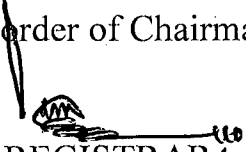


Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 1571/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	08/11/2022	<p>The appeal of Mst. Khalida Yasmin presented today by Mr. Imran Khan Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____.</p> <p>Notices be issued to appellant and her counsel for the date fixed.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

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

Service Appeal No 1571 /2022

Mst. Khalida Yasmin.....(Appellant)

V E R S U S

Hospital Director HMC/ MTI, Peshawar and
others.....(Respondents)

I N D E X

S.No.	Description of Documents	Annex	Pages
1.	Service Appeal		1-8
2.	Affidavit		9
3.	Addresses of the Parties		10
4.	Copy of certificate of the civil servant	A	11
5.	Copy of retirement order	B	12
6.	Copy of application for retirement	C	13
7.	Copy of pension to Accountant General/Respondent No. 3	D	14
8.	Copy of the sanction of recovery of overpaid salary by DG Health	E	15
9.	Copies of recovered amount and last pay certificate	F&G	16-17
10.	Copy of representation	H	18
11.	Copy of LPR	I	19
12.	Wakalat Nama		20



Appellant

Through



Dated: 08/11/2022

Imran Khan
Advocate High Court,
Peshawar.
Cell: 0333-9410989

①

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

Service Appeal No. 1571 /2022

Mst. Khalida Yasmin D/o Abdul Qayum, Ex-Charge Nurse,
BPS-16, MTI/HMC, Peshawar, presently residing at Namak
Mandi, Peshawar.....(Appellant)

V E R S U S

1. Hospital Director HMC/ MTI, Peshawar.
2. Director General Health Services, Khyber Pakhtunkhwa,
Health Directorate, Warsak Road, Peshawar.
3. The Accountant General Khyber Pakhtunkhwa, Fort Road,
Peshawar Cantt.
4. Government of Khyber Pakhtunkhwa through Secretary
Health, Civil Secretariat, Peshawar.....(Respondents)

**APPEAL UNDER SECTION 4 OF KHYBER
PUKHTUNKHWA SERVICE TRIBUNAL ACT
1974.**

PRAYER:

By accepting of this Service Appeal,

- a. The deduction/ recovery of Rs. 17,08,851/- (**14 months extra duty and also drawn salary accordingly**) from pension/ commutation of appellant may be declared illegal, unlawful, that since no fraud or foul committed by the appellant.

(2)

b. The deduction/ recovery from the pension/ commutation may kindly be ordered to be recovered to the appellant as she has performed her duty for that period.

Any other relief which has not been mentioned may also be granted in favour of appellant.

Respectfully Sheweth:

1. That the appellant is the peaceful law abiding resident of Khyber Pakhtunkhwa and being citizen of Pakistan she is entitled to all constitutional guarantees, included but not limited to right of life, due process as well as right of non discrimination etc.
2. That respondents are the governmental entities performing functions in connection with the affairs of the province, therefore, they are amenable to the jurisdiction of this Hon'ble Tribunal.
3. That the appellant was initially appointed at LRH as Staff Nurse on 02/02/1985 being civil servant.

4. That the appellant performed her duties in different hospitals of Khyber Pakhtunkhwa and on 01/02/2011 she was transferred to HMC Peshawar. (Copy of certificate of the civil servant is attached as annexure "A").

5. That the appellant perform her duty till 1st March 2022 instead of 15/01/2021 (14 months extra) duty and also drawn salary accordingly.

6. That the appellant got retired from service on attaining the age of superannuation i.e. 60 years from service on dated 19/04/2022 w.e.f. 14/01/2021. (Copy of retirement order is attached as annexure "B").

7. That on 22/03/2022 the application for retirement of the appellant was sent to the D.G. Health by HMC/ Respondent No. 1 for deduction of over payment of salary of 14 months, although it is pertinent to mention here that it remain undisputed that the appellant perform her duty for those 14 extra months. (Copy of application for retirement is attached as annexure "C").

69

8. That the case of the appellant was sent to the Accountant General KP (Respondent No. 3) for pension/commutation on dated 22/07/2022 by HMC (Respondent No. 1). (Copy of pension to Accountant General/Respondent No. 3 is attached as annexure "D").

9. That the D.G Health/respondent No. 2 has accorded the sanction for recovery of overpaid salary from the pension/ commutation of appellant. (Copy of the sanction of recovery of overpaid salary by DG Health is attached as annexure "E").

10. That the appellant when received pension/ commutation from respondent No. 3, she shocked to know that Rs. 17,08,851/- rupees has been deducted from her pension/commutation as overpaid salaries of 14 months. (Copies of recovered amount and last pay certificate are attached as annexure "F" & "G").

- (7)
11. That the appellant has submitted an application/ representation to Secretary Health KP/ Respondent No. 4 being employee of provincial government against the deduction/ recovery in her pension/ commutation. (Copy of representation is attached as annexure "H").
 12. That so far 90 days has been passed but the representation of appellant has not been decided by respondent/ Secretary Health.
 13. That the appellant having no other adequate alternate remedy, but to approach this Hon'ble Tribunal for redressal of her grievances, on the following grounds:

GROUND:

- A. That as per the judgment of Hon'ble Supreme Court of Pakistan reported in "PLD 2013 SC Page-829" wherein the apex Court held that ***no direction for the recovery of pension and emoluments already availed by them can be given, as the same are undoubtedly not obtained by them on***

6

account of any commission of wrong, fraud or fault on their part.

- B. That it remain undisputed that the appellant had ever committed a fraud or foul by performing duties for those extra 14 months.
- C. That the negligence of the retiring department cannot be shifted to the appellant as the proper account section and HR Section is for employee, and their salaries, pension, commutation, retirement, transfer etc. (Copy of LPR is attached as annexure "1").
- D. That instead of fixing the responsibility on the hospital management the appellant cannot be punished in shape of recovery/ deduction to the already paid salary from her pension/ commutation.
- E. That the respondent could not be allowed to bypass the law and acted on their own free will and caprice as their actions are amenable to the jurisdiction of this Hon'ble Tribunal.

- F. That no premium should be provided to the HMC that they were unaware about the appellant extra duty and no timely action was taken, if an error or omission/ negligence is committed then the act of the respondents should not prejudice the appellant.

- G. That 14 months is a considerable time as the appellant is a Cancer patient and she has spent and consumed the already received salary and the possibility that the appellant being cancer patient needed money for treatment and to avoid the dependency on others cannot be ruled out.

- H. That appellant will take other grounds at the time of arguments with the prior permission of this Hon'ble Tribunal.

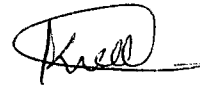
It is, therefore, most humbly prayed that by accepting of this Service Appeal,

- c. The deduction/ recovery of Rs. 17,08,851/- **(14 months extra duty and also drawn salary accordingly)** from pension/ commutation of

appellant may be declared illegal, unlawful, that since no fraud or foul committed by the appellant.

d. The deduction/ recovery from the pension/ commutation may kindly be ordered to be recovered to the appellant as she has performed her duty for that period.

Any other relief which has not been mentioned may also be granted in favour of appellant.



Appellant

Through



Imran Khan
Advocate High Court,
Peshawar.

Dated: 08/11/2022

9

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

Service Appeal No. _____/2022

Mst. Khalida Yasmin.....(Appellant)

V E R S U S

Hospital Director HMC/ MTI, Peshawar and
others.....(Respondents)

AFFIDAVIT

I, Mst. Khalida Yasmin D/o Abdul Qayum, Ex-Charge Nurse, BPS-16, MTI/HMC, Peshawar, presently residing at Namak Mandi, Peshawar, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.



DEPONENT

CNIC No. 17301-5708165-6

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

Service Appeal No. _____/2022

Mst. Khalida Yasmin.....(Appellant)

V E R S U S

Hospital Director HMC/ .MTI, Peshawar and others.....(Respondents)

ADDRESSES OF THE PARTIES

APPELLANT:

Mst. Khalida Yasmin D/o Abdul Qayum, Ex-Charge Nurse, BPS-16, MTI/HMC, Peshawar, presently residing at Namak Mandi, Peshawar.

RESPONDENTS:

1. Hospital Director HMC/ MTI, Peshawar.
2. Director General Health Services, Khyber Pakhtunkhwa, Health Directorate, Warsak Road, Peshawar.
3. The Accountant General Khyber Pakhtunkhwa, Fort Road, Peshawar Cantt.
4. Government of Khyber Pakhtunkhwa through Secretary Health, Civil Secretariat, Peshawar.

Appellant

Through

Imran Khan
Advocate High Court,
Peshawar.

Dated: 08/11/2022

"A"

(11)

**HAYATABAD MEDICAL COMPLEX
PESHAWAR**



CERTIFICATE

Certificate that Miss. Khalida Yasmin d/o Mufti Abdul Qayum working as Ex-Charge Nurse BPS-17 is/was a permanent employee of the Provincial Government and is /was a regular contributor to the Benevolent Fund from the date of her appointment to date of retirement.

DIRECTOR FINANCE
Hayatabad Medical Complex
Peshawar

DIRECTOR FINANCE
HAYATABAD MEDICAL COMPLEX
PESHAWAR.


TESTED

DIRECTOR FINANCE
HAYATABAD MEDICAL COMPLEX
PESHAWAR.



"B"

(12)

**DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR**

All communications Should be Addressed to The Director General
Health Services Peshawar and not to any official by name
Office Ph (091 - 9210269 Exchange ☎ 091 - 9210187, 091 - 9210196 Fax ☎ 091 - 9210230

OFFICE ORDER

On attaining the age of Superannuation i.e.60 years Mrs. Khalida Yasmin D/O Abdul Qayum, Charge Nurse BS-16 MTI, HMC Peshawar stood retired from Govt: Service w.e.from 14.01.2021.

Sd/-
DIRECTOR GENERAL HEALTH
SERVICES, KP PESHAWAR.

No. 2051-54 /E.II, Dated Pesh. The 19/4 /2022.

Copy forwarded to the:-

01. Hospital Director, MTI, HMC Peshawar with reference to his letter No. 6327/MTI-HMC/HR-II dated 22.03.2022. He is requested to recovery all salaries drawn by the Charge Nurse concerned beyond 14.01.2021 and deposit in the Govt. Treasury.
02. Accountant General, Khyber Pakhtunkhwa Peshawar.
03. Charge Nurse concerned.
04. DA-concerned DGHS KP Peshawar.

For information and n/action.

DIRECTOR (HRM)
DIRECTORATE GENERAL HEALTH
SERVICES, KP PESHAWAR

7
19/4/2022

ATTESTED

MANAGER HR, HR DEPARTMENT
MTI-HAYATABAD MEDICAL COMPLEX
Peshawar, Khyber Pakhtunkhwa, PAKISTAN



Tel: Off: 92 (0) 91-9217188

Fax: No: 92 (0) 91-9217189

Tel: Exch: 92- 91-9217140-47

www.hr@hmckp.gov.pk

Dated: / /2022

No. 6327 /MTI-HMC/HR-II

To

The Director General,
Health Service, Khyber Pakhtunkhwa Peshawar

Subject: APPLICATION FOR RETIREMENT
Sir,

Enclosed please find herewith an application alongwith the following documents, on the subject cited above, in respect of **Ms. Khalida Yasmeen d/o Mr. Abdul Qayum** Charge Nurse BPS-16 MTI-HMC for further necessary action:-

1. Copy of CNIC
2. Copy of SSC DMC
3. Copy of Service Book
4. Leave Account Proforma (in original)

It is further added that she has performed duty till **1st March 2022** instead of **15-01-2021** (14 months extra duty) & also drawn salary accordingly.

Therefore, her 14 months salary in lieu of overpayment may be deducted in final pension contribution.

MANAGER (HR)
HAYATABAD MEDICAL COMPLEX
PESHAWAR

No. 6328-33 /MTI/HMC/HR-II

Dated: 22/03/2022

Copy forwarded to the:-

1. Hospital Director, MTI-HMC.
2. Director Nursing & Paramedical staff, MTI-HMC.
3. Director Finance, MTI-HMC with the request, overpayment of **14 months** may be deducted from her final settlement.
4. Superintendent HR, MTI-HMC.
5. Supervisor (HR-MIS), MTI-HMC.
6. Ms. Khalida Yasmeen d/o Mr. Abdul Qayum Charge Nurse BPS-16, MTLHMC.

ATTESTED

MANAGER (HR)
HAYATABAD MEDICAL COMPLEX
PESHAWAR

DIRECTORATE OF FINANCE & ACCOUNTS

Hayatabad Medical Complex,
Khyber Girls Medical College,
Institute of Kidney Diseases,
Pakistan Institute of Community Ophthalmology,
Khyber Institute of Child Health,
Khyber Pakhtunkhwa, Peshawar.



Tel: Of: 92 (0) 91-9217107
Fax: No: 92 (0) 91-9217189
www.hhpcpeshawar.com.pk
Ref: 4859 /IMG/ED
Date: 22/07/2022

(14)

To
The Accountant General,
Khyber Pukhtunkhwa, Peshawar.

Attention:- Accounts Officer (Pension).

Subject: PENSION CASE IN R/O MST.KHALIDA YASMIN (EX-CHARGE NURSE B-16) HMC PESHAWAR.

Sir,
Kindly refer to your office letter No.Pen-l/k-1/2021-23 dated: 07.07.2022 (copy attached).

The para-wise observations and their replies may be seen as below:-

1. Retirement order was issued ON 19.04.2022 vide No. 2051-54/EII Dated 15.03.2017 by DGHS (copy attached) pension case was not delayed from HMC the pension case submitted on time by HMC.
2. Revised LPC issued and recovery amounting to Rs.121,746/- (in pay and allowances duly signed is attached) may be recovered in pension lump sum.
3. Overpayment of Rs.1,622,973/- w.e. from 14.01.2021 to 28.02.2022 (in pay and allowances) may be recovered from pension as per DGHS order issued by ADD: Director General (HRM) DGHS KP. (copy attached).
4. Entries regarding pay fixation for the period from 01.12.2010, to 01.12.2020 is signed as desired.
5. Retirement order of the Govt. servant is recorded in service book on page No.9 part-II.
6. Certificates regarding Consolidated Service w.e.01.06.1986 to 14.01.2021 recorded on page 9 part-II duly signed.

ENCL: (Original Service Book, Original Pension Papers and other relevant documents).

ATTESTED

FINANCE DIRECTOR
HAYATABAD MEDICAL COMPLEX
PESHAWAR



DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR

All correspondence should be addressed to The Director General
 Health Services Peshawar and not to any official by name
 Office Tel: 9210196 Fax: 9210197, 9210198, 9210199, 9210200, 9210201, 9210202, 9210203, 9210204, 9210205, 9210206, 9210207, 9210208, 9210209, 9210210, 9210211, 9210212, 9210213, 9210214, 9210215, 9210216, 9210217, 9210218, 9210219, 9210220, 9210221, 9210222, 9210223, 9210224, 9210225, 9210226, 9210227, 9210228, 9210229, 9210230

Subject: ISSUING OF NO DEMAND CERTIFICATE AND HISTORY OF SERVICE.
 Memo:

I am forwarding service history in respect of Mrs. Khalida Yasmin D/O Abdul Qayum Ex-Charge Nurse (BPS-16) MTI, HMC Peshawar. She has served in the following Health Institution from her 1st appointment

S.No.	Name of Institution	From	To
01	LRH Peshawar	02.02.1985	28.06.1989
02	KCD Peshawar	29.06.1989	02.09.1998
03	THQ Hospital Tangi (Charsadda)	03.09.1998	20.05.1999
04	LRH Peshawar	21.05.1999	15.09.2000
05	DHO Hospital, Landikotal	16.09.2000	30.01.2002
06	HMC Peshawar	31.01.2002	31.10.2010
07	DHO Hospital, Mansehra	01.11.2010	31.01.2011
08	HMC Peshawar	01.02.2011	14.01.2021

Moreover, she was neither involved in any departmental / judicial / Anti-corruption case nor there is any Govt dues outstanding against her. The recovery of overpaid salary from 14.01.2021 (14 months) may be made from her in pension.

(This certificate issued for the purpose of Pension case)

ADD: DIRECTOR GENERAL (HRM)
DIRECTORATE GENERAL HEALTH
SERVICES, KP PESHAWAR

10/11/2022

Deputy Director (Accounts)
 DGHS Office Peshawar.

U.O.No. 3157 /E.II.
 Dated 16.11/2022.

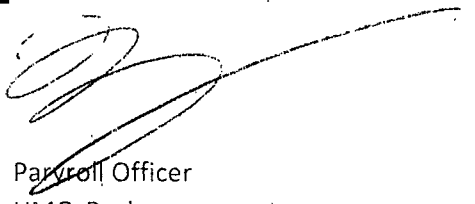
ATTESTED

"F"

(16)

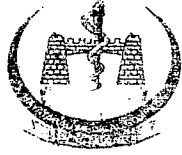
OVERPAYMENT TO MS. KHALIDA YASMIN D/O ABDUL QAYUM
EX-CHARGE NURSE, HMC

Months	Amount
17 days Jan, 2021	66323
Feb, 2021	117040
Mar, 2021	117040
Apr, 2021	117040
May, 2021	117040
June, 2021	117040
Jul, 2021	117040
Aug, 2021	133272
Sep, 2021	133272
Oct, 2021	133272
Nov, 2021	134272
Dec, 2021	135400
Jan, 2022	135400
Feb, 2022	135400
TOTAL	1,708,851



Payroll Officer
HMC, Peshawar.


ATTESTED



'G' (17)
HAYAT ABAD MEDICAL COMPLEX, PESHAWAR

NO. 4710 /DDF/HMC

DATED: 16 /05/2022

LAST PAY CERTIFICATE

1. Last pay certificate of MS. KHALIDA YASMIN D/O ABDUL QAYUM, CHARGE NURSE (BPS-16) of HMC, Peshawar. She is stand retired from service w.e.f. 14.01.2021 (F.N) vide Notification No. 2574-77/E.II, Dated: 26.04.2022, Endorsement vide No. 9849-58/MTI-HMC/HR-II, Dated: 16.05.2022, salary paid up to 28-02-2022 (AN) at the following rates (for the purpose of pension) :-

Personal No. (000-00-506374)	PAY AND ALLOWANCES		DEDUCTION	
Bank Name NBP Branch Code 1759 A/C No. 3011706976 C.N.I.C # 17301-5708165-6 G.P Fund A/C # JM/014983	Substantive Pay	62990	Benevolent Fund	800
	House Allowance	4091	RB&DC	650
	Conveyance Allowance	0	G.P Fund	3340
	Medical Allowance	2811	Income Tax	433
	Adhoc Relief 2013	1420	Electric Charge	300
	Adhoc Relief 2015	943	Gas Charges	200
	Adhoc 2016	4788	Room Rent	200
	Adhoc 2017	6299		0
	Adhoc 2018	6299		
	Adhoc 2019	6299		
	Professional Allowances	10000	Total Deductions	5923
	Dress Allowance	3100		
	Mess Allowance	8000		
		0		
	Gross Pay	117040		
Net amount payable	Rs. 111,117/-			

2. She relinquished the charge of the office of the Hospital Director, HMC on 14.01.2021 (F.N.)
3. She has drawn pay till Feb, 2022 which will be recovered and deposited in Govt. Treasury as mentioned in leave encashment order.

Payroll Officer
HAYAT ABAD MEDICAL COMPLEX PESHAWAR.
16.05.2022

ATTESTED

DIRECTOR FINANCE
HAYAT ABAD MEDICAL COMPLEX, PESHAWAR.

جناب ڈاکٹر سید سعید سعید شاہ "H"

دو فرسٹ ہیرا ڈی ایس (1708) ڈاکٹر سعید سعید شاہ کے پیش سے غیر قانونی طور پر ہمارے لئے ڈس

جناب عالی

یہ کہ سائلہ خالدہ یا سہیل Ex-Charge Nurse BPS-16-MTE HMC Peshawar

دیوٹی سرانجام دے رہی تھی جس نے اپریل 2022 تک

یہ کہ سائلہ (Cancer) کی سرسختی سے متاثر اس کے باوجود سائلہ نے اپنی ڈیوٹی کے لیے طرے سے انجام دی اور کوئی چھٹی وغیرہ نہیں لی۔

یہ کہ سائلہ کو ایف جی کے دو (HMC) کے انتظامیہ میں ریٹائرمنٹ کے

معلق تھے جسے نہیں کیا اور نہ سائلہ کو اپنی ریٹائرمنٹ کا کوئی علم تھا۔

یہ کہ اپریل 2022 کو سائلہ (HMC) کے انتظامیہ کے کام سے دوما لہ نہ کیا

کہ اس کام نہ کر کے اسے ریٹائر ڈیوٹی سے

یہ کہ سائلہ کو بتایا گیا کہ آپ نے (14) مہینے زیادہ کام کیا ہے

یہ کہ سائلہ کی (14) مہینوں کی تنخواہ جو کہ 17 لاکھ بنتی ہے سائلہ کی

پینشن سے کافی کم ہے۔ جو کہ سراسر زیادتی ہے اور سائلہ کی عمر پندرہواں بارہوی

14 مہینے ڈیوٹی نہ انجام دی۔

لہذا استدعا ہے کہ یہ درخواست منظور کر کے سائلہ کی 17 لاکھ تنخواہ کی رقم اسے کر دیا جائے۔

صفحہ 28/7/2022

سید سعید

سائلہ خالدہ یا سہیل

ATTESTED

(19)

" I "



TO BE SUBSTITUTED FOR THE SAME NUMBER AND DATE.
DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR

All communications Should be Addressed to The Director General
Health Services Peshawar and not to any official by name
Office Ph (091 - 9210269) Exchange # 091 - 9210187, 091 - 9210196 Fax # 091 - 9210230

OFFICE ORDER

Sanction is hereby accorded to the grant of 365 days encashment in lieu of LPR in favour of Mrs. Khalida Yasmin D/O Abdul Qayum, Charge Nurse BS-16 MTI, HMC Peshawar as admissible to her under the revised leave Rules, 1981.

Sd/-
DIRECTOR GENERAL HEALTH
SERVICES, KP PESHAWAR.

No. 2574-77 /E.II,

Dated Pesh. The

26 / 04 / 2022.

Copy forwarded to the:-

01. Hospital Director, MTI, HMC Peshawar with reference to his letter No. 6327/MTI-HMC/HR-II dated 22.03.2022, The recovery of over paid salaries beyond 14.01.2021 will be made in pension.
02. Accountant General, Khyber Pakhtunkhwa Peshawar.
03. Charge Nurse concerned.
04. DA-concerned DGHS KP Peshawar.

For information and n/action.

DIRECTOR (HRM)
DIRECTORATE GENERAL HEALTH
SERVICES, KP PESHAWAR
7/27/4/2022

MANAGER HR, MTI-HAYATABAD MEDICAL COMPLEX, PESHAWAR

No. 9849-58 /MTI-HMC/HR-II

Dated: 16/05/2022

Copy forwarded to the:-

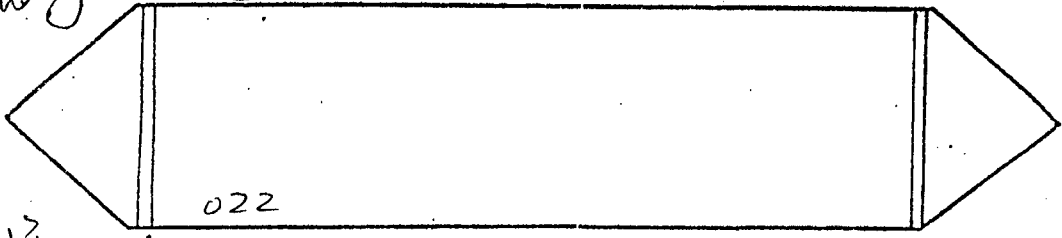
1. Hospital Director MTI-HMC.
2. Director (HRM), DGHS office Khyber Pakhtunkhwa Peshawar.
3. Director Nursing & Paramedics, MTI-HMC.
4. Director Finance, MTI-HMC with the request to recover all salaries (14 months) drawn by the charge nurse concerned beyond 14-01-2021 and deposit in the Govt: Treasury.
5. Internal Auditor, MTI-HMC.
6. Manager IT, MTI-HMC.
7. Provost, MTI-HMC
8. Superintendent HR, MTI-HMC.
9. DA (HR-MIS), MTI-HMC.
10. Charge Nurse concerned.

MANAGER (HR)
HAYATABAD MEDICAL COMPLEX
PESHAWAR

ATTESTED

16-May-22

بعدالت، صاحب، جسٹس سروس ٹریڈیونل صاحب ساہو



2 پنجاب سائیل/10/10

Director HMCY
MTI
Peshawar.

موزخه
مقدمه
دعوی
جرم

باعث تحریر آنکھ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ /
آن مقام لکھا اور کیلئے نگران اور وکیل کے لئے لکھو
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ بر حلف دینے جواب دہی اور اقبال دعویٰ اور
بسورت ڈگری کرنے اجراء اور صولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرایں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو ہمیشی وہی جملہ مذکورہ اختیارات حاصل ہوں گے اور اس کا ساختہ
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ دہر جائد التوائے مقدمہ کے سبب سے ہوگا۔
کوئی تارتخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
مذکورہ کریں۔ لہذا وکالت نامہ لکھ دیا کہ مندر ہے۔

المرقوم 9 ماہ 20 22

Attest and sign

B.C No- 09-0026
0333-9410989

ساعر بمقام

ظالون یا سمن 9 عبد الصغیر سلیہ علی مندی ساہو