


FORM OF ORDER SHEET

Court of

Case No.:-

649/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	24/03/2023	<p>The appeal of Mr. Fazal Mann presented today by Naila Jan 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</p>  <p>REGISTRAR</p>

BEFORE THE HONORABLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

SERVICE APPEAL NO. 649/2023

Mr. Fazal Manan LHC No 802 Police Department District Peshawar..... (Appellant)

Versus

1. Capital City Police Officer Peshawar at Peshawar.
2. Superintendence of Police Saddar Division CCP Peshawar..... (Respondents)

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Appellant

Through

Naila Jan
Naila Jan
Advocate High Court
Peshawar.

Dated: 24/03/2023

BEFORE THE HONORABLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

SERVICE APPEAL NO. 669/2023

Mr. Fazal Manan LHC No 802 Police Department District Peshawar..... (Appellant)

Versus

1. Capital City Police Officer Peshawar at Peshawar.
2. SUPERINTENDENCE OF POLICE DIVISION CCP Peshawar..... (Respondents)

Service Appeal under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974 against the impugned final /appellate Order dated 24/02/2023 , whereby dismissal order of the appellant dated 12/02/2021 has been set aside and the appellant has been reinstated with immediate effect instead of 12/02/2021 and the intervening period has been treated as leave of the kind due instead of full pay with all other back benefits and subsequent order dated 09/03/2023 where by intervening period has been counted as leave of the kind due in utter violation of law and the Khyber Pakhtunkhwa Police Rules 1975.

Prayers: **On acceptance of this Service Appeal the impugned final /appellate Order dated 24/02/2023 may kindly be modified to the extent of reinstatement of the appellant w.e.f 12/12/2021 with all back benefits, instead of with immediate effect and treating the intervening period as leave of the kind due and setting aside subsequent order dated 09/03/2023 with any other benefit deemed appropriate by the honourable Tribunal, not specifically prayed for.**

Respectfully sheweth;

FACTS:

The appellant submits the following facts with great Respect;

1. That the appellant was inducted into police department and since his appointment the appellant performed his duties with great zeal, zest, enthusiasm and to the entire satisfaction of the High ups.
2. That the appellant was lastly posted as LHC Police Post Sheikhan PS badaber where the appellant was falsely involved in criminal case FIR No 04 under Section 302/34/427 PPC of PS badaber and was arrested and sent to judicial custody. (Copy of the FIR is annexure -A)
3. that the appellant was proceeded departmentally without serving a charge sheet and without associating with the Inquiry proceedings and final show cause Notice and resultantly the appellant was awarded major penalty of dismissal vide order dated 12/02/2021 by respondent No 02 in an illegal cursory manners . (copy of the charge sheet Show cause Notice & inquiry report has not been provided to the appellant may kindly be requisitioned from the respondents)
4. That thereafter the appellant was released on Bail by Peshawar High court vide its judgment/order dated 11/03/2021 and after releasing, the appellant approached for joining his duty however the appellant was orally informed that the appellant has already been dismissed from service during the period of confinement however the same was not provided to the appellant .

- 2
5. That the appellant got the impugned dismissal order dated 12/02/2021 on his own efforts which was issued at the back of appellant in total disregards of law, rules principles of natural justice. (Copy of the Dismissal Order dated 12/02/2021 is annexed as annexure-B)
 6. That the appellant feeling aggrieved from the impugned illegal dismissal order dated 12/02/2021, filed Departmental appeal before respondent No 01 and during pendency of the departmental appeal, the Court of Additional Session Judge XII honourably acquitted the appellant vide judgment dated 30/01/2023 from the charges. (Copy of the Court Judgment dated 30/01/2023 and departmental Appeal are Annexures-C&D)
 7. That Respondent No 01 was gracious enough, to accept the departmental Appeal of the appellant vide impugned order dated 24/02/2023 whereby the appellant has been reinstated into service with immediate effect, instead of from the date of dismissal i.e 12/02/2021 and quite illegally declared the intervening period as leave of the kind due in utter violation law rules and principles of Natural Justice with subsequent Order dated 09/03/2023. (Copy of the Impugned Appellate/final order dated 24/02/2023 & Order dated 09/03/2023 are Annexure-E&F)
 8. That the appellant feeling aggrieved, having no other adequate remedy hence filling the instant appeal on the following grounds interalia;

GROUND:

- A. That the impugned appellate order/final Order dated 24/02/2023 is against the law rules Principles of Natural Justice, hence liable to be modified to the extent of reinstatement into service with effect from the date of dismissal i.e 12/02/2021 with all back benefits pay etc.
- B. That no charge sheet along with statement of allegation has been issued/served before initiating the so called departmental ex party Inquiry which is mandatory under the law.
- C. That the appellant was in jail and this fact was in the knowledge of the inquiry officer which is evident from the inquiry report even though no statement of the appellant or any other witness has been recorded in the appellant presence which is utter violation of the Khyber Pakhtunkhwa Police Rules 1975.
- D. That no opportunity of personal hearing/defence has been provided to the appellant at any stage of the disciplinary proceedings. Hence the appellant has been condemned unheard.
- E. That no regular inquiry has been conducted in accordance with Khyber Pakhtunkhwa Police Rules 1975 and no opportunity of defence has been provided to the appellant.
- F. That the inquiry officer as well as the competent authority was in the knowledge that the appellant is behind the bars, then they did not associate the appellant with the disciplinary proceedings.
- G. That no opportunity of personal hearing has been provided before issuing the impugned order dated 12/02/2021 or final order dated 24/02/2023.
- H. That no statement of any witness has been recorded nor did the appellant have been confronted with anything and the inquiry officer failed to bring any iota of evidence against the appellant.
- I. That under FR 54 (a) "Where a Government Servant has been dismissed or removed is reinstated, the revising or appellate authority may grant to him for the period of his absence from duty:— if he is honourably acquitted, the full pay to which he would have been entitled if he had not been dismissed or removed and, by an order to be separately recorded, any allowance of which he was in receipt prior to his dismissal or removal;"
However, in case of the appellant after acquittal from the criminal case in violation of the FR 54 the appellant was reinstated by treating the intervening period as leave of the kind due vide the final order dated 24/02/2023 and order 09/03/2023 hence the appellant has been deprived from the benefits of the intervening period.
- J. That the apex Court in C.P. Nos.517-L, 1019-L, 1062-L & 1232-L of 2016 and 1929-L/2017 titled Muhammad Sharif & others Vs Inspector General of Police, Punjab, Lahore, etc. dated 11.02.2021 has held in para 10 in the judgment "If by virtue of a declaration given by the Court a civil servant is to be treated as being still in service, he should also be given the consequential relief of the back benefits (including salary) for the period he was kept out of service as if he were actually performing duties. A civil

servant once exonerated from the charges would stand restored in service as if he were never out of it and would be entitled to back benefits.

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- K. That neither the appellant committed the alleged act nor did the appellant have been attributed the commission of the alleged acts however the appellant was made escape goat and was illegally penalised.
- L. That right of fair Trial has not been provided to the appellant as guaranteed by Article 10 A of the Constitution of Pakistan 1973.
- M. That the appellant has not been treated in accordance with Art 4 and 25 of the Constitution of Pakistan 1973.
- N. That no statement of any witness has been recorded nor did opportunity of cross examination have been provided to the appellant.
- O. That the appellant was not even charged in the FIR even then he was not only mala fidley involved but without providing any opportunity the appellant was dismissed from service without any proof.
- P. That since the impugned order the appellant is jobless and being the sole bread earner the family of appellant facing problems
- Q. That the appellant seeks permission of the honourable Tribunal to adduce other grounds during final hearing of the appeal.

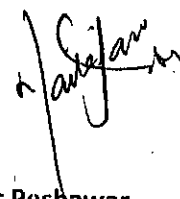
It is therefore requested that the instant Service Appeal may kindly be accepted as prayed for.

Appellant

Through

Naila Jan

Advocate High Court Peshawar



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SERVICE APPEAL NO. /2023

Mr. Fazal Manan LHC No 802 Police Department District Peshawar..... (Appellant)

Versus

1. Capital City Police Officer Peshawar at Peshawar & others..... (Respondents)

AFFIDAVIT

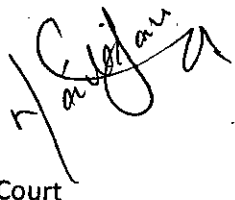
I, Fazal Manan LHC No 802 Police Department District Peshawar do hereby solemnly affirm and declare that all the contents of the **accompanied appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Hon'ble Tribunal.

DEPONENT

CNIC:

Cell No:

Identified By;



NAILA JAN
Advocate High Court
Peshawar.

BEFORE THE HONORABLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

SERVICE APPEAL NO. _____/2023

Mr. Fazal Manan LHC No 802 Police Department District Peshawar..... (Appellant)

Versus

1. Capital City Police Officer Peshawar at Peshawar & others.... (Respondents)

ADDRESS OF PARTIES

APPELLANT

Fazal Manan LHC No 802 Police Department District Peshawar.

RESPONDENTS

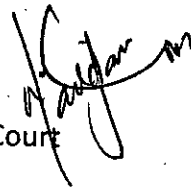
1. Capital City Police Officer Peshawar at Peshawar.
2. Superintendence of Police Saddar Division CCP Peshawar

Date. 24/03/2023

Appellant

Through

Nalla Jan
Advocate High Court
Peshawar



(7) B
Amir

OFFICE OF THE
SUPERINTENDENT OF POLICE,
SADDAR, CCP, PESHAWAR

NO. 04/E/PA

DATE: 12/02/2021.

ORDER

This order will dispose off the Departmental Inquiry against LHC Fazal Manan No. 802 of PP Sheikhan PS Badhber vide this office No. 04/E/PA dated 09.01.2021. The inquiry in hand emanated from that while he was posted at PP Sheikhan, during investigation of case FIR No. 04 dated 04.01.2021 u/s 302/34/427 PPC PS Badhber, it was found that he is involved in instant murder case. Being a member of discipline force, this act is highly objectionable. For the said negligence proper departmental inquiry was conducted through SDPO Sadder Circle. He submitted his findings vide memo No. 04/E/ST dated 19.01.2021.

Final show cause notice was issued vide this office memo No. 04/E/PA dated 23.01.2021 and sent to Superintendent Central Prison Peshawar vide this office memo No. 271/PA dated 21.01.2021 for service upon him, but to no avail.

Keeping in view the circumstances and the recommendations of inquiry officer and other material available on record, the undersigned came to the conclusion that the defaulter official found guilty. In exercise of the power vested in me under E&D Rules 1975 amended with 2014, he is hereby awarded major punishment of dismissal from service with immediate effect.

Order annexed.

- [Signature]
Superintendent of Police, Sadder Division
CCP, Peshawar.

OB. No. 550 dated 12/2/2021.

Copy of above is forwarded for information and necessary action to:

1. The Capital City Police Officer, Peshawar.
2. The Senior Superintendent of Police Operations CCP Peshawar.
3. Pay officer CCP Peshawar.
3. FMC along with Inquiry file for record.
4. All concerned

24/03/2021 [Signature]

[Signature]

[Signature]

IN THE COURT OF MUHAMMAD AYAZ KHAN
ADDITIONAL SESSIONS JUDGE-XII, PESHAWAR

SESSIONS CASE NO. 159/SC OF 2021

Date of Institution 14.07.2021
Date of Decision 30.01.2023

ORDER
30.01.2023

1. APP for the State present. The accused facing trial Fazal Manan, Salih Muhammad, Naseeb Khan Shakeel and Ijaz Ullah on bail present.

2. Through instant order, the court is going to decide on application U/S 265-K Cr.P.C in case FIR No.04 dated 04.01.2021 U/S 302/324/427/34 PPC registered at the Police Station Badhber, Peshawar.


3. Brief facts of the instant case are that, the injured Riaz reported the matter to the police, that he alongwith his friend Akbar Khan was travelling in Motorcar bearing No.ADS-348 towards his home. When they reached to the place of occurrence, in the meanwhile firing started from a shop on the vehicle of complainant. Due to said firing, the complainant sustained injury on his back and the firing also hit the vehicle, however, other eye witness Akbar Khan escaped unhurt. The complainant charged two unknown persons for commission of offense.

AT
District


4. Later on, in supplementary statement of Fateh Khan and Muhammad Akbar Khan, they charged the accused ~~Naseeb Khan~~ PASI, Fazal Manan 805 LHC, Constable Shakeel No.6962 and Saleh Muhammad 1765.

5. Argument heard and record perused.

6. Perusal of the record reveals that instant case was sent to this Court for trial by the Hon'ble District & Sessions Judge, Peshawar on 14.07.2021. Accused were summoned by the court who appeared before the court. Proceedings ~~U/o accused~~ ~~U/P/F~~ were complied with on 12.10.2021 while charge was framed on 03.11.2021. The accused facing trial pleaded not guilty and claimed trial. Consequently,

 prosecution was directed to produce evidence. In order to prove its case against the accused facing trial, the prosecution produced 14 witnesses on date. Brief resume of the PWs are as follows.

7. PW-01 is the statement of eye witness namely Muhammad Akbar Khan S/o Muhammad Asghar Khan, who stated on oath that on date and night of occurrence, he alongwith Riaz Khan (deceased) S/o Fati Khan R/o Khazana Payan alongwith other friends went to the Hujra of one Qismat Ullah S/o Said Ahmad R/o Masho Pekey, Badhber, Peshawar for dinner. His friend namely Riaz Khan wanted to leave the said Hujra, therefore, they said to their friends that they had some important work. On this, he alongwith his friend Riaz Khan left the said Hujra in the Motorcar bearing No.ADS-348/Islamabad white in color. He sat on the driving seat while Riaz Khan sat on the front seat, he was having 05 Lacs



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party) also fired in self-defense. He further admitted that the day and time the police party were nominated as accused they were there and then arrested by then SHO Ijaz Ullah Khan. He also admitted that it was also investigated by him that the SHO in his statement recorded before him that the police officials and Incharge PP Sheikhan concealed the true facts from him for almost 03 days and that he was continuously discussing the matter regarding the actual facts with the SP and DSP Saddar Circle. He admitted that it was dark night occurrence and that before proceedings to the FIR he had gone to the spot. If the above said admissions of the father of the complainant, eye witness and Investigation Officer are taken into juxta-position, it is clearly suggested that it is a case of consultation and deliberation and the accused were charged on the instance of the high-ups of the police, which verify the nature of mala fide. The august Supreme Court of Pakistan has laid down the dictum that whenever there is deliberation and consultation before registration of FIR, then, the accused shall be acquitted in circumstances. The present case is a classic sample of deliberation and consultation.

25. Under the circumstances, the fate of the case would be nothing but acquittal of the accused. Proceedings further with the case would be of no use as no case is made out against the accused on the basis of available record.

26. Therefore, the application is accepted and above accused is therefore, acquitted in the circumstances. Bail bonds of the accused

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stands cancelled and their sureties stand discharged from liability of the bail bonds. Case property be disposed of as per law.

- 27. Requisitioned police record be returned back to the quarter concerned alongwith a copy of this order accordingly.
- 28. File of this Court be consigned to record room after its necessary completion and compilation.

Announced In open Court:
30th Day of January, 2023

MUHAMMAD AYAZ KHAN,
ADDL: SESSIONS JUDGE-XII,
PESHAWAR

No.	6959
Date	02-2-23
Time	11:24
Place	P
Signature	
Date	02-2-23
	02-2-23

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Handwritten notes and signatures at the top right of the page.

To

The Worthy Capital City Police Officer
Peshwar Khyber Pukhtunkhwa.

Through

Superintendent Central Jail Peshwar

Subject: Departmental appeal against the impugned order dated 21/02/2021 communicated on 24/03/2021 whereby the appellant has been dismissed from his service on the basis of some baseless allegations in utter violation of law and Police Rules 1975.

Prayers: On acceptance of this Departmental Appeal the impugned order dated 21/02/2021 may kindly be set-aside and the appellant may kindly be reinstated into service with all back benefits.

Dear Sir

The appellant submits the following with great Respect;

1. That the appellant was inducted into police department and since his appointment the appellant performed his duties with great zeal, zest, enthusiasm and to the entire satisfaction of the High ups.
2. That the appellant was lastly posted as LHC Police Post Shekhan PS badber where the appellant was involved in criminal case FIR No:04 under Section 302/34/427 PPC of PS badber and was arrested and sent to judicial custody.(Copy of the FIR is annexure -A)
3. That thereafter the appellant was released on Bail by Peshawar High court vide its judgment/order dated 11/03/2021 and after releasing the appellant approached for joining his duty however the appellant was orally informed that the appellant has already been dismissed from service during the period of confinement however the same was not provided to the appellant.
4. That the appellant got the impugned dismissal order dated 21/02/2021 on his own efforts on 24/03/2021 which was issued at the back of appellant in total disregards of law, rules principles of natural justice. (Copy of the Impugned Order dated 21/02/2021 is annexed as annexure-B)
5. That the appellant feeling aggrieved from the impugned illegal dismissal order dated 21/02/2021 having no other adequate remedy, hence filing the instant departmental appeal on the following grounds inter alia;

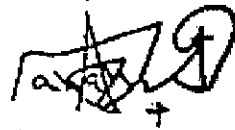
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Grounds:

- A. That the impugned order is against the law rules Principles of Natural Justice, void ab initio hence liable to be set aside.
- B. That no charge sheet along with statement of allegation has been issued before initiating the so called departmental ex parte inquiry which is mandatory under the law.
- C. That the appellant was in jail and this fact was in the knowledge of the inquiry officer which is evident from the inquiry report even then no statement of the appellant or any other witness has been recorded in the appellant presence which is utter violation of the Khyber Pakhtunkhwa Police Rules 1975.
- D. That no opportunity of personal hearing/defence has been provided to the appellant at any stage of the disciplinary proceedings. Hence the appellant has been condemned unheard.
- E. That no regular inquiry has been conducted in accordance with Khyber Pakhtunkhwa Police Rules 1975 and no opportunity of defence has been provided to the appellant.
- F. That the inquiry officer as well as the competent authority was in the knowledge that the appellant is behind the bar even then they did not associate the appellant with the disciplinary proceedings.
- G. That no opportunity of personal hearing has been granted before issuing the impugned order dated 12/02/2021.
- H. That no statement of any witness has been recorded nor did the appellant have been confronted with anything and the inquiry officer failed to bring any iota of evidence against the appellant.
- I. That neither the appellant committed the alleged act nor did the appellant have been attributed the commission of the alleged acts however the appellant was made escape goat and was illegally penalised.
- J. That right of fair Trial has not been provided to the appellant as guaranteed by Article 10 A of the Constitution of Pakistan 1973.
- K. That the appellant has not been treated in accordance with Art 4 and 25 of the Constitution of Pakistan 1973.
- L. That no statement of any witness has been recorded nor did opportunity of cross examination have been provided to the appellant.
- M. That the appellant was not even charged in the FIR even then he was mala fidey not only involved but without providing any opportunity the appellant was dismissed from service without any proof.
- N. That the inquiry officer was either to prove the charges or should have recommend the competent authority to wait for the outcome of criminal case however without proving the charges and waiting for the outcome of the criminal case the appellant was subjected to major penalty in violation of laws and rules
- O. That since the impugned order the appellant is jobless and being the sole bread earner the family of appellant facing problems
- P. That the appellant seeks Personal Hearing before your Good self.

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It is therefore requested that the instant Departmental appeal may kindly be accepted as prayed for.



Your's obediently

FAZAL MANAN (EX-LHC)





15

E
Amir

OFFICE OF THE
CAPITAL CITY POLICE OFFICER,
PESHAWAR

ORDER.

This order will dispose of the departmental appeal preferred by Ex-LHC Fazal Manan No. 802 who was awarded the major punishment of "Dismissal from service" under KP PR-1975 (amended 2014) by SP/Saddar Peshawar vide OH No.550, dated 12-02-2021.

- 2- Short facts leading to the instant appeal are that the accused LHC while posted PP Shekhan Police Station Badaber Peshawar was proceeded against departmentally on account of his involvement in criminal case vide FIR No. 04, dated 04.01.2021 u/s 302/34/427 PPC Police Station Badaber Peshawar.
- 3- He was issued proper Charge Sheet and Summary of Allegations by SP/Saddar Peshawar. SDPO/Saddar Peshawar was appointed as enquiry officer to scrutinize the conduct of the accused official. The inquiry officer after conducting proper inquiry submitted his findings in which the accused officer was found guilty. The competent authority in light of the findings of the enquiry officer issued him Final Show Cause Notice, which was sent to Superintendent Central Prison Peshawar vide No. 271/PA, dated 21.01.2021 for service upon him, but to no avail, hence awarded the above major punishment.
- 4- He was heard in person in O.R and the relevant record along with his explanation perused. During personal hearing the appellant categorically denied the allegations and stated that he was falsely been implicated in the said FIR. Moreover, the Honourable Court of Additional Session Judge-XII Peshawar, vide order dated 30.01.2023 acquitted him of the charges levelled against him in the said FIR. Keeping in view his plea and other documentary proof, his appeal for reinstatement in service hereby accepted. The punishment order of SP/Saddar Peshawar is hereby set aside. He is hereby reinstated in service with immediate effect. The period he remained out of service is treated as leave of the kind etc.

536
24-2-23

(MUHAMMAD IJAZ KHAN) PSP
CAPITAL CITY POLICE OFFICER,
PESHAWAR

No. 927-34 /PA dated Peshawar the 24/02/2023

Copies for information and necessary action to the :-

1. SP/Saddar Division Peshawar.
2. SP/IO: Peshawar
3. OASI, CRC, Pay Officer & CC
4. FMC along with Fouji Missal.
5. Official Concern



16
F
OFFICE OF THE
CAPITAL CITY POLICE OFFICER
PESHAWAR

Phone No. 091-9210641

Fax No. 091-9212607

ORDER

In continuation to this office order Endst: No.927-34/PA dated 24.02.2023, the period of absence in respect of Constable. Ex-Lt C Fazal Manan No.802 w.e.from 12.02.2021 to 24.02.2023 (total 742 days) is treated as leave of the kind due, according to the revised leave Rules 1981:-

- i) Period from 12.02.2021 to 11.06.2021 (120 days leave on full pay)
- ii) Period from 12.06.2021 to 22.11.2022 (528 days leave on half pay)
- iii) Period from 23.11.2022 to 24.02.2023 (94 days extra ordinary leave on without pay).

(Raham Hussain) SP/HQrs
For Capital City Police Officer,
Peshawar




OB No 659

Dated 9.3.2025

No. _____/CRC, dated Peshawar the _____/2023.

Copy of above is forwarded to the:-

1. DSP/HQrs Peshawar
2. OASI, Pay Officer
3. FMC & II-C
4. Computer Cell

قیمت 50 روپے	68367			
ایڈویکٹ: <u>Naila Jan</u>		پشاور بار ایسوسی ایشن، خیبر پختونخواہ		
بار کونسل / ایسوسی ایشن نمبر: <u>BC-13-4172</u>				
رابطہ نمبر: <u>03129215471</u>				

بعدالت جناب: ضیبر غمگینخواہ سروس ٹریڈینگ ریشاور

منجانب: <u>ایسٹریٹ</u>	دعویٰ: <u>سروس ایسٹریٹ</u>
	علت نمبر: _____
	مورخہ: _____
	جرم: _____
	تھانہ: _____

باعث تحریر آنگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ
 آن مقام پشاور کیلئے نامہ جان کو وکیل مقرر
 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 مفسوفی، نیز
 دائرہ کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار 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 بناختہ پرداختہ 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

المرقوم: 24/03/2022
 PESHAWAR BAR ASSOCIATION
 KHYBER PAKHTUNKHWA

مقام: _____
 تاریخ: _____

Accepted

Naila Jan

Accepted

نوٹ: اس وکالت نامہ کی کوئی کاپی ناقابل قبول ہوگی۔

منزل منان
 ایسٹریٹ