### FORM OF ORDER SHEET

Court of	
Case No	539/ <b>2023</b>

S.No.	Date of order proceedings	Order or other proceedings with signature of judge			
i	2	3			
1 ·	10/03/2023	The appeal of Mr. Muhammad Arif presented today			
	}	by Sheikh Sohail Puri Advocate. It is fixed for preliminary			
		hearing before touring Single Bench at D.I.Khan on			
		Notices be issued to appellant and his counsel for the date			
	. ]	fixed.			
		By the order of Chairman			
		REGISTRAR			
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### THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Service Tribunal Appeal No: 539/2023

#### Muhammad Arif

VERSUS

#### The Government of Khyber Pakhtunkhwa,& others

#### **INDEX**

			<u> </u>
S	Description of Documents	Annexur	Page #
‡‡		e	
4	Grounds of Appeal		1-4
2	Copies of Appointment order.	"A"	5
3	Copy of Order dated 23.06.2021.	"B"	6
4	Copy of Representation	"C"	7-81
5	Copy of Final Order dated 13.02.2023	"D"	12
6	Copy of Order Book dated 07.08.2020	"E"	13-14
5	Vakalatnama/power of attorney.		

dt. 08.03.2023

**APPELLANT** 

Muhammad Arif

Through Counsel

SHEIKH STHAIL HURI. Advocate iligh Court



Service Tribunal Appeal No: 539/2023

Muhammad Arif S/O Khan Malook Khan, Resident of Wanda Baloch, RattaKulachi,Dera Ismail Khan. ......Appellant

#### VERSUS

- 1. The Government of Khyber Pakhtunkhwa, through Secretory Secondary and Elementary EducationDepartment, Peshawar.
- 2. The Director Secondary and Elementary Education Khyber Pakhtunkhwa, Peshawar.
- 3. District Education Officer (Male) Dera Ismail Khan.
- 4. Head Master GMS Wanda Balochan D.I.Khan.
- 5. Director EMA (Education Monitoring Authority) D.I.Khan.
- 6. Officer On Duty EMA, D.I.Khan. DEO, OFFICE OIKHAN ......Respondents

## A P PE A L UNDER SECTION 4 KHYBER KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974.

The Appellant; amongst other grounds; respectfully submits as under;

- 1. That through the instant Appeal, the Appellant humbly seeks indulgence of this Honorable Tribunal for setting aside of Order No.12486 dated 23.06.2021, issued by Respondent No.3, whereby, the Appellant faced major penalty of COMPULSORY RETIREMENT, while he was serving as NaibQasid and 13.02.2023, passed by Respondent No.2, whereby representation of the appellant was dismissed.
- 2. That the Appellant was appointed as NaibQasid in GMS Wanda Balochan District Dera Ismail Khan videOrder No.3374-79/EDO/CT(M)dated 14.03.2011. Subsequently, Respondent No. 3 dispensed with the service of the appellant vide Order dated 23.06.2021 on the basis of alleged absence from the duty ,made by Respondent No.6 who was serving under control of Respondent No.5. The services of the Appellant were dispensed without holding any inquiry and other Codalformalities. Representation of appellant also dismissed by the Respondent No.2 videOrder dated 13.02.2023.Copies of theAppointment Order, Order dated 23.06.2021, Representation and the Final Order dated 13.02.2023 enclosed as Annexure A, B, C & D.
- 3. That since the date of appointment, the Appellant served the Department with devotion, dedication, and work honestly, efficiently, diligently and to the

20 M

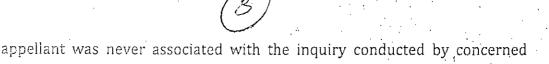


- entire satisfaction of his superiors and there is no lota of complaint against the Appellant of any kind. The service rendered by the appellant was always appreciated by the superiors.
- 4. That the allegations made by Respondent No.6, that on his visiting date, Appellant was absent from his duty, are merely false, baseless, factitious, as the Appellant was assigned night duty by the respondent No. 4 vide Order Book dated 07.08.2020 and the act of the respondents is based on malafide and the same is based on political wills and they just want to oblige their blue eyed. Copy of Order Book dated 07.08.2020 enclosed as **Annexure E.**
- 5. That the Appellant was neither given any show cause notice nor hearing and also not heard by competent authority and he has been condemned unheard.
- 6. That Respondent No.3 relied on a bogus and untrue report of respondent No.6 and never conducted any enquiry nor followed any other codal formalities and imposed major penalty of compulsory retirement, which shows common melafide intentions of respondents.
- 7. That aggrieved of order dated 23.06.2021, passed by respondent No.3, the appellant preferred departmental appeal/representation before Respondent No.2, however, same was dismissed vide order dated 13.02.2023.
- 8. That during the proceedings of representation of Appellant, Respondent No. 3 once again showed his malafide as he submitted beyond the fact comments on which led the Respondent No.2 was persuaded through dismissing of his representation.
- 9. That order dated 23.06.2021passed by Respondent No.3 and order dated 13.02.2023 passed by Respondent No.2 are arbitrary, suffering from surmises and conjectures and liable to be set aside.

#### GROUNDS

- I. That all the proceedings against Appellant were conducted in a slipshod and hasty manner.
- II. That the Appellant served the Department with devotion, dedication, honestly, efficiently, diligently and never shown any negligence nor remained absent from the duty.
- III. That from the date of his appointment, 14.03.2011, there is no iota of complaint against the appellant of any kind.
- That a perusal of inquiry report reveals that the enquiry officer has relied upon the opinion/report of the respondent No.6 without any reasons and details, therefore, findings in these circumstances are not sustainable.
- That the evidence produced by the Respondents is too weak to be relied upon for the purpose of imposing major penalty, the evidence is giving rise to doubt in favor of the appellant, therefore, penalty is not sustainable. The

70



- VI. That the evidence produced by the Respondents is based upon personal assumptions and presumptions, the evidence is sketchy and facts have not been proved, therefore, Appellant could not be held liable for penal action.
- VII. That the appellant had been deceived by tout mafia working within premises of the office concerned for their petty interest play havoc with career people like the appellant. There was no mensrea on the part of appellant; therefore, his career is required to be protected if he otherwise qualifies.
- VIII. That the reports submitted by the officer(s) concerned were self-contradictory, therefore, those could not be relied upon for imposing major penalty to the appellant.
  - IX. That, the instant appeal is well within time but, if required, delay in filing of instant appeal may be condoned.
  - X. That without prejudice to what has been discussed above it is submitted that the imposition of major penalty against the appellant is in violation of principles of natural justice.

#### PRAVER

In aforementioned circumstances, therefore, it is humbly prayed that the order dated 23.06.2021 passed by Respondent No.3 and Order dated 13.02.2023 passed by Respondent No.2 may kindly be set aside and Appellant may be reinstated in service with all back benefits.

dr. 08 03.2023

APPELLANT

Muhammad Arif

Through Counsel

SHERKH SOJIAIL PURI. Advocate High Court

#### CERTIFICATE:

It is certified that upon instructions of the client it is the 1st appeal preferred before this Honorable Tribunal against the impugned orders dated 23.06.2021 @13.02.2023.

Muhammad Arif

(4)

#### **LIFIDAVIT**

I,Muhammad Arif S/O Khan Malook Khan, Resident of Wanda Baloch, RattaKulachi, Dera Ismail Khan, the appellant, dohereby solemnly affirm and declare on Oath that all the Para-wise contents of this appeal are true and correct to the best of my knowledge and belief; and that nothing has been deliberately concealed or kept from this learned Tribunal.

At. C8 . C3- 2023

Deponent



# OFFICE OF THE EXECUTIVE DISTRICT OFFICER (ELEMENTARY & SECONDARY EDUCATION) DERA ISMAIL KHAN

ANX A"

OPMER ORDER

Consequent upon the death of Din Astam Maib Oncid G.M.S Wanda Balochan D.I.Khan on 18-10-2010 during service his legal Heir Muhammad Arif R/O Wanda Balochan District: D.I.Khan is hereby appointed as Naib Qaised against vacant post at G.M.S Wanda Balochan in BFS, under the rules in the interest of public service with immediate effect on the following terms and conditions.

- 1. \(\text{A.}\) His service will be considered as regular without pension/gratuity in terms of section— 19 of the NWFP Civil Servants Act-1973 amended in 2005.
- 12. He will contribute towards <u>CPF@10%</u> of the minimum of Pay and 10% contribution will be made by the Government.
- 3. He will be governed by such rules & regulations as may be prescribed by the Govt: from time to time, for the category to which he belongs.
- 4. His appointment is made purely temporary and liable to termination at any time without assigning any reasons.
- 5. One-month pay will be forfeited to Govt: in case of resignation without prior notice.

  The period of giving notice is one month before resignation.
- 6. His original certificates/degrees should be got verified from the respective boards/University before release of pay. All expenses will be borne by the candidate.
- The is required to join the post with in 30 days, failing which the appointment order will stand cancelled automatioically.
- S. The appointment is made subject to the condition that the candidate is permanent domiciled of District D.I.Khan.
- 9. He is required to produce health and age certificate from the Medical Superintendent Dil.Khan.
- 10. Charge Reports should be sent to all concerned:
- U. No TA/DA is allowed.

18. Depth contificate chould be not warified by the concerned outboxity:

Executive District Officer Elementary & Secondary Education D.I.Khan.

Endst: NO3374 - 7/4 DO/CT (M)

Dated D.I.Khan the 14/03/11

Copy of the above is forwarded for information & n/action to:

- . The Director (E& S) Education K.P.R. Peshawar.
- 2. The District Coordination Officer D.I.Khan.
- 3. The District Accounts Officer D.I.Khan.
- 4. The District Officer (Male) E & SE.D.I.Khan.
- The Head Master G.M.S Wanda Balochan.
- 6. The Official concerned.

Executive District Officer (E&S) Education D.F.Kh

. . . .



## OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) DERA ISMAIL KHAN

Tell: 09669280131 Email: <u>deom.di@kpese.gov:pk</u>

No\_12481

Dated DIKhan the

WHERE AS you Mr. MUHAMMAD ARIF while serving as Naib Qasid at GMS Wanda Balochan DIKhan were proceeded for having committed the following acts which constitutes inefficiency and misconduct under rules 3 sub rules (a),(b) & (d) of the Khyber Pakhtunkhwa Govt: Servants (Efficiency & Discipline) rules 2011.

a. That you were appointed against the post of sweeper vide this office Endst No. whereas you submitted arrival on \_.

h. That you remained absent from duties as reported by EMA (Education Monitoring Authority) as mentioned in various show cause notices served upon you.

AND WHERE AS show cause notices were served upon you vide this office No. 16106 dated i 2/06/2019, No. 21570 dated 20/08/2019, No. 26169 dated \_\_\_\_/03/2019, No. 29663 dated 18/10/2019 and No. 19501-05 dated 10/10/2020 by the competent authority i.e. District Education Officer (Malc)

AND WHERE AS your reply to any of show cause notices was not received.

AND WHERE AS you were called to be heard in person vide 22529-36 dated 02/11/2020 but you were failed to appear on personal hearing.

AND WHERE AS you were intimated to join the duties through public notice in Daily Mashriq dated 18/02/2021 within 15 days but you failed to do so.

NOW THEREFORE the Competent Authority in exercise of the power conferred under Sub Rules 4-b. (ii) and 9 of Govt: of Khyber Pakhtoonkhawa, Establishment & Administration Department Rules 2011, I Mr. Musarrat Hussain Khan District Education Officer (Male) DIKhan as competent authority is pleased to impose the Major Penalty of "COMPULSORY RETIREMENT" upon Mr. MUMAMMAD ARIF Naib Qaid at GMS Wanda Balochan DIKhan from the date of his first show cause notice i.e. 12.06.2019. Moreover, the absence period will be considered as Expa Ordinary Leave (EOL) without pay.

> DISTRICT EDUCATION OFF (MALE) DIKHAN

Endst: No. 12 422

Copy for information & necessary action to the:-

16. Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.

:7. Deputy Commissioner Dera Ismail Khan.

. 8. District Comptroller of Accounts DIKhan.

19. Principal/ Head Master/SDEO concerned.

20. Master file.

DISTRICT

(MALE) DIKHAN



### OFFICE OF THE DISTRICT EDUCATION (MALE) DERA ISMAIL KHAN

Tell: 09669280131 Email: <u>deom.di@kpese.gov:pk</u>

12487

WHERE AS you Mr. MUHAMMAD ARIF while serving as Naib Qasid at GMS Wanda valochan DIKhan were proceeded for having committed the following acts which constitutes inefficiency and misconduct under rules 3 sub rules (a),(b) & (d) of the Khyber Pakhtunkhwa Govt: Servants (Efficiency & Discipline) rules 2011.

a. That you were appointed against the post of sweeper vide this office Endst No. whereas you submitted arrival on \_

h. That you remained absent from duties as reported by EMA (Education Monitoring .Authority) as mentioned in various show cause notices served upon you.

AND WHERE AS show cause notices were served upon you vide this office No. 16106 dated 12/06/2019, No. 21570 dated 20/08/2019, No. 26169 dated \_\_\_/03/2019, No. 29663 dated 18/10/2019 and No. 19501-05 dated 10/10/2020 by the competent authority i.e. District Education Officer (Male)

.. NO WHERE AS your reply to any of show cause notices was not received.

AND WHERE AS you were called to be heard in person vide 22529-36 dated 02/11/2020 but you were failed to appear on personal hearing.

AND WHERE AS you were intimated to join the duties through public notice in Daily Mashriq dated 18/02/2021 within 15 days but you failed to do so.

NOW THEREFORE the Competent Authority in exercise of the power conferred under Sub Rules 4-b. (ii) and 9 of Govt: of Khyber Pakhtoonkhawa, Establishment & Administration Department Rules 23.1, I Mr. Musarrat Hussain Khan District Education Officer (Male) DIKhan as competent authority is pleased to impose the Major Penalty of "COMPULSORY RETIREMENT" upon Mr. MURAMMAD ARIF Naib Qaid at GMS Wanda Balochan DIKhan from the date of his first show cause notice i.e. 12.06.2019. Moreover, the absence period will be considered as Extra Ordinary

> DISTRICT EDUCATION OFFICER (MALE) DIKHAN

Endst: No. /ふ

Copy for information & necessary action to the:-

16. Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.

17. Deputy Commissioner Dera Ismail Khan.

13. District Comptroller of Accounts DIKhan.

19. Principal/ Head Master/SDEO concerned.

20 Master file.

DISTRIC

(MALE) DIKHAN

7

## بعدالت بتناب ذائر يكثرا يجركيش ميل بيثاور

Anx C"

ڈیپارٹمنٹ اپیل نمبر اسال 2021

و يبار منت البيل برخلاف آردُر نبر 12481 مورجه 2021-6-23 دُسرُ كرن البَوكيش آييسر ميل دُيره اساعيل خان

جناب عالى!

سیکہ سائل اپیلانٹ محمد عارف نائب قاصد گورنمنٹ ملی سکول وائڈہ بلوچاں ڈیرہ اساعیل خان مجر تعینات رہاہے جو کہ 1 201 میں بھرتی ہوا تھا اور اپنی ڈیوٹی سرانجام دے رہا ہے اور بھی بھی غیر حاضری نہیں کی ہے سکول کے حاضری رجسٹر میں بقائدہ حاضر ہوتار ہاہے اور رجسٹر ڈیمیں حاضری درج ہے۔

2- بیرکم فن آرڈر نمبر 12481 مور وید 2021-6-23 کوڈ سٹر کٹ ایجو کیش آفیسر میل ڈیرہ اسائیل خان میں ایک ارڈر جاری کیا ہے جس میں ہیں گیا ہے کہ آپ کو آفس آرڈر نمبر 16106 مور وید 2019-8-2010 دور وید 2019-8-2010 دور وید 2019-8-2010 دور وید 2019-8-1010 دور وید 2019-8-1010 دور وید 2019-8-1010 دور وید 2019-8-1010 دور وید 2019-9-1010 دور وید 2019-9-1010 کو گھڑا نے آفس کی میں آپ نے اس کا کوئی جوار نمیں اور آرٹم کر کہ 2059-2010 کو تو اس کہ تا ہے کہ آپ بیندرہ یوم کے اندر جواب دیں لیکن اپیلانٹ کوکوئی اور اخیار دور نامبہ مشرق کا ذرکہ یا گیا ہے کہ آپ بیندرہ یوم کے اندر جواب دیں لیکن اپیلانٹ کوکوئی علم نہ ہے اور اپیلانٹ کوکوئی علم نہ ہے اور اپیلانٹ این ڈیوٹی احسن طریقے سے مرانجام دے رہا ہے۔

میر کرمور خد 2021-6-23 کا آرڈرجس ش ابیلانٹ کو Comulsory Retirement ریٹ کو Comulsory Retirement ریٹ کو کہ کا آرڈر جس ش ابیلانٹ کو 12481 میں دجہ آرڈر کمبر 12481 مورجہ 23-6-2021 کی انسان مورجہ 23-6-2021 کی انسان مورجہ 23-6-2021 کی انسان ہوسکے۔

history was



4۔ بیکہا پیلانٹ غریب آ دی ہے اور جس کا گزربسرائ توکری سے ہے اور اپیلانٹ کے چھوٹے ۔ 4 میں اور اپیلانٹ کی نوکری کو تعال کیا جاوے اور آرڈر آرڈر نبر 12481 مور خد 2021 - 6-23 کومنسوخ فرمایا جاوے ۔ کومنسوخ فرمایا جاوے ۔

لہذااستدعاہے کہ بمنظور کی اپیل سروس فرماتے ہوئے من ایبلانٹ کی درخواست منظور فر اکر اپیلائٹ کی دادری فرمائی مائے مادسروس بحال کی جاوے۔

مورخه

مرعارف \_\_\_\_

بیان کشی:۔

خلفا بیان کمیاجا تا ہے کہ جملہ مرات ایل بندا تا حدملم دیقین سمجے ودرست ہے۔ اور ہمچوں تنم ابیل کسی دیگر عدالت بلس دائر نہ کی گئی ہے اور نہ ہی زیر ساعت ہے۔

محم عارف مص ايران

Ophobled

Den Aire



#### DIRECTORATE OF ELEMEN KY & SECONDARY EDUCATION KHYBER PAKHTUNKHWA PESHAWAR.

-/F.No. /A-20/C-IV/D.I Khan/Vol-1/2

Dated Peshawar the

/2022

Phone; 091-9225344

Email; ddadmn.ese@gmail.com

The District Education Officer (Male) D.I Khan.

gubject:

APPEAL FOR RE-INSTATEMENT.

Mamo:

I am directed to refer to the subject noted above and to enclose herewith a copy of an appeal in r/o Mr. Muhammad Arif Ex- Naib Qasid GMS Wanda Balocha District oll Khan.

You are therefore directed to submit detail report/comments at an early date.

Assistant Director (Admn) Directorate E& Secondary Education Khyber Pakhtunkhwa, Peshawar

Endst; No.

Copy forwarded to the: -

- Mr. Muhammad Arif Ex- Naib Qasid GMS Wanda Balocha District D.I Khan. 1.
- PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
- Master File. 3.

Assistant Director (Admn) Directorate E& Secondary Education Khyber Pakhtunkhwa, Peshawar

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## OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) DERA ISMAIL KHAN

Phone No. 0966-9280131. 0966-9280128, emisdikhan@gmail.com

Dated DIKhan the 17 10/12023

To.

The Director,

Elementary and Secondary Education, Department

Khyber Pakhtunkhwa, Peshawar.

SUBJECT:

APPEAU FOR REINSTATEMENT

Memor

Reference to your esteemed office Letter No. 2111. F.No/A-20/C-IV/Dikhan. vinted 28.11.2022, It is submitted that: -

- 1. Mr. Muhammad Arif, appointed as Naib Qasid, at GMS Wanda Balochan, DIKhan.
- 2. That the Headmaster GMS Wanda Balochan, vide his Order Book dated ..../20.20 directed Mr. Muhammad Arif to work in the afternoon/second time for security, pro-
- 3. That Mr. Muhammad Arif remained absent from his duty as per reports of the EMA.
- 4. That several notices of show cause have been issued to the official Mr. Muhammed Arif. but no reply received to the undersigned.
- 5. That several notices of personal hearing have been issued to the official Mr. Muharatand Arif, but no attendance observed before the undersigned.
- 6. That the same notices of show cause were then published in two leading dailies, yet no heed was ever paid by the official Mr. Muhammad Arif.
- 7. After fulfillment of all codal formalities, the undersigned was left with no other it at a than to impose Major Penalty of "Compulsory Retirement" upon the 'official' Mr Muhammad Arif, Naib Qasid GMS Wanda Balochan, DIKhan, hence penalized.

(MALE) DERA ISMAIL KHAN



## OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE), DERA ISMAIL KHAN Tell: 09669280128- 09669280131 (

Email: emisdikhan@gmail.com

Dated DIKhan the o

To

The Director

Blementary & Secondary Education Department

Khyber Pakhtunkhwa, Peshawar.

COMMENTS / DETAIL OF CLASS-IV.

Mame: -

It is submitted for your kind information that the undersigned has imposed major penalties of the following habitual absent of non-teaching staff under the Efficiency & Deficiency rules 2011. In this connection all the relevant record is being submitted for information please.

	Official Name,	time, Place of Action Taken Remarks			
ļ	Designation	Posting	Metion 1 Mich	Remarks	
	Mr. Waris Khan, Chowkidar	GPS Wazir Abad	Removal from Service	<ol> <li>Detail of absent report from IMU.</li> <li>Show cause notices.</li> <li>Minutes of meeting (DSC).</li> </ol>	
				<ul> <li>4. Order notification removal from service.</li> <li>5. Copy of detail comments by SDEO (M) DIKhan.</li> </ul>	
	(4: Zallay Khan, Sweeper	GMS Wanda Balochan	Compulsory retirement	Detail of absent report from IMU.     Show cause notices.     Minutes of meeting (DSC).     Order notification compulsory retirement.     Copy of detail comments by Headmaster GMS Wanda Balochan	
/3	Mr. M. Arif, Naib Qasid	GMS Wanda Balochan	Compulsory retirement	DIKhan.  1. Detail of absent report from IMU. 2. Show cause notices. 3. Minutes of meeting (DSC). 4. Order notification compulsory retirement. 5. Copy of detail comments by Headmaster GMS Wanda Balochan DIKhan.	

DISTRICT EDUCATION (MALE) DERA ISMAIL KHAN

West Dates summents Detail Class (Versing



#### DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION KIIYBER PAKHTUNKHWA PESHAWAR.

/F.No./A-2010/DI Khan/1/2

. Dated Peshawar the 13

Amail: ddadmn.esc@gmail.com

To :

Muhammad Arif Ex-Naib Qasid GMS Wanda Baloch

· Phone: 091-9225344

Subject:

APPEAL FOR REINSTATEMENT

Memo:

I am directed to refer to your appeal received in this office diary NO. 1151 dated 23/11/2022 on the subject cited above and to state that your appeal has been examined/analyzed by this office and as well DEO (M) DI Khan letter NO.11100 dated 17.01.2023, hence to inform you that your appeal has been rejected by the competent authority.

Assistant Director\*(Admn)

Directorate E& Secondary Education Khyber Pakhtunkhwa, Reshawar

Endst; No. \_

Copy forwarded to the:

1. District Education Officer (M) DI Khan letter No.11100 dated 17.01.2023

2. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.

3. Master File.

Assistant Director (Admn)

Directorate E& Secondary Education . Khyber Pakhtunkhwa, Peshawar

E:\Adimn\Irshad Ati\Class iV\Appeal Rejected\APPEAL REJECTED OF muhammad arif DI khán doc

and by and in the selection our Bode in Still be with the sail of وقعم دی لی مقی ا مران مالا کے حکم سے اسی رقع مع سوار سم كول فيزا مين لعب كرد ما لذا Q Jul 3/6 / Sis John Mig 10 خسردادی جوکنداری بولی ہے۔ لبذا آپ کو مزولم آرڈو على لا ما المدكر كول هذا من لعب كول موارم في رملو مال مل طورير آيلوسوني مال سے اور آب ي در داري كرآب اس سم كاخمال رفعن-آرڈرنگ مربوفرر دوستان

light planspille. عرف سے کہ آت تر سرد بی فی م سونی علیہی میں ۔ رس کو بیٹرس کر ایس کو بیٹرس کر ایس کی میٹرس کر ایس کر ایس کی میٹرس کر ایس کر ا المرين - العد من المستد المسرائر المرين المرين - العد المرين الم チェアののできるというしゅんから - direction of Q را الي منان (مسيمير) = سلك كيولاً- د فترى الور-مِسْرِيدُ فِي كُلْنِي كِلْنَا - الله <u> عارف خان (باب ترامی) کو تکر سکول کا جرس از</u> in was sit is still a section \_ کو سیونی مارین بے ٹاکہ کری قسم کی جوری رسرہ : - 4 JUNG COS US @ معیت الله ایران فرارسی) و میل کا منای وفره زاميان تماركز 062150 2. 2. 2. 1/ce 3

BAR COUNCIL TEIKH SOHAIL AHMAD YAR Advocate bc-12-3280 Date of Issue: February 2019 Valid uptor Fubruary 2022 Cell # 0300-4887850 E-mail: sohallpuri@ymail.com مهال پوری ایگرووکسط باقی ب ذیل شرا که بردکیل مفرد کمیا سے کسیس تیشی پرخود بایڈر دیوپر تقیاررو بروندالت حاضر، ونار ہول کا کی اور ہرونت اکارے جائے مقد سدد کیل صاحب موسوف کوا طلاع کا دے کر عاضرندالت کردن کا اگر آگریشی پرمظهرها ضرنه بوادرمقد سهیری غیرها ضری کی وجهت یمسی طور پیرے خلاف اوکیا تو صاحب موسوف اس سیکسی طرح المسددارنه بول سے نیز وسل صاحب موسوف معدرمقام کچبری سے علاوہ یا سیجری سے اوقات سے مہلے یا میں یا پروزانعظیل بیروی کرنے سے ذمددار تدووں سے اور مقدمہ تعدر کہری سے علاوہ اور مجالہ اعت ہونے یا بروز تعطیل اہڑ تال یا مجہری کے اوقات کے آھے یا سیجے بیش ہونے برمظلم کوکوئی فقصان کینچ واس کے دسداریاس کے واسطے سی معاد نسب ادا کرنے یا محفظات دالهم كرتي سكتجي صاحب وموسوف وسدوان شديوسيني مجعكوكل ساخت برواخت صاحب موسوف مثل كرده واستوخو ومنظور وتبول ودكا ورصاحب بوموسوف كوعرشي وعوي يا زواب وعوى ورخواست باستة يأجواب درخواست باست إجراءا واساسته أجرى نظروانى التيل تكرائى وبرتتم دوخواست برتتم سے ميان وسينة اور فالتى يارائنى نامد يا فيعله برسائد كرنے ا تبال دعوی کا سی افتیار موکا اور بسورت مظرر مونے تاریخ بیشی مقدم نیکور بیروان از پہری مدر بیروی مقدمه ندکورنظر بانی ایک ویرآ بدگی مقدمه یا منسوفی و کری پیکرند یا درخواست محم اتنائى ياترتى ياكراتارى قبل از فيعله اجرائ وكرى مجى صاحب موسوف كويشرط اداعيتى عليمده محفتان ميردى كااعتيار موكا ادرتهام ساخت ديروا فت ساحب موسوف مثل سرده الامتنادرو تبول وي الديه مورست صاحب موسول كويه ي النتيار وكاكر معامله باس سيمسى جرم كى كاروائي يا بعسورت ورخواست باننران انتيار الى ياديكر معامله با منده مذوره من و کن الیدو نیت یا بیر شرکا بینده نیاستهٔ امراه مقرر کرین اورا بینے مشیر قانون کوجمی برامریش وای اور دیسے افتیار حاصل بوریتے تیابے صاحب موسان کوحاصل ہو سے اور دوران متدسیں جم کھے ہرجاندالتوا مرح فیے کا وہ ساحب موسول کاحق ہوگا اورا دائیگی کا مظہر پابندو فرسددار: د کا اگر ساحب موسوف کو ایرری فیس/ تختان تاریخ بیش سے ۔ پہنے دواند کروں ہاد کا در مد سب مار سے کون روافتیارہ وگا کہ مقدمہ کی میروی شکرے اورائسی صورت میں بیرا کوئی مطالبہ سی سم ما مداحب موسوف سے برطاف پیل اوگا۔ للِذَّا وكالن نامه لكه ديات تاكية تندر س مضمون وکا نسان نا مین لیا ہے، اور المجمی طرح سمجدلیا ہے اور منظور ہے۔ Accepted Sheikh Sohail Pur

