


FORM OF ORDER SHEET

Court of _____

Case No. - 304/2023


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	10/02/2023	<p>The appeal of Mr. Zaib Khan resubmitted today by Mr. Zulfiqar Mahmood Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____. Parcha Peshi is given to appellant/counsel for the date fixed.</p> <p>By the order of Chairman  REGISTRAR</p>

The appeal of Mr. Zaib Khan Ex-Constable No. 6518 CCP Peshawar received today i.e. on 27.01.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Memorandum of appeal be got signed by the appellant.
- 2- Annexures of the appeal be attested.
- 3- Check list is blank be filled up.
- 4- Departmental appeal having no date be dated.
- 5- The authority whose order is challenged has not been arrayed a necessary party in the heading of appeal.

No. 411 /S.T.

Dt. 31/01 /2023


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Zulfiqar Mehmood Adv.
High Court at Peshawar.

All objection are removed
and The date is already mentioned in
departmental Appeal.



31/1/2023

BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICES
TRIBUNAL PESHAWAR

In S.A. 304/2023

Zaib Khan

VERSUS

IGP Khyber Pakhtukhwa & Others

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Dated: 25-1-2023

Appellant

Through

Zulfiqar
Zulfiqar Mehmood
Advocate, High Court,
Peshawar.

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICES
TRIBUNAL PESHAWAR**

In S.A. 304/2023

Zaib Khan, Ex- Constable No: 6518, Capital City Police,
Peshawar, resident of Sufaid Sang, Tehsil & District
Peshawar.

.....Appellant

VERSUS

1. Inspector General of Police, Khyber Pakhtunkhwa,
Peshawar.
2. Capital City Police Officer at Police Line, Peshawar.
3. Capt ® Saleem Abbas Kulachi (PSP) Superintendent of
Police Rural, CCP, Peshawar.
4. Deputy Superintendent of Police, Regi Circle,
Peshawar.

.....Respondents

**Appeal Under Section 4 of Khyber Pakhtunkhwa
Services Tribunal Act 1974 Against The
Impugned Dismissal Order No: 270/1 Dated: 18-
10-2022 Of The Office Of Superintendent Of
Police Peshawar, Whereby The Appellant Was
Dismissed From The Rolls Of The Respondent
Department In A Classical, Cursory And**

**Of the Appellant Has Not Been Decided Inspite Of
Lapse of Statutory Period By the Respondents.**

Respectfully Sheweth.

1. That the Appellant is a naturally born bonafide citizen of Islamic Republic of Pakistan and hails from a respectable family of District Peshawar.
2. That after going through the mandatorily required criteria, the Appellant got inducted on to the rolls of the prestigious Police Force of the province years back in 2010.
3. That during the course of his employment, Appellant always remained a pragmatic and duty full fellow, who never left any stone unturned in performance of obligation, best of level upon the shoulders of the Appellant and hence the career of the Appellant remained soot-less or without any soot or sootage.
4. That it was in the back drop of 2/09/2022, while the Appellant was performing his duty at PS Regi Model Town Peshawar, whereby the Appellant came to know that a criminal case was been registered against unknown persons village Sufaid Sung Caste Esa Khel bearing FIR No: 457 dated 02-09-2022, U/S 324/ 353/ 148/ 149/ 427 PPC and 7 ATA of Police Station, Regi, Peshawar. **(Copy of FIR, is annexed herewith as Annexure "A")**

5. That as the Appellant was charged in a criminal case, hence when he was getting back to his home after performing his duties on dated: 3/9/22, he was arrested by the DSP Regi Circle in the above mentioned FIR with malafide intention and ulterior motive on the behalf of Ex-Deputy Speaker KPK Assembly namely Mehmood Jan Khan.
6. That the Appellant moved his bail application before the competent court, who was released on bail, the Hon'ble Judge ATC vide order dated: 15-09-2022. **(Copy of Bail Order dated 15-9-22 is attached as Annexure "B")**
7. That after the release the appellant went to the PS: Regi Model Town duty place, it was staining to discover that appellant has been dismissed from his job without any notice or any prior hearing. **(Copy of Dismissal Order is attached as Annexure "C")**
8. That in this regard, the Appellant moved Departmental Appeal on dated: 18-10-2022 vide Diary No: 15839 to the Chief City Police Officer / CCPO, but despite of lapse of statutory period, nothing came out of the same. **(Copy of Departmental Appeal is annexed herewith as Annexure "D")**
9. That feeling aggrieved, the Appellant approaches this Hon'ble Tribunal for his reinstatement into service upon the following ground inter-alia:-

Grounds:

- A. That impugned dismissal order is wrong, illegal, unlawful, hence liable to be set aside.
- B. That the impugned dismissal order was passed without fulfilling the codal formalities and without following due process of law, hence the Order impugned herein is not tenable in the eyes of law.
- C. That neither Charge Sheet has been framed nor served upon the Appellant, therefore the impugned Order is illegal, unlawful, void ab-initio and liable to be set aside.
- D. That no statement of allegation as well as no Show-Cause-Notice has been issued to the Appellant, hence the impugned order is wrong, illegal and against the law, hence not sustainable in the eye of law and liable to be turned down.
- E. That no inquiry ever got initiated in case of the Appellant nor was ever afforded any opportunity of personal hearing or prior notice, thus was condemn unheard.
- F. That no final Show-Cause Notice was ever served upon the Appellant and the impugned Order was passed in hurry by the Respondent Department.
- G. That the absence of the Appellant is not intentional nor deliberated but due to the facts mentioned above, which is beyond the control of the Appellant. Therefore the impugned order is not warranted in the circumstances of the Appellant's case, hence liable to be set aside.
- H. That even the Appellate Authority simply shelved the Departmental Appeal of the Appellant without any rhyme or reason.

- I. That from all prospective the impugned Dismissal Order is illegal, unlawful, void ab-initio, coram-non-judice, hence liable to be set aside.
- J. That any other ground not raised here may graciously be allowed to be raised at the time of arguments.

It is, therefore, most humbly prayed that on acceptance of the instant Service Appeal, impugned Dismissal Order No: 270/1 dated: 18-10-2022 of the office of Superintendent of Police Peshawar, may kindly be declared as illegal, unlawful and void ab-initio, and by doing so, the impugned above dismissal order may kindly be set aside. And the Appellant be reinstated into service with all back benefits.

Any other relief not specifically asked for may also graciously be extended in favor of the appellant in the circumstances of the case.

Dated: 25-01-2023.

Appellant
Through
**Zulfiqar Mehmood
&
Muhammad Aftab
Advocates, High Court,
Peshawar.**

NOTE:

No such like appeal for the same appellant, upon the same subject matter has earlier been filed by me, prior to the instant one, before this Hon'ble Tribunal.

Advocate.

BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICES
TRIBUNAL PESHAWAR

In S.A _____/2023

Zaib Khan

VERSUS

IGP Khyber Pakhtukhwa & Others

AFFIDAVIT

I, Zaib Khan, Ex- Constable No: 7164, Capital City Police, Peshawar, resident of Sufaid Sang, Tehsil & District Peshawar, do hereby solemnly affirm & declare on oath that all content of the instant Service Appeal, are true & correct to the best of my knowledge & belief and nothing has been concealed or misstated from this Hon'ble Tribunal.

[Signature]

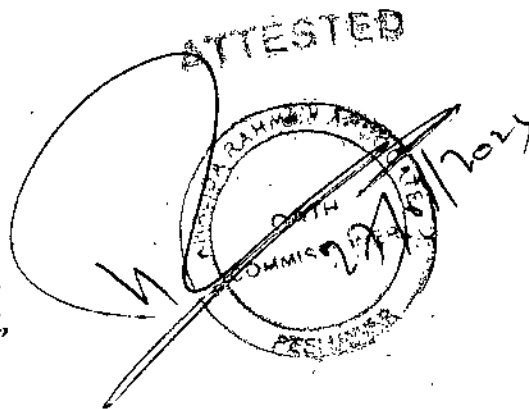
DEPONENT *Zaib Khan*

CNIC: 17301-7981457-3

Cell No: 0316-0080813

Identified BY

[Signature]
Zulfiqar Mehmood
Advocate, High Court,
Peshawar



BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICES
TRIBUNAL PESHAWAR

In S.A. _____/2023

Zaib Khan

VERSUS

IGP Khyber Pakhtukhwa & Others

ADDRESSES OF PARTIES

APPELLANT

Zaib Khan, Ex- Constable No: 7164, Capital City Police,
Peshawar, resident of Sufaid Sang, Tehsil & District
Peshawar


ADDRESSES OF RESPONDENTS

1. Inspector General of Police, Khyber Pakhtunkhwa,
Peshawar.
2. Capital City Police Officer at Police Line, Peshawar.
3. Superintendent of Police, Headquarters, Peshawar.
4. Deputy Superintendent of Police, Regi Circle,
Peshawar.

Dated: 25-1-2023

Appellant

Through


Zulfiqar Mehmood
Advocate High Court,
Peshawar

1. محمد 2. محمد 3. محمد 4. مسلم ولد منظم مشیر 5. جہانگیر ابیکرین (فرزند والا) 6. منظر
 7. ابیکر 8. غنی محمد 9. سید علی پسرانک اسم 10. نعلی زلف ولد ناملام سائق ولد علی اہل
 11. عزیز ولد نیار 12. سید ولد چاند زلف 13. زبیر ولد جہانگیر 14. دم زلف عرف فضل
 15. ولد سید علی 16. کاسران ولد سید علی 17. صہنتہ ولد ناملام 18. صبان ولد ناملام
 19. بنت مشیر ولد اسم 20. فریاض لطف انور ولد ناملام 21. صافہ صہابتہ ولد اسم
 22. مشیر 23. سید اللہ عرفت میراد ولد ناملام 24. ثناء اللہ ولد طاہرہ سکہ پارسنگہ 25.
 وقار ولد سیدہ دیگر افراد خواہن سوائے انہما ناملام سائیکان علیہ فیصل شامل ہیں
 جنہوں نے دینتے گردے اور دلتے میں خوف و ہراس ڈھرائے، بیوقوفانہ بددعا، بددعا خورد اور
 دیگر جرائم کیلئے ایک مرتلہ گروہ دینتے گردے تشکیل دیا۔ جو انہما زور جہانگیر سے
 رہا اور 44 ملزم ہے۔ انہی کے علیہ فیصلے ہیں اور دیگر انہوں نے نافرمانی کرنے والا اور
 سے ایلیا رہتے ہوئے سرکاری ڈپوٹے پر گئے گز سے علیہ فیصل جاتی ہیں۔ تو اس پر اہل کرتے
 ہیں اور مذکورہ دینتے گردے اور دیگر سے ہائیں ماہرنگہ کے تدارک کے دوران ڈپوٹے
 سے متعلقہ اقلیت کے گز سے علیہ فیصلے خبر سے جہانگیر کے پاس سے جہانگیر
 کی تدارک میں ہوتے تھے تاکہ اسے پورے دستاویز نہ جہانگیر والے سے اور ان سے ملزبان
 بلا اور تدارک جہانگیر کا پورا کرنے کے لئے زیادہ سے زیادہ کے تدارک کے دینتے گردے
 دیکھ کر سرانامہ بطور لیٹل دیئے گئے یہ دستے کیلئے 167 ارسال ہے آپ سے جو وہ دن دیکھ
 کرتے کیلئے ان کے اور تدارک کیا گیا۔ میں ان کے دینتے گردے کے لئے علمت میں
 جو دیوکت ڈپوٹے کے لئے خاتمہ کے لئے ان کے لئے کامیاب تھا اور وہ قہر میں
 سے اسلم صرف سے صرف سے گیا اور کہہ رہے وہ تم سے کہے گیا جا کر دیوکت میں جا کر
 تدارک سے صرف سے گیا اور ان کے لئے کامیاب تھا اور ان کے لئے کامیاب تھا اور ان کے لئے
 دیوکت کے لئے ہے۔ یہ وہ دیوکت کے لئے ہے۔

2021-9-22
 2021-9-22

**IN THE COURT OF Dr. MUHAMMAD AAMIR NAZIR
ADMINISTRATIVE JUDGE, ANTI TERRORISM COURTS
PESHAWAR.**

BA No. _____

Case FIR No. 457 Dated 02/9/22 U/S 324/353/148/143 PS Regi
201/295/427/7ATA

Order No.1

12/9/22

Bail application received through counsel.

Entrusted to learned Judge, ATC-III, Peshawar for disposal under the law.

(Administrative Judge)
Anti-Terrorism Courts,
Peshawar.

**IN THE COURT OF MUHAMMAD ADIL KHAN LEARNED
JUDGE ANTI TERRORISM COURT-III PESHAWAR**

Order No.02

12.09.2022

Bail Application received from the learned Administrative Judge for ATCs, Peshawar.

Be entered in the relevant register. Notice and record for 14/09/2022.

(Muhammad Adil Khan)
Judge, ATC-III, Peshawar

Order No.03

14.09.2022

Learned counsel for the accused/petitioner and Mr. Irshad Ullah learned Sr. PP for state as well as DFC PS Regi present. Learned counsel submits an application requesting therein to delete the name of the complainant from the penal of respondent, being clerical mistake. So, the application is allowed and office is directed to delete the name of the complainant from the penal of respondent. Notice received back which shows his service and also of the service of complainant Khan Zeb Khan SI. Learned PP for the state also requests for adjournment to

14.9.2022

Continued
Order No.04
Dated
15.09.2022

which Riaz Khan SHO and constable Khaista Rehman sustained injuries, who were shifted to LRH Peshawar for treatment. Secret information through Special Branch and DSP received regarding the involvement of the following accused besides others unknown accused and women :- (1) Jehanzeb retired FC employee (Commander), (2) Ibrar s/o Gul Ahmed, (3) Saidan Shah s/o Hussainay, (4) Mudassir, (5) Mutahhir, (6) Muslim s/o Azam Sher, (7) Jehanzeb Electrician, (8) Muntazhir, (9) Abu Bakkar, (10) Ghuncha Gul, (11) Socha Gul Sons of Aslam, (12) Lal Zali s/o unknown r/o Mohallah Esa Khel, (13) Uzair s/o Nihad, (14) Sabeel s/o Chandi, (15) Zubair s/o Jehanzeb, (16) Raham Zali alias Khalo s/o Sabaz Ali, (17) Kamran s/o Sabaz Ali, (18) Sifat s/o unknown, (19) Jehan s/o unknown, (20) Bakhat Munir s/o Aslam, (21) Fayaz alias Afsar s/o unknown, (22) Haji Mohabat s/o Azam Sher, (23) Sami Ullah alias Milad s/o unknown, (24) Sana Ullah s/o Taqat r/o Parsang and (25) Waqar s/o Yaseen along with other unknown persons and women being facilitators r/o Esa Khel. They have organized terrorist group for committing terrorism in the area, demanding Bhatta and committing other crimes, headed by Jehanzeb retired FC employee. The residents of the Kanday Esa Khel attacked law enforcing agencies whenever they visited the area for the performance of their duties. The abductees also succeeded to escape from the Hujra of Esa Khel Tribe during cross firing between the police and terrorists.

The accused/petitioners were arrested on 07-09-2022 but they have neither been named in the FIR nor their role has been specified during the investigation. Their involvement in the case as well as their arrest ^{is} a question mark as how they were implicated in the case and arrested. No confession has been made by them nor any recovery or discovery was effected which may connect them with the

RECEIVED

29/11/22

PRE-6.0
15.9.2022

**BEFORE THE COURT OF LEARNED SPECIAL JUDGE ANTI
TERRORISM PESHAWAR**

CR.M. _____/2022 (BA)

1. Hazrat Ullah S/o Sahar Gul
2. Zalb Khan S/o Wafyat Khan

Order Sheet No. _____

Judge ATC-III Peshawar.

BOTH RESIDENTS OF SAFAID SANG ISSA KHEL CURRENTLY CENTRAL JAIL
PESHAWAR

ACCUSED/PETITIONERS

VERSUS

1. THE STATE
2. ~~SHAYED KHAN S/O ABDEL JABBAR KHAN R/O JACDAR QALAH KAFURDHERI~~
PESHAWAR vide order No. 43 deleted
dated: 14-09-2022

RESPONDENTS

FIR No. 457

DATED: 02-09-2022

POLICE STATION: RAIGI

CHARGED U/S: 353/324/148/149/224/225/427 PPC, 7ATA

APPLICATION UNDER SECTION 21-D ATA READ WITH 497 CR.P.C & ALL OTHER
ENABLING SECTIONS OF LAW FOR GRANT OF POST ARREST BAIL TO THE ACCUSED/
PETITIONERS UNTIL THE FINAL DISPOSAL OF THE CAPTIONED CASE

RESPECTFULLY SHEWETH.

Order Sheet No. VI

Judge ATC-III Beshawar

- I. That the above captioned case has been registered against the Accused/Petitioners in which they have been malafidely charged, at a later stage in utmost disregard of law and facts at the behest of people in the corridor of power.

COPY OF FIR IS ATTACHED

- II. Now the Accused/Petitioners approach this honourable court for grant of post-arrest bail on the following grounds inter alia;

GROUND:

1. That the Accused/Petitioners are innocent and have been falsely charged with malafide by the police in order to show their efficiency.
2. That the Accused/Petitioners have been charged through malicious and incompetent investigation without an iota of evidence exclusively to satisfy egos of persons lurking in the corridors of power.
3. That the story of the Complainant is based on surmises and conjecture and is not appealable to a prudent mind.
4. That no offence on the face of the record exists against the Accused/Petitioners.
5. That the story as narrated by the Complainant is at odds with logic and defies common sense.
6. That even otherwise the case of the Accused/Petitioner falls within the purview of further inquiry as envisaged by section 497(2) Cr.P.C
7. That neither the allegation of ransom nor that of abduction can be proved upon tentative assessment of the record.
8. That the Accused/Petitioners have not been charged by name in the FIR, yet the police in classical misuse of power arrested and charged them for an occurrence which cannot be substantiated from the record.
9. That the Accused/Petitioners hail from respectable family and have no previous convictions and keeping them behind bars would only cause their unjust humiliation and harassment.
10. That the Accused/Petitioners are ready to furnish reliable sureties to the satisfaction of this honourable court.
11. That an error in granting bail can always be rectified, if the Accused/Petitioners are convicted, however no compensation or rectification can be made for the incarceration of the Accused/Petitioners in the likely event of their acquittal.
12. That the Accused/Petitioners willingly undertake to cooperate with the investigating officer as and when required.

13. That any other ground may be raised at the time of arguments.

Order Sheet No.


Judge ATC-III Peshawar

PRAYER

It is therefore most humbly submitted that on acceptance of this application, the Accused/Petitioners may kindly be released on bail until the disposal of the captioned case.


ACCUSED/PETITIONERS,

THROUGH,


BARRISTER AMIR KHAN CHAMKANI

NOTE : As per the instructions of my client no such bail petition has been filed by them prior to the current petition.

COUNSEL



ORDER

This office order will dispose of the departmental proceedings against FC Zaib Khan No. 6518 while posted at CCP Peshawar on the following allegations that.

"That he is involved in a criminal case vide FIR No. 456 dated 02.09.2022, U/S 364-A, 148, 149, 7ATA, Police Station Regi. This act to gross misconduct on his part and against the discipline of the force".

Under Police Rules 1975 (amended 2014) proper charge sheet along with summary of allegation were issued against him and SDPO Warsak was appointed as enquiry officers to scrutinize the conduct of the alleged constables. They conducted enquiry proceedings & submitted finding report.

Keeping in view the aforementioned facts, being a competent authority FC Zaib Khan No.6518 is hereby awarded Major punishment of "Dismissal from service" with immediate effect.

Order announced.

Capt (M) Saleem Abbas Kulachi (PSP)
Superintendent of Police,
Rural, CCP, Peshawar.

OB: No. 2701

Dated 18/10/2022

No. 77 /SP/Rural: dated Peshawar 18/10/2022.

Copy for information and necessary action to the:-

1. The Senior Superintendent of Police, Operation, Peshawar.
2. The Superintendent of Police Headquarter, Peshawar.
3. SDPO Regi
4. SDPO Warsak Enquiry officer.
5. Pay Officer.
6. CRC.
7. OASI
8. Fauji Missal branch with enquiry file for record.
9. Official concerned.

محضور جناب CCPO صاحب خیبر پختونخواہ پشاور

اپیل بر خلاف آفس ریہول آرڈر نمبر 2701 مورخہ 18.10.2022

اپیل بمراد نوکری پر بحال کرنے کا سنٹیل زیب خان ولد ولایت خان

جناب عالی! سائیلان حسب ذیل عرض رساں ہیں۔

- 1- یہ کہ سائیلان محکمہ پولیس میں کنسٹبلان ہے جو کہ عرصہ 9 سال سے ایمانداری سے اپنے فرائض سرانجام دے رہے تھے اور ریگی ٹاؤن میں بحیثیت کنسٹبلان تعینات ہیں۔
- 2- یہ کہ مورخہ 03.09.2022 کو سائیلان ڈیوٹی سے گھر جا رہے تھے کہ ساجد، ممتاز DSP نے بغیر کسی قانونی وجہ و جواز کو ہم سائیلان کو گرفتار کر کے 4 دن تک حسب بے جا میں رکھا اور بعد میں مقدمہ علت نمبر 457 مورخہ 02.09.2022 جرم 7ATA & PPC 149/148/427/225/324/353 تھانہ ریگی میں مورخہ 07.09.2022 کو گرفتار ظاہر کیا گیا ہے۔
- 3- یہ کہ مذکورہ مقدمہ میں عدالت حضور نے من سائیلان کو دیار ضمانت کیا ہے۔ (ٹائید میں نقل حکم عدالت حضور لفظ ہے)۔
- 4- یہ کہ سائل نے ایک عدد درخواست قبل از دائر کی تھی کہ من سائل کو ڈیوٹی پر معذور کیا جائے لیکن کوئی مثبت نتیجہ نہ آیا اور بعد از درخواست من سائل کو اپنے ڈیوٹی سے Dismissal کر دیا۔
- 5- یہ کہ من سائل نے ہمیشہ سے ایمانداری کے ساتھ اپنی ڈیوٹی سرانجام دی ہے اور تاحال میرے خلاف کوئی شکایات نہیں ہوئی ہے۔
- 6- یہ کہ مذکورہ Dismissal order سراسر غلط، خلاف قانون و اختیارات کا غلط استعمال ہے۔

لہذا استدعا کی جاتی ہے کہ من سائل کو اپنی نوکری پر دوبارہ بحال کرنے کے احکامات صادر فرمائی جائے۔

العبد

زیب خان ولد ولایت خان

پلٹ نمبر 6518

رابطہ نمبر 0316-0080813

محضور جناب انسپکٹر جنرل آف پولیس صاحب خیبر پختونخواہ پشاور

اپیل بر خلاف آفس ریمون آرڈر نمبر 2701 مورخہ 18.10.2022

اپیل براد نوکری پر بحال کرنے کا نیشنل زیب خان ولد ولایت خان

جناب عالی! سائیلان حسب ذیل عرض رساں ہیں۔

- 1- یہ کہ سائیلان محکمہ پولیس میں کنسٹبلان ہے جو کہ عرصہ 9 سال سے ایمانداری سے اپنے فرائض سرانجام دے رہے تھے اور ریگی ٹاؤن میں بحیثیت کنسٹبلان تعینات ہیں۔
- 2- یہ کہ مورخہ 03.09.2022 کو سائیلان ڈیوٹی سے گھر جا رہے تھے کہ ساجد، ممتاز DSP نے بغیر کسی قانونی وجہ و جواز کو ہم سائیلان کو گرفتار کر کے 4 دن تک حسب بے جا میں رکھا اور بعد میں مقدمہ علت نمبر 457 مورخہ 02.09.2022 جرم 7ATA & PPC/149/148/427/225/324/353 تھانہ ریگی میں مورخہ 07.09.2022 کو گرفتار ظاہر کیا گیا ہے۔
- 3- یہ کہ مذکورہ مقدمہ میں عدالت محصور نے من سائیلان کو دیار ضمانت کیا ہے۔ (نائید میں نقل حکم عدالت حضور لاف ہے)۔
- 4- یہ کہ سائل نے ایک عدو در خواست قبل از دائر کی تھی کہ من سائل کو ڈیوٹی پر معذور کیا جائے لیکن کوئی مثبت نتیجہ نہ آیا اور بعد از در خواست من سائل کو اپنے ڈیوٹی سے Dismissal کر دیا۔
- 5- یہ کہ من سائل نے ہمیشہ سے ایمانداری کے ساتھ اپنی ڈیوٹی سرانجام دی ہے اور تاحال میرے خلاف کوئی شکایات نہیں ہوئی ہے۔
- 6- یہ کہ مذکورہ Dismissal order سراسر غلط، خلاف قانون و اختیارات کا غلط استعمال ہے۔

لہذا استدعا کی جاتی ہے کہ من سائل کو اپنی نوکری پر دوبارہ بحال کرنے کے




احکامات صادر فرمائی جائے۔

العبد

زیب خان ولد ولایت خان


بلٹ نمبر 6518

رابطہ نمبر 0316-0080813

قیمت 50 روپے	58768	  
ایڈووکیٹ <u>Zulfi A. Khan</u> بار کونسل ایسوسی ایشن نمبر: <u>0923</u> رابطہ نمبر: <u>0311 280804</u>		

پشاور بار ایسوسی ایشن، خیبر پختونخواہ

بعدالت جناب: سروس سروس لیاؤ

منجانب: <u>ایڈووکیٹ</u>	دعویٰ: <u>سروس سروس</u>
 بنام <u>Zulfi A. Khan</u>	علت نمبر: _____
	سورس: _____
	مقام: <u>Zulfi A. Khan</u>

باعث تحریر آنگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ
 آن مقام ایڈووکیٹ کیلئے سروس سروس کے لئے ایڈووکیٹ صاحب کے لئے ایڈووکیٹ
 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 برحلف 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
 دائرہ 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 داخلہ 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



المقوم:

Zulfi A. Khan

نوٹ: اس وکالت نامہ کی کوئی تاویل قبول ہوگی۔

ایڈووکیٹ Zulfi A. Khan