FORM OF ORDER SHEET

Court of	
Case No	03/2023

5. N o.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	02/01/2023	The appeal of Mr. Naveed Ahmad presented today by Malik Muhammad Waseem 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.
		By the order of Chairman
		REGISTRAR ,
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BEFORE THE KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. <u>93</u> /2022

Naveed Ahmad, Tracer Lower Hazara Forest Circle, Abbottabad.
...APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa, through Secretary Forest, Peshawar & others.

... RESPONDENTS

SERVICE APPEAL

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3.	Copy of office order renewing the contracts	9-12	"B"
4.	Copy of order dated 08/07/2015	13	"C"
5.	Copy of departmental appeal	14	"D" .
6.	Copy of impugned order dated 08/12/2022	15	"E"
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...APPELLANT

Through

Dated: _____/2022

(MALIK MUHAMMAD WASEEM) Advocate High Court, Abbottabad

BEFORE THE KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL, PESHAWAR

Naveed Ahmad, Tracer Lower Hazara Forest Circle, Abbottabad.

..APPELLANT

VERSUS

- 1. Govt. of Khyber Pakhtunkhwa, through Secretary Forest, Peshawar.
- 2. Conservator of Forest, Lower Hazara Forest Circle Abbottabad.
- 3. Divisional Forest Officer, Patrol Squad Forest Division Abbottabad.

..RESPONDENTS

SERVICE APPEAL UNDER SECTION 4 OF KPK SERVICE TRIBUNAL ACT, 1974, AGAINST THE ORDER BEARING NO.4774-75/GE DATED 08/12/2022 PASSED BY RESPONDENT NO.2, WHEREBY, THE DEPARTMENTAL APPEAL FILED BY APPELLANT HAVE BEEN DISMISSED BEING TIME BARRED.

PRAYER: ALLOWING THIS APPEAL, THE ORDER BEARING NO.4774-75/GE DATED 08/12/2022

PASSED BY RESPONDENT NO.2 MAY KINDLY BE SET-ASIDE AND SERVICE OF THE APPELLANT MAY KINDLY ORDERED TO REGULARIZE FROM THE DATE OF HIS INITIAL APPOINTMENT I.E. 22/03/2010 INSTEAD OF 08/07/2015 WITH ALL THE BACK BENEFITS.

Respectfully Sheweth;-

This appeal proceeds, on the bellow stated legal points, amongst the others, and in the given background of the facts;-

FACTS;-

- 1. That appellant was appointed on the vacant post of Tracer (BPS-5) on fixed pay vide order No. 76 dated 22/03/2010. Copy of appointment order of appellant is attached as Annexure "A".
- 2. That thereafter, due to satisfactory performance of the appellant, the contract of appellant was renewed every year till 2015. Copy of office order renewing the contracts are attached as Annexure "B".

- 3. That vide office order No. 1 dated 08/07/2015, office order No.1 dated 08/07/2015 the services of appellant was regularized. It is worth to mention here that in the said order it has specifically been mentioned that Tracers who has been appointed in March 2010 are regularized meaning thereby that the service of appellant is deemed to have been regularized since his initial appointment i.e. 22/03/2010. Copy of order dated 08/07/2015 is annexed as Annexure "C".
 - 4. That vide the same order the appellant has been deprived of their right of pension and similarly, the seniority of appellant was maintained w.e.f 08/07/2015 instead of 22/03/2010.
 - 5. That faced with the situation, the appellant submitted departmental appeal before respondent No.2 praying therein that in the light of the (Khyber Pakhtunkhawa Employees Regularization of Service) Act 2009, the seniority of appellant be corrected by including the previous five years service as regular employee. Copy of departmental appeal is attached as Annexure "D".

- 6. That the appeal of appellant has been dismissed without even affording opportunity of hearing to the appellant by respondent No.2 vide order dated 08/12/2022. Copy of impugned order dated 08/12/2022 is attached as Annexure "E".
- 7. That feeling aggrieved with the impugned order dated 08/12/2022 the appellant has now come to this Honourable Court for setting aside the same being unwarranted at law and facts inter-alia on the following grounds;-

GROUNDS:-

- a. That, impugned order dated 08/12/2022 is illegal, unlawful, against facts and ineffective upon the rights of appellant.
- b. That the impugned order on the face of it is harsh in nature and deviation from the spirit of law on the subject.
- c. That in the light of (KPK Employees Regularization of Service) Act 2009, the appellant is entitled to claim seniority from

the date of his initial appointment i.e. 22/03/2010 whereas the respondent No.2 in utter disregard of the provision of law deprived the appellant from the seniority hence, the impugned order is liable to be setaside.

- d. That on one hand KPK Civil Servant Act
 1973 has been applied in the case of
 appellant and on the other he has been
 deprived from the right of pension which is
 highly unjust, unfair and uncalled for.
 - the appellant is regular employee w.e.f the date of his initial appointment i.e. 22/03/2010, therefore, the impugned order is liable to be set-aside.
 - f. That inspite of all this, appellant rendered spotless services to the satisfaction of his superior and always added to the reputation of the department.

- g. That without affording the opportunity of being heard, the dismissal order amounts to stabbing in the back quite in derogation of the principles of natural justice.
- h. That the appeal is well within time.
- i. That the other points shall be urged at the time of arguments.

It is, therefore, humbly prayed allowing this appeal, the order bearing No.4774-75/GE dated 08/12/2022 passed by respondent No.2 may kindly be set-aside and service of the appellant may kindly ordered to be regularized from the date of their initial appointment i.e. 22/03/2010 instead of 08/07/2015 with all the back benefits.

Through

Dated:	/2022

(MALIK MUHAMMAD WASEEM) Advocate High Court, Abbottabad

APPELLANT

VERIFICATION;-

Verified on oath that the contents of foregoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Tribunal

BEFORE THE KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL, PESHAWAR

Service Appeal N	lo	/2022
		-
	i .	

Naveed Ahmad, Tracer Lower Hazara Forest Circle, Abbottabad.

APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa, through Secretary Forest, Peshawar & others. ...RESPONDENTS

SERVICE APPEAL

AFFIDAVIT

I, Naveed Ahmad, Tracer Lower Hazara Forest Circle, Abbottabad, do hereby solemnly affirm and declare that the contents of foregoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.

ATTESTED BEPONENT

OFFICE ORDER NO. 76 DATED ABBOTTABAD THE 23 /03/2010 PIR OAIM SHAH DIVISIONAL FOREST OFFICER PATROL SQUAD DIVISION, ABBOTTABAD

pageno- (3).
Anneroure GA

Mr. Naveed Ahmad S/O Naseer Ahmad resident of House No. 584, Sector-4, Krhalabat Twon Ship, Mohaliah Darband Teshil & District Haripur is here. Similar as Tracer (BPS-5) against vacant post due to the promotion of Mr. Tariq Mehmood as Draftsman in Circle Office, Abbottabad on work charge with effect from the date of his arrival with the following conditions:-

- 1- Initial appointment is purely temporary only for one year, which will be subsequently extended on the basis of his satisfactory performance. In case of un-satisfactory performance his service will be dispensed with / terminated at any time without any notice.
- 21. He will not be entitled for pension / gratuity.
- 3. He will have to produce a medical certificate of fitness from an authorized Medical Officer.

Sd/- Pir Qaim Shah, Divisional Forest Officer, Patrol Squad Division, Abbottabad

Memo.

Copy forwarded to:

- 1- The Conservator of Forests, Abbottabad Circle Abbottabad for favour of information please.
- 2- The Circle Accountant Circle Office, Abbottabad for information and necessary action.
- Mr. Naveed Ahmad S/O Nascer Ahmad resident of House No: 584, Section-4, Khalabat Town Ship (Mohallah Darband Tehsil & District Haripur for information with reference to his application dated 20-03-2010

Divitional Forest Officer, Patrol Squad Division.

2- He will not be entitled for pension / gratuity.

3- He will have to produce a medical certificate of fitness from an authorized Medical Officer.

Anne 10 237 pay 90

OFFICE ORDER NO. 97 DATEI INVATULLAH KHAN MASOOD DIV SQUAD DIVISIO

BAD THE 3 / /03/2011 BY DREST OFFICER PATROL ABAD

Mr. Naveed Ahmad S/O Nascer Ahmad, resident of House No.584 Sector-4 Khalabat Township Mohallah Darband Tehsil and District Haripur was appointed as Tracer (BS-05) on work charge basis only for one year vide this office order No.76, dated 22-03-2010 with the conditions that his service will be subsequently extended on the basis of satisfactory performance.

Now he vide his application dated 22-03-2011 has applied for further extension in his service period.

As the performance of Tracer remained satisfactory during the year, 2010, therefore, his service period is hereby extended for further one (01) year with effect from 22-03-2011 on work charge basis on monthly pay of Rs.7000/- with the following conditions:

- 1- Extension in his service period is purely temporary.
- 2- He will not be entitled for pension / gratuity.

Sd/- Inyatullah Khan Masood Divisional Forest Officer Patrol Squad Division Abbottabad

Memo.

Copy forwarded to the:

- 1- Conservator of Forests Lower Hazara Forest Circle Abbottabad for favour of information please.
- 2- Circle Accountant Circle Office Abbottabad for information and necessary action.
- 3- Draftsman Circle Office for information and necessary action.
- 4- Mr. Naveed Ahmad Tracer Circle Office Abbottabad for information with reference to his application dated 22-03-2011.

(P-55)

Divisional Forest Officer Patrol Squad Division Abbottabad of





OFFICE ORDER NO. 168 DATED ABBOTTABAD THE 20 /5/2012 BY MR. ZAFFAR ALI KHAN DIVISIONAL FOREST OFFICER PATROL SQUAD DIVISION ABBOTTABAD

Mr. Naveed Ahmad S/O Naseer Ahmad resident of House No.584 Sector-4 Khalabat Township Mohallah Darband Tehsil and District Haripur was appointed as Tracer (BPS-5) on Work Charge Basis only for one year vide this Office Order No. 76, dated 22-3-2010 with the conditions that his service will be subsequently extended on the basis of satisfactory performance.

On expiry of the contract period Mr. Naveed Ahmad applied for further extension in his service period vide his application dated 22-3-2011. Therefore, keeping in view his satisfactory performance during the year, 2010 his service period was extended for further one (01) year with effect from 22-3-2011 vide Office Order No 97, dated 31-3-2011.

Now he has applied for further extension of his service period vide his application dated 20-3-2012. (P(C - 1)

Mr. Naveed Ahmad Tracer has performed satisfactory services during the year 2011 as evident from his ACRs, therefore, his service period is referred to the service period is re

- 1- Extension in his service / contract period is temporary and only for one year. His services shall stand automatically terminated on the expiry of one (01) year. In case of requirements of the job, the contract may be subsequently extended on the basis of satisfactory performance.
- 2- The employee will not contribute to GP Fund and will not be entitled to pension and gratuity benefits.

Sd/- Zaffar Ali Khan Divisional Forest Officer Patrol Squad Division Abbottabad

Memo.

Copy forwarded to the:

- 1- Conservator of Forests, Lower Hazara Forest Circle Abbottabad for favour of information please.
- 2- Circle Accountant Circle Office Abbottabad for information and necessary action.
- 3- Draftsman Circle Abbottabad for information and necessary action.
- 4- Mr. Naveed Ahmad Tracer Circle Office Abbottabad for information with reference to his application dated 20-3-2012.

Divisional Forest Officer Patrol Squad Division

OA

DATED ABBOTTABAD THE 15 104/2013 ISSUED BY MR. JAVED ARSHAD DIVISIONAL FOREST OFFICER PATROL SQUAD LOWER HAZARA CIRCLE ABBOTTABAD

Consequent upon expiry of contract period on 21-03-2013 and keeping in view of his satisfactory performance of the previous years, the services of Mr. Naveed Ahmad Tracer are hereby extended for further one year with effect from 22-03-2013 as people payor is 10, 000/- per month on the same terms and conditions as laid down in his office order No. 168, dated 30-05-2012.

Sd/- Javed Arshad Divisional Forest Officer Patrol Squad Lower Hazara Circle Abbottabad-

Memo.

Copy forwarded to the:

- Conservator of Forests Lower Hazara Forest Circle Abbottabad for favour of information please.
- 2-Circle Accountant Circle Office Abbottabad for information and necessary action.
- Draftsman Lower Hazara Forest Circle Abbottabad for information and necessary action.
 - Mr. Naveed Ahmad Tracer Circle Office Abbottabad for information with reference to his application dated 22-03-2013.

Divisiona∦Forest Officer Patrol Squad Lower Hazara Circle

Abbottabad

OFFICE ORDER NO. OC DATED ABBOTTABAD THE 33 /04/2014 ISSUED BY MR. JAVED ARSHAD DIVISIONAL FOREST OFFICER, PATROL SQUAD FOREST DIVISION, ABBOTTABAD

Consequent upon expiry of contract period on 21-03-2014 and keeping in view of his satisfactory performance of the previous years. The services of Mr. Navced Ahmad Tracer are hereby extended for further one year with enect from 22:03-2014 as work charge employee at fixed pay of Rs. 10:000/e per month on the same terms conditions as laid down in his office order No. 168, dated 30-05-2012.

Sd/- Javed Arshad Divisional Forest Officer Patrol Squad Division Abbottabad

vlemo.

Copy forwarded to the:

- Conservator of Forests Lower Hazara Forest Circle, Abbottabed for favour of information please.
- 2- Circle Accountant Circle Office Abbottabad for information and necessary action.
- 3- Draftsman Lower Hazara Forest Circle Abbottabad for information and necessary action.
- 4- Mr. Naveed Ahmad Tracer Circle Office Abbottabad for information with reference to his application dated 24-03-2014

Divisional Forest Officer Patrol Squad Division, Abhottabad W

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OFFICE ORDER NO. 21 DATED A'ABAD THE 08 /07/2015

ISSUED BY MUHAMMAD YOUSAF KHAN DIVISIONAL FOREST OFFICER PATROL SQUAD LOWER HAZARA CIRCLE ABBOTTABAD

The following appointees against the permanent post of BPS-5 on fix pay during March, 2010 are hereby regularized against the vacant posts as noted against each in BPS-5 (Rs.5400-260-13200) with usual allowances as admissible under the rules with immediate effect.

-		
S#	Name:	Post
1-	No. 10 The Control of	
2-	Mr. Naveed Ahmed	Tracer

erm and Conditions.

a) He shall, for all intents and purposes, be Civil Servant except for purpose of pension of gratuity. In lieu of pension and gratuity, he shall be entitled to receive such amount contributed by him towards Contributory Provident Fund (C.P.F) along with the contribution made by Government to his account in the said fund, in the prescribed manner.

b) He shall be governed by the Khyber Pakhtunkhwa Civil Servants Act 1973, all the Laws applicable to the Civil Servants and Rules made there under.

c) He shall initially be on probation for a period of two years extendable upto three years.

d) His service will be liable to termination at any time without assigning any reason thereof before the expiry of the period of probation/extended period of probation, is his work during this period is not found satisfactory. In such an event, he will be given a month's notice of termination from service on one month's pay in lieu thereof. In case he wishes to resign at any time, a month's notice shall be necessary or in lieu thereof a month's pay shall be forfeited.

e) His service shall be liable to termination during probation period of one year without any notice.

f) His seniority will be counted from the date issue of their regularization orders.

Sd/-(Muhammad Yousaf Khan)
Divisional Forest Officer
Patrol Squad Lower Hazara Circle
Abbottabad

Copy forwarded to the

- 1- Chief Conservator of Forests, Northern Forest Region-II Abbottabad for favour of information, please.
- 2- Conservator of Forests, Lower Hazara Forest Circle Abbottabad for favour of information with reference to his office letter No. 10601/GE, dated 03-4-2015.
- 3- Personal file of the official concerned for record
- 4- Disburser of Circle Office Abbottabad for necessary action.
- 5- All concerned

Divisional Porest Office Patrol Squad Lower Hazara Gircle ANNA-II

بخدمت جناب عزت مآب كنزرد يثرآف فارست صاحب لوئز بزاره فارستُ شركل أيبت آباد مريد . . هم

Aunorum P

بواسطت: وويونل فارسب أفيسر ييرول سكواد بزاره دويون ايبت آباد

جناب عالیٰ ذی وقار

معروضات درج ذیل ہیں:۔

1- عابز اندالتجاہے کہ سائل کو بحوالہ آفس آرڈرنمبر 76 مجریہ 2010-22 کے تحت بطور (Tracer) ٹریسر 8PS-5 میں ضالی آسامی رِفْکس تخواہ پر بھرتی کیا گیا۔ کا پی لف ہے۔ ۔ (Annexure-I)

2- بعداذال تسلی بخش کارکردگی پر ہرسال بعد میر کے کنٹر یکٹ میں توسیع کی جاتی رہی اور تا وقتیکیہ مورخہ 07-07-08 کو بحوالہ

DFO Petrol Squad office oreder No 01 dated 08-07-2015

ریگورازڈ (Regularized) کردیا گیاجس میں واضح طور پراس امرکی وضاحت کردی گئی ہے کہ مارچ 2010 میں بھرتی ہونے والے

Regular کی سروس کو با قاعدہ طور پرریگولرازڈ (Regularized) کیاجا تا ہے اور سائل کی سروس بھرتی ہونے کی تاریخ سے Regular کی سروس کو با قاعدہ طور پرریگولرازڈ (Regularized) کیاجا تا ہے اور سائل کی سروس بھرتی ہونے کی تاریخ سے جبکہ اس آفس آرڈر کہ تحت سائل کو پنش کے جن سے بھی محروم رکھا گیا جو کہ غیر قانونی ہے۔ اس کے ساتھ سنیار ٹی لسٹ میں میری تاریخ سے جبکہ اس آفس آرڈر کہ تحت سائل کو پنش کے جن سے بھی محروم رکھا گیا جو کہ غیر قانونی ہے۔ اس کے ساتھ سنیار ٹی لسٹ میں میری تاریخ کے دور فرمایا جائے اور کی بجائے 2016-08-08 کھی گئی ہے۔ اس شمن میں ابہام کودور فرمایا جائے اور

(Khyber Pakhtunkhwa Employees Regularization of Service 2009)) کی روشنی میں سائل کی بچھنی پانچے سال کی سروس کور میگولرسروس میں شامل کر کے سنیارٹی کو بھی درست کیا جائے ۔ بصورت دیگر سائل کو نا قابل تلانی نقصان کا سائل کی بچھنی پانچے سال کی سروس کور میگولرسروس میں شامل کر کے سنیارٹی کو بھی درست کیا جائے ۔ بصورت دیگر سائل کو نا قابل تلانی نقصان کا اندیشہ ہے۔ کا لی ایکٹ برائے ملاحظ لف ہذاہے۔ (Annexure-II)

المديسة و المريد و المارية المارية و المارية

ر، ریرن در روزن در روزن روزن کر از تاریخ تعیناتی مورخه 2010-03-22 سے ریگولرفر مائے جانے کا تھم صادر فرمائیں اور آفس آرڈ رنمبر 4۔ لہذا استدعا ہے کہ سائل کی سروس کواز تاریخ تعیناتی مورخه 2010-03-22 سے ریگولرفر مائے جانے کا تھم صادر فر مایا جائے۔ جو کہ مادرائے قانون ہے۔ ایک طرف تو نہ کورہ آرڈ رمیس 10 مجریہ 2015-07-08 میں ضروری تھی خروم کردیا گیا ہے جو کہ مراسز غیر سائل پر خیبر پختو نخواہ سول سرونٹ ایک ہے جو کہ مراسز غیر تائل پر خیبر پختو نخواہ سول سرونٹ ایک ہے جو کہ مراسز غیر تائونی فعل ہے۔ قانونی فعل ہے۔

اس دادری پرسائل تمام عمر جناب کے لیے دعا گوراہےگا۔

مرهد ۱۱،عد آپافر مانبردار نویداحمر ریسرلوئر بزاره فارست سرکل آفس ایب آباد



Muhammad Yousaf Khan Conservator of Foreste

Conservator of Forests Lower Hazara Forest Circle Abbottabad



Civil Line Forest Offices Abbottabad

9992-9310232
FAX 0992-9310233

E-mail: cflhfc@gmail.com

No.<u>4774-75</u>/GE

dated Abbottabad the

08 /12/2022

Mr. Naveed Ahmad

Tracer Lower Hazara Forest Circle, Abbottabad

Mr. Waqas Arshad

Telephone Operator Lower Hazara Forest Circle Abbottabad

Subject

APPEALS

Memo.

Reference your appeals dated 26-11-2021

The appeals under reference cannot be considered decide being time-barred.

Conservator of Forests Lower Hazara Forest Circle Abbottabad

	(T)
Name of Advocate Malik Muhammid Waleau Th	(6)
DBA NO. 29 TBA NO.	ALMA Secretary
BC No. R.s.200/= District 2st	r Association Suizbati
1310 J - Loudy John	n lt (n)
لوم الحراث في ما مؤرك حران و مواله ملمراك فارم	بعدائت عدان
le le	منوان.
: الملاير مطاب نوعية مقدمه مسروس ^(مل)	منجانب
باعث تحریر آئکہ مقدمہ مندرجہ بالاعنوان میں اپی طرف سے واسطے بیروی و جوابد ہی برائے بیشی یا تصفیہ مقدمہ بمقام <u>کرمد سے کرکے کر</u> کے لیے در	. 🗖
1 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	
کوحب ذیل شرائط پروکیل مقرر کیا ہے کہ میں ہر پیشی پرخود یا بذر پر پیونچیار خاص رو بروعدالت حاصر ہوتار بیون گااور برونت بکارے	
جانے مقدمہ وکیل صاحب پروشوف کواطلاع و کے کرعاضر عدالت کروا گا۔ اگر پیٹی پرمظہر حاضر نہ ہوااور مقدمت میری غیر حاضری کی وجہ	4 .
ے کی طور پرمیرے خلاف بھو گئیا تو صاحب موصوف اس کے کسی اور پر در کھر اور کہ ہوں کے نیز وکیل صاحب موصوف صدر مقام کچبری کے	•
علاوہ کسی جگہ یا بچہری کے اوقات آ <u>ے سلے یا بچھ</u> یابروز نعطیل پیروزی کرنے آگ ے ذمہ والاختہوان کے اور مقد میا وہ کسی اور جگہ	
ساعت ہونے پر یابر ور تعطیل یا تجمری گراوقات کے ا کر میں میں اور کا بھی اور کا بھی اور کا ان کے واسطے میں میں اس کے واسطے میں اور کا استان کے اسلام کا استان کی اسلام کا کا اسلام کا اسلام کا اسلام کا اسلام کا اسلام کا کا اسلام کا اسلام کا کا کا اسلام کا	 ₩
سمی معاوضہ کے اداکر نے یا مخالف کے ایک کرنا گئے ہے کہ صاحب موقع اف ذمہ دار نہ ہو گئے کہ محکول آسا تھتہ پر داختہ صاحب موصوف مثل کے مدر دونا رہتا ہے میں اور اور ایک کے بار میں اور	
مثل کردہ ذات منظور ومقبول ہوگا اور صافت کوعرض دعویٰ یا جوافی دعویٰ اور درخوا کست اجرائے فاکر ٹی ونظر ثانی ایپل گرانی و ہرقسم درخواست پر دستخط وتصدیق کرنے کا بھی ایسی رہوگا اور سی تھی یا ڈگری کرائے اور ہرقسم کا یا دیپیہ صول کرتے اور داخل کرنے	_ ,
در موست پرد حظ دسکری ترجه کا میان و دارای میاد سری میافت کا در برد کا در پیدا می اورد میدوی اورد اس مرحمات اور برتم کے بیان دینے اور اس برنا ٹی دولو می اور نیس میافت کے اور بر سری کا میان کا در بصورت جانے بیر دنجات	
ر بربر الماري وبرآ مدگی مقدمه المنسوخی ذکري بکطرفه درخواست عمل قال کی باقر تی یا گرفتاری قبل از گرفتاری واجرائ فرگ و کری بخص صاحب زیجمری صدراییل وبرآ مدگی مقدمه المنسوخی ذکری بکطرفه درخواست عمل قال کی باقر تی یا گرفتاری قبل از گرفتاری و اجرا	3
موصوف کو بشر طادا کی ملیحد و مخاند بیر دق کا مختاج موال اور به کورت مناحد میرورت مناحد میرون میرورت میرون میرورت میرون میرورت میرون)
کسی جزوکی کاروائی کے یابصورت انگیل کسی دو پیرے دولی کا است بجا ہے اار تینے اور اور کی اورا لیے ویک کو بھی ہرامر میں	. (9)
ہی اور ویسے اختیارات حاصل ہوئے جیسے صاحب موصوف کو جانس ہیں آور در ان مقد مدجو کھے ہر جاندالتو اپڑے گاوہ صاحب موصوف	, T &
کاحق ہوگا۔اگروکیل صاحبِ موصوف کو پوری فیس تاریخ پیش سے چینٹے آدانہ کروں گا تو صاحبِ موصوف کو پوراا ختیار ہوگا کہ وہ مقدمہ	v
کی پیروی ندکریں اورانیں صورت میں میراکوئی مطالبہ کسی قتم کا صاحبِ موصوف کے برخلاف نہیں ہوگا۔ - مصرف میں میں اورانیں صورت میں میراکوئی مطالبہ کسی مقتل کے استعمال کا مصرف کے استعمال کا مصرف کے مصرف کے مصرف	
ہذا و کالت نامہ کھودیا ہے کہ سندر ہے۔ مضرب کال مار سے ال میں مجھی طرح سمی ال میں منظر میں ماری ال	4
الرون وقات نامه من ليا ينج أور الهي برن به ليا ينج أور تصور بيات .	,
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