 614, 615, 616, 617, 618, 619, 620, 621, 622, 623, 624, 625, 626, 627, 628, 629, 630, 631, 632, 633, 634, 635, 636, 637, 638, 639, 640, 641, 642, 643, 644, 645, 646, 647, 648, 649, 650, 651, 652, 653, 654, 655, 656, 657, 658, 659, 660, 661, 662, 663, 664, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 682, 683, 684, 685, 686, 687, 688, 689, 690, 691, 692, 693, 694, 695, 696, 697, 698, 699, 700, 701, 702, 703, 704, 705, 706, 707, 708, 709, 710, 711, 712, 713, 714, 715, 716, 717, 718, 719, 720, 721, 722, 723, 724, 725, 726, 727, 728, 729, 730, 731, 732, 733, 734, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753, 754, 755, 756, 757, 758, 759, 760, 761, 762, 763, 764, 765, 766, 767, 768, 769, 770, 771, 772, 773, 774, 775, 776, 777, 778, 779, 780, 781, 782, 783, 784, 785, 786, 787, 788, 789, 790, 791, 792, 793, 794, 795, 796, 797, 798, 799, 800, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 816, 817, 818, 819, 820, 821, 822, 823, 824, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 838, 839, 840, 841, 842, 843, 844, 845, 846, 847, 848, 849, 850, 851, 852, 853, 854, 855, 856, 857, 858, 859, 860, 861, 862, 863, 864, 865, 866, 867, 868, 869, 870, 871, 872, 873, 874, 875, 876, 877, 878, 879, 880, 881, 882, 883, 884, 885, 886, 887, 888, 889, 890, 891, 892, 893, 894, 895, 896, 897, 898, 899, 900, 901, 902, 903, 904, 905, 906, 907, 908, 909, 910, 911, 912, 913, 914, 915, 916, 917, 918, 919, 920, 921, 922, 923, 924, 925, 926, 927, 928, 929, 930, 931, 932, 933, 934, 935, 936, 937, 938, 939, 940, 941, 942, 943, 944, 945, 946, 947, 948, 949, 950, 951, 952, 953, 954, 955, 956, 957, 958, 959, 960, 961, 962, 963, 964, 965, 966, 967, 968, 969, 970, 971, 972, 973, 974, 975, 976, 977, 978, 979, 980, 981, 982, 983, 984, 985, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000

VERIFICATION

Verified that the contents of the foregoing appeal are true and correct as per information furnished by my client and nothing has been suppressed from this Honourable Court.

Dated 19/05/2022

*[Signature]*

(Sehrish Habib Dilazak)  
Advocate High Courts  
*Mis Sehrish Habib Dilazak*  
Advocate High Courts  
Chamber 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 215, 216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, 230, 231, 232, 233, 234, 235, 236, 237, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 252, 253, 254, 255, 256, 257, 258, 259, 260, 261, 262, 263, 264, 265, 266, 267, 268, 269, 270, 271, 272, 273, 274, 275, 276, 277, 278, 279, 280, 281, 282, 283, 284, 285, 286, 287, 288, 289, 290, 291, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 326, 327, 328, 329, 330, 331, 332, 333, 334, 335, 336, 337, 338, 339, 340, 341, 342, 343, 344, 345, 346, 347, 348, 349, 350, 351, 352, 353, 354, 355, 356, 357, 358, 359, 360, 361, 362, 363, 364, 365, 366, 367, 368, 369, 370, 371, 372, 373, 374, 375, 376, 377, 378, 379, 380, 381, 382, 383, 384, 385, 386, 387, 388, 389, 390, 391, 392, 393, 394, 395, 396, 397, 398, 399, 400, 401, 402, 403, 404, 405, 406, 407, 408, 409, 410, 411, 412, 413, 414, 415, 416, 417, 418, 419, 420, 421, 422, 423, 424, 425, 426, 427, 428, 429, 430, 431, 432, 433, 434, 435, 436, 437, 438, 439, 440, 441, 442, 443, 444, 445, 446, 447, 448, 449, 450, 451, 452, 453, 454, 455, 456, 457, 458, 459, 460, 461, 462, 463, 464, 465, 466, 467, 468, 469, 470, 471, 472, 473, 474, 475, 476, 477, 478, 479, 480, 481, 482, 483, 484, 485, 486, 487, 488, 489, 490, 491, 492, 493, 494, 495, 496, 497, 498, 499, 500, 501, 502, 503, 504, 505, 506, 507, 508, 509, 510, 511, 512, 513, 514, 515, 516, 517, 518, 519, 520, 521, 522, 523, 524, 525, 526, 527, 528, 529, 530, 531, 532, 533, 534, 535, 536, 537, 538, 539, 540, 541, 542, 543, 544, 545, 546, 547, 548, 549, 550, 551, 552, 553, 554, 555, 556, 557, 558, 559, 560, 561, 562, 563, 564, 565, 566, 567, 568, 569, 570, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587, 588, 589, 590, 591, 592, 593, 594, 595, 596, 597, 598, 599, 600, 601, 602, 603, 604, 605, 606, 607, 608, 609, 610, 611, 612, 613, 614, 615, 616, 617, 618, 619, 620, 621, 622, 623, 624, 625, 626, 627, 628, 629, 630, 631, 632, 633, 634, 635, 636, 637, 638, 639, 640, 641, 642, 643, 644, 645, 646, 647, 648, 649, 650, 651, 652, 653, 654, 655, 656, 657, 658, 659, 660, 661, 662, 663, 664, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 682, 683, 684, 685, 686, 687, 688, 689, 690, 691, 692, 693, 694, 695, 696, 697, 698, 699, 700, 701, 702, 703, 704, 705, 706, 707, 708, 709, 710, 711, 712, 713, 714, 715, 716, 717, 718, 719, 720, 721, 722, 723, 724, 725, 726, 727, 728, 729, 730, 731, 732, 733, 734, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753, 754, 755, 756, 757, 758, 759, 760, 761, 762, 763, 764, 765, 766, 767, 768, 769, 770, 771, 772, 773, 774, 775, 776, 777, 778, 779, 780, 781, 782, 783, 784, 785, 786, 787, 788, 789, 790, 791, 792, 793, 794, 795, 796, 797, 798, 799, 800, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 816, 817, 818, 819, 820, 821, 822, 823, 824, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 838, 839, 840, 841, 842, 843, 844, 845, 846, 847, 848, 849, 850, 851, 852, 853, 854, 855, 856, 857, 858, 859, 860, 861, 862, 863, 864, 865, 866, 867, 868, 869, 870, 871, 872, 873, 874, 875, 876, 877, 878, 879, 880, 881, 882, 883, 884, 885, 886, 887, 888, 889, 890, 891, 892, 893, 894, 895, 896, 897, 898, 899, 900, 901, 902, 903, 904, 905, 906, 907, 908, 909, 910, 911, 912, 913, 914, 915, 916, 917, 918, 919, 920, 921, 922, 923, 924, 925, 926, 927, 928, 929, 930, 931, 932, 933, 934, 935, 936, 937, 938, 939, 940, 941, 942, 943, 944, 945, 946, 947, 948, 949, 950, 951, 952, 953, 954, 955, 956, 957, 958, 959, 960, 961, 962, 963, 964, 965, 966, 967, 968, 969, 970, 971, 972, 973, 974, 975, 976, 977, 978, 979, 980, 981, 982, 983, 984, 985, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000

**BEFORE THE HON'BLE SERVICE**  
**TRIBUNAL, KHYBER PAKHTUNKHWA,**  
**PESHAWAR**

**AZAM SHAHZAD**

*versus*

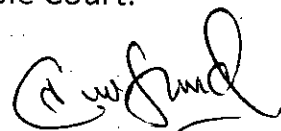
DPO etc.

**SERVICE APPEAL**

**AFFIDAVIT.**

I Azam Shahzad S/o Muhammad Aslam resident of Muhallah Roop Lal, Abbottabad Ex-Constable No. 1027, District Police Abbottabad, Solemnly affirm and declare on oath that the contents of the titled Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



  
**DEPONENT.**



**BEFORE THE HON'BLE SERVICE  
TRIBUNAL, KHYBER PAKHTUNKHWA,  
PESHAWAR.**

**AZAM SHAHZAD**

*versus*

The DPO etc.

**SERVICE APPEAL**

**CERTIFICATE.**

Certified that no such like Appeal has earlier been filed before this Hon'ble Tribunal or any other court of law.

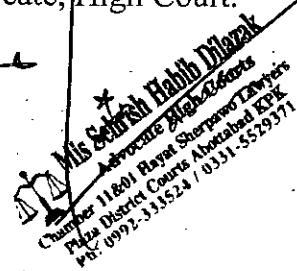
Dated:

19/5/2022

  
APPELLANT

THROUGH.

*Sehrish Habib Dilazak*  
Advocate, High Court.

  
Mis Sehrish Habib Dilazak  
Advocate High Court  
Chamber 11801 Rayat Sherpamo Lawyars  
Peshawar District Courts Abbottabad KPK  
Mob: 0992-333524 / 0331-5529371

(18)

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL, PESHAWAR**

S AND 880/22

Azam Shahzad

....APPELLANT

VERSUS

District Police Officer, Abbottabad & others.

...RESPONDENTS

**SERVICE APPEAL.**

**APPLICATION FOR ISSUANCE OF DIRECTION TO  
THE RESOPNDENTS TO CLEAR DUES OF THE  
APPELLANT, ILLEGALLY WITHHELD BY THEM.**

---

---

Respectfully Sheweth:-

1. That main appeal of the appellant is being filed and this application may also be read as part and parcel thereof.
2. That services of the appellant/petitioner had already been dispensed with by the respondents in his absentia.
3. That petitioner has served the department for more than 12 long years and during his service, deductions were being made in the shape of G.P Fund, Gratuity and other allowances, from his monthly salary.



- 4. That since such deductions were made from the salary of the petitioner, therefore, he is entitled to receive all such amounts, notwithstanding the cause whereunder his services were dispensed with as the same amounts were deducted from his monthly salary.
- 5. That the respondents were approached by the applicant for disbursement of his said funds, but they have flatly refused to pay back any penny to him on the pretext that since his services stand dispensed with, therefore, he is not entitled to receive anything from them.
- 6. That such stance of the respondents is illegal and without lawful authority.

It is, therefore, humbly prayed that on acceptance of the instant application, Respondents may please be ordered to disburse all the outstanding dues of the applicant including his G.P fund and gratuity etc.

*[Handwritten Signature]*  
 ...APPELLANT

Dated 19/05/2022

Through

(Sehrish Habib Dilazak)  
 Advocate High Court, Abbottabad  
 0311-5636528  
*[Handwritten Signature]*

**VERIFICATION**

Verified that the contents of the foregoing application are true and correct as per information furnished by my client and nothing has been suppressed from this Honourable Court.

Dated 19/5/2022

(Sehrish Habib Dilazak)  
 Advocate High Court, Abbottabad  
 0311-5636528  
*[Handwritten Signature]*



26

ANNEXURE "A" cc

ENLISTMENT ORDER

Mr. Azam Shehzad  
s/o Mohammad Aslam r/o Tanchi Chowk Atal  
PS City Distt: Abbottabad is hereby enlisted as recruit /  
Constable in BPS (5) w.e.f. 18-03-2008 and allotted  
Constabulary No. \_\_\_\_\_

Height 5x9 1/2 Chest 33x35 1/2  
Education 10th D/O Birth 13-12-1985  
Age on enrolment 22 Year 02 months & 20 days.

His service is purely on temporary basis and liable for  
termination at any time without any notice.

OB No. 92

Date: 18-03-2008

DY: COMMANDANT  
FRONTIER RESERVE POLICE  
NWFP, PESHAWAR.

*Handwritten signature/initials*



(21)

ANNEXURE A

جناب عالی!

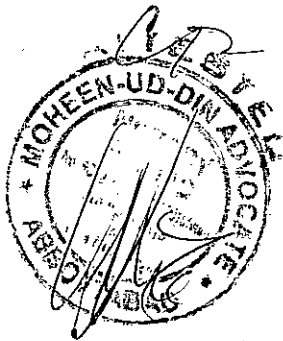
گزارش ہے کہ سائل اور دیگر اہل خانہ بھی ایک ہی گھر میں رہے ہیں۔ رہائش کم ہونے کی وجہ سے آئے روز مسائل کا سامنا ہے جسکی وجہ سے ڈیوٹی اور کارسہ کارمین کافی مشکلات رہتی ہیں۔ سائل اپنا گھر آباد اور اہل خانہ کے لیے نیا گھر تعمیر کرنا چاہتا ہے۔ مالی وسائل کم ہونے کی وجہ سے سائل اپنے گھر کی تعمیر میں خود مزدوری کرنا چاہتا ہے۔

بذریعہ درخواست استدعا ہے کہ سائل کے دو سال کی پاکستانی X لیو چھٹی دی جائے۔

عین نوازش ہوگی

العارض

اعظم شہزاد 1027/FC/45 پولیس لائنز ایبٹ آباد



صفحہ نمبر

اندرین

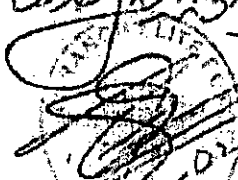
CP - MHC

پکارا پکارا کے ذریعہ ایکٹ فیس طلبہ کے  
 (1) 08-72 قسم 2020-02-06 صفحہ نمبر  
 منظور ہوئی ہیں

- ① E فصل زبان 6166 بلڈن 66-21
- ② E فقہ 25 بلڈن 79-26
- ③ E مہلزمان 2345 بلڈن 72-25
- ④ E صحابہ 1451 بلڈن 20-30
- ⑤ E نسیم خان 3421 بلڈن 11-30
- ⑥ E اصیم خان 2928 بلڈن 31-30
- ⑦ E اکبر علی 1672 بلڈن 101-24
- ⑧ E اعظم پیرا 1027 بلڈن 45-30
- ⑨ E عقیقہ 4117 بلڈن 79-28
- ⑩ E صبر سمان 4399 بلڈن 89-30
- ⑪ E رضوانہ 3940 بلڈن 100-30
- ⑫ E اظہار 39 CCP/EF بلڈن 30-30

اس وقت کے طالب علموں کے لئے اس وقت کے طالب علموں کے لئے اس وقت کے طالب علموں کے لئے

CP  


صاف لکھی  
 دیا اور ان کے لئے  


(171)  
 اللہ کے  
 اللہ کے  
 اللہ کے



نہال آزاد نمبر پی 15739-47/EF دورہ 21.12.2020 جاریہ دفتر جناب ذہنی کمانڈ

بابت برائے نوادہ پنشنر، بابت برائے نوادہ نوکری سائل کے سلسلہ میں درخواستیں

23

ANNEXURE B

- ۱۔ یہ کہ سائل نمبر پولیس میں بطور کنٹریول سائل 2008 میں بھرتی ہوا۔ سائل اپنے فرائض منصبی بطریق احسن سرانجام دینا رہا ہے اور کسی قسم کی سائل کے نفاذ کوئی شکایت نہ ہے۔ سائل نے اپنی سروس کے دوران انفران بلاؤنگ کی بھی کسی شکایت کا موقع نہ دیا ہے اور سائل اپنی ذیوقی انجامی بان فضائی سے سرانجام دیتا رہا ہے۔
  - ۲۔ یہ کہ سائل نے سال 2020 میں ایک سال کی Ex-Pakistan leave کے لئے درخواست گزاری۔ جو منظور ہونے پر سائل قتلر جائیگا۔ جہاں پر کرونا وبا کی وجہ سے ہر قسم کی فلائٹس بند ہو گئیں اور سائل اپنی رخصت پوری ہونے کے بعد واپس اپنی ذیوقی پر حاضر نہ ہو سکا۔
  - ۳۔ یہ کہ نمبر ہڈانے سائل کو غیر حاضر کرتے ہوئے شوکا زفونٹس جاری کیا اور ایک طرف کاروائی عمل میں لاتے ہوئے سائل کو نوکری سے برناست کیا گیا۔ سائل نے نمبر پولیس کا وٹار باند کرنے کیلئے عوام الناس کی بے لوث خدمت کی ہے۔
- بذریعہ اپیل / درخواست استدعا ہے کہ سائل کے سابقہ ریکارڈ کو مد نظر رکھتے ہوئے سائل کو دوبارہ نوکری پر بحال فرما کر مشکور فرماویں۔ سائل وائل خانہ سائل جناب کی سلامتی و عمر درازی کے لئے دعا گو ہیں گے۔

عین نوازش ہوگی۔

المرقوم: 30-06-2021

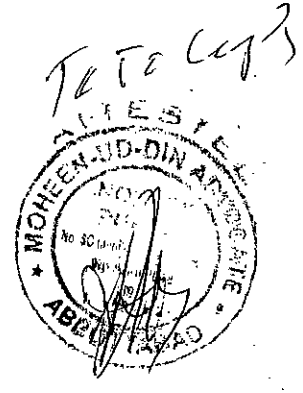
سابقہ کنٹریول اعظم شہزاد نمبر FC/1027

سویا بل نمبر: 0334-5668038

30-06-2021

C/S/12/15

21/7/2021







25

BETTER COPY

Office of the Deputy Commandant  
Elite force Khyber Pakhtunkhawa Peshawar

No.1573P-47/EF

Date: 24/12/2020

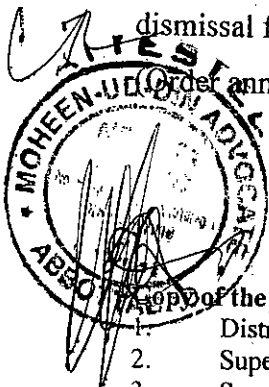
ORDER

This order will dispose of the departmental proceedings against Azam Shehzad No.1027 of District Police Abbottabad now on deputation for Elite Force Khyber Pakhtunkhawa.

As per letter of SP Elite Force Hazara Vide No.648/EFH dated 10/08/2020 you remained absent from the lawful duty without any leave or prior permission w.e.f 10/03/2020 to till date. In this regard Charge Sheet alongwith Summary of Allegations were issued to him and SP Elite Force HQrs Peshawar was appointed as enquiry officer. The Enquiry officer reported that Charge sheet and summary of the allegations were served upon him through A/DSP Abbottabad but was not received by personally or other family member and sent back return with verbal information that the said constable has proceed abroad. In thus connection a travel history of said constable was received from Director FIA which revealed that he has flew up by airline on 09/02/2020 and has no keen interest in duty and has gone to abroad without any permission and No Objection Certificate (NOC). Therefore the Enquiry Officer has recommended that he may be dismissed from service from the date of absenteeism. A Final Show Cause Notice was also issued to him vide No.1345/EF dated 23/10/2020 which is received by his brother Anjum Shahzad s/o Muhammad Aslam r/o Maudi Roop Fai Abbottabad on 19/11/2020 and stated that his brother has proceed to aboard to ensure has appearance a notice was issued to him in Daily "Mashraq" Newspaper, dated 27/11/2020 and was directed to join the enquiry proceedings within fifteen days after the publication of notice but he did not appeared.

Therefore, I Zaib Ullah Khan, Deputy Commandant, elite Force Khyber Pakhtunkhawa Peshawar as competent authority, keeping in view the above facts, circumstances and recommendations of the enquiry officer, impose major penalty of dismissal from service upon the defaulter official from the date of absence i.e. 10/03/2020.

(Order announced)



(ZAIB ULLAH KHAN) PSP  
Deputy Commandant  
Elite Force Khyber Pakhtunkhawa  
Peshawar

Copy of the above is forwarded to the:-

1. District Police Officer, Abbottabad for information.
2. Superintendent of Police, Elite Force HQr. Peshawar.
3. Superintendent of Police, Elite Force Hazara.
4. RI / Accountant, Elite Force Khyber Pakhtunkhawa Peshawar.
5. Incharge Kot/OASI/SRC, Elite Force Khyber Pakhtunkhawa Peshawar.
6. FMC, Elite Force alongwith complete enquiry file Enis (19) pages.

ANNEXURE "C"

بخدمت جناب، ڈپٹی کمشنر ٹریفک صاحب، ایلٹھ فورس، خیبر پختونخوا، پشاور

344

بحوالہ درخواست ہمارے بحالی مسائل نمبر 30.06.2021، سال حسب ذیل عرض خدمت ہے

عنوان:

جناب عالی

1. یہ کہ مسائل 2008 میں ادارہ ہذا میں پہلی بار 2020 تک مختلف مقامات پر اپنے فراموش یعنی بطریق احسن انجام دیا جا رہا ہے اور ان امور ان مسائل کی ذمہ داری سے لگن اور جانفشانی کو تسلیم کرتے ہوئے اعزازی سرٹیفیکیشن سے بھی نواز اور مسائل کو اہم جگہوں پر ڈیولپ بھی سوچنی لگی جو مسائل بطریق احسن انجام دیتا رہا۔

2. یہ کہ مسائل نے سال 2020 میں مگر کی تیسروں کی معاملات کے سلسلے میں بیرون ملک جانے کے لیے 01 سال کی پتلی کی درخواست گزار ہی جو کہ انفران بلا کی طرف سے 01 کی (Ex-Pakistan) منظور کی گئی اور اسے بحال کے دوران مسائل بچھڑی معاملات بیرون ملک چلا گیا، تاہم بد قسمتی سے کرونا وبا کے پیش نظر تمام ملائیں بند تھیں جس کی وجہ سے مسائل وقت مقررہ پر واپس نہ آسکا۔

3. یہ کہ مسائل کی عدم موجودگی میں مسائل کے خلاف حکمانہ کارروائی بابت غیر حاضری مسائل کی طرف تامل میں لائی جا کر مسائل کو نوکری سے برخواست فرمایا گیا، جس کی بابت مسائل نے درخواست نمبر 30.06.2021 گزار دی، تاہم درخواست مذکورہ پر بحال نہ تو کوئی کارروائی ہوئی اور نہ ہی مسائل کو پیش ہو کر اپنا سابقہ پیش کرنے کا موقع دیا گیا۔

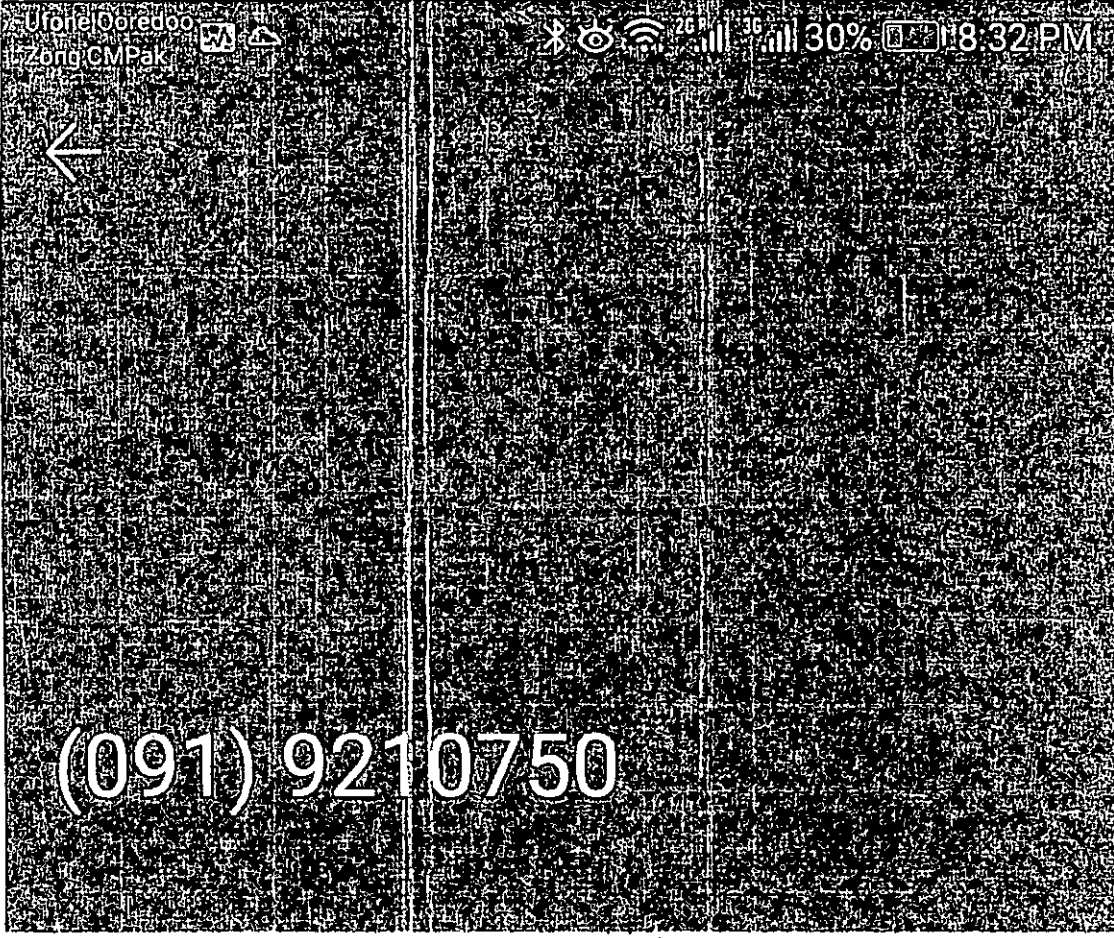
لہذا ہذا درخواست ہذا مسائل استدعا کرتا ہے کہ مسائل کی درخواست پر جلد کارروائی عمل میں لائی جائے اور مسائل کو اپنا موقع پیش کرنے کا موقع دیا جا کر مسائل کی درخواست منظور فرمائی جائے اور قریب انصاف مسائل کو ملازمت پر بحال فرمایا کر شکور فرمائیں مسائل بعد اہل خانہ جناب کی سلامتی و عمر دراز کے لیے دعا گو رہے گا۔

المرقوم: 26.04.2022

العبد  
مسائل کنیشنیل (سابقہ) مظہر شہزاد نمبر FC/1027  
رابطہ نمبر: 0334-5668038



27



(091) 9210750



(091) 9210750  
Pakistan



May 9, 1:07 PM

☎ (091) 9210750



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Create new contact

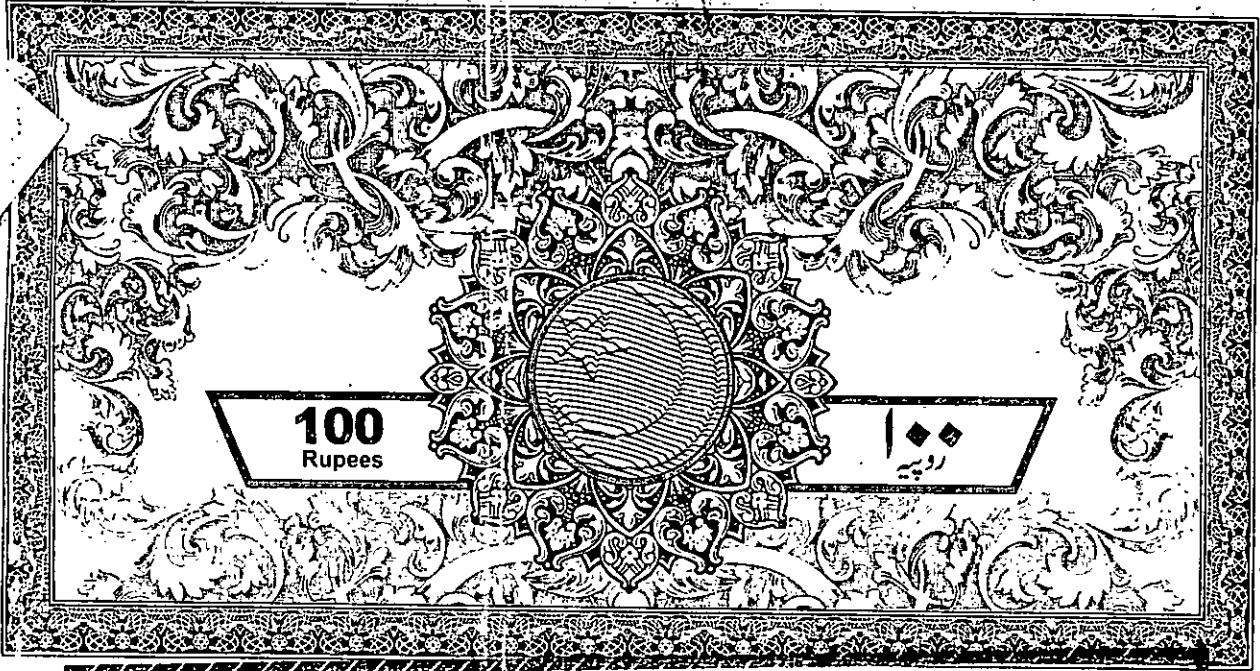


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بعد الت جناب سروس ٹریبونل خیبر پختونخواہ

پشاور، ایبٹ آباد کیمپ، کورٹ

اعظم شہزاد بنام ڈسٹرکٹ پولیس آفیسر وغیرہ

اپیل مقدمہ

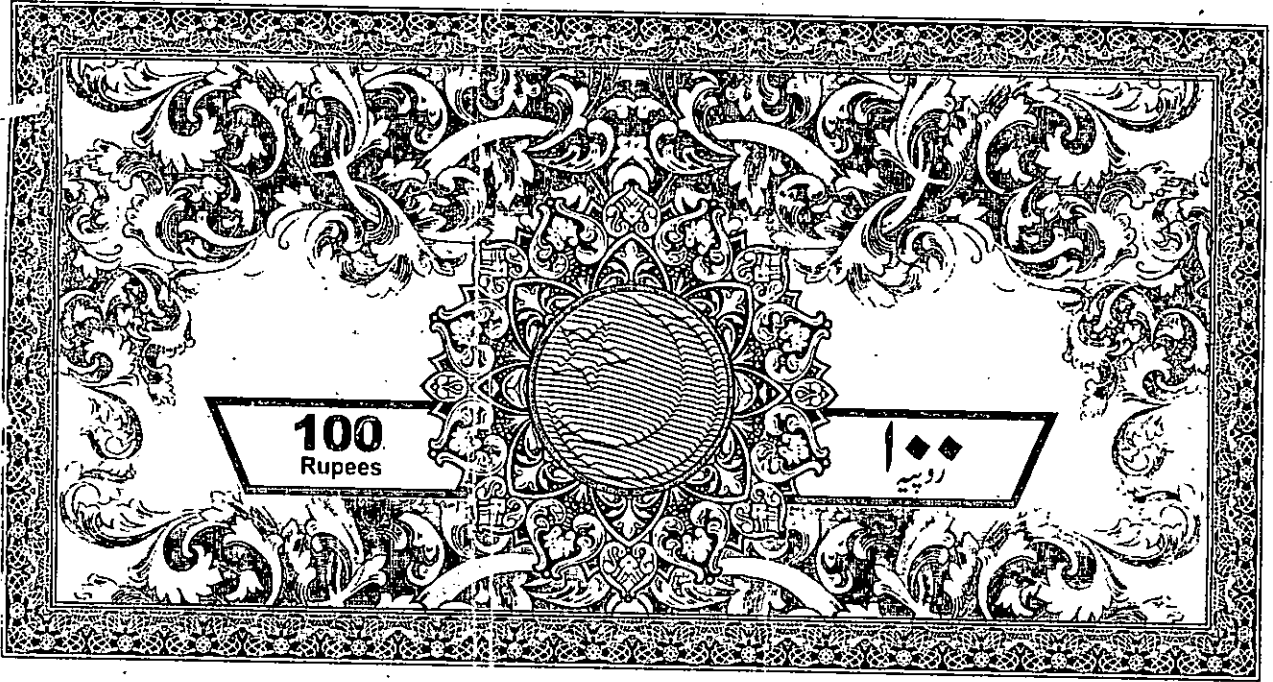
(مختیار نامہ خاص سروی مقدمہ)

منکہ مسی اعظم شہزاد ولد محمد اسلم سکند محلہ حاجی فیروز دین، تحصیل ضلع ایبٹ آباد۔ اقراری ہوں کہ مقدمہ عنوان عدالت حضور زیر تجویز ہے جس کی پیروی جو اب یہی ہے۔ من مقرر بوجہ مصروفیات ہونے اصالتاً حاضری و پیروی مقدمہ سے قاصر ہوں۔ آج بقائمی ہوش و حواس ختم رکھتے ہوئے اپنی جانب سے برادر حقیقی مسی انجم شہزاد ولد محمد اسلم سکند ایبٹ آباد (شناختی کارڈ نمبر: 5-4043659-13101) کو مختیار خاص مقرر کر کے اختیار دیتا ہوں کہ مختیار موصوف میری جانب سے مقدمہ ہذا کی پیروی کرے، مقدمہ ہذا پاکستان کی کسی بھی عدالت میں زیر سماعت مقدمہ ہو یا کیے جائیں کی پیروی کرے، دستبرداری دیوے، خرچہ گواہان وصول کرے، تقسیم کرے، رقم داخل کرے، رقم وصول کرے، ٹرانسفر کرے، کمیشن مقرر کرے، خرچہ جمع کیشن کرے، محکمہ مال رجسٹریشن آفس سے معاملات طے کرے، رٹ دائر کرے، ثبوت پیش کرے، تصدیق کرے، احکام مجاز کے روبرو پیش ہووے، قانونی کاروائی کرے، الترض جس طرح چاہے من مقرر کے تمام



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*[Handwritten scribbles]*

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19-05/2022

S.No. 166150

Name of Advocate محمد شمس الدین

DBA NO. 505R1517 TEA NO. 566A

BC No. 17-3227



R.s.200/=

وکالت نامہ

Handwritten notes and stamps in the top right corner.

بعدالت نواب سروس سٹریٹ جنرل جی بی روڈ حوالہ لیسٹا  
عنوان: منظم ہزارہانہ بنام محمد علی محمد لیسٹا سندھ  
منجانب: لیسٹا نوعیت مقدمہ سروس اسٹریٹ

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باعث تحریر آنکہ اسے آگے لے  
مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے واسطہ پیراں دو جا رہی ہیں۔ جس کی تفسیر مندرجہ مقام۔  
کو جب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوتا ہوں گا اور بروقت پکارے  
جانے مقدمہ کیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا۔ اگر پیشی پر مظہر حاضر نہ ہو اور مقدمہ میری غیر حاضری کی وجہ  
سے کسی طور پر میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طور پر ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صدر مقام پکھری کے  
علاوہ کسی جگہ یا پکھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل یا پیش ہونے پر مظہر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے  
کسی معاوضہ کے اور کرنے یا جتانے کے واجب نہیں کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پرداختہ صاحب موصوف  
مثمل کردہ ذات منظور و مقبول ہوگا اور صاحب موصوف کو عرض دعویٰ یا جواب دعویٰ اور درخواست اجراءے ڈگری و نظر ثانی اپیل گرانہ ہر قسم  
درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کرانے اور ہر قسم کاروبار وصول کرنے اور رسید دینے اور داخل کرنے  
اور ہر قسم کے بیان دینے اور اس پر غامشی و رضامندی نامہ فیصلہ بر حلقہ کرنے اقبال دعویٰ دینے کا بھی اختیار ہوگا اور بصورت جانے بیرونجات  
از پکھری صدر اپیل برآمدگی مقدمہ یا منسوخ ڈگری یا کلمہ در درخواست حکم امتناعی یا ترقی یا گرفتاری قبل از گرفتاری و اجراءے ڈگری بھی صاحب  
موصوف کو پیش بلا ادارہ کی علیحدہ و جتنی بیرونی کا اختیار ہوگا۔ اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ مذکور یا اس کے  
کسی جزوہ کی کارروائی کے یا بصورت اپیل کسی دوسرے وکیل کو اپنے بجائے یا اپنے ہمراہ مقرر کریں اور ایسے وکیل کو بھی ہر امر میں  
وہی اور ایسے اختیارات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ جہاں جہاں التوا پڑے گا وہ صاحب موصوف  
کاتق ہوگا۔ اگر وکیل صاحب موصوف کو پوری فیس بتاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ  
کی پیشی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔  
نہذا وکالت نامہ لکھ دیا ہے کہ سند ہے۔  
مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔  
2022 / 3 / 28 مورخہ: دن / ماہ / سال

منظم ہزارہانہ بنام محمد علی محمد لیسٹا سندھ

نوٹ: وکالت نامہ کی نوٹو کاپی قابل قبول نہ ہوگی  
Mia Saadiah Habib Dilazak  
Advocate High Court  
Chamber 11801 Hayat Sherwani Lawyers  
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