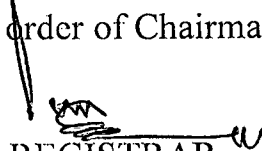


# FORM OF ORDER SHEET

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

Case No.- 1641/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	17/11/2022	<p>The appeal of Mr. Niaz Shah presented today by Rocda Khan Advocate. It is fixed for preliminary hearing before touring Single Bench at A.Abad on _____. Notices be issued to appellant and his counsel for the date fixed.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

**Peshawar.**  
**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,**  
**PESHAWAR.**

Appeal No. 1641 of 2022

Niaz Shah S/o Syed Rahim Shah Ex Constable No. 456, Tehsil and District Mansehra.

..... Appellant

**VERSUS**

- 1) District Police Officer Mansehra.
- 2) Regional Police Officer Hazara Region Abbottabad.
- 3) Provincial Police Office KPK Peshawar.

..... Respondents

**INDEX**

S.No.	Description of documents	Annexure	Pages
1.	Memo of Appeal		1-5
2.	Addresses of the parties		6
3.	Affidavit		7
4.	Condonation of delay application		8-9
5.	Copy of notification dated 29.03.2011	A	10
6.	Copy of notification dated 26.07.2012	B	11
7.	Copy of application and im order dated 12.04.2016	C&D	12-13
8.	Copy of Departmental Appeal and rejection order	E&F	14-17
9.	Copy of revision Petition	G	18-21
	Wakalat Nama		

Dated 16/11/2022

Through

*Rueh*  
Appellant

*Rueh Khan*  
Roeda Khan

Advocate, High Court,  
Peshawar.

(1)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,**  
**PESHAWAR.**

Appeal No. 1641 of 2022

Niaz Shah S/o Syed Rahim Shah Ex-Constable No. 456 R/o Dara Syedan Mansehra.

..... Appellant

**VERSUS**

- 1) District Police Officer Mansehra.
- 2) Regional Police Officer Hazara Region Abbottabad.
- 3) Provincial Police Office KPK Peshawar.

..... Respondents

**APPEAL UNDER SECTION 4 OF THE KPK SERVICE TRIBUNAL ACT, 1974, AGAINST THE IMPUGNED ORDER DATED 12.04.2016 WHEREBY THE APPELLANT HAS BEEN DISMISSED FROM SERVICE AGAINST WHICH THE APPELLANT FILED DEPARTMENTAL APPEAL ON 04.09.2022 WHICH HAS BEEN DECIDED ON 15.09.2022 ON NO GOOD GROUNDS.**

**Prayer:**

On acceptance of the instant service appeal the impugned order dated 12.04.2016 and 15.09.2022 may kindly be set aside and the appellant may kindly be reinstated in service or dismissal order may kindly be converted into compulsory retirement with all consequential/pensionary benefits of service along with all back benefits

**Respectfully Sheweth:**

**FACTS**

The appellant respectfully submits as under:

- 1) That the appellant has been appointed as constable in the Police Department in the year 2000 and after appointment the appellant performed his duty with full devotion and hard work and no complaint whatsoever has been made against the appellant.
- 2) That in the year 2011, the appellant applied for one year ex-Pakistani leave study Higher Education abroad, which has been granted vide Notification No. 7374-75/E-II, Ex-Pakistani dated 29-03-2011, in view of the above mentioned granted leave for one year, the appellant proceed to England for study in Higher Education. (Copy of notification dated 29.03.2011 is attached as Annexure-A).
- 3) That in the year 2012, the appellant applied for extension of the said leave for a period of three years which has been granted vide Notification No 14749/E-II dated 26.07.2017. (Copy of Notification 26.07.2012 is attached as Annexure-B).
- 4) That the said sanctioned leave had been expired in the year 2015, yet educational course of the appellant was not completed and need of further leave the

- appellant applied for extension of two years EOL (Leave without pay) for that purpose. Appellant applied this leave via FAX. Subsequently when the appellant came back to Pakistan in 2022 the appellant came to know regarding his dismissal from service vide order dated 12.04.2016 that's why the appellant submitted an application on 10.08.2022 for hand over the said dismissal order which was handed over to the appellant in response of the said application. (Copy of application and impugned order dated 12.04.2016 are attached as Annexure- C & D).
- 5) That the appellant submitted Departmental Appeal on 04.09.2022 to respondent Department against the impugned dismissed order which has been rejected on 15.09.2022 on no good grounds. (Copy of Departmental Appeal and rejection order are attached as Annexure-E & F).
- 6) That the appellant submitted Revision Petition on 03.10.2022 against the dismissal order dated 12.04.2016 to respondent Department. (Copy of Revision Petition is attached as Annexure-G).
- 7) That feeling aggrieved the appellant prepares the instant Service Appeal before this Hon' able Tribunal inter alia on the following grounds.

**GROUND**

- A) That the impugned dismissal orders dated 12.04.2016, 15.09.2022 under the definition of void order because it has been passed without fluffing the codal formalities.
- B) That no charge sheet no statement of allegation has been issued or serve to the appellant which is a clear cut violation of Rule-6 of Police Rules 1975.
- C) That no show cause notice has been issued against the appellant which is mandatory before imposing of major penalty.
- D) That no Departmental inquiry has been conducted and no opportunity of defense and personal hearing has been provided to the appellant.
- E) That the punishment awarded to the appellant is harsh one because the appellant served for above 15/16 years service with respondent Department.
- F) That the appellant properly applied for extension of the said leave for two years EOL (leave without pay) through fax which was never turned down/rejected by the respondent Department.
- G) That the impugned order is also comes under the definition of void order because it has been passed from retrospective effect

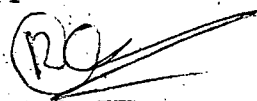
It is therefore most humbly prayed that on acceptance of the instant service appeal the impugned orders dated 12.04.2016 and 15.09.2022 may kindly be set aside and the appellant may kindly be reinstated in service or dismissal order may kindly be converted into compulsory retirement with all consequential/pensionary benefits of service along with all back benefits.

Any other remedy which this august tribunal deems fit that may also onward granted in favor of appellant.

Dated 16/11/2022

  
Appellant

Through

  
Roeda Khan  
Advocate, High Court,  
Peshawar.

**Verification:**

Verified that the contents of the above appeal are true and correct to the best of my knowledge and belief.

  
Deponent

(b)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,**  
**PESHAWAR.**

Appeal No. \_\_\_\_\_ of 2022

Niaz Shah S/o Syed Rahim Shah Ex Constable No. 456, Tehsil and  
District Mansehra.

..... Appellant

**VERSUS**

- 1) District Police Officer Mansehra.
- 2) Regional Police Officer Hazara Region Abbottabad.
- 3) Provincial Police Office KPK Peshawar.

..... Respondents

**ADDRESSES OF THE PARTIES**

**Appellant**

Naiz Shah S/o Syed Rahim Shah Ex Constable No. 456, Tehsil  
and District Mansehra.


**Respondents**

- 1) District Police Officer Mansehra.
- 2) Regional Police Officer Hazara Region Abbottabad.
- 3) Provincial Police Office KPK Peshawar.

Dated 16/11/2022

  
Appellant

Through

  
Roeda Khan  
Advocate, High Court,



**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,**  
**PESHAWAR.**

Appeal No. \_\_\_\_\_ of 2022

Syed Niaz Shah S/o Syed Rahim Shah Ex Constable No. 456,  
Tehsil and District Mansehra.

..... Appellant

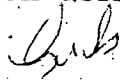
**VERSUS**

- 1) District Police Officer Mansehra.
- 2) Regional Police Officer Hazara Region Abbottabad.
- 3) Provincial Police Office KPK Peshawar.

..... Respondents

**AFFIDAVIT**

I, Niaz Shah S/o Syed Rahim Shah Ex Constable No. 456, Tehsil and District Mansehra do hereby solemnly and oath 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 Hon' able Court.

  
Deponent

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL, PESHAWAR.**

Appeal No. \_\_\_\_\_ of 2022

Niaz Shah S/o Syed Rahim Shah Ex Constable No. 456, Tehsil and District Mansehra.

..... Appellant

**VERSUS**

- 1) District Police Officer Mansehra.
- 2) Regional Police Officer Hazara Region Abbottabad.
- 3) Provincial Police Office KPK Peshawar.

..... Respondents

**APPLICATION FOR CONDONATION OF DELAY (IF  
ANY).**

Respectfully Sheweth:

- 1) That the petitioner/appellant has filed the accompanied appeal today in which no date has yet been fixed.
- 2) That petitioner/appellant has a good prima facie case and is hopeful for its success and the grounds mentioned in appeal may be treated as integral part of this application.
- 3) That the said sanctioned leave had been expired in the year 2015, yet educational course of the appellant was not completed and need of further leave the appellant

- 9 -

applied for extension of two years EOL (Leave without pay) for that purpose. Appellant applied this leave via FAX. Appellant was never intimated of sanction otherwise of leave by the Department, subsequently when the appellant came back to Pakistan in 2022 the appellant came to know regarding his dismissal from service vide order dated 12.04.2016 that's why the appellant submitted an application on 10.08.2022 for hand over the said dismissal order which was handed over to the appellant in response of the said application. (Copy of application and impugned order dated 12.04.2016 are attached as Annexure- C & D).

- 4) That there are many Judgments of the Supreme Court that cases should be decided on merit rather than on technicality.
- 5) That there are also many Judgment as well as specific provision of law that limitation has been counted from the date of communication.

It is, therefore, most humbly prayed that on acceptance of this application the delay if any may be condoned in the interest of justice.

Dated 16/11/2022



Petitioner /Appellant

Through



**Rooeda Khan**  
**Advocate, High Court**  
**Peshawar**

(A) (10)

FOR PUBLICATION IN THE KHYBER  
PAKHTUNKHWA POLICE GAZETTE PART-II  
ORDERS BY THE PROVINCIAL POLICE OFFICER  
KHYBER PAKHTUNKHWA PESHAWAR

NOTIFICATION

Dated: 29/3/2011

No. 7373 /E-II, EX-PAKISTAN LEAVE Constable  
Syed Niaz Hussain Shah No. 456 of Mansehra District is hereby  
granted 365 days Ex-Pakistan Leave from the date of availing  
under the Civil Servant Revised Leave Rules 1981 on the following  
conditions:

- |    |                         |   |                 |
|----|-------------------------|---|-----------------|
| 1. | Leave on full pay       | = | 120 days        |
| 2. | Leave on half (1/2) pay | = | 245 days        |
|    | <b>Total</b>            | = | <b>365 days</b> |

He is allowed to proceed abroad.

Sd/-  
**FAIZ AHMED KHAN TORU**  
Provincial Police Officer,  
Khyber Pakhtunkhwa Peshawar

No. 7374-25 /E-II

Copy of above is forwarded for information and necessary  
action to the:-

1. Deputy Inspector General of Police, Hazara Region  
Abbottabad w/r to his Memo No. 2821/E dated: 01.03.2011.  
His Character and Service Roll is returned herewith for  
record in your office.
2. District Police Officer Mansehra.

No. 4003-5 cell 2-4-2011.  
Copy to pay officer, SRC  
OHC for info. & action.

(NAIK AHMAD)  
Registrar  
For Provincial Police Officer,  
Khyber Pakhtunkhwa  
Peshawar

D.P.O. Man  
11/4/11

(B) (11)

FOR PUBLICATION IN THE KHYBER  
PAKHTUNKHWA, POLICE GAZETTE PART-II  
ORDERS BY THE PROVINCIAL POLICE OFFICER  
KHYBER PAKHTUNKHWA, PESHAWAR.

NOTIFICATION

Dated: 26/7/2012

No. 14249 /E-II, EX-PAKISTAN LEAVE: Constable Syed Niaz Hussain Shah  
No. 456 of district Police Mensehra was granted 365 days Ex-Pakistan leave vide this  
office Notification No. 7373-75/E-II, dated: 29.03.2011 is hereby extended for  
further period of three (03) years w. e from 27.05.2012 under the Civil Servant  
Revised Leave Rules 1981 as per detail given below:-

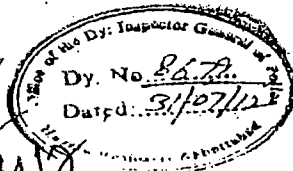
1.	Leave on half (½) pay	=	248 days
2.	Leave without pay	=	847 days
	Total	=	1095 days

He is allowed to proceed abroad.

Sd/-  
KHALID MASOOD  
Addl: IGP/Headquarters,  
For Provincial Police Officer,  
Khyber Pakhtunkhwa  
Peshawar.

No. 14250 /E-II

Copy of above is forwarded for information and necessary  
action to the Deputy Inspector General of Police, Hazara Region, Abbottabad  
w/r to his Memo No. 9153/E dated: 16.07.2012.



(MUMTAZ KHAN)  
Registrar  
For Provincial Police Officer,  
Khyber Pakhtunkhwa  
Peshawar

No. 9989 dt 3-8-2012

copy of above along with  
S. Roll is forwarded to  
D/o Mensehra for action

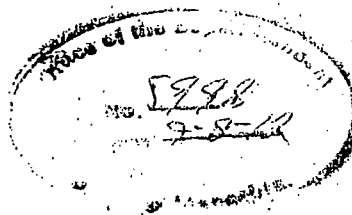
Encl: S. Roll = ①

*[Signature]*  
Dy. IGP/Hazara  
118

DHC/REC/DO

For mlg.

*[Handwritten signature]*  
118/12



سید علی

در صورتی که سالی ۱۳۰۸ بم ۶۲ ص ۱۵/۱۶  
 و در صورتی که سالی ۱۳۰۸ بم ۶۲ ص ۱۵/۱۶  
 کتاب الله و در این کتاب سید علی  
 در این کتاب سید علی  
 در این کتاب سید علی  
 در این کتاب سید علی

EX ۱۳۰۸ بم ۶۲ ص ۱۵/۱۶  
 ۱۰/۱۵  
 ۲۰۲۶

۱۱  
 For on 19  
 ۱۰/۱۵  
 ۲۰۲۶

"D" (13)



OFFICE OF THE DISTRICT POLICE OFFICER MANSEHRA

ORDER

This office order will dispose off the departmental enquiry proceeding against Constable Niaz Shah No. 456 who was proceeded against departmentally with the allegations that vide DD No. 23 dated 27.05.2015 Police Lines it has been reported that he was proceeded for 03 years ex-Pakistan leave. His leave was expired on 27.05.2015 but he has not made his arrival so far and deliberately absented himself from duty.

The Enquiry Officer i.e. Mr. Hafeez-ur-Rehman DSP Hqrs Mansehra after conducting proper departmental enquiry has submitted his report stating therein that despite repeated summons the delinquent Constable neither appear before the enquiry officer nor submit his written reply. Hence ex-parte action was initiated by the Enquiry Officer. A final show cause notice was also issued to the delinquent Constable Niaz Shah no. 456 but he failed to reply the same. The Constable is absent from duty with effect from 27.05.2015 and has turned a deaf ear to the summons for his reply/appearance. He willfully avoided his appearance before enquiry officer and undersigned.

I, the District Police Officer, Mansehra therefore, award major punishment of "Dismissal from service" to the delinquent Constable Niaz Shah No. 456 under Khyber Pakhtunkhwa Police, Disciplinary Rules 1975 with effect from 27.05.2015. His period of absence will be treated as leave without pay.

Ordered announced in absentia.

District Police Officer  
Mansehra

OB No. 62

Dated 12-4-2016

(E) (14)

**BEFORE THE REGIONAL POLICE OFFICER HAZARA REGION**  
**ABBOTTABAD**

(Departmental Appeal by Niaz Shah Constable No. 456 District Police Mansehra)

**DEPARTMENTAL APPEAL AGAINST ORDER OB NO. 62 DATED 12-04-2016 ISSUED BY DISTRICT POLICE OFFICER MANSEHRA WHEREBY APPELLANT HAS BEEN "DISMISSED" FROM SERVICE**

**PRAYER: ON ACCERTANCE OF INSTANT DEPARTMENTAL APPEAL ORDER DATED 12-04-2016 MAY KINDLY BE SET ASIDE AND APPELLANT BE RE-INSTATED IN SERVICE OR AT LEAST PUNISHMENT OF DISMISSAL BE CONVERTED INTO "COMPULORY RETIREMENT" WITH ALL CONSEQUENTIAL SERVICE BACK BENEFITS.**

Respected Sir,

With most respect and reverence the following few lines are submitted for your kind consideration and favorable orders:-

1. That appellant was inducted as constable in police department in June 2000 thus had served for about 15/16 years. Appellant was posted in DPO Office Mansehra to work as Computer Operator. Appellant always performed his assigned duties with zeal, zest, devotion, dedication and honesty to the entire satisfaction of his officers and never provided a chance of reprimand. Appellant has meritorious service record at his credit.
2. That in 2011 appellant requested for one (01) year Ex-Pakistan leave to study higher education abroad which was granted vide Notification No. 7374-75/E-II, Ex-Pakistan Leave dated 29-03-2011. In view of the above mentioned granted leave for one year, the



- 2 - (15)

appellant proceeded to "ENGLAND" for study in Higher Education. (Copy of Notification dated 29-03-2011 is attached as "A").

3. That in the year 2012 appellant applied for three (03) years extension of leave which was granted vide Notification No.14749/E-II, Ex-Pakistan Leave dated 26-07-2017. (248 days on half pay +847 days EOL = total 1095 days). (Copy of Notification dated 26-07-2012 is attached as "B").
4. That thought the sanctioned leave had expired in the year 2015 yet educational course of the appellant was not completed and stood in need of further leave, he applied for extension of 02 years EOL (leave without pay) for the purpose. Appellant applied this leave via FAX. Appellant was never intimated of sanction otherwise of leave by the Department. Subsequently when in 2022 appellant came back to Pakistan, he came to know about his dismissal service at the hands of the District Police Officer Mansehra vide order OB No. 62 dated 12-04-2016. Appellant requested for grant of dismissal order through application dated 10-08-2022 which was then issued hence this departmental appeal (Copies of application and order dated 12-04-2016 are attached as "C&D").
5. That no proper departmental inquiry was conducted. Neither Charge Sheet nor any Final Show Cause Notice was issued. Inquiry report if any

was also not given to appellant. Even he was not provided with the opportunity of personal hearing and he was awarded major punishment of dismissal from service in serious violation of law, departmental rules, regulations, facts & principle of natural justice.

6. That appellant had rendered about 15/16 years service from his appointment in June 2000 to his dismissal from service on 12-04-2016 and had completed minimum qualifying pension service. Therefore, appellant deserves to be re-instated in service and if not possible then conversion of dismissal into compulsorily retirement from service.

7. That if appellant is provided with a chance of personal hearing, he will really prove himself as Innocent by explaining all the facts and circumstances of the matter.

In view of the aforementioned facts it is earnestly requested that order dated 12-04-2016 of the District Police Officer, Mansehra may kindly be set aside and appellant be re-instated in service and if not possible then dismissal be converted into compulsorily retirement from service with all consequential service back benefits on rendition of account. Appellant shall pray for your good health and long life. Thanking you sir, in anticipation.

Yours Obedient Servant

(Niaz Shah, S/O Sayd Rahim Shah)  
Ex-Constable No. 456  
District Police Mansehra

Address:

Village: Dara Syedan  
Tehsil & Distt: Mansehra  
Mobile No. 0340-0194675

Dated: -09-2022

(F) (17)



OFFICE OF THE REGIONAL POLICE OFFICER  
HAZARA REGION, ABBOTTABAD

0992-9310021-22

0992-9310023

r.rpohazara@gmail.com

NO: 824 .IPA DATED 15/9/2022

ORDER

The competent authority has examined and *filed* the instant appeal submitted by Ex. Constable Niaz Shah No. 456 of Mansehra district against the punishment of Dismissal from service awarded by District Police Officer, Mansehra vide OB No. 62 dated 12.04.2016 being badly time barred.

*Jalil*  
For REGIONAL POLICE OFFICER  
HAZARA REGION, ABBOTTABAD

CC. The District Police Officer, Mansehra to inform the appellant accordingly.

(G<sup>v</sup> (18))

**BEFORE THE KPK PROVINCIAL POLICE OFFICER**  
**PESHAWAR**

(Revision petition by Niaz Shah Constable No. 456 District Police Mansehra)

**REVISION PETITION AGAINST ORDER OB NO. 62 DATED 12-04-2016 OF THE DISTRICT POLICE OFFICER MANSEHRA WHEREBY PETITIONER WAS DISMISSED FROM SERVICE AND ORDER DATED 15-09-2022 OF THE REGIONAL POLICE OFFICER, HAZARA REGION, ABBOTTABAD WHEREBY APPELLANT'S DEPARTMENTAL APPEAL HAS BEEN REJECTED.**

**PRAYER: ON ACCEPTANCE OF INSTANT REVISION PETITION BOTH THE ORDER DATED 12-04-2016 OF DPO MANSEHRA AND ORDER DATED 15-09-2022 OF RPO, HAZARA REGION, ABBOTTABAD MAY GRACIOUSLY BE SET ASIDE AND THE PETITIONER BE RE-INSTATED IN SERVICE FROM THE DATE OF DISMISSAL OR AT LEAST PUNISHMENT OF DISMISSAL BE CONVERTED INTO "COMPULSORY RETIREMENT" WITH ALL CONSEQUENTIAL SERVICE BACK BENEFITS.**

Respected Sir,

With most respect and reverence the following few lines are submitted for your kind consideration and favorable orders:-

1. That appellant was recruited as Constable in police department in June 2000 thus had served for about 15/16 years. Appellant was posted in DPO Office Mansehra to work as Computer Operator. Appellant always performed his assigned duties with zeal, zest, devotion, dedication and honesty to the entire satisfaction of his officers and never provided a chance of reprimand. Appellant has meritorious service record at his credit.
2. That in 2011 appellant requested for one (01) year Ex-Pakistan leave to study higher education abroad which was granted vide Notification No. 7374-75/E-II,

Ex-Pakistan Leave dated 29-03-2011. In view of the above mentioned granted leave for one year, the appellant proceeded to "ENGLAND" for study in Higher Education. **(Copy of Notification dated 29-03-2011 is attached as "A")**.

3. That in the year 2012 appellant applied for three (03) years extension of leave which was granted vide Notification No.14749/E-II, Ex-Pakistan Leave dated 26-07-2012 (248 days on half pay +847 days EOL = total 1095 days). **(Copy of Notification dated 26-07-2012 is attached as "B")**.

4. That though the sanctioned leave had expired in the year 2015 yet educational course of the appellant was not completed and stood in need of further leave, he applied for extension of 02 years EOL (leave without pay) for the purpose. Appellant applied this leave via FAX. Appellant was never intimated of sanction or otherwise of leave by the Department. Subsequently when in 2022 appellant came back to Pakistan, he came to know about his dismissal from service at the hands of the District Police Officer Mansehra vide order OB No. 62 dated 12-04-2016. Appellant requested for grant of dismissal order through application dated 10-08-2022 which was provided and departmental appeal was filed before the Regional Police Officer, Hazara Region, Abbottabad. **(Copies of application, order dated 12-04-2016 of DPO Mansehra and Departmental Appeal are attached as "C, D & E")**.
-

5. That appellant's departmental appeal was rejected by the Regional Police Officer, Hazara Region, Abbottabad vide order dated 15-09-2022 hence this Revision Petition.
6. That no proper departmental inquiry was conducted. Neither Charge Sheet nor any Final Show Cause Notice was issued. Inquiry report, if any, was also not given to appellant, Even he was not provided with the opportunity of personal hearing and he was awarded major punishment of dismissal from service in serious violation of law, departmental rules, regulations, facts & principle of natural justice.
7. That appellant had rendered about 15/16 years service from his appointment in June 2000 to his dismissal from service on 12-04-2016 and had completed minimum qualifying pension service. Therefore, appellant deserves to be re-instated in service and if not possible then conversion of dismissal into compulsorily retirement from service.
8. That if appellant is provided with a chance of personal hearing, he will really prove himself as innocent by explaining all the facts and circumstances of the matter.

In view of the aforementioned facts it is earnestly requested that order dated 12-04-2016 of the District Police Officer, Mansehra as well as the Regional Police Officer, Hazara Region, Abbottabad order dated 15-09-2022 may kindly be set aside and appellant be

(21)

re-instated in service and if not possible then at least dismissal be converted into compulsorily retirement from service with all consequential service back benefits on rendition of account. Appellant shall pray for your good health and long life. Thanking you sir in anticipation.

Yours Obedient Servant



(Niaz Shah S/O Sayd Rahim Shah)  
Ex-Constable No.456  
District Police Mansehra

**Address:** Village: Dara Syedan  
Tehsil & Distt: Mansehra  
Mobile No.0340-0194675

Dated: 03-10-2022

بعدالت لیسٹ طالعہ لکھنؤ



صفحہ 2 منجانب

نیاز شاہ بنام

مورخہ

مقدمہ

دعویٰ

جرم

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب وہی وکیل کاروائی متعلقہ

آن مقام کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز

وکیل صاحب کو راضی نامہ کرنے ق تقرر ثالث و فیصلہ پر حلف دیئے جواب وہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ار عرضی 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 محتاج 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 بھی وہی جملہ مذکور با اختیار حاصل ہوں گے اور اس کا ساختہ پر داخنتہ منظور قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ ہوں گے سب سے وہوگا۔ 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 مندر ہے۔

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ماہ

المرقوم

واہ العبد

العبد

ACCEPTED  
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