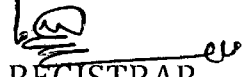


Form-A
FORM OF ORDER SHEET

Court of _____

Restoration Application No. 694/2022

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge
1	2	3
1	25.11.2022	<p>The application for restoration of Execution Petition No. 217/2021 submitted today by Syed Roman Shah Advocate. It is fixed for hearing before Single Bench at Peshawar on . Original file be requisitioned. Notices be issued to applicant and his counsel for the date fixed.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR

CM in *Restoration Appli. No 694/2022*

Execution Petition No. 217 of 2021,

In Service appeal no. 1378 of 2019

Maqsood Islam

VERSUS

Government of KPK and others

INDEX

S.No.	Description of Documents	Annex	Pages
1.	Application with affidavit		1-3
3.	Cop of judgment dated 03/06/2021	A	4-6
4.	Copy of execution petition	B	7-10
5.	Copy of order dated 27/10/2022	C	11-17
8.	Copy of other documents		18
9	Wakalat Nama		19

Maqsood Islam
Petitioner

Through

Syed Roman Shah
Syed Roman Shah
Advocate High Court

①

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR

CM in

Restoration Application No. 694/2022

Execution Petition No. 217 of 2021,

In Service appeal no. 1378 of 2019

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 2056

Dated 25/11/2022

Maqsood Islam S/o Islam Badshah, Naib Qasid Office of
the Assistant Director, Local Government & Rural
Development Department, Karak

.....**Judgment Creditor/Petitioner**

Versus

1. Provincial Government of KP Through Secretary Local Government & Rural Development, KPK Peshawar
2. Director General Local Government & Rural Development, KPK Peshawar.
3. Assistant Director, Local Government & Rural Development, Karak.

.....**Judgment Debtor/Respondent**

RESTORATION APPLICATION IN EXECUTION
PETITION NO 217/2021, WHEREBY THIS HONORABLE
TRIBUNAL FILED THE EXECUTION PETITION
WITHOUT COMPLETELY IMPLEMENTING IN
JUDGMENT DATED 03/06/2021, IN APPEAL NO.
1378/2019.

Respectfully Sheweth;

Applicant humbly submits as under

1. That the above mentioned appeal has been decided on 03/06/2021, by this honorable tribunal in favor of the petitioner. **(Copy of judgment dated 03/06/2021 is annex as Annexur-A)**
2. That the respondents were reluctant to implement the judgment of this honorable tribunal thus the petitioner approached this honorable tribunal for the implementation of the judgment in execution petition No. 217/2021. **(Copy of execution petition is annex as Annexure-B)**
3. That the execution petition was “filed and consign” vide order dated 27/10/2022, shown as satisfactorily; although the same was not completely implemented. **(Copy of Order Dated 27/10/2022 is Annex as Annexure-C).**
4. That the grievances of the petitioner has not been fully assured by the respondents as they have only “assured the adjustment of the petitioner on a position of Naib Qasid and when occurred” and they are silent about the back benefits of the petitioner.
5. That the respondents neither implementing the judgment of this honorable tribunal nor challenged the same before the upper forum i.e Supreme Court.

3

6. That there is no legal bars in restoration of the execution petition No. 217/2021, similarly this honorable tribunal has the ample power to implement the judgment Dated: 03/06/2021 in letter and spirit.

It is therefore most humbly prayed that upon acceptance of this petition, the execution petition No.217/2021 may please be restored and the respondents may please be directed to implement the order and judgment of this Hon,ble tribunal Dated 03/06/2021, in letter and spirit.

Through

29/06/21
Petitioner
[Signature]
Syed Roman Shah
Advocate High Court

AFFIDIVIT

I Maqsood Islam S/o Islam Badshah, R/o Purana Bazar Karak, Muhallah Masjid Kallan Karak, do hereby solemnly affirm and declare on oath that the contents of the above restoration application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable tribunal.

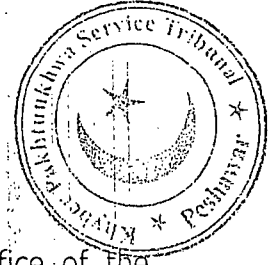


29/06/21
Deponent

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1378/2019

Date of Institution ... 21.10.2019
 Date of Decision ... 03.06.2021



Maqsood Islam S/O Islam Badshah, Naib Qasid Office of the
 Assistant Director, Local Government & Rural Development
 Department, Karak.

... (Appellant)

VERSUS

Provincial Government of Khyber Pakhtunkhwa through
 Secretary Local Government & Rural Development Department,
 Khyber Pakhtunkhwa, Peshawar and two others.

... (Respondents)

Abdul Nasir Khattak,
 Advocate

... For appellant.

Kabir Ullah Khattak,
 Additional Advocate General

... For respondents.

AHMAD SULTAN TAREEN
 ROZINA REHMAN

... CHAIRMAN
 ... MEMBER (J)

JUDGMENT

ROZINA REHMAN, MEMBER : Brief facts of the case are that the
 appellant was appointed as Naib Qasid in the office of Assistant
 Director Local Government & Rural Development Department on the
 recommendation of Departmental Selection Committee. Accordingly
 he reported his arrival for duty. It was on 01.03.2019, when he was

ATTESTED

ENAMUL HAQ
 Khyber Pakhtunkhwa
 Service Tribunal
 Peshawar

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ATTESTED TO BE
 TRUE COPY

5

informed by the bank official regarding the stoppage of his salary. He submitted departmental appeal which was not responded to, hence, the present service appeal.

2. Learned counsel for the appellant argued that the appellant was properly appointed on the recommendation of DSC, therefore, entitled to receive his salary. He submitted that he was allowed salary for thirteen (03) months which is evident from the last pay slip for the month of January 2019, therefore, the respondents were not authorized to stop his salary. He argued that he is performing his duty regularly but was deprived of his monthly pay and thus the respondents violated rule and regulations of the Government.

3. Conversely, learned A.A.G submitted that the appellant was neither appointed as Naib Qasid nor departmental Selection Committee recommended him for the said post as no DSC was constituted. He contended that appointment order dated 29.12.2017 was issued in back date by the then Assistant Director Local Government and Rural Development Department, Karak by way of Fraud. He, therefore, requested for the dismissal of the instant appeal as the appointment was bogus and fake.

4. From the record, it is evident that upon the recommendation of Departmental Selection Committee petitioner was appointed against the vacant post of Naib Qasid in the office of Assistant Director Local Government and Rural Development Department District Karak vide order dated 29.12.2017. He submitted his arrival

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ATTESTED

ENAMUL HAK
Khanjari, District Karak
Service Tribunal
Tribunal

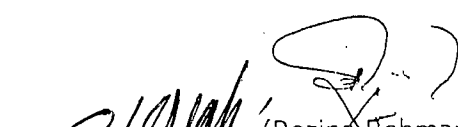
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ATTESTED TO BE TRUE COPY

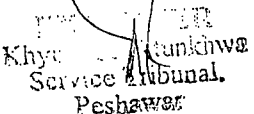
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report which is available on file where-after he started his service and he received salary which is evident from his payroll available on file. Different letters were produced by the appellant during arguments which are available on file vide which advice was sought by Assistant Director from Director General, of Local Government in respect of the present appellant. From the comments of the respondents it is also evident that when the bogus appointment order was pointed out, pay of the appellant was stopped and high ups were informed for conducting inquiry regarding the fake appointment which is still awaited. It is not denied that pay of the appellant was stopped without conducting proper inquiry, therefore, this appeal is allowed with direction to the respondents to conduct proper inquiry within ninety (90) days of the receipt of this judgment. The appellant shall be provided proper opportunity of defense during the inquiry proceedings. The issue of back benefits is subject to the outcome of inquiry. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED.
03.06.2021


(Ahmad Sultan Tareen)
Chairman


(Rozina Rehman)
Member (J)

Certified to be true copy

Khuzdar District Service Tribunal,
Peshawar

REQUESTED TO BE
Date of Presentation of Application 03/06/2021
Number of Pages 18
Number of Copies 1600
Urgent 18
Total 18
Name of Applicant [Signature]
Date of Receipt of Copy 17/6/2021
Date of Delivery of Copy 17/6/2021

7

Annex - B

**BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR**

Execution petition No. _____/2021

In

Service Appeal No: 1378/2019

Maqsood Islam

VERSUS

Govt of Khyber Pakhtunkhwa and Others

INDEX

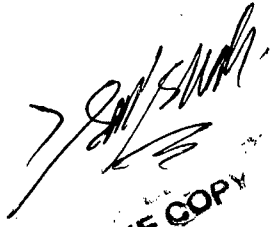
S#	Description of Documents	Annex	Pages
1.	Execution Petition with Affidavit.		1-3
2.	Affidavit		4
3.	Addresses of Parties		5
4.	Copy of Judgment	"A"	6-8
5.	Copy of Appeal	"B"	9-14
5.	Wakalat Nama.		15

Dated: 08/10/2021

Petitioner

Through

Abdul Nasir
Advocate, High Court
Member District Bar
Association Karak.


TRUE COPY

8

11/11

**BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR**

Execution petition No. _____/2021

In

Service Appeal No: 1378/2019

Maqsood Islam S/o Islam Badshah, Naib Qasid Office Of
The Assistant Director , Local Government & Rural
Development Department, Karak

-----Appellant

VERSUS

1. Provincial Government of KP through Secretary
Local Govt & Rural Development, KPK
Peshawar.
2. Director General Local Govt & Rural
Development, KPK Peshawar
3. Assistant Director, local Govt & Rural
Development, Karak.

-----*(Respondents)*.

**EXECUTION PETITION
FOR IMPLEMENTATION
OF THE JUDGMENT OF
THIS HON'BLE TRIBUNAL
IN APPEAL No. 1378/2019
DECIDED ON 03/06/2021**

Respectfully Sheweth,

1. That the above mentioned appeal was
decided by this Hon'ble Tribunal vide

Maqsood Islam
TESTED TO BE
COPY

9

4

Judgment dated 03/06/2021. (Copy of the judgment is annexed as annexure "A")

1. That the Petitioner after getting of the attested copy of the judgment of this Hon'ble Tribunal approached the Respondent for implementation of the decision of this Hon'ble Tribunal several time for implementation of the above mention judgment. However the respondents neither comply with the judgment of this Hon'ble Tribunal nor his filed has challenged the same before the appellate forum i.e Supreme Court Of Pakistan.
2. It is also submitted that the respondents has not conducted any inquiry nor initiated any proceeding as per direction of this Hon'ble Tribunal despite expiry of 90 days is fixed and specified in the judgment of the Tribunal.
3. That the respondent are legally and morally bound to obey order of this Hon'ble Tribunal and implement judgment of this Hon'ble Tribunal. But there are reluctant to implement the same.

[Handwritten Signature]
ATTESTED TO

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4. That the respondents deliberately and intentionally dishonor judgment of the Honorable Tribunal and they have no regard to court orders and directions.

5. That there is nothing which prevent this Hon'ble Tribunal from implementing of its own judgment.

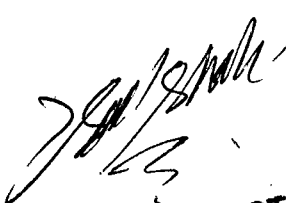
It is, therefore humbly, prayed that on acceptance of this execution petition, this Hon'ble Tribunal may be graciously be pleased to direct respondent to implement and comply with the judgment of this Hon'ble Tribunal.

Dated: 08/10/2021


Petitioner

Through

Abdul Nasir
Advocate, High Court
Member District Bar
Association Karak.


ATTESTED TO BE
TRUE COPY

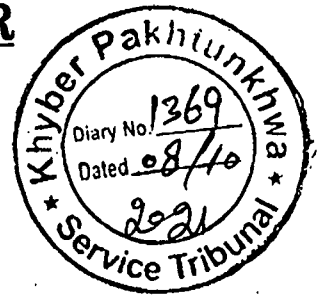
(11)

**BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR**

Execution petition No. 217/2021

In

Service Appeal No: 1378/2019



Maqsood Islam S/o Islam Badshah, Naib Qasid Office Of
The Assistant Director , Local Government & Rural
Development Department, Karak

-----Appellant

VERSUS

1. Provincial Government of KP through Secretary
Local Govt & Rural Development, KPK
Peshawar.
2. Director General Local Govt & Rural
Development, KPK Peshawar
3. Assistant Director, local Govt & Rural
Development, Karak.

-----*(Respondents)*

**EXECUTION PETITION
FOR IMPLEMENTATION
OF THE JUDGMENT OF
THIS HON'BLE TRIBUNAL
IN APPEAL No. 1378/2019
DECIDED ON 03/06/2021**

Respectfully Sheweth,

1. That the above mentioned appeal was
decided by this Hon'ble Tribunal vide

ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

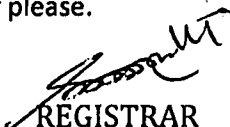


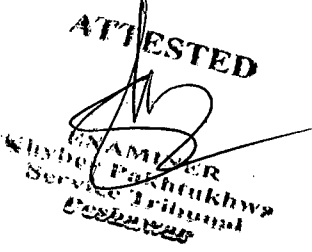
Attested

Form- A

FORM OF ORDER SHEET

Court of _____

Execution Petition No. 217 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	08.10.2021	<p>The execution petition of Mr. Maqsood Islam submitted today by Mr. Abdul Nasir Advocate may be entered in the relevant register and put up to the Court for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-	12.11.2021	<p>This execution petition be put up before SB for hearing on <u>12/11/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p> <p>Counsel for the petitioner present.</p> <p>Notices be issued to the respondents for the date fixed. To come up for implementation report on 22.12.2021 before S.B.</p> <p style="text-align: right;"> Chairman</p> <p style="text-align: center;">ATTESTED  EXAMINER Hydro Pakhtunkhwa Service Tribunal Peshawar</p>

22.12.2021

Counsel for the petitioner and Mr. Muhammad Adeel Butt, Addl. AG alongwith Amir Abbas, (Litigation Officer) for the respondents present.

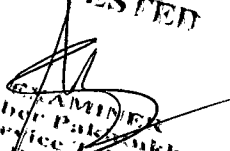
The petitioner has approached this Tribunal mainly on his grievance against stoppage of his salary and by judgment at his credit, his appeal was allowed giving liberty to the respondent department to conduct proper enquiry within ninety days after receipt of judgment. The judgment was passed on 03.06.2021 but learned AAG is clueless even today as to commencement of the enquiry. For the time being respondent department is directed to release current salary of the petitioner failing which appropriate coercive measure shall be taken as provided under the law against the responsible officer. Case to come up for compliance report on 10.02.2022 before S.B.


Chairman

10.02.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 31.03.2022 for the same as before.


Reader

ATTESTED

AMIN
Hydrabad Pakhwa
Service Tribunal
Kashmir

22nd June, 2022 Petitioner alongwith his counsel present. Syed Naseer Ud Din Shah, Assistant Advocate General alongwith Mr. Habib Nawaz, AD Local Government, Karak and Mr. Aizaz Ul Hassan, Supdt for respondents present.

The parties are directed to reconsider the matter outside the court and come up with some ^{Solution} To come up for further proceedings on 01.08.2022 before S.B.



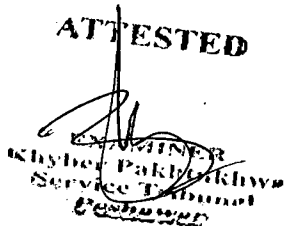
(Kalim Arshad Khan)
Chairman

01.08.2022 Learned counsel for the Petitioner present. Mr. Kabir Ullah Khattak, Additional Advocate General alongwith Mr. Habib Nawaz, AD Local Government and Mr. Aizaz Ul Hasan, Superintendent for respondents present.

Despite clear direction from this Tribunal vide its judgment dated 03.06.2021, no enquiry was conducted within 90 days of the receipt of judgment. Moreover, parties did not settle the issue outside the court in the light of direction given on 22nd June, 2022. Today again the learned Advocate General stated that he needed time for submission of implementation report, however, he stated that the salary of the appellant had been released and he was receiving it on monthly basis. He informed that there was no vacant ^{post} of Naib Qasid in the office of Assistant Director Local Government and RDD Karak, and as soon as the post became available the petitioner would be considered on merit as per rules and law, but the petitioner did not agree with the suggestion.

As enough time has already passed and neither enquiry was conducted nor out of court settlement has been reached, there is no other choice but to give one last chance to settle the issue. Both parties are once again directed to settle it amicably to the satisfaction of the appellant. To come up for further proceedings on 09.09.2022 before S.B.

ATTESTED



Chairman
Khyber Pakhtunkhwa
Service Tribunal



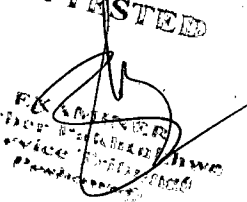
(Fareeha Paul)
Member (E)

31.03.2022

Petitioner alongwith his counsel present. Mr. Muhammad Adeel Butt, Addl: AG alongwith Mr. Habibi Nawaz, AD Local Government Karak and Mr. Azaz Ul Hassan, Supdt for respondents present.

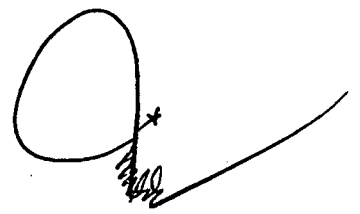
The respondent-department produced a copy of pay slip in respect of the petitioner for the month of February 2022 substantiating that current salary has been released to the petitioner in pursuance of the judgement of Service Tribunal dated 03.06.2021 as well as order sheet dated 22.12.2021. On a question from the Bench regarding conducting proper enquiry as per spirit of the judgement of Service Tribunal, representative of the respondent-department could not advance any substantial reply/proof to show that proceedings have been initiated against the petitioner so far. Learned counsel for the petitioner raised objection on the pay slip of the petitioner (February 2022) wherein he has been shown as "Sound Helper" instead of his original post of Naib Qasid. DDO code statement was also produced reflecting at serial No. 66 one Muhammad Zeeshan Danish to have been appointed as Naib Qasid against the post of petitioner.

Learned AAG on the other hand substantiated that the appointment of the petitioner was illegal as there was no vacant post and the incumbent Assistant Director Local Government Karak (DDO) had been transferred and the petitioner was able to manoeuver for release of his salary in connivance with Accounts office on the basis of fake appointment letter dated 29.12.2017. A pertinent question was raised by the Bench before the learned AAG that if there was no vacant post at that point of time then how could the petitioner be appointed as Naib Qasid?. It was clarified that criminal proceedings have been initiated by registering FIR with Anti-Corruption Establishment against four accused persons including the petitioner. This point was rebutted by learned counsel for the petitioner stating that all this has been done during pendency of his execution petition when the Chapter had already been closed once the Service Tribunal decided his service appeal on 03.06.2021.


ATTESTED

 SENIOR REGISTRAR
 SERVICE TRIBUNAL
 KARAK

In view of the Pro & Contra arguments of the parties it is quite evident that basic issue remains the same i.e to conduct

enquiry within ninety days as per judgement of the Service Tribunal dated 03.06.2021 and order sheet dated 22.12.2021. The department is therefore, under obligation to conduct the enquiry against the petitioner as per directions specifically passed in the judgement of the Service Tribunal and produce the same for perusal of the court on the next date. Adjudged. To come up for further proceedings on 22.06.2022 before S.B.



(MIAN MUHAMMAD)
MEMBER(E)

ATTESTED

MEMBER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

09.09.2022

Petitioner alongwith his counsel present.

Muhammad Jan, learned District Attorney alongwith Habib Nawaz Assistant Director and Aizaz Ul Hassan Assistant for respondents present.

From the record it is evident that last chance had been given to the parties to settle the issue amicably to the satisfaction of the petitioner. Today, parties informed that salary of the petitioner has been released and that he is not in the habit of attending the office for duty. Petitioner was strictly directed to make sure his presence on the next coming Monday at 9:00 AM before the authority while representative of the respondents was directed to make sure the production of inquiry report on or before the next date. To come pup for inquiry repot/Implementation report on 27.10.2022 before S.B.

(Rozina Rehman)
Member(J)

27th Oct., 2022

Petitioner alongwith counsel present. Mr. Naseerud Din Shah, Assistant Advocate General alongwith Mr. Habib Nawaz, Assistant Director for the respondents present.

Representative of the respondents assured that the appellat would be adjusted on a position of Naib Qasid as and when occurred and his seniority would not be affected in any case. Learned counsel for the petitioner is satisfied. Instant petition is, therefore, filed. Consign.

Pronounced in open Court at Peshawar and given under my hand and the seal of the Tribunal on this 27th day of October, 2022.

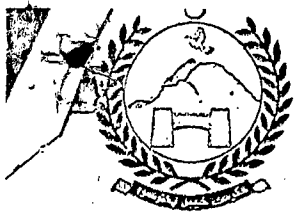
(FAREEHA PAUL)
Member(E)

Certified to be true copy

Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Case of Presentation of Application
Number
Date
Name of
Date of
Case of
28/9/22
29/10/22
29/11/22
29/11/22

18



**OFFICE OF THE ASSISTANT DIRECTOR
LOCAL GOVERNMENT, ELECTIONS & RURAL DEPARTMENT
GOVERNMENT OF KHYBER PAKHTUNKHWA KARAK**
Email Address: adkarak@gmail.com

Website: www.lgkp.gov.pk

Email address: adkarak@gmail.com

Phone Number: [0927-291204](tel:0927-291204)

No. 677/AD LG KK

Dated. 19/07/2022

Minutes of meeting regarding implementation of the order of Honorable Court of Service Tribunal Khyber Pakhtunkhwa Peshawar in execution Petition No, 217/2021 in service Appeal No, 1378/2019 on dated: 22/06/2022 under the chairmanship of AD LG & RDD Karak held on 18/07/2021.

A meeting was held on 18/07/2022 under the chairmanship of AD LG & RDD Karak in compliance of the order of Honorable Court of Service Tribunal Khyber Pakhtunkhwa Peshawar passed on 22/06/2022 in the execution Petition No, 217/2021 in Service Appeal No, 1378/2019 of Maqsood Islam VS Government.

The meeting was attended by the AD LG & RDD Karak, Progress Officer & Supervisor of the office of AD LG & RDD District Karak and Maqsood Islam along with his council.

The chair welcomed the participants and explained the aim/ objective of the meeting, the applicant i.e Maqsood Islam was of the view that his pay may be drawn against the post of Naib Qasid instead of sound helper.

The chair explained that as per the order of Honorable Court of Service Tribunal of Khyber Pakhtunkhwa Peshawar passed on 22/02/2022 in the said execution petition, his pay has already been released and he has been receiving his pay regularly on monthly basis.

The chair further mentioned that at the present there is no vacant post of Naib Qasid in the office of the Assistant Director Local Government and RDD Karak, as and when the post of Naib Qasid becomes vacant then his case will be considered on merit as per rules and law. But the appellant was not agree with the suggestion of the chair. He said that matter /case will be decided by the Honorable Court of Service Tribunal of Khyber Pakhtunkhwa and was not ready to resolve the case outside the court.

The meeting was ended with the vote of thanks.

**Assistant Director
LG & RDD KARAK**

(Signature)

Endst: No & Date Even:




Copy forwarded to the:

1. Register Of Honorable Court of Service Tribunal Kyber Pakhtunkhwa Peshawar.
2. Assistant Director(Litigation) LG & RDD, Khyber Pakhtunkhwa Peshawar.
3. P.A to Director General LG & RDD Kyber Pakhtunkhwa Peshawar.

**Assistant Director
LG & RDD KARAK**

(Signature)

**AT TESTED TO BE
TRUE COPY**

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ایڈوکیٹ: <u>سید روحان شاہ</u> <u>حلی</u> <u>اللہ</u> بار کونسل ایسوسی ایشن نمبر: 25-2277 / 17-7618-Be رابطہ نمبر: 9918890-0333		پشاور بار ایسوسی ایشن، خیبر پختونخواہ بعدالت جناب: <u>سر سید عبدالرحیم</u>

Petitioner: <u>سید روحان شاہ</u> Opposite Party: <u>بنام</u> (Seal of Peshawar Bar Association) Date: <u>20/03/2022</u>	دعویٰ: _____ علت نمبر: _____ مورخہ: _____ جرم: _____ تھانہ: _____
<h3 style="background-color: black; color: white; padding: 5px;">باعت تحریر آنگہ</h3>	

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ
 آن مقام سید روحان شاہ حلی اللہ کو وکیل مقرر
 کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو
 راضی نامہ کرنے و تقررات و فیصلہ بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق
 زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز
 دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی
 کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ لے سکتے ہیں۔ بجائے تقرر کا اختیار ہوگا اور صاحب
 مقرر شدہ کو وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داخے منظور و قبول ہوگا
 دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے
 باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے
 المرقوم: 24/01/2022

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 وکیل صاحب
 مقام: پشاور

نوٹ: اس کا تصدیقی نامہ تو وکیل صاحب کو قبول ہوگی۔