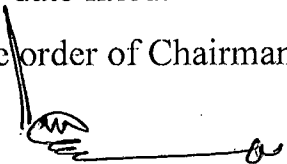


FORM OF ORDER SHEET

Court of _____

Case No.- 1619/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	14/11/2022	<p>The appeal of Mr. Rahmatullah received today by registered post through Mr. Muhammad Abdullah Baloch Advocate. It is fixed for preliminary hearing before touring Single Bench at D.I.Khan on _____. Notices be issued to appellant and his counsel for the date fixed.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR:

Appeal no...1619... of 2022.

Rahmat Ullah

VERSUS

Govt; of KPK and others

SERVICE APPEAL

I N D E X

S.No.	Description of documents	Annexure	Pages
1.	Memorandum of Appeal along with Affidavit		1-6
2.	Copy of Inquiry report and order dt- 01-12-2021	A & A/1	7-11
3.	Copy of Impugned Notification	B	12
4.	Copy of Departmental Appeal	C	13-14
5.	Copy of impugned Notification of appellate authority	D	15
6.	Miscellaneous	--	—
7.	Vakalatnama	--	16

11/11/2022

Your humble appellant



Rahmat Ullah

Through counsel



MUHAMMAD ABDULLAH BALOCH
Advocate High Court

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR.

Appeal no. 1619 of 2022.

Rahmat Ullah S/O Watan Khan R/O Khan Suleman Khel
presently working as SPST (BFS-14) GPS Payow Zar Bhattani
District Lakky Marwat.

VERSUS

1. Government of KPK through Secretary Elementary and Secondary Education Deptt: Peshawar.
2. Director Elementary and Secondary Education Deptt: Peshawar.
3. Assistant Director-III (Estab-I) Directorate of Elementary and Secondary Education Deptt: Peshawar.
4. District Education officer (Male) Lakki Marwat .

**APPEAL UNDER SECTION 4 OF KPK SERVICE TRIBUNAL
ACT AGAINST THE IMPUGNED NOTIFICATION NO. 3105
DATED; 29/06/2022 AND APPEAL AGAINST THE IMPUGNED
ORDER OF APPELLATE AUTHORITY ENDST; NO. 3228-31
DATED 26/10/2022, WHEREIN THE APPELLANT HAS BEEN
AWARDED MAJOR PENALTY OF REDUCTION TO 3
LOWER STAGES.**

Handwritten signature/initials

Note: Addresses given above are sufficient for the object of service.

That the brief facts of the case are as under:

1. The Appellant had been serving the Education department Lakki Marwat since 24/07/2004 and before the inflection of punishment was serving as PSHT (BPS-15) at Government Primary School, Abu Khan Suleman Khel, Lakki Marwat.

2. That appellant has been performing his duties by heart and being PSHT environment of the school has always been a priority. The appellant has a trust of the parents and performance of children was also satisfactory. That ASDEO (Circle) Tajori Lakki Marwat sent a report to SDEO (M) Lakki Marwat. However the present appellant is still not aware about the contents of that report. After that SDEO (M) also sent a report to DEO (M) Lakki Marwat which was also not in the knowledge of appellant.

3. That without serving any show cause upon the appellant, Mr. Wajeeh Ullah Principal GHSS Wanda Amir Lakki Marwat was appointed as inquiry Officer. Who submitted his inquiry report dated 20/10/2021. The Competent Authority being satisfied with inquiry report, issued Order No.7214 dated 01/12/2021. The appellant and his PST did their best to do more and excellent results were shown to the SDEO. Copies of Inquiry report and Order are annexed as Annexure "A" & "A/1".

4. That, surprisingly, the competent authority, without giving any notice and without giving an opportunity of personal hearing, issued impugned Notification No.3105 dated 29/06/2022 wherein the appellant was awarded major penalty of reduction to lower post from PSHT (BPS-15) to SPST (BPS-14) for period of five(5) years falling. Copy of impugned Notification is annexed as Annexure "B".

5. That the appellant being aggrieved of the impugned Notification, preferred a Departmental Appeal/ Representation to appellate

Abul

authority/Respondent No.2 on 20/07/2022. Copy of Departmental Appeal is annexed as **Annexure-"C"**.

6. That the appellate authority, Director Elementary and secondary Education KP decided the Departmental Appeal of the appellant and convert the **major penalty of reduction to lower post into reduction to three lower stages.** Copy of the Impugned Notification of appellate authority Endst; No. 3228-31 dated 26/10/2022 is annexed as **Annexure-"D"**.

7. That the appellant being aggrieved has a right and cause of action to file instant appeal before this Honorable Service Tribunal inter alia on the following grounds.

GROUNDS:

- i. That the impugned Notifications of the competent authority and of the appellate authority against law, against service rules, void and are in sheer violation of KP Government Servant (E&D) rules 2011.
- ii. That both the impugned orders are patently illegal, void ab-initio, unwarranted and legally not sustainable in the eyes of law and that too has been prepared at the back of Appellant, infringing his valuable vested rights, thus liable to be set aside on this score alone.
- iii. That appellant was not served with any show cause notice and even no charge sheet or statement of allegations were issued or served upon the appellant. Similarly rule 5(2) of KP Government Servant (E&D) rules 2011 has been

Ch. H. H. H.

violated. Both the impugned Notifications itself showing that this rule has not been followed by the competent authority.

- iv. That similarly rule 10(b)(c) of KP Government Servant (E&D) rules 2011 was also not followed as allegations against the appellant are still ambiguous and are not clearly specified. However, the alleged blur allegation is also lacking apportionment of responsibility among PSHT and other school staff (PST).
- v. That inquiry Officer also did not followed the procedure, however, the Inquiry Officer in his recommendation has clearly mentioned that report of ASDEO (C) is not based upon facts. After the inquiry report a letter No. 7214 dated 01/12/2021 was issued but the competent authority without any reason issued impugned Notification No. 3105 dated 29/06/2022 and awarded major punishment.
- vi. That before awarding major punishment, no final show cause notice was issued and even no opportunity of personal hearing was given to the appellant.
- vii. That after issuing of letter No. 7214 dated 01/12/2021 in consequence of the inquiry report; the competent authority was not in any way empowered to award major punishment.
- viii. That the competent authority was gone beyond the recommendations of inquiry report and issued impugned notification without assigning any cogent reason.

APPELLANT

- ix. That allegedly ASDEO (C) Tajori Lakki Marwat sent a report to the SDEO (M) and inquiry report also shows that SDEO (M) sent a report DEO (M). Nevertheless, the contents of both the reports are event not known to the appellant till today. However, from the contents of inquiry report, the SDEO sent a report to DEO with the subject "DOWNGRADING/DEMOTION OF PSHT REHMAT ULLAH GPS ABU KHAN SULMAN KHEL FROM PSHT TO SPST ON THE REPORT OF ASDEO(C)" this shows prejudice and biasedness on the part of ASDEO and SDEO that they are pre-deciding the major punishment upon the appellant.
- x. That the impugned order No. 3105 dated 29/06/2022, shows that competent authority exercised its powers under rule 9 of KP Government Servant (E&D) rules 2011, which is also not applicable in the instant case and this shows hurriedly of the competent authority.
- xi. That no procedure as envisaged in rule 5 of KP Government Servant (E&D) rules 2011 was followed.
- xii. That appellate authority even over looked the record of the case as no show cause notice, charge sheet or statement of allegations were served upon the appellant. The impugned Notification No. 3105 dated 29/06/2022 itself clearly revels that no such mandatory requirements were followed as impugned notification is silent in this regard.
- xiii. That counsel for the appellant may graciously be allowed to raise additional grounds at the time of arguments.

1/10
Chakraborty

It is, therefore, respectfully prayed that on acceptance of this appeal, the impugned notifications No. 3105 dated 29/06/2022 and impugned order of appellate authority Endst; No. 3228-31 dated 26/10/2022, wherein the appellant has been awarded major penalty of reduction to 3 lower stages, being void, illegal may please be set aside and appellant may kindly be restored to actual position as PSHT (BPS-15) along with all back benefits.

Dated; /11/2022

YOUR HUMBLE APPELLANT

Rahmat Ullah
Through Counsel

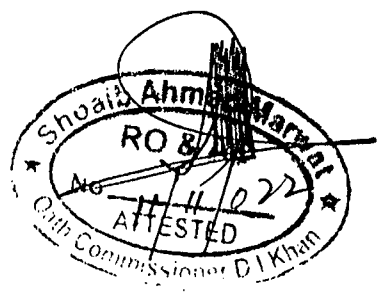
MUHAMMAD ABDULLAH BALOCH
Advocate High Court

AFFIDAVIT

I, **Rahmat Ullah**, Appellant, do hereby solemnly affirm and declare on OATH that the contents of the same are true and correct to the best of my knowledge and belief and that nothing has been concealed from this honorable court.

Deponent.

11201-5550680-1



To

The District Education Officer (M),
District Lakki Marwat.

Subject: Submission of Inquiry Report Against the PSHT of GPS Kotka Abu Khan
Sulaiman Khel Lakkki Marwat:

Sir,

With reference to your office order No. 4939-42 dated 10.09.2021 on the subject cited above,
i. Wajeeh Ullah Principal GHSS Wanda Amir Lakki Marwat, was nominated as enquiry officer
to probe into the matter concerned.

Hence the detailed and unbiased enquiry report is hereby submitted for further necessary
action please.

Date: 20.10.2021.

DAI/PSI
20/10/21

655
21/10/21

Wajeeh Ullah,
Pr GHSS Wanda Amir,
Lakki Marwat.

Attested to be true
copy.
[Signature]

Inquiry Report Against the PSHT of GPS Kotka Abu Khan Sulaiman Khel Lakkki Marwat

Authority:

District Education Officer (M) Lakkki Marwat

Ground for the Inquiry:

ASDEO Circle Tajori Lakkki Marwat paid a visit to GPS Kotka Abu Khan Sulaiman Khel on 09.06.2021, and submitted a detailed report to SDEO (M) Lakkki Marwat on 15.06.2021. (Attached as Annex "A") SDEO (M) Lakkki Marwat submitted a report to DEO (M) Lakkki Marwat on 28.07.2021 with the subject, "DOWNGRADING/DEMOTION OF PSHT REHMAT ULLAH GPS ABU KHAN SULAIMAN KHEL FROM PSHT TO SPST ON THE REPORT OF ASDEO (C)". (Attaches as Annex "B") In pursuance, DEO (M) Lakkki Marwat, as competent authority approved an Enquiry to be launched to find the facts regarding the matter.

Proceedings of the Inquiry:

The following procedure was adopted to find facts regarding the matter:

I visited GPS Kotka Aabu Khan Sulaiman Khel on 18.09.2021 and reached the school on 09:20 am, The PSHT and PST Siraj Uddin were present and the school was running smoothly. Students of different classes were seated separately.

Two or three birds (Peacocks) were present in the school, I looked for their shelters (Cages) in the school, but could not. Hence seemed that the birds do not reside permanently in school.

I also checked class wise attendance of the students physically, which was as under:

5 th class	01/01
4 th class	05/13
3 rd class	10/14
2 nd class	06/09
1 st class	06/16
Prep	07/13
Play Group	23/23

Total 58/89

*After to be true
copy. 10/11*

It was found that strength has decreased when compared with the strength of last year, which was as under as per attendance register:

5 th class	08
4 th class	Nil
3 rd class	17
2 nd class	17
1 st class	16
Prep	25
Play Group	28

Total	111

I also checked other registers of school record, which were not maintained properly and systematically.

I interrogated PSHT verbally and through questionnaire (Attached as Annex "C") containing questions regarding the issues and situation of the school stated by ASDFO (C) in his report. He submitted his written response on 26.09.2021. (Attached as Annex "D") He was of the opinion that the allegations charged by ASDFO (C) were not based upon fact. He said that the school was his own and his near relatives such as sons, nephews etc. study here, then how it is possible that he will not pay attention to the school. He also argued verbally that like other schools, the students of his school have also migrated to private schools and none of the students of my school has migrated to other Gov. School. (But that was to be confirmed) He confessed that he did not use smart phone, instead use simple or common phone, but PST of his school Siraj Uddin regularly uses smart phone, which is linked with office of the DFO (M) and all the required information are provided well in time, hence no information gap exists,

PST of the school Siraj Uddin was also interrogated verbally and a questionnaire was also handed over to him. (Annex "E") He admitted that PSHT did not use mobile phone earlier, but now he is using. He also urged the students' strength has been affected by Covid-19 pandemic and vacations due to it. He was found to be satisfied with the performance of the PSHT as his subordinate.

[Handwritten signature]

*PSHT to be true
com. [Signature]*

Findings of the Enquiry:

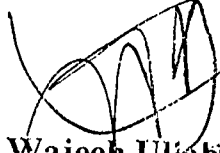
Following are the findings of the enquiry:

1. Strength of students of the school has decreased as compared to last year, but it is not 45, as physically 58 students were present and 89 as per student attendance register.
2. No pet birds are kept permanently at school.
3. Teaching learning condition/situation of the school was not too worse to bring about demotion of PSHT.
4. Though PSHT uses simple or common mobile phone, but he does not use smart phone. As PST of the school uses smart phone regularly, which is linked with DEO (M) office, hence no information gap exists.
5. The registers or record of the school has not been maintained properly or systematically.
6. PSHT of the school is simple and straight forward man rather stranger type. But these are individual differences either based on locality or natural division hence cannot be termed as standard for such like posts.
7. The chowkidar of the school has not taken over charge at the school.

Recommendations of the Enquiry:

Following are the recommendations of the enquiry:

1. Most of the points of the report of ASDEO (C) are not based upon fact; hence his recommendation for demotion of PSHT to SPST is encroachment of his authority or misuse of his official capacity.
2. PSHT may be directed strictly to update his school record accordingly.
3. PSHT and PST may be directed to motivate the local community for enhancement of enrollment, as the strength of the students is not satisfactory.
4. The competent authority may make surprise visits to the said school and all schools of far flung areas.


 Wajeeh Ullah
 Principal GHS Wanda Amir
 Lakki Marwat

PSHT to be transferred
 conf. - [Signature]

Annexure "A" 4

**Office of The District Education Officer
Male Lakki Marwat**

Phone & Fax: (0969) 238291, Email: deomalelakki@go.gov.pk,
www.facebook.com/deomalelakki, www.twitter.com/deo_m_lakki

No. 7214 /Misc Dated: 01/12/2021

To
Mr Rehmat Ullah, PSHT
GPS. Kotka Abu Khan Sulaiman Khel
Lakki Marwat


Subject: Submission of Inquiry Report against PSHT GPS Kotka Abu Khan
Sulaiman Khel Lakki Marwat

Memo,

It refers to an Inquiry Report ordered on written report of ASDEO Circle Tajori and received in this office vide SDEO Male Lakki Marwat covering memo No. 987 dated 28-07-2021 and to narrate the recommendations of Inquiry Officer pertains to you as under.

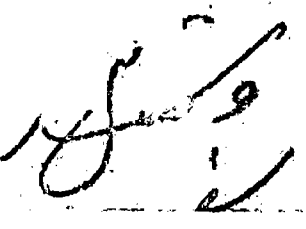
1. The PSHT may be directed strictly to update his school record accordingly.
2. The PSHT and PST may be directed to motivate the local community for enhancement of enrolment as the strength of students is not satisfactory.

The undersigned fully agrees with the above cited recommendations and ask you to implement the same in letter and spirit and submit compliance report to the undersigned through SDEO Male Lakki Marwat. Moreover, the SDEO Male Lakki Marwat is directed to increase surprise inspection visits to the above cited school and those located in remote rural areas of his tehsil.



District Education Officer
(Male) Lakki Marwat

Event No. & Date:

3. Sub Divisional Education Officer Male Lakki Marwat



*Requested to be
and compliance
1/12/2021*


District Education Officer

(12)

Office of The District Education Officer
Male Lakki Marwat

Annexure "B"

Ph: (0969)538291, email: _____
www.fic.buc.hk, www.deo.m.lakki, www.twitter.com/deo.m.lakki

No. 3105 Dated 29/10/2022

NOTIFICATION:-

1. WHEREAS, Mr. Rahmat Ullah PSHT (BPS-15) GPS Abu Khan Suleman Khel Now working in GPS Payao Zar Bhattani Lakki Marwat was proceeded against under KPK E&D Rules 2011 for the charges of Misconduct, Inefficiency, Illegal Occupation, poor administration and management as reported by the SDEO (Male) Lakki Marwat letter bearing No.982 dated. 28-07-2021.
2. WHEREAS, inquiry conducted vide DEC (M) letter bearing No.4939-42 dated. 10-09-2021 and submit inquiry report dated 20-10-2021.
3. WHEREAS, show cause notice was served upon the cited PSHT vide DEO (Male) Lakki Marwat letter bearing No.7778 dated. 29-12-2021 through SDEO (Male) Lakki Marwat and unsatisfactory reply was submitted on his part to this effect was received to the office of the undersigned.
4. WHEREAS, an opportunity of personal hearing was granted to him vide DEO (M) office letter bearing No.2273-77 dated. 13-05-2022, for the above cited PSHT to appear in person to defend the charges leveled against him.
5. AND NOW THEREFORE, keeping in view the above facts and documents available in office record the competent authority (Mr. Zahoor Khan District Education Officer Male Lakki Marwat) in exercise of power conferred upon him under section 9 of Khyber Pakhtunkhwa Govt. Servants (Efficiency & Discipline) Rules-2011 amended in December 2021 read with rule-4 (1) (b) (i), is satisfied and pleased to impose the major penalty of Reduction to Lower Post From PSHT (BPS-15) to SPST (BPS-14) for period of Five (05) years falling, upon Mr. Rahmat Ullah PSHT GPS Abu Khan Suleman Khel now working in GPS Payao Zar Bhattani Lakki Marwat with immediate effect.

SV
District Education Officer
(Male) Lakki Marwat.

Even No. & Date.

Copy to the:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Deputy District Education Officer (Male) Local Office.
3. District Monitoring Officer, Lakki Marwat.
4. District Accounts Officer, Lakki Marwat.
5. SDEO (Male) Ghazni Khel.
6. Official concerned.

Zahoor Khan
29/10/22
District Education Officer
(Male) Lakki Marwat

*AK's to be true
copy
29/10/22*

To The Director
Elementary & Secondary Education
Department Khyber Pakhtunkhwa
Peshawar

Subject: DEPARTMENTAL APPEAL AGAINST THE ORDER OF DISTRICT
EDUCATION OFFICER, MALE LAKKI MARWAT BEARING NO.3105
DATED 29-06-2022.

PRAAYER IN DEPARTMENTAL APPEAL:

By accepting this departmental appeal, regarding officer order bearing No.3105 dated 29-06-2022 issued by District Education Officer, Male Lakki Marwat in respect of Rahmat Ullah PSHT BPS-15 Government Primary School Abu Khan Suleman Khel may be set aside and directed to restore the reduction from lower post i.e. SPST (BPS-14) to PSHT (BPS-15).

Respected Sir,

That the appellant files the department appeal before Appellant Authority/Director E&SE Khyber Pakhtunkhwa Peshawar inter alia on the following grounds:

FACTS:

1. That the appellant was serving as PST Teacher in the Education Department Lakki Marwat since 24-07-2004.
2. That the appellant served the duties till his posting as PSHT with zeal and zest in the Government Primary Schools.
3. That on 09-06-2021, ASDEO circle Tajori Lakki paid a visit to GPS Kotka Abu Khan Suleman Khel enabling submitted a detail report through proper channel to District Education Officer, Male Lakki Marwat for further action at his end.
4. That being competent authority, the District Education Officer, Male Lakki Marwat appointed Mr. Wajeeh Ullah Principal GHSS Wanda Amir Lakki Marwat as Inquiry Officer bearing order No.4939-42 dated 10-09-2022 to probe into the matter.
5. That on 20-10-2021, the inquiry officer submitted his inquiry report to the District Education Officer, Male Lakki Marwat as [F/A].

*Order to be true
COP. 10/11*

GROUNDS:

Respected Sir,

- a) Now the Appointment Authority/District Education Officer, Male Lakki Marwat issued Notification vide No.3105 dated 29-06-2022 regarding MAJOR PENALTY OF REDUCTION TO LOWER POST FROM PSHT (BPS-15) TO SPST (BPS-14) FOR PERIOD OF FIVE (05) YEARS FALLING, with the reason/based on inquiry report.
- b) It is pertinent to mention here and admitted facts that the recommendations of Inquiry Officer are based as following:
 - i. Most of the points of the report of ASDEO (C) are not based upon facts; hence his recommendation for demotion of PSHT to SPST is encroachment of his authority or misuse of his official capacity.
 - ii. PSHT may be directed strictly to update his school record accordingly.
 - iii. PSHT and PST may be directed to motivate the local community for enhancement of enrollment, as the strength of the students is not satisfactory.
 - iv. The competent authority may make surprise visits to the said school and all schools of far flung areas.
- c) In the aforementioned recommendations of the Inquiry Officer, nothing was proposed i.e. major penalty OF REDUCTION TO LOWER POST FROM PSHT (BPS-15) TO SPST (BPS-14) FOR PERIOD OF FIVE (05) YEARS FALLING.
- d) Sir, I am a poor man enabled residing my old mother/father, 4 kids and there is no source of income other than PST teacher.

In view of the above narrated facts, it is humbly prayed that Notification bearing No.3105 dated 29-06-2022 issued by the District Education Officer, Male Lakki Marwat may kindly be set aside and directed to restore the reduction from lower post i.e. SPST (BPS-14) to PSHT (BPS-15) along with all consequential back benefits. I shall be very thankful to you for your this act of kindness.

Rahmat Ullah
 Rahmat Ullah
 PSHT GPS Abu Khan
 Lakki Mawat
 20-7-22

*Attitude to be fine
 copy papers collected
 10/11*

(15)

**Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar**

Annexure "D"

NOTIFICATION

1. WHEREAS, Mr. Rahmat Ullah SPST (BPS-14) GPS Payao Zar Bhattani District Lakki Marwat was proceeded under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011.
2. AND WHEREAS, The District Education Officer (Male) Lakki Marwat, imposed major penalty of "Reduction from PSHT (BPS-15) to Lower Post SPST (BPS-14) for the period of Five Years" upon Mr. Rahmat Ullah SPST (BPS-14) GPS Payao Zar Bhattani District Lakki Marwat under 4 (1)(b)(i) of the Ibid Rules Vide Order No. 3105 Dated: 29-06-2022.
3. AND WHEREAS, Mr. Rahmat Ullah SPST (BPS-14) GPS Payao Zar Bhattani District Lakki Marwat, lodged an appeal before the Worthy Director, ESSE, Khyber Pakhtunkhwa, Peshawar.
4. NOW THEREFORE, in exercise of power conferred upon by the Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar, being appellate authority after having examined the evidences on record and report of the DEO concerned is pleased to accept the appeal and to modify the order and convert major penalty of Reduction to Lower Post into Reduction to Three Lower Stages upon Mr. Rahmat Ullah SPST (BPS-14) GPS Payao Zar Bhattani District Lakki Marwat under Rules (17)(2)(C) of (Efficiency & Discipline) Rules-2011, in the best interest of public.

(Dr. Hafiz Muhammad Ibrahim)

DIRECTOR

Directorate of Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

End. t: No: _____ / F.No. / Vol-I / Departmental Appeal / Estab-1

Dated Pesh: the 30/12/2022.

Copy forwarded for information to the: -

1. District Education Officer (Male) Lakki Marwat.
2. District Accounts Officer Lakki Marwat.
3. Mr. Rahmat Ullah SPST (BPS-14) GPS Payao Zar Bhattani District Lakki Marwat.
4. P.A. to Director Elementary & Secondary Education, Local Directorate, Peshawar.

*Submitted to be
by me
10/11*

30/12/2022

Assistant Director-III (Estab-1)

Directorate of Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar



وکالت نامہ

MUHAMMAD ABDULLAH

Advocate
bc-09-09-44
Date of issue: June 2021
Valid upto: June 2024



ADVOCATE HIGH COURT

کورٹ
فیس

Secretary
KP Bar Council

Before the KPK Services Tribunal Peshawar

Appellant

Govt. of KPK and others vs. Rahmat Ullah

Service Appeal

باعث تحریر آنکے

D.I Khan کے لیے

Muhammad Abdullah Baloch (AHC)

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے دائلے بیرونی و جواب دہی برائے پیشی یا تہفیف مقدمہ بنام
 کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں پیشی پر خود یا ہذا بذریعہ رو برو عدالت حاضر ہونا رہوں گا اور ہر وقت پکارے جانے مقدمہ وکیل صاحب
 موصوف کو اطلاع دے کر حاضر عدالت کروں گا اگر پیشی پر بظہر حاضر نہ ہو اور مقدمہ میری غیر حاضری کی وجہ سے کسی طرز میرے خلاف ہو گیا تو صاحب
 موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صدر مقام پشوری کے علاوہ یا پشوری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل
 بیرونی کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ صدر پشوری کے علاوہ اور جگہ سماعت ہونے یا بروز تعطیل یا پشوری کے اوقات کے آگے یا پیچھے پیش ہونے
 پر نظر کوئی تہنسان پیچھے تو ان کے ذمہ دار یا اسکے واسطے کسی معاوضہ کے ادا کرنے یا محنت نہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے مجھ
 کو کل ساختہ پر وادختہ صاحب موصوف محل کردہ ذات، خود منظور قبول ہو گا اور صاحب موصوف کو عرض دہی یا جواب دہی یا درخواست اجراء اسانے دہی
 نظر ثانی اپیل، نگرانی و ہر قسم درخواست، ہر قسم کے نوٹ دینے اور پر ثانی یا راضی نامہ و فیصلہ برحلاف کرنے، اقبال دہی کا بھی اختیار ہو گا اور بصورت مقرر ہونے
 تاریخ پیشی مقدمہ مرکز بیرون از پشوری صدر بیرونی مقدمہ مرکز نظر ثانی اپیل و نگرانی و برآمدگی مقدمہ یا مستوفی دہی یک طرفہ یا درخواست حکم اختتامی یا قرتی
 یا گزارشی قبل از فیصلہ اجراء دہی بھی صاحب موصوف کو بشرط ادا یعنی علیحدہ و مختصم بیرونی کا اختیار ہو گا اور تمام ساختہ پر وادختہ صاحب موصوف محل کردہ
 از خود منظور و قبول ہو گا اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہو کہ مقدمہ مذکورہ یا اس کے کسی جزو کی کارروائی یا بصورت درخواست نظر ثانی
 اپیل نگرانی یا دیگر معاملہ و مقدمہ مذکورہ کسی دوسرے وکیل یا ہر منظر کو اپنے بجائے یا اپنے ہمراہ مقرر کریں اور ایسے مشیر قانون کو بھی ہر امر میں دہی اور ویسے
 اختیارات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ میں جو کچھ ہر جائے التوا پرے گا وہ صاحب موصوف کا حق ہو گا مگر
 صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہو گا کہ مقدمہ کی بیرونی نہ کریں اور ایسی صورت
 میں ہیرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا

لہذا وکالت نامہ لکھ دیا ہے تاکہ سند رہے

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