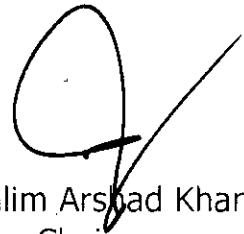


27th September, 2022

Learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Additional Advocate General for respondents present.

Learned Additional Advocate General present in the court is directed to ensure submission of reply/comments within 15 days from today, failing which their right for submission of reply/comments shall be deemed as struck off. Adjourned. To come up for preliminary hearing on 25.10.2022 before the S.B at Camp Court D.I.Khan.




(Kalim Arshad Khan)
Chairman
Camp Court D.I.Khan

25.10.2022

Appellant in person present.

Kabir Ullah Khattak, learned Additional Advocate General alongwith Khalil Khan S.I (Legal) for respondents present.

Representative of respondents submitted reply/comments. Copy of the same was handed over to appellant who made a request for adjournment. Adjourned. To come up for preliminary hearing on 23.11.2022 before S.B at Camp Court, D.I.Khan.

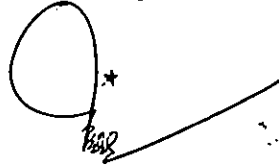


(Rozina Rehman)
Member (J)
Camp Court, D.I.Khan

29.06.2022

Mr. Imtiaz Ali Khan, Advocate for the appellant present.

Learned counsel for the appellant contended that the appellant is basically aggrieved of the impugned order dated 24.12.2019 whereby he was awarded major punishment of dismissal from service. The appellant challenged the impugned order through his departmental appeal dated 20.08.2020 (however, copy of the departmental appeal has not been annexed with the service appeal). His departmental appeal was rejected vide appellate order dated 11.11.2020 and subsequently his revision petition under Rule 11-A of the Khyber Pakhtunkhwa Police Rules, 1975, was also rejected on 15.12.2020 on the ground being badly time barred, whereafter the instant service appeal was filed on 01.04.2022. Learned counsel for the appellant was confronted with the question of limitation for delay about 16 months, he could not come up with plausible reasons and solid justification in support of his claim. In the circumstances, the service appeal cannot be admitted and it seems more appropriate to issue pre-admission notices to the respondents for submission of reply/comments. To come up for reply/comments as well as preliminary hearing on 28.07.2022 before S.B at Camp Court, D.I.Khan.


(Mian Muhammad)
Member (E)
Camp Court, D.I.Khan

28/7/22

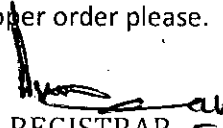


Doe to summer vacation to
come up for the same on 27/9/22



Form- A
FORM OF ORDER SHEET

Court of _____

Case No.- 508 /2022


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	12/04/2022	<p>The appeal of Mr. Muhammad Sohrab resubmitted today by post through Mr. Imtiaz Ali Khan 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> <p>This case is entrusted to touring Single Bench at D.I.Khan for preliminary hearing to be put there on <u>29.04.2022</u>. Notices be issued to appellant and his counsel for the date fixed.</p> <p style="text-align: right;"> CHAIRMAN</p> <p><i>29-4-22</i></p> <p><i>Tour to camp court D-I-Khan has been cancelled to come up for the same as before on 29.6.2022</i></p> <p style="text-align: right;"> Raza</p>

The appeal of Mr. Muhammad Sohrab, R/O Arra, Gomal University, Tehsil and District D.I. Khan received today i.e. on 01.04.2022 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

1. Every memorandum of appeal shall be presented in approved file covers.
2. Checklist is not attached with the appeal.
3. Appeal has not been flagged/marked with annexure marks.
4. Annexures of the appeal may be attested.
5. Certificate be given to the effect that appellant has not been filed any service appeal earlier on the subject matter before this Tribunal.
- ⑥ Copies of charge sheet, statement of allegation, show cause notice, enquiry report and replies there to are not attached with the appeal which may be placed on it.
7. Copy of departmental appeal and revision petition mentioned in the memo of appeal are not attached with the appeal which may be placed on it.
8. Copy of Annexure-C attached with the appeal is illegible which may be replaced by legible/better one.

No. 810 /S.T,

Dt. 01/04 /2022


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Imtaiz Ali Khan Adv. D.I. Khan.

Resubmitted after necessary completion except point no.6 above, which Respondent no.3 has allowed only copy of order (which is already on file). Copy of application is attached.

*Registrar
Service Tribunal
Peshawar*

*Int 2
Advocate
09-4-22*

BEFORE KHYBER PAKHTUNKHAWA SERVICE TRIBUNALS PESHAWAR


CHECK LIST

Case Title: Sohrab vs IGP etc

S#	Contents	Yes	No
1.	This appeal has been presented by:	✓	
2.	Whether Counsel/Appellant/Respondent /Deponent 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 / annexure are properly paged?	✓	
9.	Whether certificate regarding filing any earlier appeal on the subject, furnished?	✓	
10.	Whether annexure are legible?	✓	
11.	Whether annexure are attested?	✓	
12.	Whether copies of annexure are readable/clear?	✓	
13.	Whether copy of appeal is delivered to A.G/D.A.G?	✓	
14.	Whether power of attorney of the counsel engaged is attested and signed by petitioner/Appellant /respondents?	✓	
15.	Whether number of referred cases given are correct?		
16.	Whether appeal contains cuttings/over writing?		✓
17.	Whether list of books has been provided at the end of 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 annexure 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 Sohrab

Signature 

Dated: 09-6-22

**BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, CAMP COURT DERA ISMAIL KHAN.**

Service Appeal No. 509 /2022

Muhammad Sohrab(Appellant)

VERSUS

Inspector General of Police KPK etc ..(Respondents)

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<u>S.NO</u>	<u>PARTICULARS</u>	<u>ANNEXURE</u>	<u>PAGE NO.</u>
1	Grounds of Service appeal along with affidavit.		1-4
2	C.M for condonation of delay along with affidavit		5
3	Copy of medical receipts	"A"	6-7
4	Copy of order dated 24/12/2019	"B"	8
5	Copy of order dated 11/11/2020	"C"	9
6	Copy of order dated 15/12/2020	"D"	10
7	Vakalatnama		11

Your Humble Appellant



Muhammad Sohrab
Through Counsel

Dated: /03/2022



IMTIAZ ALI KHAN
Advocate, District Bar Association, DIK
Cell No. 0346-7847274

①

**BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, CAMP COURT DERA ISMAIL KHAN.**

Service Appeal No. 508/2022

Muhammad Sohrab son of Imam Bakhsh Caste Chijra
Resident of Arra, Gomal Univerity, Tehsil & District Dera
Ismail Khan (Ex Constable No. 972).

.....(Appellant)

VERSUS

1. Inspector General of Police (I.G.P), Khyber Pakhtunkhwa, Peshawar.
2. Regional Police Officer / Deputy Inspector General (D.I.G) Dera Ismail Khan.
3. District Police Officer (DPO) Dera Ismail Khan.

.....(Respondents)

**SERVICE APPEAL UNDER SECTION 4 OF
KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL ACT 1974, AGAINST THE
IMPUGNED ORDER ENDST; NO. 2251
DATED 24/12/2019 OF RESPONDENT NO.
3 WHEREBY APPELLANT WAS DISMISSED
FROM SERVICE, AND AGAINST ORDER NO.
9682/ES DATED 11/11/2020 WHEREBY
DEPARTMENTAL APPEAL OF APPELLANT
WAS REJECTED BY RESPONDENT NO. 2
AND ORDER NO. 4862 DATED 15/12/2020
OF RESPONDENT NO. 1 REJECTING THE
REVISION PETITION OF APPELLANT FOR
NO GOOD GROUNDS.**

Respectfully Sheweth:-

- 1- That the addresses of parties as given above are correct and sufficient for the purpose of service.
- 2- That appellatant is bonafide citizen of Pakistan and belong to respectable family of Dera Ismail Khan.
- 3- That while posted at Police Station Band Korai, Dera Ismail Khan, the appellatant fell ill seriously and remained under treatment. Copy of medical receipts is enclosed as **Annexure "A"**.
- 4- That respondent No. 3 issued a charge sheet with the allegations of absence from 24/04/2019 to

13/05/2019, 15/05/2019 to 16/06/2019 and 20/06/2019 till date.

5- That one sided department enquiry was conducted and respondent No. 3 dismissed the appellant from service vide order bearing endst; No. 2251 dated 24/12/2019. Copy of order is enclosed as Annexure "B".

6- That no copies of enquiry etc provided to the appellant.

7- That appellant submitted departmental appeal which was rejected vide order No. 9682/ES dated 11/11/2020 by respondent No. 2. Copy of order is enclosed as Annexure "C".

8- That thereafter the present appellant submitted revision petition which was also rejected by respondent No. 1 vide order No. 4862 dated 15/12/2020. Copy of order is enclosed as Annexure "D".

9- That feeling aggrieved from the impugned act of respondents, the present appellant having no other adequate remedy to file the instant Service Appeal before this Honourable Tribunal, inter alia, on the following grounds:-

GROUND:-

a) That impugned dismissal order dated 24/12/2019, departmental appeal rejection order dated 11/11/2020 and revision petition order dated 15/12/2020 are against the law, facts, norms of justice and material on record, therefore not tenable and liable to be set aside.

b) That impugned dismissal order is unwarranted, illogical and against the rules, therefore not tenable in the eyes of law.

c) That appellant has been condemned unheard and as such the impugned orders are having no sanctity, therefore the impugned orders are liable to be set aside.

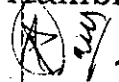
d) That no proper enquiry was conducted. Appellant was neither provided opportunity of defense nor cross examination witness, therefore orders are liable to be set aside.

e) That no final show case notice was issued and rules violated.

- f) That no opportunity of personal hearing provided to appellant, therefore order of dismissal is liable to be set aside.
- g) That appellant was referred to medical board, report is already enclosed as Annexure "A" but no lawful consideration was paid to the same either during enquiry nor during impugned orders of dismissal.
- h) That no proper procedure has been adopted during departmental proceedings, hence, on this sole ground the enquiry may be declared illegal and ineffective over the rights of appellant.
- i) That it is a crystal principle of law that where a law requires a thing to be done in a particular manner the same is to be done in that manner and not otherwise.
- j) That appellant has 15 years unblemished record of service, therefore the impugned punishment order on mere charges of absence is too harsh.
- k) That from every angle the appellant is liable to be reinstated into service with all back benefits.
- l) That the Appellant may very graciously be allowed to add further grounds during the course of arguments.

It is, therefore, humbly prayed that on acceptance of instant service appeal, the impugned orders No. 2251 dated 24/12/2019, order No. 9682/ES dated 11/11/2020 and order No. 4862 dated 15/12/2020 may graciously be set aside and appellant may very graciously be reinstated into service with all back benefits.

Your Humble Appellant



Muhammad Sohrab
Through Counsel

Dated: /03/2022


IMTIAZ ALI KHAN
Advocate, District Bar Association, DIK
Cell No. 0346-7847274

**BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, CAMP COURT DERA ISMAIL KHAN.**
Service Appeal No. _____/2022

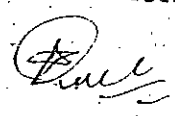
Muhammad Sohrab(Appellant)

VERSUS

Inspector General of Police KPK etc ..(Respondents)

AFFIDAVIT

I, **Muhammad Sohrab** son of Imam Bakhsh Caste Chijra Resident of Arra, Gomal Univerity, Tehsil & District Dera Ismail Khan (Ex Constable No. 972), the appellant, do hereby solemnly affirm declared on oath that contents of the above **Appeal** are true and correct to the best of my knowledge and nothing has been concealed from this Honourable Tribunal.



DEPONENT

Before The Service Tribunal KP Peshawar

Mohammad Sohrab versus IGP etc

Certificate

It is certified that no such type
of appeal is pending or submitted
before this honorable Tribunal before
submission of instant appeal.

yours sincerely

Mohammad Sohrab
appellant

Ⓟ ms
identified by counsel

Int-2

09/4/22

5

**BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, CAMP COURT DERA ISMAIL KHAN.**

C.M No. _____ of 2022

In Service Appeal No. _____/2022

Muhammad Sohrab(Appellant)

VERSUS

Inspector General of Police KPK etc ..(Respondents)

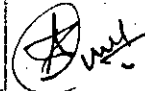
**APPLICATION U/S-5 OF LIMITATION ACT FOR
CONDONATION OF DELAY.**

Respectfully Sheweth:-

- 1-** That the above titled Service appeal is being filed before this Honourable Tribunal and the contents of service appeal may kindly be considered as part of main appeal.
- 2-** That the appellant remained ill due to which the impugned orders were not communicated to the appellant well in time. Hence, the appellant appeal is well within time.
- 3-** That there is no delay in filing the above mentioned appeal before the Honourable Tribunal as the appellant filed departmental appeal well within time, but result / order was communicated after considerable delay.
- 4-** That valuable rights of the appellant are involved in the main appeal. Hence the appeal of the appellant may graciously be disposed on merits, rather than on technicalities.

It is, therefore, humbly prayed that on acceptance of the above mentioned application, the delay of appeal may kindly be condoned in the light of above submissions.

Your Humble Appellant



Muhammad Sohrab
Through Counsel


IMTIAZ ALI KHAN

**Advocate, District Bar Association, DIK
Cell No. 0346-7847274**

Dated: /04/2022

AFFIDAVIT:-

I, **Muhammad Sohrab** son of Imam Bakhsh Caste Chijra Resident of Arra, Gomal Univerity, Tehsil & District Dera Ismail Khan (Ex Constable No. 972), the appellant, do hereby solemnly affirm declared on oath that contents of the above **application** are true and correct to the best of my knowledge and nothing has been concealed from this Honourable Tribunal.


DEPONENT

(6)

Annexure A

Phone: 0966-9280201
Fax: 0966-9280149

OFFICE OF THE MEDICAL DIRECTOR/CHAIRMAN DSMB
MEDICAL TEACHING INSTITUTION, DHQ TEACHING HOSPITALS, DIKHAN

No. 5348 /

Dated 10/7/2019

To

The District Police Office
Dera Ismail Khan

Subject: **MEDICAL BOARD**

Memo:

Reference your office letter No.2559/EC dated 21.05.2019.

Proceeding of District Standing Medical Board MTI DHQ Teaching Hospital DIKhan in respect of constable Muhammad Sohrab No.972 of your department is sent herewith in original for further necessary action.

MEDICAL DIRECTOR/CHAIRMAN DSMB
MTI DHQ TEACHING HOSPITAL
DIKHAN

(Handwritten mark)

102cc

7

**OFFICE OF THE MEDICAL DIRECTOR / CHAIRMAN
DISTRICT STANDING MEDICAL BOARD MTI DHQ/MMM TEACHING
HOSPITALS DIKHAN**

Constable Muhammad Sohrab No.972 attached to the District Police DIKhan having CNIC No.12101-2397803-3 appeared before the District Standing Medical Board DHQ Teaching Hospital DIKhan on 25.06.2019.

He complains of pain in his left knee joint. He had a history of trauma to same knee in 2014.

His MRI shows partial tear of ACL at its femoral attachments with mild effusion of the joint.

On above grounds a light duty is recommended for six (06) months and after that case may be reassessed if needed.

Station DIKhan
Dated 25.06.2019



**MEDICAL DIRECTOR/CHAIRMAN
DSMB DHQ/MMM TEACHING HOSPITALS
DIKHAN**

**MEDICAL SPECIALIST
DSMB DHQ/MMM TEACHING HOSPITAL
DIKHAN (MEMBER)**

**SURGICAL SPECIALIST
DSMB DHQ/MMM TEACHING HOSPITAL
DIKHAN (MEMBER)**

ORTHOPEDIC SURGEON

(1) Name of copyist
(2) Copy prepared on 20.7.2019
(3) Copy delivered on 22.7.2019
(4) Name of copyist



8

Annexure B

ORDER

This order will dispose of departmental proceedings conducted against **Constable Sohrab No.972** of this district Police, under the Khyber Pakhtunkhwa, Police Rules, 1975 (amendment 2014).

- 1) As reported by Muharrir PS Band Kurai vide Mad No.23 dated 15.05.2019 that he while posted at PS Band Kurai-absented himself from lawful duties w.e.from 15.05.2019 to 19.06.2019 (34-days) without any leave / permission from the high ups.
- 2) He while posted in Police Lines absented himself from lawful duties w.e.from 24.04.2019 to 13.05.2019 (19-days) without any leave or permission from competent authority.
- 3) He while posted at PS Band Kurai DI Khan, absented himself from lawful duties w.e.from 20.06.2019 to till date without any leave or permission from higher authority vide DD No.25 dated 20.06.2019

For the above, serious / professional misconduct of the accused official, charge sheet alongwith statement of allegations was served upon the accused official. An enquiry was conducted into the matter through Mr. **Malik Habib DSP Legal DI Khan** was appointed as enquiry officer to scrutinize the conduct of accused official. The Enquiry Officer vide his report established separately in which he stated that the accused official-is found guilty of the charges levelled against him and recommended for Major Punishment.

Keeping in view of finding and recommendations of the Enquiry Officer, the undersigned came to the conclusion that the charge leveled against the accused official has been established beyond any shadow of doubt.

Therefore, in exercise of powers conferred upon me under the ibid rules I, **Capt. @ Wahid Mehmood**, District Police Officer, DI Khan, award him Major Punishment of Dismissal from Police Service from the date of absence i.e 20.06.2019 and his following absence period are treated as leave without pay.

- 1) 24.04.2019 to 13.05.2019 19-days
- 2) 15.05.2019 to 19.06.2019 34-days

OB, 2251
DT, 24-12-2019

Capt. @ WAHID MEHMOOD, PSP
District Police Officer,
Dera Ismail Khan
B/12

78

(a) Register No. _____

(b) Application received on 24.12.2019

(c) Copy of the application to _____

(d) Judgment sent for copying on _____

(e) Name of the applicant FC Sohrab

(f) No. of the applicant No. 972

(g) Name of the employer _____

(h) Copy forwarded on 24.12.2019

(i) Copy addressed to 24.12.2019

(j) Name of the officer _____



9

OFFICE OF THE
REGIONAL POLICE OFFICER
DERA ISMAIL KHAN
REGION

Annexure C

No. 9682 /ES, Dated: DIKhan the 11/11/2020

ORDER

This order is aimed to dispose of the departmental appeal of Ex-Constable Muhammad Sohrab No.972 of District Police DIKhan against the Major Punishment order i.e. Dismissal from Service by DPO DIKhan vide OB No. 2251 dated 24.12.2019, on the following allegations:

- 1) As reported by Muharrir PS Band Kurai vide Maj No.23 dated 15.05.2019 that he while posted at PS Band Kurai, absented himself from lawful duties w.e.from 15.05.2019 to 19.06.2019 (34-days) without any leave / permission from the high ups.
2018
13-11-2020
- 2) He while posted in Police Lines, absented himself from lawful duties w.e.from 24.04.2019 to 13.05.2019 (19 days) without any leave or permission from the competent authority.
2325
- 3) He while posted at PS Band Kurai, absented himself from lawful duties w.e.from 20.06.2019 to till date without any leave or permission from higher authority vide DD No.25 dated 20.06.2019.
19-11-2020

He was issued charge sheet and proper departmental proceedings was initiated against him. Enquiry into the matter was conducted into through Mr. Malik Habib DSP Legal DIKhan who submitted his findings report and stated that the accused official is found guilty of the charges leveled against him and recommended for Major Punishment. Hence, DPO DIKhan has passed the order dated 24.12.2019

He preferred an appeal to the undersigned on 28.07.2020 against the order of DPO DIKhan. His appeal was sent to DPO DIKhan for comments and to provide his service record vide this office Endst: No. 3290/ES dated 13.08.2020. DPO DIKhan vide his office memo: No. 5802/EC dated 17.09.2020 has furnished the comments on the subject appeal.

The undersigned perused the file of the appellant thoroughly as well as heard him in person in Orderly Room dated 03.11.2020. From the perusal of his service records it reveals that he is a habitual absentee and 375-days absence period is recorded in his Service Roll. Prior to this, he was awarded a major punishment of dismissal from service on the allegation of absence with effect from 13.12.2013 to 09.02.2014 i.e. 59 days. He is not interested in his job, which is not ignorable. His instant appeal is also badly time barred under Rule 11 clause-1 of Police Rule 1975 amended-2014.

Therefore, I, YASEEN FAROOQ, Regional Police Officer, Dera Ismail Khan, in exercise of the powers conferred upon me under Rule-11(4)(a) of Police Rules 1975 amended 2014, the Major punishment of Dismissal from Service awarded by DPO D.I.Khan uphold the order of penalty and his appeal is hereby rejected.

[Signature]
REGIONAL POLICE OFFICER
DERA ISMAIL KHAN

[Signature]
No. 9682 /ES
Copy of above is sent to the DPO DIKhan alongwith service records i.e. Service Roll & Nauji Missal w.r.t his office memo: No.5802/EC dated 17.09.2020.

[Signature]
REGIONAL POLICE OFFICER
DERA ISMAIL KHAN

(a) Register No. 116
 (b) Application received on 16-11-2020
 (c) Copying fee remitted on _____
 (d) Judgment made for copying on _____
 (e) No. of copies made 1
 (f) Copying fee _____
 (g) Search fee 100 972
 (h) Urgent fee _____
 (i) Name of applicant _____
 (j) Copy completed on 16-11-2020
 (k) Copy delivered on 19-11-2020
 (l) Date _____ For signed



Annexure "D"

OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
Central Police Office, Peshawar.

No. S/ 4862 /20, dated Peshawar the 15/12/2020.

To: The Regional Police Officer,
Dera Ismail Khan.

Subject: **REVISION PETITION.**

Memo:

Inspector General of Police, Peshawar
By 4627
Date 21-12-2020

The Competent Authority has examined and filed the revision petition submitted by Ex-FC Muhammad Sohrab No. 972 of DIKhan district Police against the punishment of dismissal from service awarded by District Police Officer, DIKhan vide OB No. 2251, dated 24.12.2019, being badly time barred.

The applicant may please be informed accordingly.

20
21
(SYED ANIS-UL-HASSAN)

Registrar,
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.



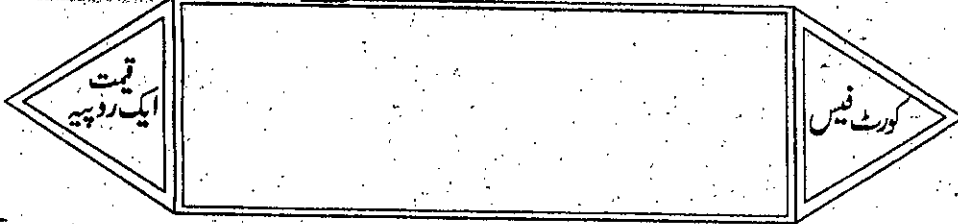
IMTIAZ ALI KHAN

Advocate
bc: 112641
Date of Issue: October 2021
Valid upto: October 2024



وکالت نامہ

Secretary
KP Bar Council



بعدالت جناب سر جسٹس فیاض حسین بختویز اوہ لیشاہ

منجانب امیر نیک

محمد سید باب نام ۱۶۱۰ دغیرہ

دعویٰ یا جرم سر جسٹس فیاض حسین بختویز حکم برضا سنی از عدالت دغیرہ

تفصیل دعویٰ یا جرم

باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف واسطے بیرونی وجود اپنی برائے پیشی یا تصدیق مقدمہ بمقام
عدالت از علی رضا خان سردار امیر نیک

کو حسب ذیل شرائط پر وکیل مقرر کیا ہے، کہ میں ہر پیشی پر خود بذریعہ اختیار خاص رو برو عدالت حاضر ہونا ہوں گا۔ اور ہر وقت پکارے جانے مقدمہ وکیل صاحب
موصوف کو اطلاع دیکر حاضر عدالت کروں گا، اگر پیشی پر منظر حاضر نہ ہوں۔ اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور پر میرے برخلاف ہو گیا۔ تو صاحب موصوف
ایسے کسی طرح ذمہ دار نہ ہوں گے، نیز وکیل صاحب موصوف صدر مقام بکھری کے علاوہ کسی جگہ یا بکھری کے اوقات سے پہلے یا پیچھے یا برو خطیل بیرونی کرنے کے
ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام بکھری کے علاوہ کسی جگہ یا بکھری کے اوقات سے پہلے یا پیچھے یا برو خطیل بیرونی کرنے کے ذمہ دار نہ
ہوں گے۔ اور مقدمہ صدر مقام بکھری کے علاوہ از جگہ صحت ہونے یا برو خطیل یا بکھری کے اوقات کے آگے پیچھے پیش ہونے پر منظر کو کوئی نقصان پہنچے تو اس کے ذمہ
دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا عین واپس کرنے کے بھی موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پروا خط صاحب موصوف میں کرو
ذات خود منظور قبول ہوگا۔ اور صاحب موصوف کو عرضی دعویٰ یا اجاب دعویٰ یا درخواست اجراء کے ذمہ نظر ثانی اہل گمانی و جرم درخواست پر دیکھنا تصدیق کرنے کا
بھی اختیار ہوگا۔ اور کسی حکم یا ذمہ داری کرنے اور جرم کا روپیہ وصول کرنے اور رسید دینے اور داخل کرنے اور جرم کے بیان دینے اور اس پر حاشی یا راسی نامہ دیکھنا
حلف کرنے، اقبال دعویٰ کا بھی اختیار ہوگا۔ اور بصورت مقرر ہونے تاریخ پیشی مقدمہ مذکورہ بیرون از بکھری صدر بیرونی مقدمہ مذکورہ نظر ثانی و اہل گمانی و جرم کی
مقدمہ یا منسوی ذمہ داری تک طرف یا درخواست حکم استامی یا قری یا کرتاری میں از فیصلہ اجراء کے ذمہ بھی صاحب موصوف کو بشرط ادا تکلی طیرہ منہ بیرونی کا اختیار ہوگا
اور تمام ساختہ پروا خط صاحب موصوف میں کرو ذمہ ذات خود منظور و قبول ہوگا۔ اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ مذکورہ یا اسکے کسی جزو
کی کارروائی یا بصورت درخواست نظر ثانی اہل گمانی یا دیگر حالت مقدمہ مذکورہ کسی دوسرے وکیل یا برو منظر کو اپنے بجائے یا اپنے ہمراہ مقرر کریں۔ اور ایسے مشیر قانون کو
بھی ہر امر میں وہی اور ویسے اختیارات حاصل ہوں گے، جیسے صاحب موصوف کو حاصل ہیں، اور دوران مقدمہ میں جو جگہ ہر جائزہ انشاء پڑے گا، وہ صاحب
موصوف کا حق ہوگا۔ مگر صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا۔ تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی بیرونی نہ کریں اور ایسی
صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔

لہذا وکالت نامہ لکھ دیا ہے۔ تاکہ سند رہے

مورخہ _____ مار 201

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

العبد _____ العبد _____ العبد _____

Accepted
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Advocate

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