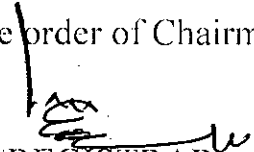


FORM OF ORDER SHEET

Court of _____

Case No.- _____ **385/2023**

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	02/03/2023	<p>The appeal of Mr. Zahid Minhas resubmitted today by registered post through Mr. Sadam Hussain Zakori Advocate. It is fixed for preliminary hearing before touring Single Bench at D.I.Khan on _____. Notices be issued to appellants and his counsel for the date fixed.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

BEFORE THE PROVINCIAL SERVICE TRIBUNAL,
KHYBERPAKHTUNKHWA

Appeal No. 385 of 2023

Zahid Minhas

VERSUS Government of KP and others
Service Tribunal Act.

APPEAL U/S 4 OF KP SERVICE TRIBUNAL ACT, 1974

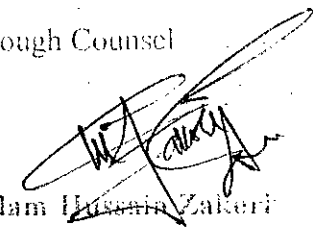
INDEX

S#	Description of Documents	Annexure	Page Numbers
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3.	Copy of the Impugned order Dated 07.10.2022	A	8-9
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Zahid Minhas

Yours Humble Appellant

Through Counsel


Sadam Hussain Zakori

Advocate-High-Court

(1)

**BEFORE THE PROVINCIAL SERVICE TRIBUNAL,
KHYBERPAKHTUNKHWA**

Service Tribunal Appeal No: 385 of 2023

Zahid Minhas, Ex-Constable, No. 726, CFU/CTD, Tehsil & District Dera Ismail Khan

(Appellant)

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary Home & Tribal Affairs Department, Khyber Pakhtunkhwa, Peshawar
2. Inspector General of Police, (IGP) Khyber Pakhtunkhwa, Peshawar
3. Deputy Inspector General of Police, Counter Terrorism Department (CTD), Khyber Pakhtunkhwa, Peshawar
4. Superintendent of Police, Counter Terrorism Department (CTD), DIKhan Region, Office District Dera Ismail Khan

(Respondents)

**APPEAL UNDER SECTION 4 OF THE SERVICE TRIBUNAL ACT, 1971
KP AGAINST THE BELOW ORDER OF THE RESPONDENT NO.4
OFFICE ORDER NO.OB NO.81/CTD NO.5862-65/CTD DATED DIKHAN
THE: 07.10.2022 VIDE WHICH THE APPELLANT WAS IMPOSED UPON
MAJOR PUNISHMENT OF DISMISSAL FROM SERVICE**

Respectfully Sheweth,

BRIEF FACTS:

- I. That the addresses of the parties written above for the purpose of services may be deemed sufficient.

Zahid Minhas

2. That the appellant was initially appointed as Constable, No.726, and was posted at NFU/CTD DIKhan Region and appellant is having 21 years of service.
3. That throughout the service there is no objection against the appellant except the recent departmental proceedings. However, vide the subject order Dated 07.10.2022 major punishment of dismissal from service was imposed on appellant. Copy of the impugned order is attached as Annexure-A.
4. That later on 19.10.2022 the appellant preferred departmental appeal before the Respondent No.3. However, the appeal of the appellant is not decided, one way or the other, by the Respondent No.4 within the statutory period, hence, the instant appeal before this Honourable Tribunal is within time. Copies of the departmental appeal along with receipt of General Post Office are attached as Annexure-B.
5. That the major punishment of dismissal from service was imposed upon Mr. Iftikhar Ali Shah, who at the relevant time was having the additional charge of Superintendent of Police, CTD, DIKhan Region and was not a full time SP. It is time and again reminded and reiterated by the government that any incumbent who holds a post as additional charge can't make any decision which has long term implications. Hence, it is held that an officer looking after the charge of a post can't exercise administrative powers as the same have not been delegated to him by the Respondent No.4. Copies of the government notifications in regarding to additional charge are attached as attached as Annexure-C.
6. That it was incumbent upon the Respondent No.4 to hand over complete documents and material allegedly in their possession against the appellant. The Respondent No.4 was also duty bound to provide complete list of alleged witnesses which were to depose against the appellant. It is now the celebrated principle of law that no one should be taken by surprise.
7. That the inquiry officer never provided any documentary evidence, if any, against the appellant, nor provided any list of witnesses which were to be produced against the appellant. Rather, the appellant for the first time came to know about the witnesses from the impugned order Dated 07.10.2022, wherein reference is made to certain witnesses, but still their names are not mentioned in the said order.
8. That it is the golden principle of law that the employee against whom departmental proceedings are initiated and if certain witnesses are produced against him, he should be given an opportunity of cross-examining the said witnesses. However, the appellant was not provided any opportunity of cross-examining the said alleged witnesses nor any opportunity was given to appellant to produce his witnesses. Though, the same is also the fundamental right of appellant well enshrined in various articles of The Constitution of Pakistan, 1973, including the Article 10-A.
9. That no evidence is available against the appellant for the charges levelled against the appellant, rather appellant has been made the victim of political interference.

19. That the facts mentioned above may please be considered sufficient grounds for the acceptance of the instant appeal, however, appellant may

18. That the appellant had 21 years of long career to his badge and with one slip of pen the Respondent No.4 has ruined the entire career. The appellant has served the department and the citizens of this country at the stake of his life and has been in life danger situations many times in his career.

17. That the Respondent No.4 never gave opportunity of personal hearing to the appellant.

16. That according to the Police Rules, 1975, amended in 2014, there are two kinds of proceedings against an employee, i.e., 1). Summary Police Proceedings. 2). General Police Proceedings. As per the said rules it was mandatory upon the Respondent No.4 to first make a specific order as to what kind of proceedings it is going to adopt so that the accused mind is clear about the same. However, no such order is ever made by the Respondent No.4, and it is the celebrated principle of law that any deviation from law would render the most sacred proceedings null and void. Hence, the entire edifice would crumble to the ground and the entire proceeding is nullity in the eyes of law.

15. That the inquiry officer who was deputed for the purpose of allegations never allowed the appellant an opportunity of personal hearing. The appellant was only called upon by the said enquiry officer but was directed to sit outside his office and was never associated during the proceedings.

14. That the inquiry was conducted by the subordinate to the Respondent No.4 which is against the law and natural justice.

13. That the manner and mode in which the inquiry was conducted by the inquiry officer clearly suggests that the inquiry was conducted not by independent officer.

12. That the impugned order and the entire departmental proceeding are against the law and facts hence, not tenable in the eyes of law.

11. That no charge sheet or statement of allegation was ever communicated to the appellant by the Respondent No.4 or the inquiry officer. The entire proceeding was just initiated to complete the paper work. However, they have utterly failed in doing so. Even, the enquiry officer never summoned the appellant in this connection and entire proceeding was conducted in the appellant's absence.

10. That the alleged GDR Data were never requested by the appellant. In fact no date and time of the alleged request are mentioned in the impugned order nor cellphone numbers are mentioned in the same. Rather, no such record was ever communicated by the Respondent No.4 or the inquiry officer to the appellant. In fact the inquiry officer never gave any opportunity to appellant to defend himself against the allegations.

please be allowed to raise additional grounds for the success of the instant appeal.

20. That feeling aggrieved by the order Dated 07.01.2023 the appellant is now left with no other option but to invoke the jurisdiction of this Honourable Tribunal inter alia on the following grounds;

GRUNDS:

1. That the impugned orders are against the law and facts hence, not tenable in the eyes of law

2. That no charge sheet and statement of allegation is provided to the appellant in relationship to the allegations levelled.

3. That the alleged inquiry is conducted not by independent officer, but was subordinate to the respondent No.4 which is against the law and natural justice.

4. That the enquiry officer never recorded statement of any independent eye-witness nor taken in possession solid concrete evidence against the appellant which could have been exhibited and no right of cross-examination was afforded to the appellant. Hence, fair trial and due process was not given to the appellant which was my vested and fundamental rights enshrined in the Constitution of Pakistan, 1973.

Jalil Khan

5. That the inquiry officer who was deputed for the purpose of allegations didn't allow the appellant an opportunity of personal hearing. The appellant was only called upon by the said enquiry officer but was directed to sit outside his office and was never associated during the proceedings.

6. That according to the Police Rules, 1975, amended in 2014, there are two kinds of proceedings against an employe, i.e., 1). Summary Police Proceedings. 2). General Police Proceedings. As per the said rules it was mandatory upon the Respondent No.4 to first make a specific order as to what kind of proceedings it is going to adopt so that the accused mind is clear about the same. However, no such order is ever made by the respondent No.4, and it is the celebrated principle of law that any deviation from law would render the most sacred proceedings null and void. Hence, the entire edifice would crumble to the ground and the entire proceeding is nullity in the eyes of law.

7. That at the relevant time the respondent No.4 was holding additional charge of the post of SP CTD Dikhan, hence, as per the government clarifications, issued from time to time, any officer who holds additional charge of a post can't make any decision which has long term implication. Hence, respondent No.4 was not competent to pass the impugned order Dated 07.10.2022.

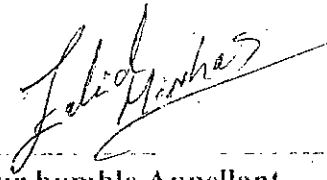
8. That the allegations levelled against appellant are in regard to a job description which are not of a constable rather the authority which is

5

burdened with the said duty is not associated with the inquiry by the inquiry officer or the respondent No.4, nor any inquiry is conducted against him. Appellant is made target of political victimization as appellant has always remained neutral and honest.

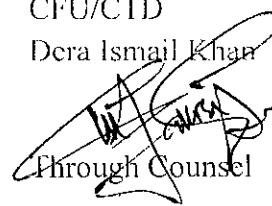
9. That throughout my long career of 21 long years there is no allegation of miss conduct or corruption against the appellant. This speaks volume about the great career of the appellant.
10. That the appellant had 21 years of long career to his badge and with one slip of pen the respondents have ruined the entire career. The appellant has served the department and the citizens of this country at the stake of his life and has been in life danger situations many times in his career.
11. That appellant was entitled to fair trial under the article 10A of the Constitution of Pakistan, 1973 and other statutory and case laws which was never provided to him.
12. That the facts mentioned above may please be considered sufficient grounds for the acceptance of the instant appeal, however, the counsel of the appellant may please be allowed to raise additional grounds for the success of the instant appeal.

HENCE, IT IS, THEREFORE, REQUESTED TO SET ASIDE THE IMPUGNED ORDER AND TO REINSTATE THE APPELLANT IN HIS SERVICE WITH ALL HIS BACK BENEFITS.



Your humble Appellant
Zahid Minhas

Ex-Constable, No.726
CFU/CTD
Dera Ismail Khan



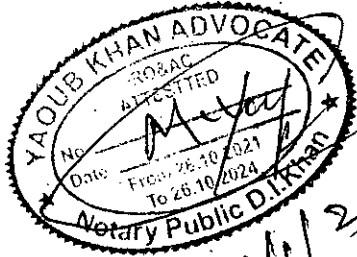
Through Counsel
Sadam Hussain Zakori
Advocate High Court

Dated 34/02 / 2023

6

AFFIDAVIT

I Zahid Minhas do hereby solemnly affirm and declare that the contents of this Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Tribunal and this is the lone Appeal on the subject.



Zahid Minhas

Deponent

12101-7733945-5

03459821160

CERTIFIED AT D.I.KHAN

That the parawise content of the instant appeal are true and correct and it is the lone petition on the subject matter

Zahid Minhas

Zahid Minhas....(Appellant)

(7)

BEFORE THE PROVINCIAL SERVICE TRIBUNAL,
KHYBERPAKHTUNKHWA

Appeal No. _____ of 2023

Zahid Minhas *VERSUS* Government of KP and others

Service Tribunal
APPEAL U/S 4 OF KP CIVIL SERVANTS ACT, 1974

At
MEMO OF ADDRESS

Zahid Minhas, Ex-Constable, No. 726, CFU/CTD, Tehsil & District Dera Ismail Khan

(Appellant)

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary Home & Tribal Affairs Department, Khyber Pakhtunkhwa, Peshawar
2. Inspector General of Police, (IGP) Khyber Pakhtunkhwa, Peshawar
3. Deputy Inspector General of Police, Counter Terrorism Department (CTD), Khyber Pakhtunkhwa, Peshawar
4. Superintendent of Police, Counter Terrorism Department (CTD), DI Khan Region, Office District Dera Ismail Khan

(Respondents)

Zahid Minhas

Your humble Appellant

(Zahid Minhas)

Dated 14/02 / 2023

Through Counsel

Sadam Hussain Zakori

Advocate High Court

Dera Ismail Khan

(51) Annexure-A

8

OFFICE OF THE SUPERINTENDENT OF POLICE
Counter Terrorism Department, Dera Ismail Khan Region

ORDER

My this Order will dispose off the departmental proceedings initiated against Constable Zahid Minhas No. 726 posted at CFU/CTD DIKhan Region for the following allegations against him:

- i) He requested a total of 46 CDRs (32 Telenor, 14 Jazz) of different numbers in behalf of relation to terrorism cases without prior permission.
- ii) He requested CDRs, which were later check thoroughly and found not to be related to any terrorism case of this Unit.
- iii) He was suspected to be receiving monetary benefits from misusing your position at this Unit.

He was charge sheeted and an enquiry Officer, Mr. Gul Rauf Khan, DSP/OPs CTD DIKhan Region was tasked to conduct proper departmental proceedings and submit his findings to the undersigned. Enquiry Officer conducted proper departmental enquiry against the delinquent Official and recorded statements of:

- 1. ASI Rehmat Ullah No. 13/D, reader DFU/CTD DIK
- 2. HC Khurram Shahzad No. 689 posted at CFU/RPO DIKhan Region
- 3. FC Zulqarnain No. 1309 CFU/CTD DIK
- 4. FC Muhammad Zubair No. 245 CFU/CTD DIK
- 5. FC Zahid Minhas No. 726 CFU/CTD DIK (Delinquent)
- 6. FC Muhammad Saeed No. 1180 OPs/CTD DIK

Attested
Superintendent of Police
CTD DIKhan

The said statements are placed on Enquiry file. Also, during Enquiry, Constable FC Zahid Minhas No. 726 replied and failed to satisfy the Enquiry Officer. He and the above witnesses were also cross questioned in which his answers contradicted the evidences against him. Moreover, undeniable evidences were revealed during enquiry against him which proved all the allegations leveled against him. Upon completion of enquiry conducted against him, the Enquiry Officer submitted his finding report to the undersigned in which he recommended delinquent Official for Major punishment.

However, in the interest of fairness, he was issued final show cause notice and called into the office of the undersigned to be heard in person. He was given every opportunity to prove his innocence. He submitted his reply in his defense which was found unsatisfactory by the Undersigned. Also, during his appearance for being heard in person by the undersigned, he was unable to justify his acts and the allegations leveled against him were proved beyond any shadow of doubt.

attested
Zahid
13/10/2022

Zahid Minhas

In light of all aspects of the enquiry including the report of Enquiry Officer and hearing of delinquent Official, I, Iftikhar Ali Shah, Superintendent of Police, CTD DIKhan Region in exercise of power vested in me, hereby impose the Major Punishment of Dismissal from Service upon Constable Zahid Minhas No. 726 under amended Police Rules 1975 with immediate effect.

ORDER ANNOUNCED.

Superintendent of Police
CTD, DIKhan Region

OB No. 81 /CTD

No. 5862-65 /CTD dated DIKhan the:

07/10/2022

Copy to:

1. Deputy Inspector General of Police, CTD Khyber Pakhtunkhwa, Peshawar.
2. Regional Police Officer, DIKhan Region.
3. Accountant, OHC/SRC CTD DIKhan Region.
4. All concerned.

Allested
Superintendent of Police
CTD DIKhan

Superintendent of Police
CTD, DIKhan Region

Zahid Minhas

**BEFORE THE WORKTY DEPUTY INSPECTOR GENERAL OF POLICE CTD
KP PESHAWAR**

Department Appeal No: _____ of 2022

Subject: **DEPARMENTAL APPEAL AGAINST THE NOTIFICATION NO. 5862-65/CTD
DATED DIKHAN THE 07.10.20222 OF THE SUPRETENDANT OF POLICE
CONTER TERRORISM DEPARTMENT DERA ISMAIL KHAN VIDE WHICH
MAJOR PUNISHMENT OF DISMISSAL FROM SERVICE AS CONSTABLE
WAS IMPOSED ON APPELLANT**

Respectively stated

That the applicant humbly submits as below:

BRIEF FACTS:

1. That the appellatant was initially appointed as constable, no 726 and was posted at CFU CTD DIKHAN region and appellatant is having 21 year of service.
2. That throughout the service there is no objection against the appellatant except the recent departmental proceedings. However, vide the subject order dated 07.10.2022 major punishment of dismissal from service was imposed on appellatant. **Copy of impugned order is attached.**
3. That it was incumbent upon competent authority to hand over complete documents and material allegedly against the appellatant. The competent authority was also duty bound to provide complete list of alleged witnesses which were to depose against the appellatant. It is now the celebrated principle of law that no one should be taken by surprise.
4. That the inquiry officer never provided any documentary evidence, if any the appellatant, nor provided any list of witnesses which were to be produced against the appellatant for the first time came to know about the witnesses from the impugned order dated 07.10.2022, where in reference is made to certain witnesses, but still their names are not mentioned in the said order.
5. That it is the golden principle of law that the employee against whom departmental proceedings are initiated and if certain witnesses are produced against him. He should be given opportunity of cross- examining the said witnesses. However, the appellatant was not provided any opportunity of cross-examining the said alleged witnesses not any opportunity of cross examining the said alleged witnesses not opportunity was given to appellatant to produce his witnesses. Though, the same is also the fundamental field of appellatant well enshrined in various articles of of the constitution of Pakistan 1973, including the Article 10-A.

Fahid Mirza

[Handwritten signature]

6. That No evidence is available against the appellant of the charges levelled against appellant, further appellant has been made the victim of political interference.
7. That the alleged CDR data were never requested by the appellant. In fact, no date and time of the alleged request are mentioned in the impugned order not any cellphone numbers are mentioned in the same. Rather no such record was ever communicated by the competent authority or the inquiry officer to the appellant. Infact the inquiry officer never gave any opportunity to appellant to defend himself against the allegations.
8. That no charge sheet or statement of allegation was ever communicated to the appellant by the competent authority or the inquiry officer. The entire proceeding was just initiated to complete the paper work. However, they have utterly failed in doing so, even the enquiry officer never summoned the appellant in the connection and entire proceeding was conducted in appellant's absentia.
9. That the impugned order and the entire departmental proceeding are against the law and facts hence, not tenable in the eyes of law.
10. That the manner and mode in which the inquiry was conducted by the inquiry officer clearly suggest the inquiry was conducted not by independent officer.
11. That the inquiry was conducted by the subordinate to the competent authority which is against the law and natural justice.
12. That the inquiry officer who was deputed for the purpose of allegation never allowed the appellant an opportunity of personal hearing. The appellant was only called upon by the said enquiry officer but was directed to sit outside his office and was never associated during the proceedings.
13. That acceding to the Police Rules, 1975 amended in 2014, there are two kinds of proceedings against an employee, (i.e, i). Summary Police Proceedings. 2) General Police Proceedings. As per the said rules it was mandatory upon the competent authority to first make a specific order as to what kind of proceedings it is going to adopt so that the accused mind is clear about same. However, no such order is ever made by competent Authority, and it is the celebrated principle of law that any deviation from law would render the most sacred proceedings null and void Hence, the entire edifice would crumble to the ground and the entire proceeding is nullity in the eyes of law.
14. That the competent authority never gave opportunity of personal hearing to the appellant.
15. That the appellant had 21 years of long career to his badge and with one slip of pen the competent authority has ruined the entire career. The appellant has served the department and the citizen of this country at the stake of this life and has been in life danger situations many time in his career.

did wishes



appellant has served the department and the citizens of this country at the stake of his life and has been in life danger situations many times in his career

16. That the facts mentioned above may please be considered sufficient grounds for the acceptance of the instant appeal, however, appellant may please be allowed to raise additional grounds for the success of the instant appeal.

HENCE, IT IS, THEREFORE, REQUESTED TO SET ASIDE THE IMPUGNED ORDER AND TO REINSTATE THE APPELLANT IN HIS SERVICE WITH ALL HIS BACK BENEFITS.

Zahid Minhas
19.10.2022

Your humble Appellant
Zahid Minhas
Ex-Constable, No 726
CFD/CID
Dera Ismail Khan

Zahid Minhas

[Signature]

13

of sender

No. 798 For Ins RGL94726698 Rs. Ps.

Stamps affixed except in case of
uninsured letters of not more than
the initial weight prescribed in the
Post Office Code of which no
acknowledgment is due

Received a registered*
addressed to *Amal Datta* Date-Stamp *6/8/1*

Initials of Receiving Officer *CPD* *Write here "letter", "postcard", "packet" or "parcel"
Insured for Rs. *100* with the word "insured" before it when necessary.
(in words) (in words)

If insured { Insurance fee Rs. _____ Ps. _____ Weight Kilo Grams
Name and address of sender: *Amal Datta*

19/10/21

Falid Minhas

Amal Datta



15

GOVERNMENT OF
KHYBER PAKHTUNKHWA
HOME & TRIBAL AFFAIRS DEPARTMENT

No. E & A (HD) 1-12/2022
Dated Peshawar the 12th December, 2022

To,
SSP/HQs
FC-0131-Acett

1. The Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
2. The Inspector General of Prisons, Khyber Pakhtunkhwa, Peshawar.
3. The Director General Prosecution, Khyber Pakhtunkhwa, Peshawar.
4. The Director, Provincial Public Safety Commission, Khyber Pakhtunkhwa.
5. The Director, Reclamation and Probation, Khyber Pakhtunkhwa, Peshawar.

Diary No. 2702/100
Dated. 13-12-2022

5
DIG CTD
22-12-2022

Subject: CLARIFICATION REGARDING ASSIGNING LOOK AFTER CHARGE

Dear Sir,

I am directed to enclose herewith a copy of letter No. SO(Policy)/E&AD/1-3/APT Rules, dated 07/12/2022 received from Government of Khyber Pakhtunkhwa, Establishment Department on the subject noted above, which is self-explanatory for information and compliance, please.

5568
22-12-2022

SECTION OFFICER (GENERAL)

OFFICE OF THE INSPECTOR GENERAL OF POLICE KHYBER PAKHTUNKHWA

No. CPO/E-11 2549

Dated Peshawar the 20 December, 2022

Copy of above alongwith its enclosures is forwarded for information and compliance to the:-

- i) The Capital City Police Officer, Peshawar.
- ii) All Regional Police Officers, in Khyber Pakhtunkhwa.
- iii) All Head of Units/Offices, in Khyber Pakhtunkhwa.

Encl(01)

HA Jan
20/12

(AFSAR JAN)
Registrar
For Inspector General of Police
Khyber Pakhtunkhwa,
Peshawar

OFFICE OF DEPUTY INSPECTOR GENERAL OF POLICE, CTD

KHYBER PAKHTUNKHWA, PESHAWAR.

No. 705-15 /EC/CTD

Dated Peshawar the 27/12 /2022.

1. All Regional SsP CTD Khyber Pakhtunkhwa, All SsP CTD HQrs: Peshawar w/r to CPO, Peshawar office Letter No. 2549/E-1 dated 20-12-2022, for information and compliance, please.

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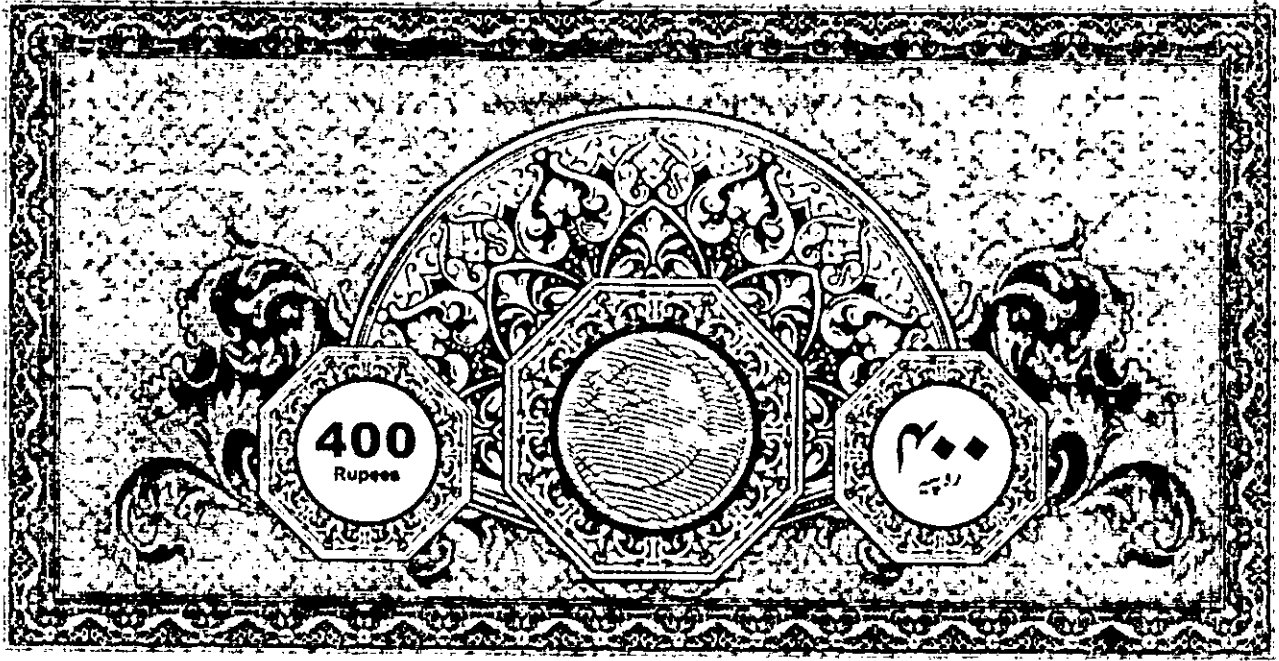
SSP Admn:

For Deputy Inspector General of Police,
CTD, Khyber Pakhtunkhwa,
Peshawar

Fateh Aminhos

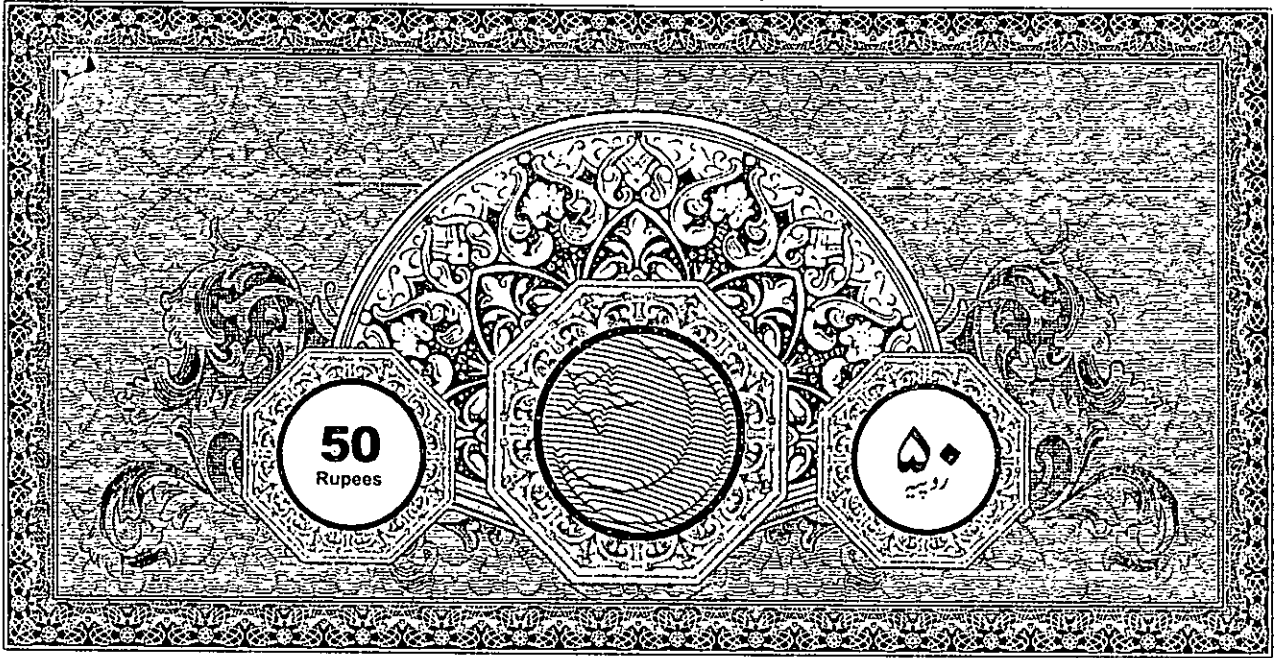
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PAKISTAN COURT FEE

پاکستان کورٹ فیس



PAKISTAN COURT FEE

آرٹھ کوورٹ فیس



KHYBER PAKHTUNKHWA
BAR COUNCIL

SADAM HUSSAIN ZAKORI

Advocate
bc-14-4591
Date of Issue: December 2020
Valid Upto: December 2023



ADVOCATE HIGH COURT

Secretary
KP Bar Council

VAKALAT NAMA

(Power of attorney)

Before the Honourable KP Service Tribunal - Dikhan Bench

Zahid Minhas VERSUS Govt of KP & others

Offence/Suit/Appeal/Application/Writ Appeal v/s Govt of KP under Service Tribunal Act, 1974

FOR Zahid Minhas --- (Appellant)

I/We hereby appoint **SADAM HUSSAIN ZAKORI ADVOCATE HIGH COURT, DIKHAN** according to the following terms & conditions:-

1. As my / our counsel in the above mentioned case with power to appear, plead and act marking and presenting applications to the Court by signing and verifying pleadings, by depositing withdrawing and receiving document and money from Court or from the opposite party in the above said case. By doing all other legal act, and legal proceedings as I / we were present personally.
2. No part of fee is refundable in any case whatsoever and my / our counsel shall be entitled to retain costs payable by other side.
3. I / we make our own arrangements for attending the Court on every hearing and to inform him. My / our counsel shall not be responsible for any loss caused to me through my / our failure to so inform him.
4. I / we shall make special arrangements for travel in case my / our hearing is held in any outstation. All expenses shall be borne by me / as and my / our counsel is not liable to incur any of the said expenses.
5. I / we undertake to appear in the above matter before the Court, my / our counsel shall not be held responsible in case the matter is dismissed / disposed off ex-party due to my / our failure to appear / attend the case.
6. I / we also undertake to pay his full professional fees before the conclusion of the case. In case his full fee is not paid the counsel can withdraw his vakalatnama from the above matter.
7. My / our counsel is also authorized to engage and appoint any other pleader or counsel whenever my / our counsel thinks to do so.

DATED: 14/01/2023

Accepted By:

SADAM HUSSAIN ZAKORI
ADVOCATE HIGH COURT, D.I.KHAN
Mob# 0341-9283883

Zahid Minhas
Zahid Minhas --- (Appellant)
Signature / thumb impression of Client
CNIC# 12101-7733945-5
Mob # 03459821160