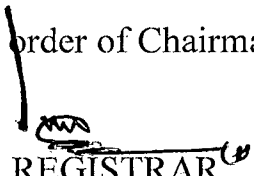


Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 1566/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	07/11/2022	<p>The appeal of Mr. Fazal Mabood presented today by Mr. Mujeeb Ullah Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____.</p> <p>Notices be issued to appellant and his counsel for the date fixed.</p> <p style="text-align: right;">By the order of Chairman</p> <p style="text-align: right;"> REGISTRAR</p>

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

- Service Appeal No. 1566/2022

Fazal Mabood

VERSUS

Govt of Kp & Others

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5	Copy of leave sanctioned order dated 6-11-2019	B	8
6	Medical receipts of father illness	C	9-11
7	Copy of impugned office order dated 15-06-2022	D	12
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	Wakalatnama		19


Appellant

Through:


Mujeeb Ullah
Advocate High Court,

Khalid & Law Associates
46 C, Cantonment Plaza
2nd Floor, Peshawar, Sadar.

Cell No. 03018521721

①

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal No. 1566 /2022.

Fazal Mabood S/O Fazal Haq Junior Technician (Patbology BPS-12) Central Prison Mardan R/O Village Godar, P/O Munda, Tehsil Samarbagh, District Dir Lower.
.....APPELLANT

VERSUS

1. Govt; of Khyber Pakhtunkhwa through Secretary Home & Tribal Affairs Department, Secretariat Peshawar.
2. Inspector General of Prison Khyber Pakhtunkhwa, Peshawar
3. Deputy Director (E) Prison Khyber Pakhtunkhwa, Peshawar
4. Superintendent Central Prison Mardan

.....RESPONDENTS

APPEAL UNDER SECTION 04 OF THE KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL ACT 1974, AGAINST THE OFFICE ORDER DATED 15/06/2022 WHEREBY APPELLANT WAS REMOVED FROM SERVICE WITH EFFECT FROM THE DATE OF ABSENCE FROM THE DUTY AND AGAINST THE ORDER DATED 22/09/2022 OF THE RESPONDENTS WHEREBY DEPARTMENTAL APPEAL OF THE APPELLANT HAS BEEN DISMISSED.

Prayer:

By accepting the instant appeal, the impugned order dated 15/06/2022 & 22/09/2022 may kindly be set aside and the Respondents may kindly be directed to reinstate the appellant with all back benefits. Any other relief, which this Honorable Court deems fit and appropriate may also be granted to the Appellant for the ends of justice.

Respectfully Sheweth:

Brief facts leading to the instant appeal are;



1. That Appellant is well qualified is law abiding citizen of Pakistan and belongs to respectable family of Dir Lower.
2. That Appellant was appointed as Junior Technician vide office order dated 29-06-2018 by Respondent No. 02 and lastly posted at Central Prison Mardan.
{Copy of appointment order dated 26-06-2018 is annexed as A}
3. That in pursuance of the aforementioned appointment order, the Appellant served the department with sheer zeal and dedication to the utmost satisfaction of his superiors and till date no complaint whatsoever had been received from any corner of life
4. That the appellant submitted an application to the worthy Inspector General of Prisons Khyber Pakhtunkhwa Peshawar, for Two years i.e. (730 Days) extra ordinary leave/ leave without pay on 06-11-2019. The application was processed and was approved and leave was sanctioned for a period of two years started from 12-02-2020 till 15-02-2022
{Copy of leave sanctioned order dated 6-11-2019 is annexed as B}
5. That Appellant is law abiding citizen of Pakistan and is the only bread winner for their family resumed back his duties from 15-02-2022.
6. That the Appellant had a serious domestic issue of father illness, his father was already suffering psychological disease/disorder from few years and the case became worst, his father lost his memory and was out of self-control/Disruptive behavior.
{Medical receipts of father illness are annexed as C}
7. That it is worth to mention that during the aforementioned period the Appellant was eager for healthy life of his father what to say about application for grant of leave or any other communication in respect of his absence. In the meanwhile the Appellant was shocked when he received Removal from service order dated 15-06-2022 from Respondents.
{Copy of office order dated 15-06-2022 is annexed as D}

8. That the Appellant being interested in the services immediately filed Departmental Appeal before the Appellate authority on 14/07/2022, which was decided on 22/09/2022.

{Copies of Departmental Appeal and order dated 30-09-2022 are annexed as E & F}

9. That Appellant being aggrieved from the order dated 22/09/2022 whereby departmental appeal of the Appellant was not considered, having no other efficacious remedy available except to approach this Hon'ble Tribunal inter alia on the following grounds.

G R O U N D S

- A. That the impugned office order dated 15/06/2022 & 22/09/2022 of Respondents are wrong, illegal, unfounded, unconstitutional, based on colorable exercise of power, hence, is liable to be set aside.
- B. That the impugned office orders issued by Respondents are in sheer violation of the Fundamental Rights guaranteed to the Appellant as envisaged under the Constitution of Islamic Republic of Pakistan 1973. As well as against Article 10-A of the Constitution, wherein no opportunity of hearing has been given to the Appellant.
- C. That the Appellant has not been treated in accordance with law and rules by the Respondents Department on the subject noted above and as such the Respondents violated Article 4 & 25 of the Constitution of Islamic Republic of Pakistan 1973.
- D. That no show cause notice, charge sheet, and statement of allegations has been issued to the Appellant which is mandatory under the rules before imposing major penalty of removal from service.
- E. That neither regular inquiry has been conducted nor has any notice of absentee and publication has been made by the Respondents which is mandatory under the rules before imposing major penalty.
- F. That due a high level of mental and financial stress, appellant was unable to communicate with department. The Appellant had no chance and, there was no

other single person at his home to deal or receive any notice or to reply for any departmental matter. Moreover, the case of Appellant is the case of hardship and absence of the Appellant is not intentional rather due to the serious disease of his father, own mental/family and financial stress issues mentioned above which is beyond his control.

- G. That the whole proceedings took place on malafide; ill will intentions and just to harass the appellant, which is violation of fundamental rights guaranteed by Constitution of Islamic Republic of Pakistan 1973.
- H. That any other ground will be taken at the time of arguments with the kind permission of this Honorable Court.

In wake of above, stated facts circumstance and documented evidence, the impugned removal order / ex-parte proceedings dated 15-06-2022, may kindly be set aside and the Appellant may kindly be reinstated with all back benefits by exonerating the Appellant from the charges levied against the under signed.


Appellant

Through

Mujeeb Ullah 
Advocate High Court,

Khalid & Law Associates
46 C, Cantonment Plaza
2nd Floor, Peshawar, Sadar.
Cell No. 03018521721

5

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal No. _____/2022.

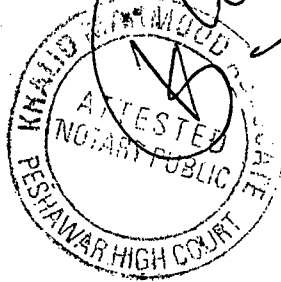
Fazal Mabood

VERSUS

Govt of Kp & Others

AFFIDAVIT

I Fazal Mabood S/O Fazal Haq Junior Technician (Pathology BPS-12) Central Prison Mardan R/O Village Godar, P/O Munda, Tehsil Samarbagh, District Dir Lower do, hereby solemnly affirm and declare that the contents of the instant appeal are true and correct to the best of my knowledge and belief, and nothing has been concealed from this Honorable Court.



Handwritten signature of Fazal Mabood

DEPONENT

6

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal No. _____/2022.

Fazal Mabood

VERSUS

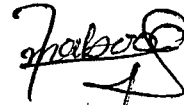
Govt of Kp & Others

Appellant:

Fazal Mabood S/O Fazal Haq Junior Technician (Pathology BPS-12) Central Prison Mardan R/O Village Godar, P/O Munda, Tehsil Samarbagh, District Dir Lower.

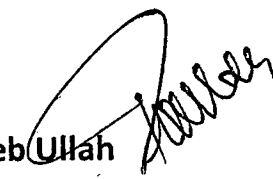
Respondents:

1. Govt; of Khyber Pakhtunkhwa through, Secretary Home & Tribal Affairs Department, Secretariat Peshawar.
2. Inspector General of Prison Khyber Pakhtunkhwa, Peshawar
3. Deputy Director (E) Prison Khyber Pakhtunkhwa, Peshawar
4. Superintendent Central Prison Mardan



Appellant

Through:



Mujeeb Ullah
Advocate High Court,

Khalid & Law Associates
46 C, Cantonment Plaza
2nd Floor, Peshawar, Sadar.
Cell No. 03018521721

Annex A

INSPECTOR GENERAL OF PRISONS
KHYBER PAKHTUN KHWA PESHAWAR

No. M/557

Dated 29-01-16

OFFER OF APPOINTMENT

Upon recommendation of the Departmental Selection Committee Mr. Fazal Mahmood S/O FAZAL MAHOOD is hereby appointed to and a post of Junior Technician (Pathology DPS-12) in the Khyber Pakhtunkhwa Prison Department in Grade Pay Scale Rs. 13320-960-42120 plus other allowances on the following terms and conditions:

- 1) The appointment will be effective from the date of joining duty at his place of posting.
- 2) The appointment is purely temporary and the services are liable to be terminated at any time or for any reason without assigning any reason.
- 3) No T/A will be admissible to him for joining duty.
- 4) In case he wishes to resign at any time he will give one month notice. If he resigns before one month's notice will be required from him subject to the discretion of the competent authority in public interest and will leave the matter open to acceptance of his resignation.
- 5) The appointment is subject to Medical fitness for Government Service.
- 6) He will be eligible for consideration on the post if his work and conduct remained satisfactory and on the expiry of his temporary appointment provided the vacancy is not filled by a permanent appointment.
- 7) He will be on probation for a period of one year extendable upto another year. During probation period his services will be terminated if his work and conduct is not found satisfactory on the expiry of probation.
- 8) All terms and conditions of his service will be those as laid down in the Prison Department Rules 1986.
- 9) He will not be able to serve anywhere in the Prison Department in the Khyber Pakhtunkhwa.
- 10) He will be liable to impose such as Pay, T/A and Medical Attendance etc; he will be governed by such Rules as may be issued by the Government for the category of Government Servants of the Prison Department to which he will belong.
- 11) He will be governed by the Khyber Pakhtunkhwa Government Servants (Conduct) Rules 1986, the Khyber Pakhtunkhwa Civil Servants (Appeal) Rules 1980, the Khyber Pakhtunkhwa Civil Servants Act 1973, the Civil Servants (Appointment, Promotion and Transfer) Rules 1984, the Khyber Pakhtunkhwa (Govt) 2011 and all other rules / regulations framed or to be framed by the Government from time to time.
- 12) His services will be liable to termination / reversion at any stage if his Academic Certificate / Degree / Dip. / CNIC, Domicile etc are found fake, his services will be considered as terminated automatically and FIR will be lodged against him.
- 13) His salary will be released after making proper verification of his, Domicile, and Academic Qualification Certificate / Degree / Diploma etc; from the quarter concerned. Moreover, if any verification charges are involved on this account, the same will be paid by the appointee.

If he accepts the appointment on the above mentioned terms and conditions, he should report to the Superintendent, Central Prison Mardan within fifteen (15) days of the receipt of this offer of appointment. In case he fails to join duty within the specified period the offer of appointment will be treated as cancelled / withdrawn.

INSPECTOR GENERAL OF PRISONS,
KHYBER PAKHTUNKHWA, PESHAWAR.

Under No. M/557-60

Copy of the above is forwarded to:

- 1) The Superintendent, Central Prison Mardan for information. On arrival of the above named officer at Mardan, necessary action should be taken on judicial stamp paper from him to the effect that he has accepted all terms and conditions contained in the offer of his appointment and a copy of the offer for record. This condition No. 13 may be fulfilled before releasing him on duty as far as possible. The Nominal Roll forms should also please be put in the office and submit to the office which is enclosed herewith.
- 2) The District and District Officer concerned for information.
- 3) Mr. Fazal Mahmood S/O Fazal Hussain Resident of P/O Munda village Shalkundi, Mosabud now Munda village for information and necessary action.

ATTESTED

INSPECTOR GENERAL OF PRISONS,
KHYBER PAKHTUNKHWA, PESHAWAR.



Annex B

(8)

OFFICE OF THE
INSPECTOR GENERAL OF PRISONS
KHYBER PAKHTUNKHWA
PESHAWAR

091-9210334, 9210408 091-9213445

No. 67/217018 35852-1

Dated 6-11-2019

ORDER

Mr. Fazal Mabood Junior Technician Pathology (BPS-12) attached to Central Prison Mardan is hereby granted (730) seven hundred and thirty days extraordinary leave (without pay) from the date of availing.

Certified that he is likely to return to the same or similar post on the expiry of this leave.

INSPECTOR GENERAL OF PRISONS,
KHYBER PAKHTUNKHWA PESHAWAR.

ENDST; NO. 35853-54

Copy of the above is forwarded to :-

1. The Superintendent, Central Prison Mardan for information and necessary action with reference to his letter No.6262-WE dated 03-09-2019. Date of availing of leave by the official concerned may be intimated through Fax.
2. The District Accounts Officer Mardan for information.

06/11
o/e
ASSISTANT DIRECTOR,
FOR INSPECTOR GENERAL OF PRISONS,
KHYBER PAKHTUNKHWA PESHAWAR.

ATTESTED

GSS PD. 2263/235-P. ds. 11.08.16/P4(2)/Form Store Jobs/Med. 2

Medical No. 2

Rs. 10/-

No.

OUT-PATIENTS DEPARTMENT

NAME

YEARLY NO.

DATE

No.

Rs. 10/-

OUT-PATIENTS DEPARTMENT

NAME

YEARLY NO.

DATE

DISEASE

FACE VALUE RUPEES 10/- FACE VALUE RUPEES 10/-

Insomnia
Mood disorder
Lab. Quantum 100mg
1/10/22

Lab. Risperidone 1/10/22

Lab. Mirtazapine 30mg
1/10/22

ATTESTED



40

Medical No. 2

Rs. 10/-

No.

OUT-PATIENTS DEPARTMENT

NAME

YEARLY NO.

DATE

No.

Rs. 10/-

OUT-PATIENTS DEPARTMENT

NAME Fazal Haq

YEARLY NO.

DATE 18/11/2021

DISEASE

FACE VALUE RUPEES 10/- FACE VALUE RUPEES 10/-

Mood disorder

Insomnia

No. ~~see~~ sleep

Disturbance

Tab. Tramal plus

30 - 12

Tab. Lenormid 37

1/2 on 3/4

Tab. Savolun 37

1/2 on 3/4

ATTESTED
[Signature]

11

Medical No. 2 Rs. 10/-

No. OUT-PATIENTS DEPARTMENT

NAME

YEARLY NO.

DATE

No. Rs. 10/-

OUT-PATIENTS DEPARTMENT

NAME *Fazal Haq*

YEARLY NO.

DATE *23/03/22*

DISEASE

FACE VALUE RUPEES 10/- FACE VALUE RUPEES 10/-

*Insomnia.
behavioral change,
& lack of interest
in daily activity*

*Tab: HP 25mg
1/10 - 5/10*

*Tab: Risperidon 1mg
1/10 - 5/10*

*Tab: Calcium 10mg
1/10 - 5/10*

ATTESTED *[Signature]*



Annex D (12)

INSPECTORATE GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR

001-0210334, 0210406 091-0213446
No. 69/2-J-2018-19233-1
Dated 15-6-2022-1

ORDER

WHEREAS, Mr. Fazal Mabood Junior Technician Pathology (BPS-12) posted to Central Prison Mardan absented himself from duty with effect from 02-03-2022 till date without prior permission of the competent authority as reported by Superintendent Central Prison Mardan vide notice served under letter No. 004 dated 14-03-2022. Later on another notice was served on him at his home address vide this office letter No. 89/2-J-18-11751 dated 28-03-2022 with the direction to resume duties immediately failing which disciplinary action could be initiated against him under the Khyber Pakhtunkhwa Government Servants (E&D) Rules, 2011.

AND WHEREAS, after expiry of more than 15 days period, the said official neither resumed duty nor any intimation was received from him, therefore, as required under Rule-9 of ibid rules, a notice was published in two daily newspapers i.e Roznama Azaadi Swat dated 30-04-2022 & Daily Aaj dated 03-05-2022 by directing him to resume duty within 15 days of publication of the notice. But after lapse of stipulated period given in the notice he neither resumed his duty nor any response was received from his end as confirmed by Superintendent Central Prison Mardan vide his letter No. 996 dated 18-05-2022.

NOW THEREFORE, in exercise of powers conferred under Rule-9 of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules 2011, the undersigned being competent authority, hereby awards major penalty of "Removal from Service" to Mr. Fazal Mabood Junior Technician Pathology (BPS-12) posted to Central Prison Mardan from the date of his willful absence i.e 02-03-2022.

INSPECTOR GENERAL OF PRISONS,
KHYBER PAKHTUNKHWA, PESHAWAR.

ENDST; NO. 19234-38 /

Copy of the above is forwarded to:-

1. The Secretary to Government of Khyber Pakhtunkhwa Home & Tribal Affairs Department for information.
2. The Superintendent, Central Prison Mardan for information and necessary action with reference to his letter No. 996 dated 18-05-2022.
3. The District Accounts Officer Mardan for information.
4. Mr. Fazal Mabood S/O Fazal Haq, Village Godar P/O Munda, Tehsil Samar Bagh & District Dir Lower for information.
5. Confidential Clerk for placing a copy of the said order in his character roll.
6. PS to Special Assistant to Chief Minister (For Prisons) Khyber Pakhtunkhwa for information.

Noted s/w
PO7 at 12:00
25/06/22
Supdt
20.06.22

DEPUTY DIRECTOR(E)
INSPECTORATE GENERAL OF PRISONS,
KHYBER PAKHTUNKHWA PESHAWAR

D: No 3339

ATTESTED

Appellant copy

Annex E

13

BEFORE THE WORTHY SECRETARY HOME & TRIBAL AFFAIRS
KHYBER PAKHTUNKHWA, AT PESHAWAR.

SUBJECT: DEPARTMENTAL APPEAL/REPRESENTATION AGAINST THE
OFFICE ORDER DATED 15-06-2022 OF INSPECTOR GENERAL PRISON
KP WHEREBY MAJOR PENALTY OF REMOVAL FROM SERVICE.

Respectfully Sheweth:

Appellant submits most respectfully the following facts leading to the instant Departmental Appeal for your kind consideration as under.

- 1) That the appellant was selected and appointed as Junior Technician Pathology (BPS-12) vide order bearing No.19558-60 Dated 29-06-2018 at Central Prison Mardan.
- 2) That in pursuance of the aforementioned appointment order, the Appellant served the department with sheer zeal and dedication to the utmost satisfaction of his superiors and till date no complaint whatsoever had been received from any corner of life.
- 3) That the appellant submitted an application to the worthy Inspector General of Prisons Khyber Pakhtunkhwa Peshawar, for Two years i.e. (730 Days) extra ordinary leave/leave without pay on 06-11-2019. The application was processed and was approved and leave was sanctioned for a period of two years started from 12-02-2020 till 15-02-2022.
- 4) That Appellant is law abiding citizen of Pakistan and is the only bread winner for their family resumed back his duties from 15-02-2022.
- 5) That on 02/02/2022 date the Appellant had a serious domestic issue of father illness, his father was already suffering a psychological disease from few years and the case became worst, his father lost memory and was out of selfcontrol/Disruptive behaviour.
- 6) That is worth to mention that during the aforementioned period the Appellant was

Received Mudabir

St Sh

14/07/2022

D.No. 855
HS

ATTESTED

eager for healthy life of his father what to say about application for grant of leave or any other communication in respect of his absence.

- 7) That Appellant feel proud for being the member of well-disciplined Force and expected sympathy and affection on the part of your good self.
- 8) That the case of the Appellant is a case of hardship and due to aforementioned admitted and documented facts the absence of the appellant from duty was not intentional rather the same was beyond the control of Appellant.
- 9) Hence, the Appellant being a member of the force under your kind supervision is obliged to file the departmental appeal/ Representation against the impugned office order inter alia on the following grounds:

Grounds:

- A. Because the appellant was one to deal the situation and he is the only one to help and care of his home and father.
- B. Due a high level of mantel and financial stress applicant was unable to communicate with department.
- C. Because the Appellant had no chance and, there was no other single person at his home to deal or receive any notice or to reply for any departmental matter.
- D. Moreover, the case of Appellant is the case of hardship and absence of the Appellant is not intentional rather due to the serious disease of his father, own mental/family and financial stress issues mentioned above which is beyond his control.

In wake of above, stated facts circumstance and documented evidence, the instant appeal/ departmental representation may kindly be accepted and, the removal order / ex-parte proceedings dated 15-06-2022, may kindly be set aside and the Appellant may kindly be reinstated with all back benefits by exonerating the charges levied against the under signed.

Yours sincerely,

Fazal Mabood
Ex. Junior Technician Pathology (BPS-12),
Central Prison Mardan

ATTESTED

Dated:
14-July- 2022



GOVERNMENT OF KHYBER PAKHTUNKHWA,
Home & Tribal Affairs Department.

213

Annex F

(15)

No. SO(P&R)/HD/8-4/2020

Dated Peshawar, the September 22, 2022

IG		

To,

The Inspector General of Prisons,
Khyber Pakhtunkhwa.

Subject:-

DEPARTMENTAL APPEAL / REPRESENTATION AGAINST THE
OFFICE ORDER DATED 15.06.2022 OF IG PRISON KP WHEREBY
MAJOR PENALTY OF REMOVAL FROM SERVICE

Q-213

Dear Sir,

I am directed to refer to your letter No.69/2-J-18-27201-WE dated 23.08.2022 on the subject noted above and to state that departmental appeal / representation of Mr.Fazal Mabood, Ex-Junior Technician Pathology (BPS-12) against the office order dated 15.06.2022 of Inspector General Khyber Pakhtunkhwa cannot be considered at this stage, please.

Yours faithfully,

Encls; As above.

Section Officer (Prison-I)

Encls: even No & date:-

Copy forwarded for information to:

1. PS to Home Secretary, Khyber Pakhtunkhwa
2. Master File.

Section Officer (Prison-I)

20077

27-9-22

Cit
30/9/22

ATTESTED

16

Registered

**INSPECTORATE GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR**

091-9210334 9210406 091-9213445
No. 69/2-J-2018-19233 33447 IWE
Dated 30-9-2022



URGENT/REGISTERED

To

Mr. Fazal Mabood S/O Fazal Haq,
Village Godar P/O Munda,
Tehsil Samar Bagh & District Dir Lower
(Contact# 0301-8830-094)

Subject: **DEPARTMENTAL APPEAL / REPRESENTATION AGAINST THE OFFICE
ORDER DATED 15-06-2022 OF IG PRISONS KP WHEREBY MAJOR
PENALTY OF REMOVAL FROM SERVICE**

Memo:
I am directed to refer to this office order No. 69/2-J-2018-19233 dated 15-06-2022 on the subject and to forward herewith a copy of letter No. SO(P&R)/HD/8-4/2020 dated 22-09-2022 on the captioned subject (self-explanatory) received from Government of Khyber Pakhtunkhwa Home & TA's Department Peshawar for information.

DEPUTY DIRECTOR(E)
INSPECTORATE GENERAL OF PRISONS,
KHYBER PAKHTUNKHWA PESHAWAR

Encl: No

Copy of the above is forwarded to the

1. Secretary to the Government of Khyber Pakhtunkhwa Home & TA's Department for information with reference to Home Department letter No. referred to above please
- 2 PS to Special Assistant to Chief Minister (For Prisons) Khyber Pakhtunkhwa Peshawar for information.

DEPUTY DIRECTOR(E)
INSPECTORATE GENERAL OF PRISONS,
KHYBER PAKHTUNKHWA PESHAWAR

ATTESTED

Reg
To,

OFSS
Gujranwala

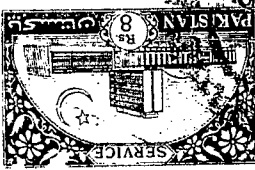
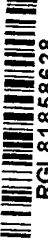
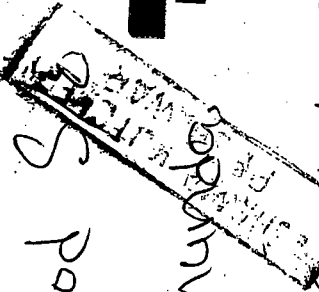
Mb- Fazal Mabood Siddiqui Fazal Nagar,

Village Gurdas P/O Munda

Tehsil Samat Bagh District

District Lower

0301-8830084



POST OFFICE
GUJRANWALA
DISTRICT LOWER

بعدالت

Before Honble Chairman
Service Tribunal KP, Peshawar

Appellant
Govt of KP
Others

2 منجانب

بنام

Fazal Mabood

موزعہ
مقدمہ
دعویٰ
جرم

باعث تحریر آنکے

مقدمہ مندرجہ عنہا میں اپنی طرف سے واسطے پیروی و جواب دہی مکمل کارروائی متعلقہ
آن مقام سید محمد علی کیلئے محمد عبداللہ ایدوگوند
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی مکمل کارروائی کا کامل اختیار ہوگا۔ نیز
ڈیکل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور صولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سندر ہے۔

المرقوم 7 ماہ نومبر 2022

کے لئے منظور ہے۔

Attested
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بمقام
سید

فضل محمود صاحب