

P.S

29.10.2021

Learned counsel for the petitioner turned up and requested for withdrawal of the execution petition. In this respect his statement also recorded on the margin of order sheet. As such the instant execution petition is hereby dismissed as withdrawn. File be consigned to the record room.



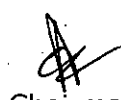


Chairman

Announced:
29.10.2021

Form- A
FORM OF ORDER SHEET

Court of _____
Execution Petition No. 185 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	14.09.2021	<p>The execution petition of Mr. Sohail Ahmad submitted today by Mr. Fazal Shah Mohmand 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-	29.10.2021	<p>This execution petition be put up before S. Bench at Peshawar on <u>29/10/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p> <p>Learned counsel for the petitioner present. Notices be issued to the respondents for submission of implementation report on <u>14.12.2021</u> before S.B.</p> <p style="text-align: right;"> Chairman</p>

Respondent
 kindly write down the case on behalf of counsel.
 P. 185
 re/oi/bel

BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR

Implementation Petition No _____/2021

In

Service Appeal No 931/2019

Sohail Ahmed.....**Petitioner**

V E R S U S

PPO and another.....**Respondents**

I N D E X

S. No	Description of documents	Annexure	Pages
1.	Implementation Petition with Affidavit		1-2
2.	Application for interim relief with Affidavit		3-4
3.	Copy of the Order and Judgment dated 23-06-2021	A	5-8
4.	Copy of the Order and Judgment, Charge Sheet & Reply	B, C & D	9-16
5.	Vakalat Nama		17

Dated:-13.09.2021


Applicant/Petitioner

Through


FAZAL SHAH MOHMAND

ADVOCATE,
SUPREME COURT OF PAKISTAN.

OFFICE:-
Cantonment Plaza Flat# 3/B
Khyber Bazar Peshawar.
Cell# 0301 8804841
Email:- fazalshahmohmand@gmail.com

BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR



Implementation Petition No 185 /2021
In
Service Appeal No 931/2019

Sohail Ahmed, Ex Drill Insrtuctor/Constable No. 44, Police
Training College Hangu. **Applicant/Petitioner**

V E R S U S

1. Provincial Police Officer, Khyber Pakhtunkhwa Peshawar.
2. Commandant, Police Training College Hangu.
.....**Respondents**

**PETITION FOR THE IMPLEMENTATION OF
ORDER/JUDGMENT DATED 23-06-2021 PASSED
BY THIS HONORABLE TRIBUNAL IN THE ABOVE
TITLED SERVICE APPEAL.**

Respectfully Submitted:-

1. That the Petitioner/appellant earlier filed Service Appeal No 931/2019 for his reinstatement in service which was accepted vide Order/Judgment dated 23-06-2021, the petitioner was reinstated in service and the matter was remanded back to the department for de-novo inquiry in accordance with law, to be completed within a period of one month from the date of receipt of Judgment and the issue of back benefits was left to the result of de-novo inquiry. **(Copy of the Order and Judgment is enclosed as Annexure A).**
2. That the Petitioner/appellant after obtaining attested copy of the stated Order/Judgment of this honorable Tribunal approached respondents which was received by the respondents on 08-07-2021, where after the petitioner/appellant was reinstated in service and charge sheet with statement of allegations was issued to the petitioner on 02-08-2021 which he replied accordingly but with no further proceedings till date. **(Copy of the Order/Judgment, Charge Sheet & reply therein is enclosed as Annexure B, C & D).**

3. That the respondents are not ready to implement the Order and Judgment of this honorable Tribunal in its true spirit for no legal and valid reasons, this act of the respondents is unlawful, unconstitutional and goes against the Orders and Judgment dated 23-06-2021 of this honorable Tribunal.
4. That the respondents are bent upon to remove the petitioner from service in violation of the Judgment of this honorable Tribunal, as respondents were required to have completed the de-novo proceedings within period of one month which has already lapse and any further action beyond the ratio of the Judgment of this honorable Tribunal would be violation of the Judgment of this honorable Tribunal.

It is therefore prayed, that on acceptance of this Application/Petition, respondents may kindly be directed to implement the Order and Judgment of this honorable Tribunal dated 23-06-2021 passed in Service Appeal No 931/2019.

Dated:-13.09.2021

Sohail Ahmed
Applicant/Petitioner
Through
Fazal Shah Mohmand
FAZAL SHAH MOHMAND
ADVOCATE,
SUPREME COURT OF PAKISTAN.

AFFIDAVIT

I, Sohail Ahmed, Ex Drill Insrtuctor/Constable No. 44, Police Training College Hangu, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Implementation Petition** are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Tribunal.

Sohail Ahmed
DEPONENT



BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR

Implementation Petition No _____/2021

In

Service Appeal No 931/2019

Sohail Ahmed.....**Petitioner**

V E R S U S

PPO and another.....**Respondents**


Application for interim relief, thereby restraining respondents from taking any adverse action against the petitioner beyond the ratio of Judgment dated 23-06-2021 of this honorable Tribunal

Respectfully Submitted:-

1. That the above titled Implementation Petition is being filed today wherein no date of hearing has been fixed so far.
2. That respondents are going to proceed illegally and beyond the ratio of the Judgment of this honorable Tribunal against the petitioner and are going to take adverse action against the petitioner.
3. That any action if taken against the petitioner would be in violation of the Judgment of this honorable Tribunal, hence if respondents are not restrained from taking any adverse action against the petitioner, he would suffer irreparable loss.
4. That implementation of the Judgment of this honorable Tribunal is required in its true letter and spirit.

It is therefore prayed that on acceptance of this application, respondents may kindly be restrained from taking any adverse action against the petitioner beyond the ratio of Judgment dated 23-06-2021 of this honorable Tribunal, by maintaining status quo.

Dated:-13.09.2021


Applicant/Petitioner

Through


FAZAL SHAH MOHMAND
ADVOCATE,
SUPREME COURT OF PAKISTAN.

BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR

Implementation Petition No _____/2021

In

Service Appeal No 931/2019

A Sohail Ahmed.....**Petitioner**

V E R S U S

PPO and another.....**Respondents**

A F F I D A V I T

I, Sohail Ahmed, Ex Drill Insrtuctor/Constable No. 44, Police Training College Hangu, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Application**, are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Tribunal.

Sohail Ahmed
D E P O N E N T



"A" -5-

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

Service Appeal No. 745/2019

Date of Institution ... 19.06.2019

Date of Decision ... 23.06.2021



Bashir Muhammad, Ex-ASI No. 840/MR District Police Mardan.

... (Appellant)

VERSUS

Commandant Police School Training Hangu and another.

... (Respondents)

Mr. FAZAL SHAH MOHMAND,
Advocate

For appellant.

MR. USMAN GHANI,
District Attorney

For respondents.

MR. SALAH-UD-DIN ---

MEMBER (JUDICIAL)

MR. ATIQ-UR-REHMAN WAZIR ---

MEMBER (EXECUTIVE)

JUDGEMENT:

SALAH-UD-DIN, MEMBER:- Through this single judgment, we intend to dispose of the instant Service Appeal as well as Service Appeal bearing No. 931/2019 titled "Sohail Ahmad Versus Provincial Police Officer and two others" as well as Service Appeal bearing No. 1000/2019 titled "Matiullah Versus Inspector General of Police Khyber Pakhtunkhwa Peshawar and two others", as common questions of law and facts are involved therein.

2. Precise facts of the instant appeal as well as connected service appeals bearing No. 931/2019 and 1000/2019 are that during posting of the appellants namely Bashir Muhammad as In-charge ammunition Kot, Sohail Ahmad as Naib in SMG Kot and Matiullah as Reader to DSP Security, in Police Training College Hangu, 76285 live rounds of SMG

ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

were found missing, while entry of 11084 rounds was not properly made in the relevant record, therefore, disciplinary action was taken against the appellants and one H.C Muhammad Akram No. 1193/133. Vide order dated 15.03.2019, the appellants were dismissed from service, while H.C Muhammad Akram was exonerated from the charges. The departmental appeals of the appellants went un-responded, therefore, they have now approached this Tribunal through filing of the instant Service Appeals.

3. Mr. Fazal Shah Mohmand, Advocate, representing the appellant Bashir Muhammad, has contended that Commandant Police Training College Hangu was an officer of the rank of Deputy Inspector General of Police, who issued charge sheet as well as statement of allegations and also passed order of dismissal of the appellant, rendering the whole inquiry proceedings as nullity in the eye of law because as per Schedule-I of Police Rules 1975, Deputy Inspector General of Police being Appellate Authority was not the Authority competent under the law to proceed himself against the appellant. He further argued that whole of the inquiry proceedings were conducted in slipshod manner, without providing the appellant an opportunity of cross examination of the witnesses examined during the inquiry. He also argued that neither any show-cause notice was issued to the appellant nor any opportunity of personal hearing was afforded to him. He next contended that the appellant was admittedly transferred to Police Training College Hangu on deputation basis, therefore, in view of Rule-9 (iii) of Police Rules, 1975, Commandant Police Training College Hangu was not competent to impose punishment upon the appellant. In the last he contended that the appellant is quite innocent and has been condemned unheard, therefore, the impugned order may be set-aside and the appellant may be re-instated into service by extending him all back benefits. He relied upon 1996 SCMR 856, PLD 2018 Supreme Court 114, PLD 2016 Peshawar 278, PLD 2008 Supreme Court 663 and 2021 SCMR 673.

4. Mr. Shahid Qayum Khattak, Advocate, representing appellant Sohail Ahmad, while placing reliance on the arguments of learned counsel for the appellant Bashir Muhammad, has further argued that ammunition is kept in ammunition Kot, while the appellant was posted as Naib in SMG Kot, meant for stocking only of SMG Rifles, therefore, the appellant was

ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

having no concern with the alleged mis-appropriation of live rounds of SMG, therefore, the impugned order of dismissal of the appellant is liable to be set-aside.

5. Mr. Noor Muhammad Khattak, Advocate, representing the appellant Matiullah, has argued that the appellant was not issued any charge sheet and only statement of allegations was issued to the appellant, however it has been mentioned in para-3 of summary of allegations that the same was a charge sheet. He further argued that the procedure as laid down in Rule-6 of Police Rules, 1975, has not been complied with and even no opportunity of cross-examination of witnesses or personal hearing was afforded to the appellant, therefore, the impugned order of dismissal of the appellant is void ab-initio, hence liable to be set-aside. Reliance was placed on 2003 PLC (C.S) 365, 1988 PLC (C.S) 179, 2011 SCMR 1618, 1989 PLC (C.S) 336, PLJ 2017 Tr.C.(Services) 198, 2008 SCMR 1369, 2003 SCMR 681 and 1988 PLC (C.S) 379.

6. Conversely, learned District Attorney for the respondents has argued that the appellants were found involved in mis-appropriation of huge quantity of ammunition, therefore, disciplinary action was taken against the appellants and they were rightly dismissed from service. He also argued that the inquiry was conducted in a legal manner by providing opportunity of hearing to the appellants. He next contended that after conducting of proper inquiry against the appellants, the inquiry committee came to the conclusion that the charges against the appellants were proved, therefore, the competent Authority has rightly dismissed them from service.

7. We have heard the arguments of learned counsel for the appellants as well as learned District Attorney for the respondents and have perused the record.

8. A perusal of record would show that the show-cause notice, charge sheet as well as statement of allegations were issued to the appellants by Commandant Police Training College Hangu and upon receipt of the inquiry report, the order of dismissal of the appellants was also passed by Commandant Police Training College Hangu, who was an officer of the rank of Deputy Inspector General of Police. In light of

ATTESTED

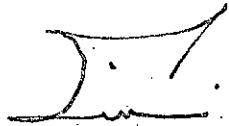
EXAMINER


**Khyber Pakhtunkhwa
Service Tribunal
Peshawar**

Schedule-I of Police Rules-1975, officer of the rank of DPO/SSP/SP, being Authority competent to award punishment to the appellants, could have legally taken disciplinary action against the appellants. Commandant Police Training College Hangu was an officer of the rank of Deputy Inspector General of Police, therefore, keeping in view Schedule-I of Police Rules 1975, the action taken by him was illegal, without jurisdiction and void ab-initio. Moreover, the appellants were not at all provided any opportunity of cross-examination of the witnesses examined during the inquiry, which has caused them prejudice. The impugned order of dismissal of the appellant is thus not sustainable in the eye of law and is liable to be set-aside.

9. In view of the above discussion, the appeal in hand as well as Service Appeal bearing No. 931/2019 titled "Sohail Ahmad Versus Provincial Police Officer and two others" as well as Service Appeal bearing No. 1000/2019 titled "Matiullah Versus the Inspector General of Police Khyber Pakhtunkhwa Peshawar and two others", are allowed by setting-aside the impugned order of dismissal of the appellants. The appellants are re-instated into service and the matter is remanded back to the department for de-novo inquiry against the appellants strictly in accordance with relevant law/rules. The de-novo inquiry proceeding shall be completed within a period of one month from the date of receipt of copy of this judgment. The issue of back benefits of the appellants shall follow the result of de-novo inquiry. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED
23.06.2021


(SALAH-UD-DIN)
MEMBER (JUDICIAL)


(ATIQ-UR-REHMAN WAZIR)
MEMBER (EXECUTIVE)

Certified to be true copy

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Date of Presentation of Application 10-9-21
Number of Words 1600
Copying Fee 18.00
Urgent 4.00
Total 22.00
Name of Copyist _____
Date of Completion of Copy 10-9-21
Date of Delivery of Copy 10-9-21

-10- "B" -9-



BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR

Service Appeal No. 745/2019

Date of Institution. ... 19.06.2019

Date of Decision ... 23.06.2021

Bashir Muhammad, Ex-ASI No. 840/MR District Police Mardan.

... (Appellant)

VERSUS

Commandant Police School Training Hangu and another.

(Respondents)

Mr. FAZAL SHAH MOHMAND,
Advocate

For appellant

MR. USMAN GHANI,
District Attorney

For respondents.

MR. SALAH-UD-DIN ---
MR. ATIQU-UR-REHMAN WAZIR ---

MEMBER (JUDICIAL)
MEMBER (EXECUTIVE)

JUDGEMENT:

[Handwritten signature]

SALAH-UD-DIN, MEMBER:- Through this single judgment, we intend to dispose of the instant Service Appeal as well as Service Appeal bearing No. 931/2019 titled "Sohail Ahmad Versus Provincial Police Officer and two others" as well as Service Appeal bearing No. 1000/2019 titled "Matiullah Versus Inspector General of Police Khyber Pakhtunkhwa Peshawar and two others", as common questions of law and facts are involved therein.

Remand on 3/7/2021

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[Vertical stamp: PESHAWAR DISTRICT COURT]

ATTESTED


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ATTENDED

ATTESTED

K. A. Khan
Secretary

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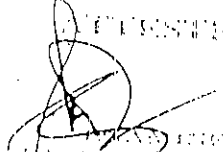
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6. Conversely, learned District Attorney for the respondents has argued that the appellants were found involved in mis-appropriation of huge quantity of ammunition, therefore, disciplinary action was taken against the appellants and they were rightly dismissed from service. He also argued that the inquiry was conducted in a legal manner by providing opportunity of hearing to the appellants. He next contended that after conducting of proper inquiry against the appellants, the inquiry committee came to the conclusion that the charges against the appellants were proved, therefore, the competent Authority has rightly dismissed them from service.

7. We have heard the arguments of learned counsel for the appellants as well as learned District Attorney for the respondents and have perused the record.

8. A perusal of record would show that the show-cause notice, charge sheet as well as statement of allegations were issued to the appellants by Commandant Police Training College Hangu and upon receipt of the inquiry report, the order of dismissal of the appellants was also passed by Commandant Police Training College Hangu, who was an officer of the rank of Deputy Inspector General of Police. In light of

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DISTRICT ATTORNEY
HANGU

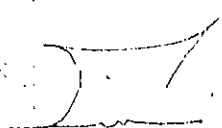
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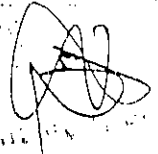
Schedule-I of Police Rules 1975, officer of the rank of DPO/SSP/SP, being Authority competent to award punishment to the appellants, could have legally taken disciplinary action against the appellants. Commandant Police Training College Hangu was an officer of the rank of Deputy Inspector General of Police, therefore, keeping in view Schedule-I of Police Rules 1975, the action taken by him was illegal, without jurisdiction and void ab-initio. Moreover, the appellants were not at all provided any opportunity of cross-examination of the witnesses examined during the inquiry, which has caused them prejudice. The impugned order of dismissal of the appellant is thus not sustainable in the eye of law and is liable to be set-aside.

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ANNOUNCED
23.06.2021


(ATIQ-UR-REHMAN WAZIR)
MEMBER (EXECUTIVE)


(SALAH-UD-DIN)
MEMBER (JUDICIAL)

RECEIVED
23/06/2021

THREE COPY

Date of Presentation of Copy 07-07-21
Number of Copies 7000
Copy 22.00
Upward
Amount 22.00
Date of Delivery of Copy 07-07-2021
07-07-2021



"C"
-13-

OFFICE OF
THE COMMANDANT
POLICE TRAINING COLLEGE, HANGU
Office Phone: 0925-621886, Fax: 0925-620886
Email: kptc@hangu7@gmail.com

CHARGE SHEET

Whereas, I am satisfied that a de-novo enquiry as contemplated by the Service Tribunal Khyber Pakhtunkhwa, Service Appeal No. 931/2019, decided on 23.06.2021 titled Sohail Ahmad vs Commandant, PTC, Hangu, communicated to this office vide AIG: Inquires, CPO, Peshawar office Memo: No. 1984/CPO/IAB, dated 26.07.2021 received to this office on 30.07.2021, is necessary and expedient.

AND WHEREAS, I am of the view that the allegations if established would inviolate the major penalty awarded to you as defined in rules-4(b)(iv) of the Khyber Pakhtunkhwa Police Rules-1975 (amended-2014).

AND THEREFORE, as required by Police Rules 6(1) of the aforesaid rules, I Dr. Fasihuddin, PSP, COMMANDANT, Police Training College, Hangu hereby charge you FC Sohail Ahmad, No. 44, Ex. Drill Instructor, for your misconduct on the basis of summary of allegations attached to this Charge Sheet.

AND, I, hereby direct you further under rules 6(i)(b) of the said rules to put in written defence within 07-days of receipt of this Charge Sheet as to why the proposed action should not be taken against you and also state at the same time whether you desire to be heard in person or otherwise.

AND, in case, your reply is not received within the prescribed period, without sufficient cause, it would be presumed that you have no defence to offer and that ex-parte proceeding will be initiated against you.

Fasihuddin
(FASIHUDDIN) PSP
Commandant
Police Training College, Hangu

ATTESTED

-14-

DISCIPLINARY ACTION

Whereas I, Dr. Fasihuddin, PSP, COMMANDANT, Police Training College Hangu, is of the opinion that FC Sohail Ahmad, No. 44, Ex. Drill Instructor, has rendered himself liable to be proceeded departmentally specified in Section-3 of Khyber Pakhtunkhwa Police Disciplinary Rules-1975, as he has committed the following act/omission:

SUMMARY OF ALLEGATIONS

1 On 09.01.2019 ASI/LI Abid Ullah of Bannu Region was posted as incharge ammunition Kot in-place of ASI Bashir Muhammad of Mardan Region. On 14.01.2019 while taking the charge, he observed that a number of 87369 rounds of SMG were short/missing. The matter was brought into the notice of high-ups and therefore to unearth the facts, a preliminary enquiry conducted by Mr. Abdul Sattar, DSP (Legal) and Mr. Shah Mumtaz, DSP/CLI, PTC, Hangu. During enquiry accused officer ASI Bashir Muhammad, Ex. Incharge ammunition Kot and his co-accused officials i.e IHC Mati Ullah, District Hangu, HC Muhammad Akram, No. 1193/133, District D.I Khan and FC Sohail Ahmad produced the embezzled rounds numbering 76285 before the enquiry committee which were deposited in the SMG rounds Kot PTC, Hangu. After preliminary enquiry the enquiry officers submitted their initial enquiry report and held responsible accused officers/officials named above with their mutual understanding and their common criminal intention for embezzling a huge quantity of Govt. SMG rounds numbering 76285 probably with the help of other accomplices while the enquiry committee revealed that SMG rounds numbering 11084 were not properly entered in the relevant record. In response to the preliminary enquiry, the accused officers/officials named above were suspended and show cause notices were served upon them. Accused officer and co-accused officials submitted their written replies, but found unsatisfactory, hence proper departmental enquiry was initiated under the supervision of DSP/CLI Shah Mumtaz, assisted by Inspector Baroz Khan and Inspector Said Noor Shah as enquiry officers/committee. The enquiry committee conducted proper departmental enquiry. They recorded the statements of the relevant witnesses and also of the accused officers/officials. During enquiry, the enquiry committee recounted the SMG rounds produced by the accused officer/officials. They also collected and perused the relevant record i.e stock/issue register and Daily Diary of Model Police Station PTC Hangu. During enquiry, the enquiry committee held responsible accused officer ASI Bashir Muhammad No. 840/MR the then incharge ammunition Kot and his accomplices namely IHC Mati Ullah, No. 255 and FC Sohail Ahmad, No. 44 for embezzling Govt:

(11/1/2019)

-15-

SMG rounds with mutual connivance. Therefore, to follow Police Rules-1975 (amended 2014), ASI Bashir Muhammad, No. 840/MIR, IHC Mati Ullah No. 755 and FC Sohail Ahmad, No. 44 were awarded major punishment of "dismissal from service", while accused HC Muhammad Akram, No. 1193/133 was exonerated and reinstated in service from the date of suspension owing to non-availability of any tangible evidence against him vide PTC, Hangu order Endst: No. 119-34/PA, dated 15.03.2019.

2. The delinquent officer FC Sohail Ahmad, No. 44, Ex. Drill Instructor, filed departmental appeal against the said order of dismissal, but it was filed. Subsequently, then he approached the Khyber Pakhtunkhwa Service Tribunal, Peshawar vide service appeal No. 931/2019, which was allowed by the Honourable Tribunal on 23.06.2021 in the terms mentioned in the aforesaid appeal.
3. For the purpose of de-novo inquiry against the appellant strictly in accordance with relevant law/rules with reference to the above allegations, Mr. Arshad Mehmood, SP/Investigation (District Complaint Officer), Hangu is appointed as Enquiry Officer vide AIG: Inquires, IAB Khyber Pakhtunkhwa Peshawar office. Memo: No. 1984/CPO/IAB, dated 26.07.2021.
4. The enquiry officer/committee shall in accordance with the provisions of the Police Rules-1975 (amended-2014), provide reasonable opportunity of hearing and defense to the defaulter, record his findings within prescribed period after the receipt of this charge sheet and put up recommendations about the guilt or innocence of the accused officer.
5. The enquiry officer/committee should complete the requisite enquiry in time and submit his final findings report direct to the quarter concerned before 11.08.2021 with intimation to this office.

Fasihuddin
(FASIHUDDIN) PSP
Commandant
Police Training College, Hangu

No. 603-04/PA, dated Hangu the 02/08/2021.

Copy to the:

- 1. Mr. Arshad Mehmood, SP/Investigation (District Complaint Officer), Hangu for initiating de-novo inquiry against the defaulter under the provision of Police Disciplinary Rules-1975 (amended-2014). Enquiry file containing 408 papers are enclosed.
2. FC Sohail Ahmad, No. 44, Ex. Drill Instructor, PTC Hangu.

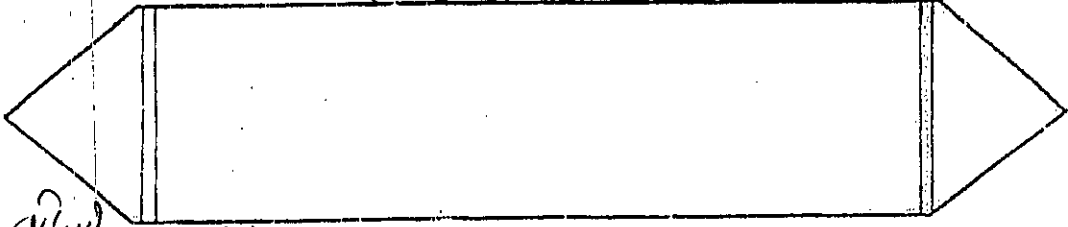
Fasihuddin
(FASIHUDDIN) PSP
Commandant
Police Training College, Hangu

ATTESTED

کہ میرا حدمات ذائب اچاج SMC دافل کونت تخیات تھا نہ کہ SMC
 دورہ میرا دورہ کے ساتھ کس قسم کا تعلق نہیں جتنا میرے خلاف
 جو الزام لگایا ہے ۶۹ ہے بنیاد ہے اور میرے طرف سے غلابیانات ایک
 کے لئے میرے طرف سے $2 \frac{2}{19}$ کہ ایک غلابیانات کاوا ہے والا کار $2 \frac{2}{19}$
 کہ میں ابدالہت جناب سول حجج III ڈوٹیر میں موجود تھا $3 \frac{2}{19}$
 کہ جب والی آیا تو مجھے ایک جھوٹے الزام میں بند لوارٹر کارڈ لیا
 کیا جس دنوں تک بند رہا دوران لوارٹر کارڈ اشوکار ڈوٹیراں خارج بنسٹا دئے
 کے $26 \frac{2}{19}$ کہ لوارٹر کارڈ سے رہا کیا لیا دوران لوارٹر کارڈ مختلف ازیت دیا میں
 ہے قصور میں غریب گوانے سے تعلق ہے چھوٹے بچے ہیں دوران برخانی
 دھاڑی مزوری آھی گندہ کرید خرچ سے بغیر قرض داریوں آپ صاحبان
 سے التماس ہے میرے حال پر رحیم کر کے مجھے تنخواہ کے ساتھ بحالی
 برقرار رہے عمر بھر دیا کہ رہے گا اللہ

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بعدالت لدر و س نر بیوں پتور



2022ء منجانب (سائنس)

سبیل احمد بنام P.P. وغیرہ

موزخہ	-----
مقدمہ	-----
دعویٰ	-----
پروم	-----

باعث تحریر آئنگہ

مظفر الدوکیلی

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ
آج مقام مظفر آباد کیلئے سبیل بنام محمد + ASC رالہ مظفر الدوکیلی

مقررہ کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا مکمل اختیار دیا گیا ہے۔ نیز
وکیل صاحب کو رضی نامہ کرنے و تقرر ثالثتہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور
پاد ورت ڈگری کرنے اجراء اور صولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برادگی اور منسوخی
نیز دائر کرنے اپیل عمرانی و نظر ثانی و پیروی کرنے کا اختیار 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 مذکورہ باختیارات حاصل ہوں گے اور اس کا سہاکتہ
برداشتہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانش التوائے مقدمہ کے سبب سے ہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
مکروز کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

Accepted
[Signature]

الرقوم _____ ماہ _____ 20 _____

Accepted by
[Signature]

سبیل احمد
[Signature]