


FORM OF ORDER SHEET

Court of _____

Case No. - _____

801/2023


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	10/04/2023	<p>The appeal of Mr. Abdullah resubmitted today by Mr. Shahid Naseem Khan Chamkani Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 11.04.2023.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

The appeal of Mr. Abdullah Shah son of Amal Shah r/o Sheikhhan Dab Begu Khol Esak District Karak received today i.e. on 06.04.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days:

- 1- Memorandum of appeal is not signed by the appellant.
- 2- Copies of charge sheet, statement of allegations, show cause notice, enquiry report and replies to thereof are not attached with the appeal which may be placed on it.
- 3- Copy of departmental appeal against the impugned order is not attached with the appeal which may be placed on it.
- 4- Annexures-A&B appeal is illegible which may be replaced by legible/better one.
- 5- The authorities whose orders are challenged has not been arrayed a necessary parties.
- 6- The documents that are to be provided must be illegible/readable.

No. 1103 /S.T,

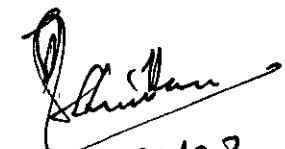
Dt. 07/04 /2023


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Shahid Naseem Khan Chamkanni Adv.
High Court Peshawar.

1. Appeal now being signed.
2. No charge sheet, statement of allegations, show cause notice was served. Nor any enquiry report was given. As such could not be placed on record.
3. Annexure 'C' is already annexed.
4. Legible copies / Better copies annexed.
5. D. P. O Karak has been added as Ropt No. 3.

Submitted.


Adv. 874/23

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. 801 /2023

Abdullah Shah. **APPELLANT**

VERSUS

Govt. of Khyber Pakhtunkhwa & others. . . . **RESPONDENTS**

I N D E X

S.No.	Description of Documents	Annex	Pages
1.	Service Appeal		1-5
2.	Affidavit		6
3.	Addresses of the Parties		7
4.	Order dated 16.11.2014	A	8
5.	Pension Book	B	9
6.	Departmental Appeal with Postal Receipt	C	10-12
7.	Wakalatnama		13

Through Appellant



Shahid Naseem Khan
Chamkani
Advocate High Court

Dated: 16.03.2023

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. 801 /2023

Abdullah Shah S/o Amal Shah R/o Sheikhan, Dab Begu
 Khel, Esak, Tehsil & District Karak. **APPELLANT**

VERSUS

1. Govt. of Khyber Pakhtunkhwa through Secretary,
 Home & Tribal Affairs Department, Civil Secretariat,
 Peshawar.
2. Inspector General of Prisons, Khyber Pakhtunkhwa,
 Peshawar. **RESPONDENTS**
3. District Police Officer, Karak

APPEAL U/S 4 OF THE SERVICE TRIBUNAL
ACT, 1974 AGAINST THE IMPUGNED ORDER
DATED 16.11.2014, OF RESPONDENT NO.2.

Respectfully Sheweth:

1. That appellant joined the respondents' Department as a Constable on 11.12.1994 at the Kohat Police strength.
2. That since his enrollment in the respondents' department, the appellant performed his official work with honesty, dedication and zeal and zest, for 19-years 7-months and 14-days.
3. That with the performance of the appellant, his officers were also satisfied and never preferred any complaint against the appellant.

4. That unfortunately while serving in the police, the father of appellant fell sick. His sickness was so severe that he could not move. He remained on bed for a longtime for which the appellant has to attend him.
5. That the appellant for his medical treatment remained home for longtime.
6. That in the meantime, at the back of the appellant departmental proceedings on the ground of absence from duty were initiated against the appellant.
7. That at the back of the appellant, enquiry was conducted. The appellant was not associated with the proceedings of the enquiry and ultimately, the competent authority treated leave of the appellant as earned leave and also compulsorily retired the appellant from service with immediate effect.
8. That regarding the impugned order the appellant was not informed by the office of the competent authority either at his home address or some other source of intimation, whenever appellant used to inquire, his bosses assured him to take care of his father.
9. That the appellant was not even called to office for announcement of order in presence of the appellant.
10. That being aggrieved, the appellant has filed a departmental appeal before the respondent No.2, but of no avail.
11. That appellant also filed a revision petition, but again no reply.

12. That the appellant feeling aggrieved and having no other adequate available remedy approached this Hon'ble Tribunal, on the following amongst other grounds;

GROUNDS:

- A. That the impugned order of the compulsory retirement of the appellant is not in accordance with law, rules and the principles of 'natural' justice, hence it is liable to be set aside.
- B. That the enquiry was conducted at the back of the appellant. The enquiry officer failed to associate the appellant with the enquiry proceedings.
- C. That the appellant was not provided opportunity to defend himself nor was he afforded opportunity to cross examine the witnesses. Hence enquiry is one sided, unilateral and legally defective and on the basis of such enquiry no punishment can be awarded.
- D. That due to process of law has not been followed which is mandatory in the eyes of law.
- E. That the order is also in violation of Article 10-A of the constitution, the said provision has envisaged that trial/inquiry shall be transparent and independent but unfortunately the alleged enquiry against the appellant is neither independent nor transparent. Hence the fundamental right of the appellant was violated which alone has made the enquiry and the impugned order legally questionable

and of not legal consequences upon the rights of the appellant.

F. That the impugned order is also illegal on the two counts. First that under the law, for an offence only one punishment is to be awarded and secondly Article 12 & 13 of the constitution of Pakistan have laid down that no retrospective and double punishment for an offence can be awarded. If the impugned order is perused it will transpire that for the default of absence the appellant was awarded punishments on two counts i.e. the absence period was treated as earned leave and punishment of compulsory retirement was also awarded, hence the impugned order is in violation and derogation of the well-established principle of law and justice and as well the constitution of Pakistan, hence the order of punishment is legally not sound and has got no legal impact on the rights of the appellant.

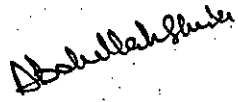
G. That against any void order no limitation runs.

H. That the appeal against the impugned order has strong probability to succeed on merits, however, the worthy respondent office may take the shield of some technicalities like limitation but it is an admitted legal fact that when case or appeal is fit to be accepted on merits then technicalities should not come in their way and they should be ignored and decision is to be delivered on merit. Same principle is applicable on the case/ appeal of the appellant. In this regard the Honourable Supreme Court of Pakistan has decided the matter in affirmative.

- I. That 20 years service of the appellant was forced to come to an end with a stroke of pen without any justification.
- J. That the appellant has completely fit and he is fit to serve the Police Department with more enthusiasm and dedication.
- K. That the appellant is prepared to return the pension periodically with every pay in installments.
- L. That any other ground with the permission of this Hon'ble Tribunal, will be raised at the time of arguments.

It is humbly prayed that on acceptance of the instant appeal, the impugned Orders of the respondents No.2 may kindly be set aside in the interest of justice and the appellant may kindly be reinstated in service with all back benefits.

Any other relief deems fit and appropriate in the circumstances of the case may also be granted.


Appellant

Through


Shahid Naseem Khan
Chamkani

&


Asghar Shah
Advocates Peshawar

Dated: 16.03.2023

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. _____/2023

Abdullah Shah. **APPELLANT**

VERSUS

Govt. of Khyber Pakhtunkhwa & others. . . . **RESPONDENTS**

AFFIDAVIT

I, Abdullah Shah S/o Amal Shah R/o Sheikhan, Dab Begu Khel, Esak, Tehsil & District Karak, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.



Abdullah Shah
DEPONENT

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. _____/2023

Abdullah Shah..... **APPELLANT**

VERSUS

Govt. of Khyber Pakhtunkhwa & others. . . . **RESPONDENTS**

ADDRESSES OF THE PARTIES

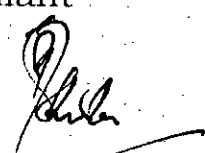
APPELLANT:

Abdullah Shah S/o Amal Shah R/o Sheikhan, Dab Begu
Khel, Esak, Tehsil & District Karak.

RESPONDENTS:

1. Govt. of Khyber Pakhtunkhwa through Secretary,
Home & Tribal Affairs Department, Civil Secretariat,
Peshawar.
2. Inspector General of Prisons, Khyber Pakhtunkhwa,
Peshawar.

Appellant
Through


Shahid Naseem Khan
Chamkani
Advocate High Court

Dated: 16.03.2023

8

ORDER

This Order is passed on the departmental enquiry against Constable Abdullah Shah No. 552 Police Lines Karak leading to the present departmental proceedings are as follows:-

Constable Abdullah Shah No.552 absented himself from his lawful duty w.e from 18.08.2014 till date vide D.D No.14 dated 18.08.2014, Police Lines Karak. His pay has been stopped to this effect.

Charge Sheet and Statement of allegation based on above allegations were served upon the Constable Abdullah Shah No. 552. Mr. Muhammad Ismail, DSP (IO) Karak was appointed as Enquiry Officer to scrutinize the conduct of the said Constable with reference to the charges leveled against him.

The Enquiry Officer conducted departmental enquiry and reported that the defaulter Constable was time and again directed to appear before him but he turned deaf ear and did not bother for the completion of enquiry process. Therefore, the allegations leveled against him have been proved and he is recommended for award of major punishment.

Keeping in view the above circumstances, facts on file and his long service more then 19 year, poor financial position, he is awarded a major punishment of Compulsory Retirement from service with immediate effect. The period of absence is treated as earned leave. His pay has been released.

Order Announced
Dated: 05.11.2014

OB No. 898
Dated 06/11 /2014

M. A. I.
District Police Officer, Karak

OFFICE OF THE DISTRICT POLICE OFFICER, KARAK

No. _____/EC

Copy to SRC, OHC and PO for necessary action.

ORDER

This order is passed on the departmental enquiry against Constable Abdullah Shah No. 552 Police Lines Karak leading to the present departmental proceeding are as follows:-

Constable Abdullah Shah No.552 absented himself from his lawful duty w.e.from 18.08.2014 till date vide D.D No.14 dated 18.08.2014 Police Lines Karak. His pay has been stopped to this effect.

Charge sheet and Statement of allegation based on above allegations were served upon the Constable Abdullah Shah No. 552, Mr. Muhammad Ismail, DSP HQ's Karak was appointed as Enquiry Officer to scrutinize the conduct of the said Constable with reference to the charges leveled against him.

The Enquiry Officer conducted departmental enquiry and reported that the defaulter Constable was time and again directed to appear before him but he turned deaf ear and did not bother for the completion of enquiry process. Therefore, the allegations leveled against him have been proved and he is recommended for ward of major punishment.

Keeping in view the above circumstances, facts on the file and his long service more than 19 years, poor financial position, he is awarded a major punishment of Compulsory Retirement from service with immediate effect. The period of absence is treated as earned leave. His pay has been released.

Order Announced
Dated: 05.11.2014

OB No.898
Dated 16/11/2014

Sd/-
District Police Officer, Karak

OFFICE OF THE DISTRICT POLICE OFFICER, KARAK

No. _____/EC/

Copy to SRC, OHC and PO for necessary action.

Pensioner Data Verification Sheet

(9)

Date: 24.11.2014
 Status: FRESH
 Number: 00300602-01

Register No:
 Name: ABDULLAH SHAH
 Husband name: AMAL BADSHAH
 Position: CONSTABLE
 ID: 1420213571613
 Scale: 05
 Department: Home & Tribal Affairs
 Type: SELF
 Retirement Type: COMPULSARY RETIREMENT
 Birth: 12.07.1976
 Appointment: 11.12.1994
 Retirement: 06.11.2014
 Death:
 Commence: 06.11.2014
 Restoration: 06.11.2014
 Office ID: KK
 Office Name: Karak
 Province: NWFP

Qualifying Service: 19 years, 7 months, 14 days
 Order Number:
 Date of sanction of pension/ Letter No.: DPO KARAK
 No. DT 06.11.2014
 Date of the other Audit and Accounts officer authorising
 Pension/Gratuity/Commutation
 Present Address: DABB SHEHAN, P/O DABB, BIGOKHEL
 KARAK

Note:
 Age: 38 years
 Last Drawn pay/Emoluments (Rs.): 10609.00
 Gross Pension (Rs.): 3946.67
 1/4th Surrendered Portion (Rs.):
 Commuted Portion (Rs.): 1731.33
 Net Pension (Rs.): 3215.34
 Net Family Pension (Rs.): 0.00
 Amount of Computation (Rs.): 542271.00
 With Held Amount (Rs.): 0.00
 Life Time Arrears (Rs.): 0.00
 Arrears Of Pension (Rs.): 0.00
 Special Additional Pension (Rs.): 0.00
 Commutation Percentage: 3.10
 Commutation Table value: 3.10
 Recovery on A/C of
 Debitable to Govt: NWFP
 Total Net Share
 Federal: 0.00 Punjab: 0.00
 Sindh: 0.00 NWFP: 0.00
 Balochistan: 0.00 Military: 0.00
 AJK: 0.00 Autonomous: 0.00

Payment Mode:
 Bank Branch:
 Bank Account Number:
 Employee Station: District Police Officer (DISTT KARAK)

He is also entitled to the following increases

Period	Increase % or amount	Increase Amount	W.E.F.
JUL.2010	15.00 %	482.30	06.11.2014
JUL.2011	15.00 %	554.65	06.11.2014
JUL.2012	20.00 %	850.46	06.11.2014
JUL.2013	15.00 %	765.41	06.11.2014
JUL.2014	10.00 %	586.82	06.11.2014
JUL.2010	25.00 % Medical	924.41	06.11.2014

1032010
 27/11/2014
 [Signature]

A sum of Rs. 542271.00 (Rupees FIVE HUNDRED FORTY-TWO THOUSAND TWO HUNDRED SEVENTY-DOLLAR) on account of commuted value of pension is also payable.

The Payment value is debitible to the head.

Major Object A04 Transfer Payments,
 Minor Object A041 Superannuation Allowance and Pens
 Detailed Object A04101 Pension
 A04102 Commuted value Pension.
 A04103 Gratuity Civil
 A04104 Other Pension
 A04105 Gratuity Pension (Where Pension is mature)
 A04170 Others

[Signature] District Accounts Officer Karak

(Signature).....
 (Designation).....

To The TREASURY OFFICER

Pensioner Data Verification Sheet

Date of issue: 24.11.2014
 :FRESH
 Number :00300602-01
 No:
 Pension Register No:
 Pensioner's Name: **ABDULLAH SHAH**
 Father/Husband name: **AMAL BADSHAH**
 Designation: CONSTABLE
 CNIC: 1420213871613
 Grade/Scale: 05
 Department. Min: Home & Tribal Affairs
 Pensioner's Type: **SELF**
 Pension Type: **COMPULSORY RETIREMENT**
 Date of Birth: 12.07.1976
 Date of appointment: 11.12.1994
 Date of retirement: 06.11.2014
 Date of Death:
 Date of commence: 06.11.2014
 Date of Restoration: 06.12.2040
 Accounts office ID: KK
 Accounts office Name: Karak
 Federal / Province: NWFP
 Length of Qualifying Service: 19 years, 7 months, 14 days
 PPO Number:
 No. and Date of sanction of pension / Letter No: DPO Karak
 O 898, DT 06.11.2014
 and date of the other Audit and Accounts officer authorising
 the Pension/Gratuity/Commutation
 Permanent Address: DABB SHEHAN, P/O DABB, BIGOKHEL
 KARAK

Note:
 Age: 38 years
 Last Drawn pay/Emoluments (Rs.) : 10600.00
 Gross Pension(Rs.) : 4946.67
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 Net Pension (Rs.) : 3215.34
 Net Family Pension (Rs.) : 0.00
 Amount of Commutation (Rs.) : 542271.00
 With Held Amount (Rs.) : 0.00
 Life Time Arrears (Rs.) : 0.00
 Arrears Of Pension (Rs.) : 0.00
 Special Additional Pension (Rs.) : 0.00
 Commutation Percentage
 Commutation Table value
 Recovery of A/C of
 Debitable to Govt. : NWFP
 Total Net Share
 Federal: 0.00 Punjab: 0.00
 Sindh: 0.00 NWFP: 0.00
 Balochistan: 0.00 Military: 0.00
 AJK: 0.00 Autonomous: 0.00
 Payment Mode:
 Bank Branch:
 Bank Account Number:
 Employee Station: District Police Officer (DISTRICT KARAK)

is also entitled to the following increases

Sr. No.	Period	Increase % or amount	Increase Amount	W.E.F.
1	JUL.2010	15.00%	452.30	06.11.2014
2	JUL.2011	15.00%	554.65	06.11.2014
3	JUL.2012	20.00%	850.46	06.11.2014
4	JUL.2013	15.00%	765.41	06.11.2014
5	JUL.2014	10.00%	586.82	06.11.2014
6	JUL.2010	25.00% Medical	924.41	06.11.2014
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27				

A sum of Rs. 542271.00 (RUPEES FIVE HUNDRED FORTY-TWO THOUSAND TWO HUNDRED SEVENTY-ON) on account of commuted value of pension is also payable.

The payment value is debitable to the head.

Major Object A04 Transfer Payments.
 Minor Object A041 Superannuation Allowance and Pens
 Detailed Object A04101 Pension
 A04102 Commuted value Pension
 A04103 Gratuity Civil
 A04104 Other Pension
 A04105 Gratuity Pension (Where Pension is mature)
 A04170 Others

(Signature).....

(Designation).....

To
 The TREASURY OFFICER

حضرت صاحب انجمن اعلیٰ پولیس ڈیپارٹمنٹ خواہ بشاد

مسلک، جس وقت استقامت طامی حلاوت برطرف جبری ایشیا ٹرسٹ
نام: کنیشن عبداللہ شاہ سابق عمر 552 ڈسٹرکٹ پولیس ڈسٹرکٹ کرک

ہائیلی:

حسن سائل ذیل پر عرض کریں

1۔ کہ سائل ڈسٹرکٹ پولیس کرک میں حذر علی بالا عمر کے قتل کنیشن کی نسبت سے

خبر اصرار سرانجام دیا گیا تھا۔ سائل نے اپنی ڈیوٹی ایشیا اعلیٰ اندازی خرضن سے
سے سرانجام دیا ہے اور کبھی بھی انہیں بالا کو شکایت کا موقع نہیں دیا ہے

2۔ کہ بدوران حلاوت سائل کا والد ایشیا میں ہوا علاج پر سائل نے گھر کی
جم رکھی غریب کی جس سے گھر میں خاتمے ہونے لگے۔ کیونکہ میں یہی پوری خیمہ کی
کفالت کر رہا تھا۔ والد کے وفات پر میری حلاوت اور خاتون سے دل اچھا ہو گیا
اور حلاوت سے علیہا ہنر رہا۔ مگر نہ کہ جسے ایشیا میں مدد لیا تھا۔

3۔ غیر جانوری پرہیزگاری کے واسطے انکو آٹری حشر کی جس نے سفارشات لکھ کر مجھے پوری
حلاوت سے برخواست کیا۔ اور حضور کی لیشن دہری۔

4۔ کہ سائل اس وقت تک رہتا ہے۔ سائل اگر ایسے بیمار و افغان کے علاج کا سائل
ایشیا اعلیٰ اندازی کے ساتھ سرانجام دیا گیا تھا۔ بدوران ڈیوٹی کبھی بھی
ایسے افغان بالا کو شکایت کا موقع نہیں دیا تھا۔

5۔ کہ سائل کی کوشش کی وہی فوجی ہے کہ جسے وہاں حکم پولیس میں
جیل لگاؤں۔ تاکہ جہت زدہ خاندان کو خاتمہ کشتی سے بچاؤں۔

6۔ کہ وہ 14 سال 19 سال 7 ماہ 14 دن تک رہا۔ کبھی بھی جسے انکو آٹری
کا سامنا نہیں کرنا پڑا۔ اب میرے بچے پوری اور حسن سائل ایک خانگیہ پر
موجود ہیں۔

سائل۔ نمبر درج ذیل حلقہ میں ہے کہ ملذرت پر حال کر کے ایک حصہ زردہ فادر
کوشاقت کشی سے بچائیں۔ سائل۔ فنا کی احتمال ملدی لکھ کر نام زینت دعا
رہی ہے۔ ساری عمر ملدی اور بھی ماہ صابہ جو طرف کو اور ماہ صابہ جو طرف کے
وہاں کو دعا گوں رہو لکھا۔

السائل جوہر 17/2022

السائل جامع عرفان کنسٹبل عبدالرشید شاہ 352 ڈسٹرکٹ پولیس کمر سکنڈ ڈویژن ڈالہ

ڈیو سیکرٹری جنرل تحصیل و ضلع کوٹک - فون: 0313-9903515-99
0346-9994760

No. 1199

For Insurance Notices see reverse.
Stamps affixed except in case of
uninsured letters of not more than
the initial weight prescribed in the
Post Office Guide or on which no
acknowledgment is due.

Rs. Ps.

Received a registered*
addressed to _____

Date-Stamp

Initials of Receiving Officer _____
*Write "or", "postcard", "packet" or "parcel"
with the "red" before it when necessary.

Insured for Rs. (in figures) 100

If insured.

Insurance fee Rs. _____ Ps. _____ (in words)	Weight _____	Kilo _____
Name and address of sender _____		Grams _____

RGL21702661

18/11

وکالت نامہ

سر میں سر محمد رسول شاہ

بعدالت

ممبر الہ شاہ نام محمد عیوب شاہ

علت: مورخہ تھانہ

جرم: منجانب

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے واسطے پیروی و جوابدہی بہ مقام
کلیے

شہادہ نسیم خان چکنی ایڈووکیٹ ہائی کورٹ پشاور کو بدیں شرط وکیل مقرر کیا ہے میں ہر پیشی پر
خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوتا رہوں گا اور بروقت پکارے جانے مقدمہ جانے مقدمہ وکیل
صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا، اگر پیشی پر من مظهر حاضر نہ ہوا اور مقدمہ میری غیر
حاضری کی وجہ سے کسی طور پر میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہونگے، نیز
وکیل صاحب موصوف صدر مقام کچہری سے کسی اور جگہ یا کچہری کے مقررہ اوقات سے پہلے پانچپے یا بروز
تعطیل پیروی کرنے کے ذمہ دار نہ ہونگے، اگر مقدمہ علاوہ صدر کچہری کے کسی اور جگہ سماعت ہوتے یا بروز
تعطیل یا کچہری کے اوقات کے آگے پچھپے پیش ہونے پر من مظهر کو کوئی نقصان پہنچے تو اس کی ذمہ دار یا اس کے
واسطے کسی معاوضہ کے ادا کرنے یا مختار نامہ واپس کرنے کے بھی صاحب موصوف ذمہ دار ہونگے، مجھ کو کل
ساختہ پرداختہ صاحب موصوف مثل کردہ ذات خود منظور قبول ہوگا اور صاحب موصوف کو عرضی دعویٰ و جواب
دعویٰ اور درخواست اجراءے ڈگری و نظر ثانی اپیل و گرانٹی ہر قسم کی درخواست پر دستخط و تصدیق کرنے کا بھی
اختیار ہوگا اور کسی حکم یا ڈگری کے اجراء کرنے اور ہر قسم کا روپیہ وصول کرنے اور رسید دینے اور داخل کرنے
اور ہر قسم کے بیان دینے اور سپرد ثالثی و رضائی نامہ کو فیصلہ پر خلاف کرنے، اقبال دعویٰ دینے کا بھی اختیار ہوگا
اور بصورت اپیل برآمدگی مقدمہ یا منسوخ ڈگری یکطرفہ درخواست حکم اتنہائی یا قرتی یا گرفتاری قبل از اجراء
ڈگری بھی موصوف کو بشرط ادا ہوگی علیحدہ مختار نامہ پیروی کا اختیار ہوگا اور بصورت ضرورت صاحب موصوف کو
بھی اختیار ہوگا، یا مقدمہ مذکورہ یا اس کے کسی جزو کی کارروائی کے واسطے یا بصورت اپیل، اپیل کے واسطے کسی
دوسرے وکیل یا پیر مشر کو بجائے اپنے یا اپنے ہمراہ مقرر کریں اور ایسے مشیر قانون کو ہر امر میں وہی اور ویسے ہی
اختیارات حاصل ہونگے جیسے کہ صاحب موصوف کو حاصل ہیں اور دوران مقدمہ میں جو کچھ ہر جانہ التواء
پڑے گا وہ صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی پیروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ
بھی صاحب موصوف کے برخلاف نہیں ہوگا، لہذا یہ مختار نامہ لکھ دیا تاکہ سند ہے۔

مورخہ 12/3/23 مضمون مختار نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

العبد

شہادہ نسیم خان چکنی ایڈووکیٹ ہائی کورٹ پشاور

آفس: دفتر نمبر TF49-50، ٹھکانہ ڈیزیز ٹریڈسٹر پشاور صدر

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Shahid

12/3/23

Shahid