



15<sup>th</sup> Nov. 2022

Assistant to learned counsel for the appellant present.

Muhammad Riaz Khan Paindakhel learned Assistant Advocate  
General for respondents present.

Perusal of record reveals that security and process fee have not been deposited nor written reply/comments submitted by the respondents but inadvertently on 13.06.2022, the case was adjourned 05.09.2022 for arguments. On 05.09.2022, the case was adjourned through Reader note for today. As comments have not been filed, therefore, learned AAG is directed to make sure submission of comments within 10 days positively, failing which their right for submission of comments would be deemed as struck off. To come for arguments and further proceedings on 28.12.2022 before D.B.

  
(Fareeha Paul)  
Member (E)


  
(Rozina Rehman)  
Member (J)

28.12.2022

Due to winter vacation, the case is adjourned to 05.04.2023 for the same as before.

  
Reader

23.11.2021 Proper D.B is not available, therefore, case is adjourned to 1 / 3 / 2022 for the same as before.



Reader

1-3-22

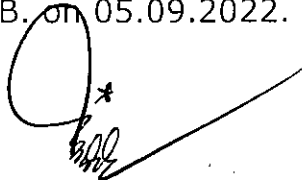
*Due to Retirement of the Hon.ble Chairman  
The case is adjourned on 13-6-22*



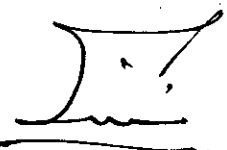
Reader

13.06.2022 Clerk of counsel for the appellant present. Mr. Arif Saléem, Stenographer alongwith Mr. Naseer-ud-Din Shah, Assistant Advocate General for the respondents present.

Clerk of counsel for the appellant stated that learned counsel for the appellant is unable to attend the Tribunal today due to strike of Lawyers. Adjourned To come up for arguments before the D.B. on 05.09.2022.



(MIAN MUHAMMAD)  
MEMBER (EXECUTIVE)



(SALAH-UD-DIN)  
MEMBER (JUDICIAL)

05.09.2022 Due to leave of the Worthy Chairman, the Bench is incomplete. Case to come up for the same on 15.11.2022 before the D.B.



Reader

02.07.2021

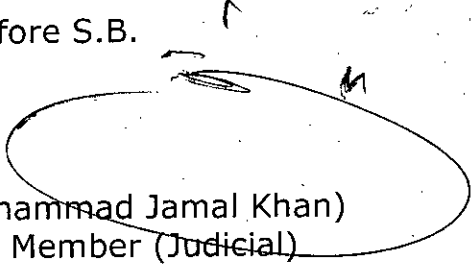
Counsel for the appellant present. Preliminary arguments heard.

Points raised need consideration. The appeal is admitted to regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days after receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time, the office shall submit the file with a report of non-compliance. File to come up for arguments on 23.11.2021 before the D.B.

  
Chairman

22.10.2020

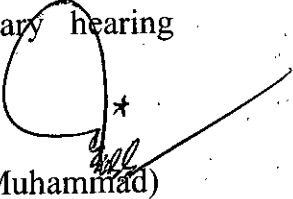
Since the Members of the High Court as well as of the District Bar Association Peshawar are observing strike today, therefore, the case is adjourned to 30.12.2020 on which date to come up for preliminary hearing before S.B.

  
(Muhammad Jamal Khan)  
Member (Judicial)

30.12.2020

None for the appellant present.

Adjourned to 29.03.2021 for preliminary hearing before S.B.


  
(Mian Muhammad)  
Member(E)

29.03.2021

Nemo for appellant.

Appellant/counsel be put on notice for

2 / 7 / 2021 for preliminary hearing, before S.B.

  
(Rozina Rehman)  
Member (J)

Acknowledge  
for counsel  
22.6.21

01.04.2020

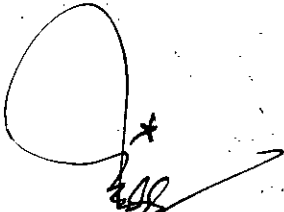
Due to public holiday on account of COVID-19, the case is adjourned to 24.06.2020 for the same. To come up for the same as before S.B.

SCANNED  
Resuwan

  
Reader

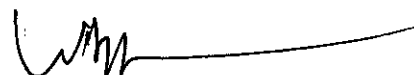
24.06.2020

None for the appellant present. On the last date of hearing the case was adjourned through Reader note. The office, shall, therefore, issue notices to the appellant and his counsel. To come up for preliminary hearing on 31.08.2020 before S.B.

  
MEMBER

31.08.2020

Clerk to counsel for the appellant present and requested for adjournment as counsel for the appellant is not available today. Adjourned. To come up for preliminary hearing on 22.10.2020 before S.B.





  
Member (E)

Form- A

FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No.- 1716/2019

| S.No. | Date of order proceedings | Order or other proceedings with signature of judge   |
|-------|---------------------------|--|
| 1     | 2                         | 3  |
| 1-    | 09/12/2019                | <p>The appeal of Mr. Atif Bangash presented today by Syed Mudassir Pirzada Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p><br/>REGISTRAR 9/12/19</p> |
| 2-    | 10/12/19                  | <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>08/01/20</u></p> <p><br/>CHAIRMAN</p>   |
|       | 08.01.2020                | <p>Nemo for appellant.</p> <p>Notices be issued to appellant/counsel. To come up for preliminary hearing on 18.02.2020 before S.B.</p> <p><br/>Chairman</p>   |
|       | 18.02.2020                | <p>Learned counsel for the appellant present and seeks adjournment. Adjourn. To come up for preliminary hearing on 01.04.2020 before S.B</p> <p><br/>Member</p>   |

BEFORE THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal 1716 2019

Atif Bangush S/o Farid Hussain Bangush Ex-SI KDA Kohat


(Appellant)

VERSUS

1. INSPECTOR GENERAL OF KPK POLICE PESHAWAR.
2. DEPUTY INSPECTOR GENERAL OF POLICE KOHAT REGION KOHAT
3. DISTRICT POLICE OFFICER KOHAT. (Respondent)

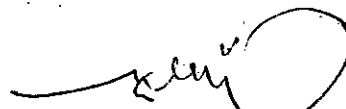
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| 3     | Address of the Parties   |          | 6     |
| 4     | Copy of impugned Order along with representation <del>copy</del> | A        | 7-10  |
|       | <del>Copy of Naqal Mad No: 16204</del>                           | ⓑ        |       |
|       | Copy of Naqal Mad No: 16204 along with Show Cause Notice Reply   | B        | 11-13 |
|       | Wakalatnama  |          |       |

  
Appellant

Through

Date 9/12/19

  
Syed Mudasir Pirzada  
Advocate HC  
0345-9645854

BEFORE THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL PESHAWAR.

Atif Bangush S/o Farid Hussain Bangush Ex-SI KDA Kohat

(Appellant)

VERSUS

1. INSPECTOR GENERAL OF KPK POLICE PESHAWAR.
2. DEPUTY INSPECTOR GENERAL OF POLICE KOHAT REGION KOHAT
3. DISTRICT POLICE OFFICER KOHAT. (Respondent)

**APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE IMPUGNED ORDER DATED 16-08-2019- VIDE OB-NO 1019 IN WHICH THE RESPONDENT NO:-3 WITHOUT THE AID OF ENQUIRY ILLEGALLY AWARD THE PUNISHMENT OF REVERTED FROM THE RANK OF OFFG :S.I TO SUBSTANTIVE RANK OF ASI WITH IMMEDIATED EFFECT AND THE APPELLANT FOUND UNFIT FOR ANY INDEPENDENT TASK THE APPELLANT PREFERRED DEPARTMENTAL REPRESENTATION DATED 13-8-2019 BUT THE SAME WAS NOT ENTERTAIN NOR CONSIDER TILL TO DATE**

Respectfully Sheweth,

With great veneration the instant appeal is preferred by the appellant on the following grounds:--

**Facts:**

Briefly facts of the case are that the appellant while serving as SHO PS KDA Kohat and was served with the show cause notice where in the following allegations raised against the appellant

i-In wake of prevailing situation and foolproof security arrangements during the event of Eid-Ul-Adha all officers/officials were directed to remain on duty and all kind of leaves were banned during the Eid days till further orders as per approved leave plan.

ii-That despite the lawful orders he willfully violated the lawful orders and on query / information he was not available in his area of responsibility found in his house and called for duty.

iii-That his area of responsibility is most sensitive in view of location of vital installations/offices, posh residential area and residence of high dignitaries and there was apprehension of any untoward incident. Thus he has violated the lawful orders, exhibited disinterested in discharge of duty and seized inefficient.

1:- That the appellant submitted to the reply of show cause notice issued on 13-08-2019 and reply was submitted on 16-08-2019 which was not considered and with remarks that the reply is unsatisfactory. (Copy of impugned order and show cause notice along with reply is Annexed as annexure A)



2:- That the appellant was never ever remains absent from his lawful duty on the event full day as per Naqal mad No: 31, dated: 12-08-2019, (Copy Annexed as annexure B).

3-There is nothing on the record which connect the appellant with the allegation nor proved because the appellant was on duty and proper security arrangement were made by the appellant along with other police officials.

4:-That an unjust has been done with the appellant by not giving ample opportunity of cross examination as well as not heard in person nor properly enquired the allegation without following the prescribed rules relating to enquiry proceedings as per Police Rules 1975 (amended 2014).

5:-That nothing has been proved beyond any shadow of doubt that the appellant has committed any misconduct or tarnished the image of Police department.

6:-That there are numerous good entries in the service record of the appellant which could be verified but this fact has not been taken in consideration while awarding the major punishment which is against to the canon of justice.

7:-That the appellant was neither provided an opportunity to cross examine the witnesses nor to produce defense evidence and the enquiry proceedings accordingly defective. Furthermore the requirements of rules regarding enquiry have not been observed while awarding the impugned punishment.

8:-That the appellant dragged unnecessarily into litigation which is clearly mentioned in 2008 SCMR 725.

9:-That while awarding the impugned major punishment the enquiry report has not been given to the appellant which is very much necessary as per 1991 PLC CS 706 & PLC 1991 584.

10:- That the very un just done with the appellant by not entertain the departmental representation till to date.

#### Grounds:

A-That during service, the appellant has always served the police dept: strictly on merits, the worthy senior police officers always expressed satisfaction on the performance of the appellant and never made any complaint against the appellant.

B-That no enquiry officer was appointed nor any enquiry was conducted against the appellant.

C-That the punishment of the reversion from the rank of Sub-Inspector to the Rank of ASI is one sided, unilateral and repugnant to the well established principles of law and justice.

D-The punishment awarded without charge sheet, statement of allegation and proper enquiry is against law has got no legal effect on the rights of the

appellant.

E-That the competent authority has acted as complainant and judge at the same time, thus the impugned order has become illegal and of no legal effect.

F-That the allegation leveled against the appellant is false, unfounded and baseless. *as well as FR- Rules not observed.*

G-That the appellant was given no right to defend himself even though the respondent No 3 was duty bound to collect the CDR data of the appellant if the appellant was absent from his lawful duty the location will show the presence of the appellant in the PS but this fact was not consider till to date.

H- That under Article 10-A of the 1973 Constitution transparent, just and fair enquiry is the fundamental right of the appellant. The impugned order of punishment is deviation from the fundamental right of the appellant. Thus, the impugned order has become unlawful and ineffective on the right of the appellant.

I-That the competent authority has exceeded from his lawful powers on one hand and by his conduct has manifestly expressed malafide against the appellant to punish him at any cost on the other.

J-That such an unfounded and false allegation has tarnished the good image / reputation of the appellant in the eyes of his family members, friends and the society at large.

K- That the appellant is absolutely innocent and he has been punished for no fault on his part.

L- That the punishment being not in accordance with last and the principles of justice deserves to be set aside.

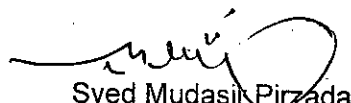
M- That if deemed proper, the appellant may kindly be heard in person.

Pray:

In the view of above circumstances it is humbly prayed that the impugned order of Respondent No-3 date 16-08-2019 may please be set aside for the end of justice and the appellant may please be graciously restored in rank of Sub Inspector with all back benefits.

  
Appellant

Through

  
Syed Mudasil Pirzada  
Advocate PHC  
0345-9645854

Date 9 / 12 / 19

Certificate:-

Certified that no such like appeal has earlier been filed in this Hon able Service tribunal as per instruction of my client.

List of Books

- 1:- Constitution of Pakistan 1973
- 2:- Police Rules
- 3:- Case Law according to need.

Service Appeal \_\_\_\_\_ 2019

AFFIDAVIT

I, Syed Mudasir Pirzada Advocate, as per instruction of my client do here by solemnly affirm and declare that all the contents of accompanying service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Tribunal.

Advocate

BEFORE THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL PESHAWAR.

Atif Bangush S/o Farid Hussain Bangush Ex-SI KDA Kohat

(Appellant)

VERSUS

1. INSPECTOR GENERAL OF POLICE KPK PESHAWAR.
2. DEPUTY INSPECTOR GENERAL OF POLICE KOHAT REGION KOHAT
3. DISTRICT POLICE OFFICER KOHAT. (Respondent)

ADDRESS OF THE PARTIES

APPELLANT :-

Atif Bangush S/o Farid Hussain Bangush Ex-SI KDA Kohat

RESPONDENTS

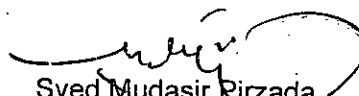
1. INSPECTOR GENERAL OF POLICE KPK PESHAWAR.
2. DEPUTY INSPECTOR GENERAL OF POLICE KOHAT REGION KOHAT
3. DISTRICT POLICE OFFICER KOHAT.



Appellant

Through

Date 9 / 12 / 19



Syed Mudasar Rizada  
Advocate PHC  
0345-9645854



OFFICE OF THE  
DISTRICT POLICE OFFICER,  
KOHAT

Tel: 0922-9260116 Fax 9260125

*Ameem J*  
*P-7*

**ORDER**

This order is passed on the departmental enquiry against Offg: SI Muhammad Atif Bangash under the Khyber Pakhtunkhwa, Police Rules, 1975 (amendment 2014).

Brief facts of the case are that the accused official was served with Show Cause Notice under the rules ibid as under:-

- i. In wake of prevailing situation and foolproof security arrangements during events of Eid Ul Adha all officers/officials were directed to remain on duty and all kind of leaves were banned during the Eid days till further orders as per approved leave plan.
- ii. That despite the lawful orders he willfully violated the lawful orders and on query / information he was not available in his area of responsibility. found in his house and called for duty.
- iii. That his area of responsibility is most sensitive in view of location of vital installations / offices, posh residential area and residence of high dignitaries and there was apprehension of any untoward incident. Thus he has violated the lawful orders, exhibited disinterest in discharge of duty and seized inefficient.

Reply to the Show Cause Notice received, but found unsatisfactory. Therefore, the accused official was called for personal hearing on 16.08.2019. He was heard patiently, but failed to advance any plausible explanation to his misconduct. However, Offg: SI Muhammad Atif Bangash placed under suspension is hereby re-instated in service from the date of suspension dated 13.08.2019.

In view of above, I, reached to the conclusion that the accused official willfully violated the lawful orders and left his place of posting on a special occasion which could cause any untoward incident in his area of responsibility. The accused official having rank of Offg: Sub Inspector and found inefficient. Therefore, I, Capt @ Wahid Mehmood, District Police Officer, Kohat in exercise of the powers conferred upon me dispensed with general proceedings and Offg: SI Muhammad Atif Bangash is reverted from the rank of Offg: SI to Substantive rank of ASI with immediate effect and he is found unfit for any independent task.

Announced  
16.08.2019

*Attest*  
*Wahid Mehmood*

*[Signature]*  
DISTRICT POLICE OFFICER  
KOHAT

OB No. 1019

Date 16-08-2019

No. \_\_\_\_\_ /PA dated Kohat the \_\_\_\_\_ 2019.

Copy of above to the Regional Police Officer, Kohat f  
favour of information please.

2. District Account Officer, Kohat
3. Reader/P.O/SRC/OHC for necessary action.

*[Signature]*  
DISTRICT POLICE OFFICER  
KOHAT

8

BEFORE THE DEPUTY INSPECTOR GENERAL OF POLICE KOHAT REGION

(Through Proper Channel) KOHAT.

SUBJECT: DEPARTMENTAL APPEAL AGAINST THE IMPUGNED ORDER OF DPO KOHAT VIDE OB NO 1019 DATED 16-08-2019 IN WHICH THE APPELLANT WAS AWARDED MAJOR PUNISHMENT OF REVERSION FROM THE RANK OF S.I TO ASI WITH IMMEDIATE EFFECT WITH REMARKS THAT THE APPELLANT IS UNFIT FOR ANY INDEPENDENT TASK WITHOUT FOLLOWING THE PRESCRIBE RULE AS WELL AS WITHOUT ANY LAW FUL JUSTIFICATION.

Respectfully Sheweth,

With great veneration the instant appeal is preferred by the appellant on the following grounds:-

Facts:

Briefly facts of the case are that the appellant while serving as SHO PS KDA Kohat and was served with the show cause notice where in the following allegations raised against the appellant

i-In wake of prevailing situation and foolproof security arrangements during the event of Eid-Ul-Adha all officers/officials were directed to remain on duty and all kind of leaves were banned during the Eid days till further orders as per approved leave plan.

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1:- That the appellant submitted to the reply of show cause notice which was not considered and with remarks that the reply is unsatisfactory. (Copy of impugned order and show cause notice along with reply is Annexed)

2:- That the appellant was never ever remains absent from his lawful duty on the event full day as per Naqal mad No: 31, dated: 12-08-2019, (Copy Annexed).

3-There is nothing on the record which connect the appellant with the allegation nor proved because the appellant was on duty and proper security arrangement were made by the appellant along with other police officials.

4:-That an unjust has been done with the appellant by not giving ample opportunity of cross examination as well as not heard in person nor properly enquired the allegation without following the prescribed rules relating to enquiry proceedings as per Police Rules 1975 (amended 2014).

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8:-That the appellant dragged unnecessarily into litigation which is clearly mentioned in 2008 SCMR 725.

9:-That while awarding the impugned major punishment the enquiry report has not been given to the appellant which is very much necessary as per 1991 PLC CS 706 & PLC 1991 584.

Grounds:

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B-That no enquiry officer was appointed nor any enquiry was conducted against the appellant.

C-That the punishment of the reversion from the rank of Sub-Inspector to the Rank of ASI is one sided, unilateral and repugnant to the well established principles of law and justice.

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F-That the allegation leveled against the appellant is false, unfounded and baseless.

G-That the appellant was given no right to defend himself.

H- That under Article 10-A of the 1973 Constitution transparent, just and fair enquiry is the fundamental right of the appellant. The impugned order of punishment is deviation from the fundamental right of the appellant. Thus, the impugned order has become unlawful and ineffective on the right of the appellant.



10

I-That the competent authority has exceeded from his lawful powers on one hand and by his conduct has manifestly expressed malafide against the appellant to punish him at any cost on the other.

J-That such an unfounded and false allegation has tarnished the good image / reputation of the appellant in the eyes of his family members, friends and the society at large.

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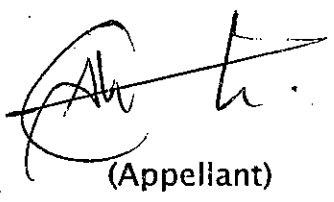
M- That if deemed proper, the appellant may kindly be heard in person.

Pray:

In the view of above circumstances it is humbly prayed that the impugned order of DPO, Kohat date 16-08-2019 may please be set aside for the end of justice and the appellant may please be graciously restored in rank of Sub Inspector with all back benefits.

Date: 27/8/2019

Attest  
by Council



(Appellant)

Muhammad Atif Bangash  
ASI/Ex-Sub Insp: No.  
Kohat.

10/10/13

12/8/13

16/8/13

Handwritten text in Urdu script, likely a letter or report, starting with "بسم اللہ الرحمن الرحیم".

فہرست

تقریباً 10/10/13

13-8-13

10/10/13

12/8/13

19/8/13

Handwritten text in Urdu script, continuing the letter or report, mentioning dates and details.

فہرست

تقریباً 10/10/13

13-8-13

That You Offg: SI Atif Bangash SHO PS KDA (Placed Under Suspension) have rendered yourself liable to be proceeded under Rule 5 (2) of the Khyber Pakhtunkhwa, Police Rules 1975 (Amendment 2014), for following misconduct;

That in wake of prevailing situation and foolproof security arrangements during events of Eid Ul Adha all officers/officials were directed to remain on duty and all kind of leaves were banned during the Eid days till further orders as per approved leave plan.

That despite the lawful orders you willfully violated the lawful orders and on query / information you were not available in your area of responsibility, found in your house and called for duty.

That your area of responsibility is most sensitive in view of location of vital installations / offices, posh residential area and residence of high dignitaries and there was apprehension of any untoward incident. Thus you have violated the lawful orders, exhibited disinterest in discharge of duty and seized inefficient.

That by reason of above, as sufficient material is placed before the undersigned, therefore it is decided to proceed against you in general Police proceeding without aid of enquiry officer:

That the misconduct on your part is prejudicial to good order of discipline in the Police force.

That your retention in the Police force will amount to encourage in efficient and unbecoming of good Police officers.

That by taking cognizance of the matter under enquiry, the undersigned as competent authority under the said rules, proposes stern action against you by awarding one or more of the kind punishments as provided in the rules.

You are, therefore, called upon to show cause as to why you should not be dealt strictly in accordance with the Khyber Pakhtunkhwa Police Rules, 1975 (Amendment 2014) for the misconduct referred to above.

You should submit reply to this show cause notice within 07 days of the receipt of the notice failing which an ex-parte action shall be taken against you.

You are further directed to inform the undersigned that you wish to be heard in person or not.

Grounds of action are also enclosed with this notice.

No. 9811 /PA

Dated 13-8-2019

  
DISTRICT POLICE OFFICER,  
KOHAT

ذوالشوماد لوٹسی 479/2019 نمبر 9811/PA بجاریب  
13.8.19 13.8.19

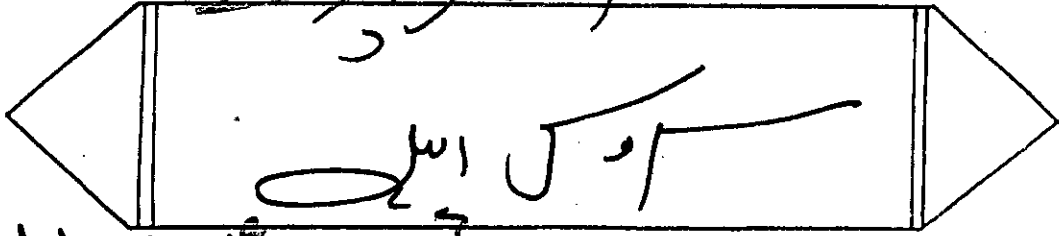
جناب DPO مناب کوھاٹ معروف خدمت ہوں کہ سائل  
کو آپ جناب نے حال ہی میں SRO عقائد 14DA تعینات  
کیا تھا۔ سائل کو اس بات کا بخوبی ادراک ہے کہ  
14DA اثبات اہم مقام ہے۔ عوام کی جان و مال  
اور اہم تنسیبات کی حفاظت کرنا اور لین دین  
ہے۔ اپنے عمر سے تعینات کے دوران عوام الناس عام  
فاس کی بلا تشریح خدمت کا ہے۔ انہوں نے ہر ایک  
کوشش کا موقع پیش دیا ہے، ہر حکم کو تسلیم نہیں کرتے  
مانا ہے۔ عید الاضحیٰ کے دن لوٹا میں بھی سائل نے ثابت دلچسپی  
اور فزہ پشاف سے مزائن متبعی سرانجام دی ہیں۔  
عید الاضحیٰ کے دن لوٹا میں میں اپنے علاقے میں موجود تھا۔  
اور اپنی ڈیوٹی ثابت ایمانداری سے ادا کی ہیں اور  
انشاء اللہ مستقبل میں بھی ایمانداری اور خوش اسلوبی  
سے ادا کرونگا۔

استدعا فقید شوماد لوٹسی صفحہ داخل دفتر نمبر کے  
سائل کو سروس پر بحال کرنے کا حکم صادر فرمائیں  
سائل دعا گو رہے گا

Attest  
بندہ

si/p-line 16/8/19

بعدالت کروکل رونیو لیساور



2017ء پنجاب ایسٹرن  
1GP-etc بنام

حافظ بنٹس

موزخہ  
مقدمہ  
دعویٰ  
جرم

### باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ  
آن مقام لیساور کیلئے سید منیر پور اور اندولہ کے  
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز  
وکیل صاحب کو راضی نامہ کرنے و تقرر حالت فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور  
بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق  
زرائیں پر دستخط کرنے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یا یکطرفہ یا اپیل کی برآمدگی اور منسوخی  
نیز دائر کرنے اپیل نگرانی 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 با اختیارات حاصل ہوں گے اور اس کا ساختہ  
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ دہر جانہ التوائے مقدمہ کے سبب سے وہوگا۔  
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی  
مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سندر ہے۔

ماہ 12 دسمبر 2017ء

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واہ الع

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میں  
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بمقام لیساور

منیر