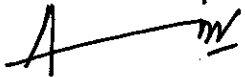


# FORM OF ORDER SHEET

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

**Appeal No.** 1072/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	11/05/2023	<p>The appeal of Mr. Raja Sadqat Khan presented today by Mr. Muhammad Ishaq Batagrami Advocate. It is fixed for preliminary hearing before touring Single Bench at A.Abad on _____</p> <p>By the order of Chairman  For REGISTRAR</p>

**BEFORE THE HONOURABLE KHYBER-  
PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR**

Appeal No. 1072/2023

Raja Sadaqat ex-constable No.4536 FRP Platoon No.101  
Hazara Range, Abbottabad resident of Pharahari, Tehsil &  
District Haripur

.....(Appellant)

Versus

- 1) The Commandant Frontier Reserve Police KPK,  
Peshawar.
- 2) Superintendent of Police FRP, Hazara Range,  
Abbottabad.
- 3) IGP KPK, Peshawar.
- 4) KPK Provincial Government through Secretary Home  
and Tribal areas, Civil Secretariat Peshawar.
- 5) Accountant/SRC/RI FRP, Hazara Range, Abbottabad  
.....(Respondents)

**Service Appeal**

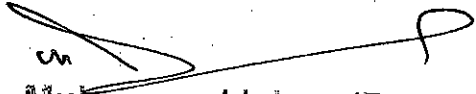
**INDEX**

S.NO.	Description of Documents	Annexures	Pages
1.	Service Appeal alongwith Affidavit, Certificate, Addresses of the parties.		1 To 9
2.	Departmental Appellate Order dated 11.04.2023, Appeal, Order of SP FRP, Abbottabad dated 26.01.2023	"A-C"	10 To 12
3.	Vakalatnama		13

Appellant

Through

HARIPUR  
// -05-2023

  
**Muhammad Ishaq (Batagrami)**  
Advocate High Court  
Haripur

1

**BEFORE THE HONOURABLE KHYBER-  
PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR**

Appeal No. 1072/2023

Raja Sadaqat Khan ex-constable No.4536 FRP Platoon  
No.10/Hazara Range, Abbottabad resident of Pharahari,  
Tehsil & District Haripur

.....(Appellant)

Versus

- 1) The Commandant Frontier Reserve Police KPK,  
Peshawar.
- 2) Superintendent of Police FRP, Hazara Range,  
Abbottabad.
- 3) IGP KPK, Peshawar.
- 4) KPK Provincial Government through Secretary Home  
and Tribal areas, Civil Secretariat Peshawar.
- 5) Accountant/SRC/RI FRP, Hazara Range, Abbottabad  
.....(Respondents)

**SERVICE APPEAL U/S 4 OF KPK SERVICE TRIBUNAL ACT,  
1974 AGAINST THE ORDER NO.3513/SI LEGAL DATED  
PESHAWAR 11-04-2023 AGAINST THE RESPONDENT No.1  
WHEREBY HE HAS MAINTAINED/REJECTED THE APPEAL  
OF THE APPELLANT AGAINST THE ORDER NO.147-  
50/OASI/FRP DATED 26.01.2023 OF THE RESPONDENT  
NO.2 VIDE WHICH HE HAS IMPOSED MAJOR  
PUNISHMENT/REMOVAL FROM SERVICE DUE TO THE  
ABSENCE OF THE APPELLANT.**

**PRAYER:**

On acceptance of the instant appeal, both the impugned orders dated 11.04.2023 & 26.01.2023 of the respondents no.1 & 2 mentioned above may graciously be set aside and the appellant be reinstated in his service from the date of dismissal with the consequential/back benefits services.

Respectfully Submitted:

Facts of the instant appeal are as under:

- 1) That the Appellant was appointed in the FRP/ESTABLISHMENT of the respondents in the year 2009 and performed his duty round about 13/14 years with zeal and zest, devotion, dedication and with honesty to the entire satisfaction of the respondents/officer and never provided a chance of reprimand/complaint so, appellant has marvellous service record at his credit before ailment.
- 2) That on 09.10.2022 abruptly and suddenly a severe backache raised due to which the appellant still now cannot walk move and lied in bed and also remained admitted in Hospital and having medicine regularly and the concerned doctor/surgeon advised that the neck/backbone have been dislocated and defective due to which the appellant is very perturb/worried on one side for his health and other side for his Government service.

3) That the appellant due to the above reasons could not attend his services duty on 09.10.2022 and on so many dates mentioned in the orders due to the severe pain and compulsion of illness.

4) That the appellant was remained admitted in the hospital due to the said severe illness so no show cause notice and other allegation of charge received or provided by the respondents to the appellant, so no reply was given and the respondent No.1 & 2 issued the ex parte order against the appellant and were un-heard when the respondent NO.2 dismissed the services of the appellant he has submitted the appeal to the respondent No.1 but he has rejected the said appeal on 11.04.2023. The dismissal/removal order and appeal and the decision of the appellate Authority are annexed as annexure-A to C, so the same is challenging through the instant service appeal on the interalia on the following grounds:

- a. That the appellant having 13/14 years government service in his credit and the respondent un-heard so their orders are against law, not sustainable and maintainable so the same is liable to be set aside.
- b. That the appellant is severe pain backbone/backaches and cannot move and is

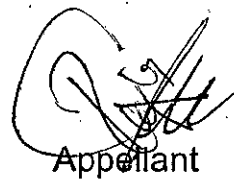
admitted in hospital/bed ridden and due to severe pain now having tension of his health and also government services and also faced financial hardship as the medicines of the country is very expensive and also cannot bears the same due to current inflation/price hiking.

- c. That when the appellant was healthy and strong he has rendered his best services to government/public at large and to the respondents and when seriously fall ill, the respondent neglected the appellant due to his compulsion/illness and have feel no pity/compassion towards the appellant which is against the law and humanity, so their *removal* order and maintaining the same order is illegal, without justification and not a fair order under Article 6 of the Constitution of Islamic Republic of Pakistan, 1973 which amended up to date, which order of the respondents is unjust, unfair, arbitrary and not sustainable as the same is against the ends of justice and also against the fundamental rights.
- d. That the appellant is totally innocent and due to his severe illness could not appear and the said dates of his duty which is a compulsion. While the appellant

informed regarding his severe illness to the respondent.

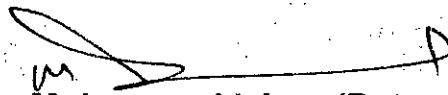
- e. That the respondent ought to help the appellant due to his severe illness and compulsion and should not pass/issue the ~~order~~ <sup>Removal</sup> order of the appellant shall give chance to take/use the medicine and to recover the appellant but the respondents without justification issued the ~~order~~ <sup>removal</sup> order mentioned above so the order of the respondents are liable to be set aside and the appellant is required to be reinstated in service with all back benefits.
- f. That the appellant should be provided a chance of recovery of his health then give him a chance so that he will prove himself as innocent by explaining all the facts and circumstances of the matter. So, the order of the respondents No.1 & 2 are against the Police Act & Police Rules and also Police Disciplinary Rule, 1975 which are amended in 2014.
- g. That other arguments and facts will be agitated with the permission of this honorable Court at the time of hearing of the case. So, the order No.3513/SI Legal dated Peshawar dated 11.04.2023 of the respondents No.1 & order No.147-50/OASI/FRP

In view of the above mentioned facts and grounds, it is prayed/requested that ~~the~~ the order No.3513/SI Legal dated Peshawar dated 11.04.2023 of the respondents No.1 & order No.147-50/OASI/FRP dated 26.01.2023 of the respondents No.2 may graciously be set aside and the appeal of the appellant may graciously be allowed and the appellant's government service be restored/reinstated with all consequential/back benefits.

  
Appellant



Through



**Muhammad Ishaq (Batgrami)**  
Advocate High Court  
Haripur

Phone No. 0305-8742022 & 0301-8124546  
Gmail Address: [m.ishaqadv5310@gmail.com](mailto:m.ishaqadv5310@gmail.com)

**VERIFICATION:**

It is verified that the contents of the instant service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Tribunal.

  
Appellant





**BEFORE THE HONOURABLE KHYBER-  
PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR**

Appeal No. \_\_\_\_/2023

*lehan*

Raja Sadaqat ex-constable No.4536 FRP Platoon No.101  
Hazara Range, Abbottabad resident of Pharahari, Tehsil &  
District Haripur

.....(Appellant)

Versus

- 1) The Commandant Frontier Reserve Police KPK, Peshawar.
  - 2) Superintendent of Police FRP, Hazara Range, Abbottabad.
  - 3) IGP KPK, Peshawar.
  - 4) KPK Provincial Government through Secretary Home and Tribal areas, Civil Secretariat Peshawar.
  - 5) Accountant/SRC/RI FRP, Hazara Range, Abbottabad
- (Respondents)

**Service Appeal**

**AFFIDAVIT**

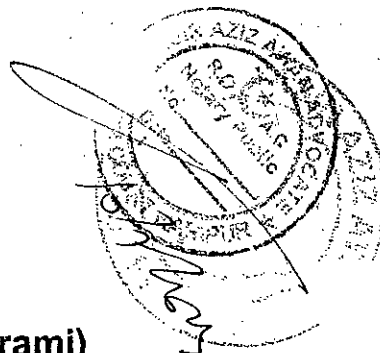
I, Raja Sadaqat s/o Raja <sup>lehan</sup> <sup>sal</sup>abat Khan r/o Pharahari, Tehsil & District Haripur (Ex-constable No.4536 FRP Platoon No.101 Hazara Range, Abbottabad) do hereby declare and affirm on oath that the contents of the instant Service Appeal are true and correct to the best of my knowledge and belief and nothing has been suppressed or concealed from this Honorable Court.

**Haripur**  
11-05-2023

Deponent: \_\_\_\_\_

Identified by:

*M*  
Muhammad Ishaq (Batagrami)  
Advocate High Court  
Haripur



**BEFORE THE HONOURABLE KHYBER-  
PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR**

Appeal No. \_\_\_\_\_/2023

*Ullan*

Raja Sadaqat, ex-constable No.4536 FRP Platoon No.100  
Hazara Range, Abbottabad resident of Pharahari, Tehsil &  
District Haripur

.....(Appellant)

Versus

- 1) The Commandant Frontier Reserve Police KPK, Peshawar.
  - 2) Superintendent of Police FRP, Hazara Range, Abbottabad.
  - 3) IGP KPK, Peshawar.
  - 4) KPK Provincial Government through Secretary Home and Tribal areas, Civil Secretariat Peshawar.
  - 5) Accountant/SRC/RI FRP, Hazara Range, Abbottabad
- .....(Respondents)

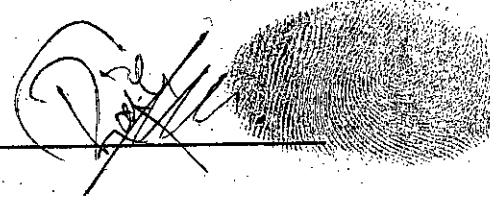
**SERVICE APPEAL**

**CERTIFICATE:**

It is certified that no such service appeal prior to this one on the subject has ever been filed or pending before any court/tribunal.

**Haripur**  
//05-2023

Appellant: \_\_\_\_\_



P-9

**BEFORE THE HONOURABLE KHYBER-  
PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR**

Appeal No. \_\_\_\_/2023

<sup>kenan</sup>  
Raja Sadaqat, ex-constable No.4536 FRP Platoon No.10/  
Hazara Range, Abbottabad resident of Pharahari, Tehsil &  
District Haripur

.....(Appellant)

Versus

- 1) The Commandant Frontier Reserve Police KPK,  
Peshawar.
- 2) Superintendent of Police FRP, Hazara Range,  
Abbottabad.
- 3) IGP KPK, Peshawar.
- 4) KPK Provincial Government through Secretary Home  
and Tribal areas, Civil Secretariat Peshawar.
- 5) Accountant/SRC/RI FRP, Hazara Range, Abbottabad  
.....(Respondents)

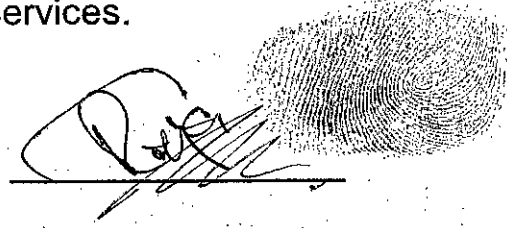
**SERVICE APPEAL**

**Addresses of the parties:**

It is certified that the addresses of the parties given in the heading  
of the appeal are sufficient and correct for their services.

Haripur  
11/05-2023

Appellant: \_\_\_\_\_



**ORDER**

*Annex 'A' P-10*

This order will dispose of the departmental appeal preferred by ex-constable Raja Sadaqat No. 4536 of FRP Hazara Range, against the order of SP FRP Hazara Range, Abbottabad, issued vide Order Endst. No. 147-50/OASI/FRP, dated 26.01.2023 wherein he was awarded major punishment of removal from service. The applicant was proceeded against on the allegations that he was deliberately absented himself from lawful duty with effect from 09.10.2022 to 27.10.2022, 02.11.2022 to 04.11.2022, 05.11.2022 to 05.11.2022, 07.11.2022 to 13.11.2022, 21.11.2022 to 24.11.2022 and 29.11.2022 till the date of his removal from service i.e 26.01.2023 for total period of (88) days without any leave or prior permission of the competent authority.

In this regard, he was served with Show Cause Notice vide No. 1624/SRC/FRP, dated 28.10.2022 but his reply was found unsatisfactory. Proper departmental proceedings were initiated against him as he was issued Charge Sheet alongwith Summary of Allegations vide office Endst. NO. 1870-71/SRC/FRP, dated 14.12.2022 and Inspector Hussan Gul was appointed as Enquiry Officer to conduct proper enquiry against him. After completion of enquiry, the Enquiry Officer submitted his findings report, wherein he was found guilty of the charges leveled against him and recommended for major punishment.

Upon the findings of Enquiry Officer, he was issued Final Show Cause Notice vide No. 51/OASI/FRP, dated 09.01.2023, but he neither replied nor appeared before the competent authority in orderly room.

Keeping in view the above narrated facts and other material available on record, he was awarded major punishment of removal from service vide Order Endst. No. 147-50/OASI/FRP, dated 26.01.2023.

Feeling aggrieved against the impugned order of SP FRP Hazara Range, Abbottabad, the applicant preferred the instant appeal. The applicant was summoned time and again for personal hearing in orderly room, but he failed to turn up by meaning thereby that he is no more interested in the service of Police Department. From perusal of enquiry file it has been found that the allegations leveled against him were fully established by the Enquiry Officer during the course of enquiry. Thus there doesn't seem any infirmity in the order passed by the competent authority, therefore no ground exist to interfere in same.

Based on the findings narrated above, I, **Commandant FRP Khyber Pakhtunkhwa, Peshawar**, being the competent authority, has found no substance in the appeal, therefore, the same is rejected and filed being meritless.

Order Announced

*OC*  
  
**Commandant**

Frontier Reserve Police  
Khyber Pakhtunkhwa, Peshawar.

No. 3513 /SI Legal, dated Peshawar the 11 / 4 /2023.

Copy of above is forwarded for information and further necessary

- action to the -
1. SP FRP Hazara Range, Abbottabad. His service record alongwith D-file sent herewith
  2. Ex-constable Raja Sadaqat No. 4536 S/o Raja Salabat Khan R/o Village, Pharhari, Police Station Saddar, District Haripur

*All stated to be True copy*  
*Adt for Appeal*

Anneve B P-11

بخدمت جناب کمانڈنٹ صاحب فرٹیسر ریزوپولیس خیر پختونخواہ پشاور

عنوان: ایپل ہمداد بحالی سروس بحوالہ آرڈر نمبر OASI/50-147 مورخہ 26-01-2023 مجاریہ

جناب SP صاحب FRP ہزارہ ریج ایبٹ آباد۔

جناب عالی

معروض خدمت ہوں من ساکل 2009 میں بطور کنسٹیبل FRP ہزارہ ایبٹ آباد میں بھرتی ہوا تھا۔ اس طرح ساکل کی 14 سال سروس ہو چکی ہے۔

1- یہ کہ ساکل FRP پلاٹون کے ساتھ ڈسٹرکٹ ہری پور میں فرائض سرانجام دے رہا تھا۔ دوران تعیناتی ساکل سے دو یوم تین یوم اور سات یوم کی غیر حاضری ہوتی رہی۔ جبکہ ساکل نے یکمشت بڑی غیر حاضری نہیں کی۔

2- یہ کہ ساکل کے والدین ضعیف العمر ہیں اور والدہ صاحبہ اکثر بیمار رہتی ہے۔ جس کو علاج معالجہ کے لیے ہسپتال لے جانا ضروری تھا۔ اتفاقاً رخصت نہ ملنے کی وجہ سے چھوٹی موٹی غیر حاضری ہوتی رہی۔ جو کہ اتنی بڑی تعداد میں غیر حاضری نہ تھی۔

3- یہ کہ غیر حاضری کے سلسلہ میں ساکل کو ابھی تک کوئی چارج شیٹ یہ شوکاژ نوٹس موصول نہیں ہوا۔ اور نہ ہی انکو آفیسر نے مجھ کو طلب کیا۔ جبکہ ڈسچارج آرڈرز میں بے بنیاد الزام لگا کر چارج شیٹ بھی جاری کرنے اور شوکاژ جاری کرنے کا تحریر کیا گیا۔

4- یہ کہ جناب SP صاحب ہزارہ ریج FRP ایبٹ آباد کے دفتر میں لائن آفیسر اور RI صاحب نے دو، تین یوم اور سات یوم غیر حاضری اکٹھی کر کے غیر حاضر یوں کی تعداد زیادہ بنا کر سروس سے ڈسچارج کرنے کا حکم صادر فرمایا۔

5- یہ کہ ساکل کی غیر حاضری کی تاریخیں بمطابق ڈسچارج آرڈر نمبری FRP/OASI/50-147 مورخہ 26-01-2023 کل 37 یوم بنتی ہیں۔ جبکہ آرڈرز میں 88 یوم تحریر کیا گیا ہے۔ جو کہ بدینتی پر مبنی ہے۔ جو کہ قابل ملاحظہ ہے اور ہمراہ لف ہے۔

6- یہ کہ ساکل اپنی والدہ کا علاج عاجز کرانے کے دوران خود بھی شدید نفسیاتی بیماری کا شکار ہو چکا ہے۔ جس کا علاج ساکل نے شروع کیا ہوا ہے۔ اور اب بھی سائٹ ہسپتال میں زیر علاج ہے۔

7- استدعا ہے کہ ساکل کی 14 سالہ سروس کی خدمات کو مد نظر رکھتے ہوئے اور ساکل کی والدہ اور ساکل کی اپنی بیماری کو مد نظر رکھتے ہوئے ساکل کی عرصہ غیر حاضری کو رخصت کلاں میں تصور کرتے ہوئے ساکل کو دوبارہ سروس پر بحال کرنے کا حکم صادر فرمایا جاوے تاکہ ساکل آپکو تاحیات دعا گور ہے۔

ایپل کنندہ کنسٹیبل راجہ صداقت نمبر FRP 4536 ہزارہ ریج ایبٹ آباد

موبائل نمبر 0341-9005880

Raja Sadayat

24/02/2023

~~Applicant~~

Annexure  
(C)  
P-12

Annexure "C"

P-12

KHYBER PAKHTUNKHWA SERVICE

**OFFICE OF THE  
SUPERINTENDENT OF POLICE, FRP,  
HAZARA REGION, ABBOTTABAD.**

Office # 0992-9310016  
Fax# 0992-9310478  
Email: [spfrp@hazara.gov.pk](mailto:spfrp@hazara.gov.pk)

**ORDER**

This order <sup>will</sup> dispose off the Departmental Inquiry initiated against Constable Raja Sadaqat No. 4536 of Platoon No. 101 Haripur on the score of the following grounds.

Brief facts of the case are that Constable Raja Sadaqat No. 4536 deliberately absented self from official duty w.e.f 09-10-2022 to 27-10-2022, 02-11-2022 to 04-11-2022, 11-2022 to 05-11-2022, 07-11-2022 to 13-11-2022, 21-11-2022 to 24-11-2022 and again absented w.e.f from 29-11-2022 till date (Total 88 days) without taking any leave or prior permission of the competent authority.

He was served with Show Cause Notice vide this office No. 1624/SRC/FRP, dated 10-2022 but his reply could not satisfy the undersigned.

In this regard proper departmental inquiry was initiated against him. He was issued charge Sheet/ Statement of allegation vide this office Endst: No. 1870-71/SRC/FRP, dated 12-2022 and Inspector Hussan Gul was nominated as inquiry officer. The inquiry officer on conducting proper departmental inquiry, recommended him for major punishment.

The defaulter Constable was issued Final Show Cause Notice vide this office No. OAS/FRP dated 09-01-2023 but he neither replied nor appeared before the undersigned Orderly Room.

Keeping in view of above from the perusal of his previous record as well as finding of Inquiry Officer, it came crystal clear that the defaulter constable is not taking interest in lawful duties.

Therefore in exercise of powers conferred upon me under the Khyber Pakhtunkhwa Police rules 1975, amended 2014, I Khabbir Muhammad Superintendent of Police FRP, Hazara Region being a competent authority, have decided to impose Major punishment of removal from service upon Constable Raja Sadaqat No. 4536 of this unit with immediate effect. His absence period is hereby treated as without pay.

Order announced.

*[Signature]*

Superintendent of Police, FRP,  
Hazara Region, Abbottabad.

147-59 OAS/FRP, dated Abbottabad the 26-01-2023

- Copy of above is forwarded for favour of information and necessary action to the
1. Commandant, Frontier Reserve Police, Khyber Pakhtunkhwa, Peshawar
  2. SRC/Accountant/RI/FRP Hazara

OB#14  
26-01-2023

ATTESTED  
TO BE TRUE  
CC/FRP

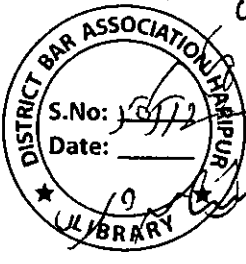
*[Signature]*  
M. Ishaq Batagrami  
Advocate H. Court  
Legal Advisor

DBA No: 165  
 BC No: 1 0 4 7 - 6 2  
 Name of Advocate: محمد اسحاق بٹگرامی

S.No: 50512



# وکالت نامہ



0305 8792022 / 0308129546

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے ملحق بیرونی وجوہ بندی برائے پیشی یا تصفیہ مقدمہ بمقام  
 عدالت عالیہ ہری پور کے لئے  
 نام: محمد اسحاق بٹگرامی  
 نوعیت مقدمہ: کیس  
 باعث تحریر آنگہ: کیس



مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے ملحق بیرونی وجوہ بندی برائے پیشی یا تصفیہ مقدمہ بمقام عدالت عالیہ ہری پور کے لئے  
 کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں ہر چیٹی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوتا رہوں گا اور بروقت  
 پکارے جانے مقدمہ مکمل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا۔ اگر پیشی پر مظہر حاضر نہ ہوا اور مقدمہ میری  
 غیر حاضری کی وجہ سے کسی طور پر میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طور پر ذمہ دار نہ ہوں گے نیز وکیل صاحب  
 موصوف صدر مقام کچہری کے علاوہ کسی جگہ یا کچہری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل بیرونی کرنے کے ذمہ دار نہ  
 ہوں گے اور مقدمہ کچہری کے علاوہ کسی اور جگہ سماعت ہونے پر یا بروز تعطیل یا کچہری کے اوقات کے آگے پیچھے پیش ہونے  
 پر مظہر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا بختانہ کے واپس کرنے کے بھی صاحب  
 موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پر داخستہ صاحب موصوف مثل کردہ زایت منظور و مقبول ہوگا اور صاحب موصوف کو  
 عرض دعویٰ یا جواب دعویٰ اور درخواست اجراءے ڈگری و نظر ثانی اپیل نگرانی و ہر قسم درخواست پر دستخط و تصدیق کرنے کا بھی  
 اختیار ہوگا اور اور کسی حکم یا ڈگری کرانے اور ہر قسم کاروبار وصول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اور  
 اس کے ثالثی و راضی نامہ و فیصلہ بر حلف کرنے اقبال دعویٰ دینے کا بھی اختیار ہوگا اور بصورت جانے بیر و نجات از کچہری صدر  
 اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم امتناعی یا ترقی یا گرفتاری قبل از گرفتاری و اجراءے ڈگری بھی صاحب  
 موصوف کو بشرط ادائیگی علیحدہ محتانہ بیرونی کا اختیار ہوگا۔ اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ  
 مزکور یا اس کے کسی جزوی کاروائی کے یا بصورت اپیل کسی دوسرے وکیل کو اپنے بجائے یا اپنے ہمراہ مقرر کریں اور ایسے وکیل کو  
 بھی ہر امر میں وہی اور وہی اختیار حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ جو کچھ ہر جانہ  
 التوا پڑے گا وہ صاحب موصوف کا حق ہوگا اور وکیل صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب  
 موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی بیرونی نہ کریں اور ایسی صورت میں میرا کوئی مہلکہ کسی قسم کا صاحب موصوف کے  
 برخلاف نہیں ہوگا۔

13/05/2023  
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