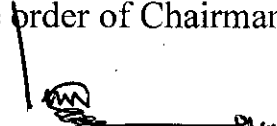


FORM OF ORDER SHEET

Court of _____

Case No. - 1772/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	08/12/2022	<p>The appeal of Mr. Muhammad Sohail Khan presented today by Mr. Sial Ahmad Shalwan Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar 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 HONOURABLE SERVICE TRIBUNAL KHYBER PUKHTUNKHWA,
PESHAWAR

Service Appeal No 1772/2022

Muhammad Sohail.....(Appellant)

VERSUS

Commandant FRP and another.....(Respondents)

INDEX

S NO	DESCRIPTION OF DOCUMENTS	ANNEX	PAGE
1.	Service Appeal alongwith Affidavit		1-6
2.	Memo of addresses	-	7
3.	Copy of the CNIC of the Appellant	'A'	8
4.	Copy of the service card	'B'	9
5.	Copies of the medical prescriptions	'C'	10
6.	Copy of the order dated 18-08-2022	'D'	11
7.	Copy of the grounds of appeal and order dated 07-11-2022	'E & F'	12-14
8.	Copies of the other relevant documents	-	15-19
9.	Wakalat Nama (in original)	-	20

Appellant

Through:

(SIAL AHMAD SHALMAN)
Advocate,
High Court, Peshawar
Cell # 0300-9021228

Dated: -08-12-2022

BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PUKHTUNKHWA,
PESHAWAR

Service Appeal No 1772 /2022

Muhammad Sohail Khan S/O Shakir Ullah R/O Dawat Khel, District Swabi (Ex-Constable No FRP-1031).....Appellant

V E R S U S

1. Commandant Frontier Reserve Police, Khyber Pakhtunkhwa Peshawar
2. Deputy Commandant, Frontier Reserve Police Khyber Pakhtunkhwa Peshawar.....(Respondents)

Appeal under Section 4 of the NWFP Service Tribunal Act, 1974 against the impugned order No 1412-18 dated 18-08-2022 and order No 9024-26/SI Legal dated 07-11-2022 till the final disposal of the instant service appeal

PRAYER IN APPEAL

On acceptance of this Appeal, the order No 1412-18 dated 18-08-2022 and order No 9024-26/SI Legal dated 07-11-2022 may graciously be set aside and the services of the Appellant may kindly be reinstated alongwith all back benefits.

Respectfully Sheweth:-

The Appellant humbly submits as under:-

- 1) That the Appellant is the natural born citizen of Pakistan and is entitled for all the right guaranteed by the Constitution of Islamic Republic of Pakistan, 1973 and hails from a respectable family of District Swabi. (Copy of the CNIC is attached as Annex 'A').
- 2) That in fact, the Appellant was got recruited in the Frontier Reserve Police as (Constable) vide belt No FRP-1031 in the year 2011. (Copy of the service card is attached as Annex 'B').
- 3) That the Appellant served his duty very honestly, sincerely and efficiently with full zeal and devotion.
- 4) That the Appellant was absent from his duty from 31st March, 2022 till 18th August, 2022 due to his serious illness. It is pertinent to mention here that the Appellant visited City Medical Centre and Surgical Hospital on dated 01st April, 2022; where the Doctors advised some medical tests and after conducting of said tests, the result was beyond the imagination of Appellant, the Doctors finally come to conclusion that kidney operation/surgery of the Appellant will be necessary. (Copies of the medical prescriptions are attached as Annex 'C').
- 5) That inspite of serious illness and do or die situation, the Appellant come to Traffic Headquarter on 15-07-2022, but the high-ups informed the Appellant that he should to wait for further order and surprisingly received the impugned

order dated 18-08-2022. (Copy of the order dated 18th August, 2022 is attached as Annex 'D').

- 6) That thereafter, the Appellant submitted a departmental appeal on 15th September, 2022 against the order dated 18-08-2022 but the prayer of Appellant was turned down vide impugned order No 9024-26/SI Legal dated Peshawar the 07th November, 2022. (Copy of the grounds of appeal and order dated 07-11-2022 is attached as Annex 'E & F').
- 7) That feeling aggrieved from the orders, the Appellant having no other adequate and efficacious remedy, approaches before this Honourable Court for his reinstatement into service with all back benefits on the following grounds inter-alia:-

GROUNDS:-

- A) That the Appellant is the natural born citizen of Pakistan and is fully entitled to all the basic and fundamental rights as enshrined in the fundamental law of the state, interpreted and guaranteed by the law of the land.
- B) That the fundamental rights of the Appellant have blatantly violated by the Respondents and the Appellant have been discriminated and has been denied his due rights under the Constitution of Islamic Republic of Pakistan, 1973.
- C) That this Honourable Court has in a number of judgments allowed the cases of similarly nature, however, the

Respondents are depriving the Appellant from his fundamental rights.

D) That once of the celebrated right to earn livelihood through lawful means is a basic fundamental right guaranteed not only by the constitution of the modern world but rather has a backing history spread over immemorial time in the stateless and even in the mediaeval ages. The Appellant seeks to enforce his said right and to remain peaceful citizen of the society in this modern era of globalization.

E) That the impugned orders are against the norms of justice, illegal, unconstitutional and without authority, therefore, not tenable.

F) That any other ground not raised here specifically may also graciously be allowed to be raised at the time of arguments.

PRAYER:-

It is, therefore, most humbly prayed that on acceptance of this Service Appeal, the order No 1412-18 dated 18-08-2022 and order No 9024-26/SI Legal dated 07-11-2022 may graciously be set aside and the services of the Appellant may kindly be reinstated alongwith all back benefits. Furthermore, the Appellant may very graciously be reinstated into service as (Constable) with all back benefits till the final disposal of the instant writ petition.

(4)

(5)

Any other relief not specifically asked for may kindly be extended in favour of the Appellant, in the circumstances of the case.

Appellant

Through:

(SIAL AHMAD SHALMAN)
Advocate,
High Court, Peshawar

Dated:-08-12-2022

CERTIFICATE:

No such appeal has earlier been filed by the Appellant before any competent authority on the subject matter

Advocate

(6)

BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PUKHTUNKHWA,
PESHAWAR

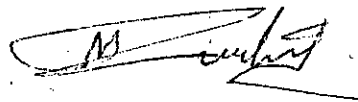
Muhammad Sohail.....(Appellant)

VERSUS

Commandant FRP and another.....(Respondents)

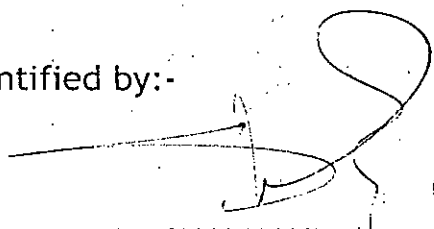
AFFIDAVIT

I, Muhammad Sohail Khan S/O Shakir Ullah R/O Dawat Khel, District Swabi (Ex-Constable No FRP-1031), do hereby solemnly affirm and declare on oath that all the contents of accompanied Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed OR withheld from this Honourable Court.

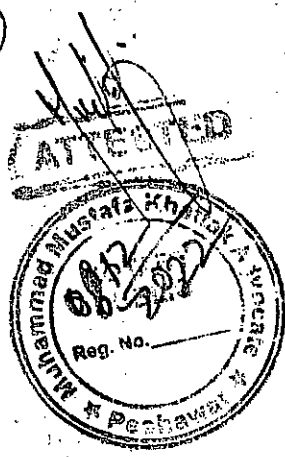


DEPONENT _____
CNIC # 16202-8920129-9
Cell # 03163515823

Identified by:-



(SIAL AHMAD SHALMAN)
Advocate
High Court, Peshawar



(7)

BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PUKHTUNKHWA,
PESHAWAR

Muhammad Sohail.....(Appellant)

V E R S U S

Commandant FRP and another.....(Respondents)

ADDRESSES OF THE PARTIES

APPELLANT

Muhammad Sohail Khan S/O Shakir Ullah R/O Dawat Khel, District
Swabi (Ex-Constable No FRP-1031)

RESPONDENTS

1. Commandant Frontier Reserve Police Khyber Pakhtunkhwa
Peshawar
2. Deputy Commandant, Frontier Reserve Police Khyber
Pakhtunkhwa Peshawar

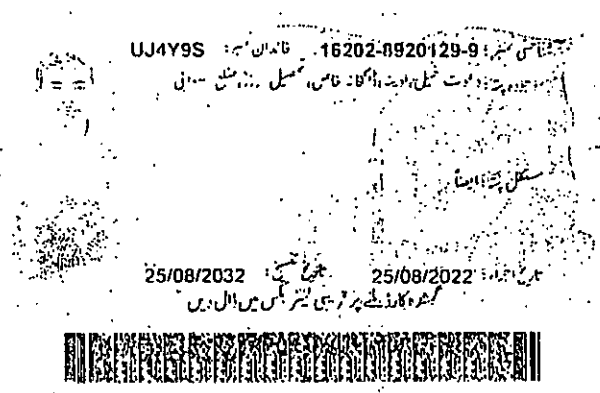
Appellant

Through:

(SIAL AHMAD SHALMAN)
Advocate,
High Court, Peshawar

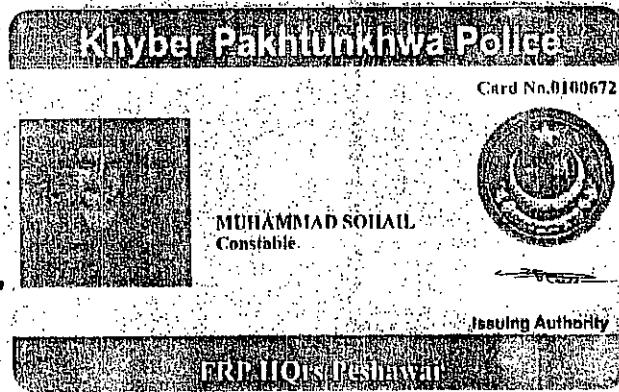
Dated:-08-12-2022

(A)
8



ATTESTED

(B)
9



CNIC # 1620289201299

Date of Birth 10-01-1993

Date of Issue 24-02-2022

Date of Expiry 23-02-2025

Emergency Contact# 03155566674

Address Adana Razar Swabi



1. In the event of loss the card holder should report to the nearest police station.
2. If found, please drop into the nearest letter box.
3. Contact us: 091-9210437

ATTESTED

(10)

**FINAL SHOW CAUSE NOTICE UNDER THE KHYBER PAKHTUNKHWA
POLICE RULES 1975, AMENDED 2014.**

I, Jehan Zeb Khan Barki, PSP Deputy Commandant FRP Khyber Pakhtunkhwa being competent authority do hereby serve this Final Show Cause Notice to you, Constable Sohail No. 1031 of FRP / HQrs: Peshawar.

(1) i. That, you Constable Sohail No. 1031 of FRP / HQrs: Peshawar absented yourself from lawful duty w.e.f 31/03/2022 till date without taking any leave / proper permission of the competent authority. In this connection an inquiry was entrusted to L.O, H.R.P, HQrs: Peshawar, who after conducting proper departmental inquiry recommended for taking ex-parte action against you.

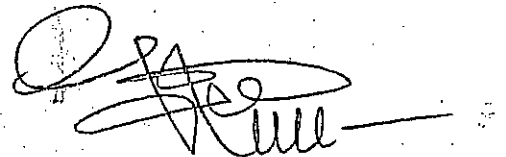
ii. That consequent upon the completion of inquiry conducted against you by L.O, FRP HQrs: Peshawar for which you were given full opportunity of hearing but you failed to submit any reply to the Charge Sheet / statement of allegation and recommended for taking ex-parte action against you.

iii. On going through the findings / recommendations of the Inquiry Officer as well as other material available on record and other connected papers, I am satisfied that you have committed the above acts / omissions under the Khyber Pakhtunkhwa Police Rules 1975, amended 2014.

(2) Therefore, I Jehan Zeb Khan Barki, PSP Deputy Commandant, FRP, Khyber Pakhtunkhwa being competent authority have tentatively decided to impose upon you Major / Minor penalty including Dismissal from Service under the said Rules.

(3) You are, therefore, required to Show Cause to this final notice as to why not the aforesaid penalty should be imposed upon you.

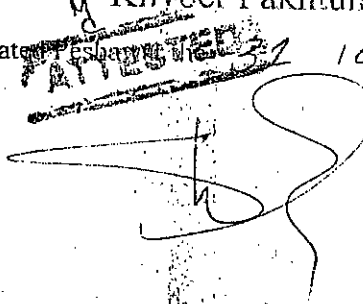
(4) If no reply to this Final Show Cause Notice is received within seven (07) seven days of its delivery in the normal course of circumstances, it shall be presumed that you have no defence to put in and consequently ex-parte action shall be taken against you.



**(Jehan Zeb Khan Barki) PSP
Deputy Commandant,
Frontier Reserve Police,
Khyber Pakhtunkhwa, Peshawar.**

No. 939 /PA, dated 10/5/2022

ATTESTED



(D)
(11)

ORDER


This order will dispose of the Departmental Inquiry initiated against Constable Sohail No. 1031 of F.R.P, HQrs: Peshawar on the score of the following grounds.

Brief facts of the case are that Constable Sohail No. 1031 of F.R.P, HQrs: Peshawar deliberately absented himself from lawful duty with effect from 31.03.2022 till date without taking any leave / permission of the Competent Authority. In this regard, proper departmental proceedings were initiated against him. He was issued Charge Sheet / Statement of allegations and Line Officer, F.R.P, HQrs: Peshawar was nominated as Inquiry Officer. After conducting proper departmental inquiry, the Inquiry Officer submitted his findings wherein the accused official was found guilty, hence recommended him for suitable punishment. Upon the recommendations of the Inquiry Officer, the accused official was issued Final Show Cause Notice, to which he failed to submit reply within the stipulated period. Later on he was called in Orderly Room for personal hearing but did not appear before the undersigned.

Keeping in view all the above facts and recommendations of the Inquiry Officer as well as other material available on record, it has come crystal clear, that the said accused constable deliberately absented himself from lawful duty for such a long period i.e 31.03.2022 till date.

Therefore, in exercise of powers of the Khyber Pakhtunkhwa Police Rules 1975, (amended 2014) conferred upon me, I, **Jehanzeb Khan Barki**, P.S.P / Deputy Commandant, F.R.P, Khyber Pakhtunkhwa, Peshawar being competent authority, hereby award Major punishment of **Removal from service** to the accused official i.e **Constable Sohail No. 1031** of F.R.P, HQrs: Peshawar with immediate effect. However, his absence period as well as intervening period he spent out of service, is hereby treated as leave without pay.

Order announced.


(JEHANZEB KHAN BARKI) PSP
Deputy Commandant,
Frontier Reserve Police
Khyber Pakhtunkhwa Peshawar

No. 1412-18 /PA dated Peshawar, the 18 / 08 /2022.

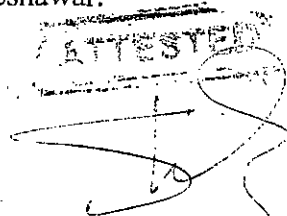
Copy of above is forwarded:-

For information to the:-

1. Worthy Commandant, FRP Khyber Pakhtunkhwa Peshawar.

For necessary action to the:-

2. D.S.P / HQrs: F.R.P, Peshawar.
3. Accountant, S.R.C, F.R.P, HQrs: Peshawar.
4. R.I, O.A.S.I, M.A.S.I, F.R.P, HQrs: Peshawar.

ATTESTED


(E)
(12)

**BEFORE THE WORTHY COMMANDANT FRP KHYBER
PAKHTUNKHWA, PESHAWAR**

**DEPARTMENTAL APPEAL AGAINST THE
IMPUGNED ORDER NO.1412-18 DATED
18.08.2022 PASSED BY DEPUTY COMMANDANT
FRP KHYBER PAKHTUNKHWA, PESHAWAR.**

PRAYER IN APPEAL

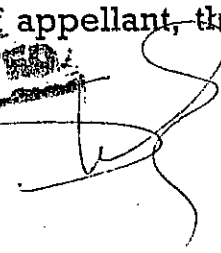
**TO SET-ASIDE THE IMPUGNED ORDER DATED
18.08.2022 AND TO REINSTATE THE
APPELLANT ALONGWITH ALL BACK
BENEFITS.**

Respectfully Sheweth:

The appellant very humbly submits as under:-

1. That the appellant was appointed as Constable in the Year 2011. (Copy of service card is attached herewith)
2. That the appellant served very honestly, sincerely and efficiently.
3. That the appellant was absent from his duty from 31.03.222 till 18.08.2022 due to his serious illness. It is, pertinent to mention here that the appellant visited City Medical Center and Surgical Hospital on dated 01.04.2022, where the Doctor advised some medical test and after conducting of said test, the result was beyond the imagination of appellant, the

ATTESTED

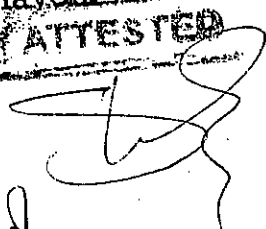


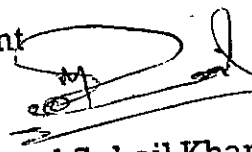
doctor finally come to the conclusion that Kidney operation / surgery of the appellant will be necessary. (Copy of medical documents are attached)

- 4. That inspite of serious illness and do or die situation, the appellant come to Traffic Headquarter on 15.07.2022, but the highups informed the appellant that he should to wait for further order, and surprisingly received the impugned order dated 18.08.2022, hence the instant departmental appeal.
- 5. That the absence from duty was not intentional nor deliberate, but due to the reasons mentioned above.
- 6. That the appellant was condemned unheard and it is the golden principal of natural justice that "no one should be condemned unheard" meaning thereby that fair chance of hearing is must to be given to each and every person.
- 7. That the impugned order is against the fundamental rights of the appellant guaranteed by the constitution of Islamic Republic of Pakistan, 1973.

It is, therefore, most humbly prayed that on acceptance of instant appeal, the appellant may kindly be reinstated with all back benefits.

Any other relief deems appropriate and not specifically asked for may also be granted in favour of appellant.

ATTESTED


Appellant

Muhammad Sohail Khan
Ex-Constable
FRP/1031

15-9-2022

0315-5566674

ORDER

This order will dispose of the departmental appeal preferred by Ex-constable Sohail No. 1031 of FRP HQrs; against the order of Deputy Commandant FRP Khyber Pakhtunkhwa, Peshawar, issued vide Order Endst; No. 1412-18/PA, dated 18.08.2022, wherein he was awarded major punishment of removal from service. The applicant was proceeded against on the allegations that he absented himself from lawful duty with effect from 31.03.2022 till the date of removal from service i.e 18.08.2022 for total period of 04 months 18 days, without any leave or prior permission of the competent authority.

In this regard, proper departmental enquiry was initiated against him as he was issued Charge Sheet alongwith Statement of Allegations and Line Officer FRP HQrs; Peshawar was nominated as Enquiry Officer to unearth the actual facts. After completion of all codal formalities, the Enquiry Officer submitted his finding report alongwith other relevant papers, wherein the delinquent officer was found guilty of the charges leveled against him and recommended for suitable punishment.

Upon the findings of Enquiry Officer, he was issued Final Show Cause Notice, to which he failed to submit reply within stipulated period. Later on he was called in orderly room for personal hearing, but he failed to appear before the competent authority.


Keeping in view the above narrated facts and other material available on record, he was awarded major punishment of removal from service vide Order Endst; No. 1412-18/PA, dated 18.08.2022.

Feeling aggrieved against the impugned order of Deputy Commandant FRP, Khyber Pakhtunkhwa, Peshawar, the applicant preferred the instant appeal. The applicant was summoned and heard in person in Orderly Room held on 01.11.2022.

During the course of personal hearing, the applicant failed to prove himself innocent. From perusal of enquiry file it has been found that the allegations of willful absence were fully established against him by the Enquiry Officer during the course of enquiry. Thus the applicant has been found to be an irresponsible person in utter disregard the discipline of the force. Therefore any leniency or complacency would further embolden the accused officer and impinge upon adversely on the overall discipline and conduct of the force. There doesn't seem any infirmity in the order passed by the competent authority, therefore no ground exist to interfere in same.

Based on the findings narrated above, I, **Commandant FRP** Khyber Pakhtunkhwa, Peshawar, being the competent authority, has found no substance in the appeal, therefore, the same is rejected and filed being meritless.

Order Announced.

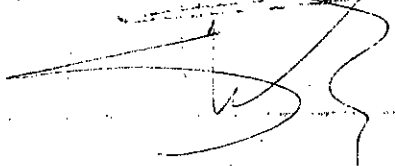
O/C

Commandant
Frontier Reserve Police
Khyber Pakhtunkhwa, Peshawar.

No 9024-26/SI Legal, dated Peshawar the 07 / 11 / 2022.

Copy of above is forwarded for information and necessary action to

the:-

1. DSP FRP HQrs; Peshawar.
2. SRC/Incharge Fauji Missal FRP HQrs; Peshawar. His Service record alongwith D-file sent herewith.
3. Ex-constable Sohail No. 1031 S/o Shakir Ullah R/o Village Adina Dawat Khel, Police Station Kalo Khan, District Swabi.

ATTESTED




Reg #
402637-R

CITY

MEDICAL CENTER
& SURGICAL HOSPITAL
New Casualty Gate Near Lady
Reading Hospital Peshawar

Ph: 091-2566254
0345-8596888 0333-9596339

CITY

Medical Center
& SURGICAL HOSPITAL

ایڈریس: پشاور لیڈی ریڈنگ ہسپتال

24 Hours Service

ڈاکٹر ابرار	ڈاکٹر محمد اسد معروف	ڈاکٹر جمال بہار	ڈاکٹر توحید احمد ملک
ڈاکٹر عقیل ڈارانی	ڈاکٹر زاہد خان	ڈاکٹر نعیم شاہ	ڈاکٹر علی ملک
ڈاکٹر محمد ابرار ایم بی	ڈاکٹر محمد یوسف	ڈاکٹر فیضان شاہ	ڈاکٹر محمد علی
ڈاکٹر سحر	ڈاکٹر سحر	ڈاکٹر سحر	ڈاکٹر سحر

24 HOURS SERVICE

The following facilities are available

- 24 Hours Emergency Admission
- Clinical Laboratory & Vital Signs
- X-Ray/Endoscopy
- 24 Hours Endoscopy
- 24 Hours Bedside X-Ray
- 24 Hours Ambulance
- 24 Hours Pharmacy
- 24 Hours Laboratory

Name of Patient: Mohammed Sheel

Age: 26 Sex: M

Address: Sheela Room No: E-2

Consultant Dr: Mohammed Bekar

D.O Admission: 14/4/2022 D.O discharge: 18/4/2022

Diagnosis: multistyle Stone in l.u
RD KIDNEY - 14726 N.d.u.v.u

Treatment: RD URS done
RD SRSG

RELEASED

Not for medico legal purposes

DISCHARGE CARD

S. No. ———— 814

TREATMENT CHART

Pt. Name: M. Jahan J Age 29 yrs Room # E-2

Ad. Time 11 Ad. Date 14/4/21 Address Swaha

Diagnosis Malaria Consultant Dr Shahar S

یہ علاج مسلمان بیمارستان کے ذریعہ کیا گیا ہے اور اس دوران کے ہر ضمنی اثر سے متنبہ رہیں اور کسی بھی نوعیت کے ہر قسم کی پیچیدگیوں (Complications) سے متنبہ رہیں۔ یہ مریض کو اور اس کے خاندان کے دیگر افراد کو بھی متنبہ ہے۔

CONSENT FOR OPERATION

اس مریض کے لیے سرجری کے لیے رضامندی دینی ہے اور اس مریض کی سرجری سے پہلے اس کے خاندان کے دیگر افراد کو بھی متنبہ ہے۔ یہ مریض کو اور اس کے خاندان کے دیگر افراد کو بھی متنبہ ہے۔

اس مریض کے لیے سرجری کے لیے رضامندی دینی ہے اور اس مریض کی سرجری سے پہلے اس کے خاندان کے دیگر افراد کو بھی متنبہ ہے۔ یہ مریض کو اور اس کے خاندان کے دیگر افراد کو بھی متنبہ ہے۔

اس مریض کے لیے سرجری کے لیے رضامندی دینی ہے اور اس مریض کی سرجری سے پہلے اس کے خاندان کے دیگر افراد کو بھی متنبہ ہے۔ یہ مریض کو اور اس کے خاندان کے دیگر افراد کو بھی متنبہ ہے۔

Date	Hospital Treatment	Dose	Investigations
	NBM 10:00 AM		HBS ✓ Algeal HCV ✓ HB% 11.6 gm/dl RBS/FBS 118 gm/dl ECG ✓ X-RAY - N/C (VITALS)
	29 mg Aug 19		B.P= 130/70 mmHg PULSE= 98 B TEMP= 98° F
	37 mg Aug 20		
	37 mg Aug 21		
	37 mg Aug 22		
	37 mg Aug 23		
	37 mg Aug 24		
	37 mg Aug 25		
	37 mg Aug 26		
	37 mg Aug 27		
	37 mg Aug 28		
	37 mg Aug 29		
	37 mg Aug 30		
	37 mg Aug 31		

(15)

(11)

Daily Progress Report

Room No: B-22

Room No: E-02

Date	Home Treatment	Diet	Investigation
	at Overdosed		

Date	Complaints	Pulse	B.P.	Temp.	Sy. Examination	Other Findings	Sign
14/4			130/120	100°		Paro.	S
15/4			110/102	101°		Paro	S
16/4			139/80	98°		1	A
17/4			134/80	98°		Wendly	L
17/4			170/80	98.5		Wendly	R
17/4			170/80	100°		Paro	R

[Handwritten signature]

Operation Finding/Procedure

2. (R1) Mild Discharge

Specimen

Investigations

U&S done

e- Study

Study → done after

Treatment In Hospital

OB medicines

any Day Discharge

OB - 28

OB Caprosone

OB Pellet

OB

OB Cefixime

OB Paracetamol

Treatment at Home

OB Caprosone

OB Pellet

OB Cefixime

OB Pellet

OB Paracetamol

OB Cefixime

OB Paracetamol

OB Paracetamol

OB Paracetamol

OB Paracetamol

(18)

Handwritten notes and signatures at the bottom of the page, including a signature that appears to be 'Dr. ...' and some illegible text.

RECORDED

ہسپتال کی سہولتیں

ایٹلڈ سرجیکل ہسپتال

ایم ایچ ایچ 24/7

ہسپتال میں 24 گھنٹے ایمرجنسی، لیبر روم، آپریشن تھیٹر، لیبارٹری، فائبرس اور دیگر سہولیات سے آراستہ ماہر سہولت ڈاکٹرز کی زیر نگرانی علاج اور آپریشن کئے جائینگے۔

جسٹل OPD

آرتھوپیدک اوپ ڈی	ڈنٹل اوپ ڈی	سرجیکل اوپ ڈی	میڈیکل اوپ ڈی
چلڈرن اوپ ڈی	نیدرورجن	ECHO & ECG	گائنی اوپ ڈی
لیبر روم	آپریشن تھیٹر	لیبارٹری	جنرل آئی سی یو
ایم آر آئی	ایکس رے	الٹراساؤنڈ	فائبرس

24 گھنٹے ایمرجنسی کے زیر نگرانی دو پہر 2 بجے سے رات 9 بجے تک

سٹی میڈیکل سنٹر بلتقا، علی ایڈری ریڈنگ ہسپتال، پشاور فون: 091-2566254

قیمت 50 روپے	54768	  
ایڈوکیٹ: سیال احمد شہیدان بار کونسل ایسوسی ایشن نمبر: BC-10-8080 رابطہ نمبر: 0300-9021228		

پشاور بار ایسوسی ایشن، خیبر پختونخواہ

بعدالت جناب: سروس ٹریڈنگ سہیل محمد خواجہ

منجانب:	دعویٰ:
	علت نمبر:
	مورخہ:
	جرم:
	تھانہ:
	باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ
 آن مقام کے لئے سیال احمد شہیدان 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 تقرر ثالث 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 یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب
 مقرر شدہ کو وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داخستہ 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: 07-12-2022
 PESHAWAR BAR ASSOCIATION
 KHYBER PAKHTUNKHWA

مقام: پشاور
 کے لیے منظور ہے۔

Accept

نوٹ: اس وکالت نامہ کی فوٹوکاپی ناقابل قبول ہوگی۔