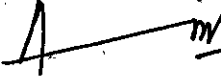


FORM OF ORDER SHEET

Court of _____

Case No. _____

1059/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	09/05/2023	The appeal of Mr. Abdul Majid presented today by Mushtaq Ahmad Khan Alizai Advocate. It is fixed for preliminary hearing before touring Single Bench at Swat on-
		By the order of Chairman  For REGISTRAR

Before the service tribunal khyber pukhtoonkhwa Peshawar .

Service appeal No. 1059.....20123

Abdul Majid s/o Faqir Gul ,Ex warder District Jail Daggar, district Buner, presently village Rega , tehsile Gagra district Buner

Appellant


vs


Superintendent circle H.Q Prison haripur KPK and others.....Respondents

Index

S NO	Description of documents	Annextures	Pages
1	Service appeal		1-3
2	Affidavit		4
3	Adresses of parties		5
4	Appointment order	"A"	6
5	some medical documents and application for leave	B and C	7-21
6	Doctor opinion	D	22
7	applications for joining service	E	23
8	application for providing the impugned order of removal along with post office receipt	F	24-25
9	Impugned order of removal <i>along with better copy</i>	"G"	26-27
10	department appeal there against and rejection order of the departmental appellate authority	H and I	28-30
11	Wakalat nama		31

Dated: 5/05 2023

Appellant 

Through 

Mushtaq Ahmad khan alizai

Advocate, office district court

Buner. cell No 03469014199

Before the service tribunal khyber pukhtoonkhwa Peshawar .

Service appeal No.....1059.....2023

1. Abdul Majid s/o Faqir Gul ,Ex warder District Jail Daggar,district Buner,presently village *Reza*, tehsile *Gafra*, district BunerAppellant

vs

- 1. Superintendent circle H.Q Prison haripur KPK.
- 2. Inspector General Of prison khyber pukhtoonkhwa at Peshawar.
- 3. The Superintendent Jail daggar district Buner.
- 4. Govt of K.P.K through ^{HOME} secretary Khyber pukhtoonkhwa at Peshawar.....respondents

Service Appeal against the impugned appellate order dated 9/3/2022(received on 26/4/2023 through whatsapp No 03219693765) ,whereby the respondent No 1 rejected the appeal of the appellant against the impugned original order dated 19/9/2022 of the respondent no 1 whereby penalty of "Removal from service" was imposed upon the appellant against law and natural justice.

The appellant submits as follows:

- 1. That vide order of appointment dated 5/5/2021 the Appellant was appointed as warder and was posted in District jail buner at daggar and since then he was serving the department with full zeal and zest to the entire satisfaction of his superiors. (Appointment order attached as anx A).
- 2. That at the end of November 2021 the appellant became ill and was in very dismal conditions hence he visited several medical doctors and after detail investigation by them he was diagnosed for psychological disorder/panic attacks and depression and at that stage he was unable to efficiently perform his duties hence he filled an application for leave and was also performing his duties despite the facts that he was not properly able to perform his duties.
- 3. That in at the End of April 2022 his illness became more severe and due to his illness and use of tranquilizers and other such sort of medicine he could not perform his duties so he filled an application for leave.(some medical documents and application for leave attached as anx B and C.)
- 4. That few days before preferring of the departmental appeal the doctor of the appellant opined that he has gained his health and can perform his duties.(opinion of the doctor attached as anx D)
- 5. That after the above opinion of the doctor the appellant went for performing his duties to the district jail buner at daggar but was told by the concerned that he was no more in service hence he demanded his dismissal order,if any, but he was not given any order hence he filled an application for joining his

duties but the same was not purposely taken/received by them hence he sent the afore said application and application for providing the impugned dismissal order through the post office.(applications for joining service and application for providing the impugned order of removal along with post office receipt attached as anx E and F)

6. That pursuance to the above process the appellatant received the impugned removal order which was not according to law hence he preferred a department appeal within few days of receipt of the impugned removal order but the same was rejected by respondent No 2 without consulting the law and rules on the subject and same was communicated to him, on 26.4.2023 through Watsapp No 03219693765 after several demands .(impugned order of removal, department appeal there against and rejection order of the departmental appellate authority are attached as anx G, H and I).
7. That the impugned removal order and rejection of departmental appeal there against are against law and natural justice, hence this appeal on the following grounds inter alia.

Grounds:

- a. That the impugned original removal order dated 19/9/2022 of the respondent No 1 and appellate order of rejection dated 9/3/2023 of the respondent No 2 are illegal, against natural justice and per incuriam coram non iudice hence void.
- b. That the respondent No 1 and 2 has totally ignored the law and rules applicable to the subject matter and have not issued the impugned order in consonance with the law and natural justice.
- c. That no showcause notices, charge sheet and statement of allegation were issued to the appellatant. More over neither any opportunity of personal hearing was given to him nor any inquiry was conducted in the case on which score alone the impugned removal order is illegal and unwarranted under the law.
- d. That the superintendent circle HQ prison Haripur has not fulfilled the legal mandatory requirement as mentioned in KP govt servant efficiency and discipline rules 2011 and have illegally removed the appellatant by violating the rules of natural justice.
- e. That the appellatant has not willfully ignored his duties rather under compiling situation of his illness could not perform his duties which factum was in the Knowledge of the superintendent jail daggar and in that respect applications had also been given for leave along with medical chits but even no fact finding inquiry was conducted to ascertain the serious health issue of the appellatant.
- f. That the action and inactions of the respondents are violative of the Khyber pukhtoonkhwa Govt servant efficiency and discipline rules 2011 read with amended rules 2021 and constitution of Islamic republic of Pakistan.
- g. That rule 3 and 9 of the Khyber pukhtoonkhwa Govt servant efficiency and discipline rules 2011, amendment rules 2021 has wrongly been applied to the case of the appellatant hence not tenable in the eye of law.


- h. That the appellant has preferred department appeal within statutory provided time after receipt of the impugned order of removal dated 19/9/2022 but the appellate authority has wrongly and illegally held the same as time barred. The impugned order had not been communicated to the appellant through any means and as soon as he received the same after application for joining the service etc, he preferred department appeal within few days.
- i. That a hasty and arbitrary proceedings were initiated and conducted against the appellant which is a classic example of the Maxim "justice hurried is a justice buried".
- j. That the appellant seeks the permission of this worthy tribunal to relay on additional grounds at the time of arguments.


Prayer:

It is therefore kindly prayed that, on acceptance of this appeal the impugned order dated 19/9/2022 of the respondent No 1 and appellate order dated 9/3/23 of the respondent no 2 may kindly be set aside and the appellant may kindly be re-instated in service with all back benefits.

Any other relief not specifically prayed for and which this worthy tribunal deem fit and appropriate in the facts and circumstances of the instant case may also kindly be granted for the end of justice.

Dated: 5/5/2023


Appellant

Through 

Mushtaq Ahmad khan alizai
Advocate, office district court
Buner. cell. No 03469014199.

4

Before the service tribunal khyber pukhtoonkhwa Peshawar .

Service appeal No.....2023

Abdul Majid s/o Faqir Gul ,Ex warder District Jail Daggar,district Buner,presently
village *Reza* , tehsile *Gazra* district Buner

.....Appellant

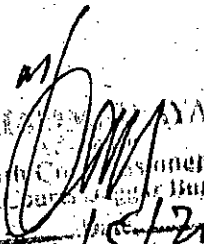
VS

Superintendent circle H.Q Prison haripur KPK and others.....Respondents

AFFIDIVET

I Abdul Majid Appellant, do hereby solemnly affirm and declare on oath that the contents of the instant service appeal is correct to the best of my knowledge and belief & nothing has been concealed from this worthy tribunal.


Deponent


ABDUL MAJID
Oath Commissioner
Dist: *Buner* District Buner
No. *03/5/2023*

3

Before the service tribunal khyber pukhtoonkhwa Peshawar

Service appeal No.....2023

Abdul Majid s/o Faqir Gul ,Ex warder, District Jail Daggar, district Buner, presently village Reza , tehsile Cragra : district Buner

.....Appellant

vs

Superintendent circle H.Q Prison haripur KPK and others.....Respondents

Addresses of parties

PETITIONER

Abdul Majid s/o Faqir Gul ,Ex warder District Jail Daggar, district Buner, presently village Krapa , tehsile Daggar district Buner.

RESPONDANTS

1. Superintendent circle H.Q Prison haripur KPK.
2. Inspector General Of prison khyber pukhtoonkhwa at Peshawar.
3. The Superintendent Jail daggar district Buner.
4. Govt of K.P.K through secretary Khyber pukhtoonkhwa at Peshawar

Appellant

Through

Mushtaq Ahmad khan alizai
Advocate, office district court
Buner. cell No 03469014199.



Ana A (D)

OFFICE OF THE SUPERINTENDENT
CIRCLE (EASTERN) HQs PRISON HARIPUR
No. 97-1-1 Dated 05-05-2021
Phone/Fax: 0995-920066

OFFER OF APPOINTMENT:

Upon recommendation of the Departmental Selection Committee, following candidates are hereby appointed against the post of **Warder (BPS-07)** in the Khyber Pakhtunkhwa Prisons Department in **Basic Pay Scale (07)/Rs. (10990-610-29290)** plus other usual admissible allowances on the following terms and conditions:-

S.No	Name	Father Name	District of Domicile	Place of Posting
56.	ZAHID SHAH	MEHBOOB SHAH	Buner	District Jail Buner at Daggar
57.	ZAHID SHAH	SAID HAKIM SHAH	Buner	District Jail Buner at Daggar
58.	MUSHTAQ ALI	RANI ZAI	Buner	District Jail Buner at Daggar
59.	ABDUL WALI KHAN	SHER AFZAL KHAN	Buner	District Jail Buner at Daggar
60.	BAKHT BELAND KHAN	MUHAMMAD QADAR	Buner	District Jail Buner at Daggar
61.	YOUNAS ALI	KHAN SAID	Buner	District Jail Buner at Daggar
62.	MUSHARAF KHAN	IBRAHIM SHAH	Buner	District Jail Buner at Daggar
63.	MUNTAZIR SHAH	DAWOOD SHAH	Buner	District Jail Buner at Daggar
64.	MUHAMMAD SAEED	HABIB ULLAH KOKA	Buner	District Jail Buner at Daggar
65.	ABDUL MAJID	FAQIR GUL	Buner	District Jail Buner at Daggar

1. Their appointment will take effect from the date of joining duty at their place of posting.
2. Their appointment is purely temporary and their services are liable to be terminated at any time on 15 days' notice without assigning any reasons.
3. No TA/DA will be admissible to him for joining first appointment.
4. In case they wish to resign at any time they will give one month notice OR in lieu thereof one month's pay will be forfeited from him subject to the discretion of the Competent Authority in public interest and will leave the service after acceptance of Their resignation.
5. Their appointment is subject to medical fitness for Government Service.
6. They will be eligible for continuance on the post if their work and conduct remained satisfactory during the period of their temporary appointment provided the vacancy against which they has been appointed continues.
7. They will be on probation for a period of one year extendable upto another year. During probation period their services will be terminated if their work and conduct is not found satisfactory OR the vacancy ceases to exist.
8. They will be liable to serve anywhere in the Prisons Department Khyber Pakhtunkhwa.
9. For all other purposes such as Pay, T.A and Medical Attendance etc; they will be governed by such rules as may be issued by the Government for the category of Government Servants of the Prison Department to which they will belong.
10. They will be governed by the Khyber Pakhtunkhwa Government Servants (Conduct) Rules 1987, the Khyber Pakhtunkhwa Civil Servants (Appeal) Rules 1986, the Khyber Pakhtunkhwa Civil Servants Act 1973, the Civil Servants (Appointment, Promotion and Transfer) Rules 1989, the Khyber Pakhtunkhwa (E&D) Rules, 2011 the Khyber Pakhtunkhwa Prison Department Service Rules and all other rules/regulations framed or to be framed by the Government from time to time.
11. Their services are liable to termination/reversion at any stage if Their Academic Certificates/Degrees (if any), CNIC, Domicile etc; are found fake, their services will be considered as terminated automatically and FIR will be lodged against him.
12. Their salary will be released after making proper verification of their antecedents/character roll, Domicile, and Academic Qualification Certificates/Degrees etc; from the quarter concerned by the Jail on Their first posting. Moreover, if any verification charges are involved on their accounts, the same will be paid by the appointee.
13. If they accept the appointment on the above cited terms and conditions, they should report to **Superintendent District Jail Buner at Daggar** within 30 (Thirty) days of the receipt of their offer of appointment at their own expense. In case they fail to join duty within the same period, the offer of appointment will be treated as cancelled/withdrawn.

SUPERINTENDENT
CIRCLE HQ, PRISON HARIPUR

Endorsement No. 97-1-1

Copy of the above is forwarded to:-

1. The Inspector General of Prisons Khyber Pakhtunkhwa Peshawar for information please.
2. The SO(P & R) / Member Home & TAs Department Khyber Pakhtunkhwa Peshawar.
3. The Superintendent District Jail Buner at Daggar for information. On arrival of the above named officials an undertaking should be taken on judicial stamp paper from them to the effect that they have accepted all the terms and conditions contained in the offer of their appointment and submitted to this office for record. **The condition No. 12 may be fulfilled before releasing their salary within shortest possible time.**
4. The District Accounts Officer Buner for information & further necessary action please.
5. Appointees concerned.

SUPERINTENDENT
CIRCLE HQ, PRISON HARIPUR

M
ATTESTED

Dr. Sardar Alam

MBBS, RMP
Psychiatrist
FCPS -II Psychiatry
Pims Islamabad



{ ماہر امراض ذہنی و نفسیاتی سروردر مرکی، نقیات
ڈپریشن و نفسی امراض مخصوصہ معدہ و کیس }

ڈاکٹر سردار عالم

نیوروسائیکیاٹرٹ
ایم بی بی ایس، آر ایم پی
(ایف سی بی ایس) سائیکیاٹرٹ

Name Abdul Mujid داکا Age 28 Sex ♂ Date 31/11/21

Clinical Record *Rec*

*all
Headache
Anxiety
Depression
Suicidal thoughts
1207/21*

*Top
12/1
Medication
12/1
Risperidone
3/21
Medication
12/1
Top
12/1
Apprehensive
Medication
12/1
Top
12/1
Medication
12/1*

Pressure 15

03439705960
03359661687
03449879080

ATTESTED
(Signature)

مشاورہ: 1207/21

کلینیکل سائیکالوجسٹ

Psychiatrist

Dr. Zahid Nazar

MBBS, FCPS, (Psychiatry)
PMDC Reg # 4888-N

Professor

Department of Psychiatry,
MTI / Lady Reading Hospital
Peshawar.

Abdul Majid
29/12
Bunavir

6.5/10
Hearers

Aripin Clous

1/2
Shemant

Clan / Depinge

1/2

اسما

ATTESTED

(Signature)

دوبارہ معائنہ

ڈاکٹر سے مشورہ بذریعہ سٹیک (SMS) دیا

Mob: 0300-5870334

4:00 بجے 8:00 بجے شام

اسٹریٹ میڈیکل سنٹر بالقابل سیکینہ مسجد نزد امام ہسپتال ڈگری گارڈن پشاور

نمبر کی معلومات کیلئے
صبح 8 سے دوپہر 1 بجے رابطہ کریں
رضوان

0313-5522767

NOT VALID FOR
MEDICO-LEGAL / COURT
PURPOSES

9 Dec 2021

(A)

S. Zulekha

1-1-1
1-1-1

OSP/MUC

1-1-1

LCY/MUC

1-1-1

Epiral S. Zulekha

1-1-1

S. Zulekha

S. Khan

1-1-1

(Signature)

سائیکاٹرسٹ
ڈاکٹر زاہد نذر

ایم بی بی ایس، ایف سی پی ایس، (سائیک)

پروفیسر لیڈی ریڈنگ ہسپتال
ماہر امراض دماغی - اعصاب - سردرد - ڈپریشن
مرگ - نفسیات و جنسی امراض

B.P: 100/60



Aman Hospital

Radiology Department

Open MRI & C.T Scan

Aman Hospital, Dabgari Garden, Peshawar.

Asst Prof

Dr Hussain

MBBS, FCPS

CONSULTANT RADIOLOGIST

Peshawar Diagnostic & Research Center

Email: Peshawardiagnosticcenter@gmail.com

Name	Abdul majid	Age/Gender	Y / M
Report Date	03 Nov 2021	Ref. By	

CT SCAN BRAIN

TECHNIQUE: Imaging was performed with appropriately angled contiguous axial tomographic slices, Multiplanar sagittal and coronal reformation was also carried out.

HISTORY:

Findings:

The brain parenchyma appears normal.

The ventricles, basal cisterns and cerebral sulci are unremarkable.

There is no evidence of hemorrhage or acute stroke.

The visualized bones appear unremarkable.

The visualized paranasal sinuses and mastoids appear normal.

Physiological calcifications are noted in pineal gland and choroid plexus

IMPRESSION:

Unremarkable CT scan brain

DR Hussain

ATTESTED

THE INFORMATION CONTAINED HEREIN IS THE PROPERTY OF AMAN HOSPITAL AND IS NOT TO BE REPRODUCED OR TRANSMITTED IN ANY FORM OR BY ANY MEANS, ELECTRONIC OR MECHANICAL, INCLUDING PHOTOCOPYING, RECORDING, OR BY ANY INFORMATION STORAGE AND RETRIEVAL SYSTEM. THIS IS NOT A MEDICAL REPORT AND IS NOT VALID IN THE COURT OF LAW.

Asad

Medical Laboratory



Add: Asad Medical Center,
Opposite Sakina Masjid Near
Aman Hospital Dabgari Garden
Peshawar. Cell: 0333-9160683
Email: asadlab11@gmail.com

HCC Reg # HRA/500/R/PR/LAB/100

Not Valid for Court

Patient Name	Abdul Majid	Age	?Years
Referred By	Prof Dr Zahid Nazar Sb	Sex	Male
Test Required	H.PYLORI	Date	9-Dec-21

Serology

Test	Result
H.Pylori	Positive

ATTESTED
[Signature]

Dr Fazal Rahim
MBBS, MPH, DCP

Mr. Javed Iqbal
Chief Medical Technologist
Govt ESSI Poly Clinic Peshawar

Mr. Salman
DMLT(C Path) Med. Faculty (KPK)
Lab Technician.

Mr. Rizwan
DMLT(C Path) Med. Faculty (KPK)
Lab Technician

Asad

Medical Laboratory



HCC Reg # HRA/500/R/PR/LAB/100

Not Valid for Court.

Add: Asad Medical Center,
Opposite Sakina Masjid Near
Aman Hospital Dabgari Garden
Peshawar. Cell: 0333-9160683
Email: asadlab11@gmail.com

Patient Name	Abdul Majid	Age	?Years
Referred By	Prof Dr Zahid Nazar Sb	Sex	Male
Test Required	Urine R/E,	Date	9-Dec-21

Physical Examination

Test	Result
Color	P. Yellow
Volume	20 ML
Ph	Acidic

Chemical Examination

Test	Result
Sugar	Nil
Albumin	Nil

Microscopy Examination

Test	Result	
RBC	Nil	/HPF
Pus Cell	04 - 06	/HPF
Epithelial cell	Nil	/HPF
Mucus Thread	(+)	/HPF
Amorphous Urates	Nil	/HPF
Calcium Oxalates	Nil	/HPF

ATTESTED
M

Dr Fazal Rahim
MBBS, MPH, DCP

Mr. Javed Iqbal
Chief Medical Technologist
Govt ESSI Poly Clinic Peshawar

Mr. Salman
DMLT(C Path) Med. Faculty (KPK)
Lab Technician.

Mr. Rizwan
DMLT(C Path) Med. Faculty (KPK)
Lab Technician

"O T-Notes"

Consultant Neuro Surgeon

Dr. Bakht Zar Khan

FCPS (Neuro Surgery)

DHQ Hospital Daggar Buner



PMDC #: 1545-N

مشیت نیوروسرجن
اکثر بخت زرخان
ایف سی پی ایس (نیوروسرجی)
دھق ہسپتال ڈاگر بونیر

Pt's Name Abdul majid Age 22 Add _____ Date 13/10/02

Clinical Record

For Head
X-ray
of occipital
bone

Adm.
X-ray. Pos.
view

R
K
=> 108: Epin. soap
=> 708: ~~1~~ Necessa
1 - 1
B. Khan

ATTESTED

چھٹی بروز جمعرات، جمعہ

(13)

Gastroenterologist & Hepatologist

Dr. Inayat Ullah

MBBS

FCPS (Gastroenterology)

PMDC No. 18733-N

Abdul Majid

(M)

17-10-20

Summary
Abdomen

BP

- CBAE

- Bowel

- No duct

postprandial
pain

BP 120/80

Clear

On

Ar

Distal

H. pylori

...

(FV)

(N)

(N)

R

Cap. Clavus 3/10

(S) ...

Fed. Detritals 2000

...

Cap. ...

...

...

...

...

ATTESTED

(M)

Adh

4/5 Abdomen

CRP

...

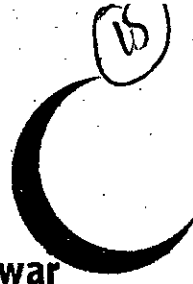
03-230-333

0939-513111

...

Dr. Iqbal Buneri

MBBS, FCPS-II
Lady reading Hospital Peshawar
For appointment
0331-5291277



ڈاکٹر اقبال بونیری

ایم بی بی ایس، ایف سی پی ایس - II
لیڈی ریڈنگ ہسپتال پشاور

Name: Abdul Majid
Dated: October 17, 2021
Gender : Referring physician: Dr Inayat Ullah seb
Clinical History:

US ABDOMEN

Liver: size- [16cm]. [Diffusely increased echo texture with no focal mass seen]
contour- [smooth]

Portal vein: has normal calibre 10mm.

Bile ducts- [intrahepatic and extrahepatic bile ducts are not dilated, with common bile duct having normal caliber]

Gallbladder: size [normal]
[No cholelithiasis]
[Gallbladder wall thickness normal]

Pancreas: [Head and body appear normal; tail obscured by bowel gas]

Kidneys: Normal size, shape and echotexture, No stone or hydronephrosis on either side.

Spleen: Normal in size and echotexture.

Ascites: [none]

Bowel loops show normal caliber and wall thickness.
No para aortic or mesenteric lymphadenopathy.
Urinary bladder is empty at the time of scan.

IMPRESSION:

- Fatty Liver.
- Rest unremarkable study.

ATTESTED
(M)

(16)

Gastroenterologist & Hepatologist

Dr. Inayat Ullah

MBBS

FCPS (Gastroenterology)

PMDC No. 18733-N

Abelul matiel (m)

98 - 10 - 2021

Follow up

Function



Cap. Tabex 3/25 mg
G1 - 1/2 - 1 G1

G2 - 1/2 - 1 G1
G3 - 1/2 - 1 G1

G4 - 1/2 - 1 G1
G5 - 1/2 - 1 G1

G6 - 1/2 - 1 G1
G7 - 1/2 - 1 G1

ATTESTED

Signature
- AH
- CBC

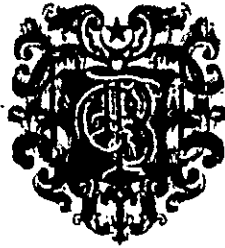
Formal duties
in the presence of my
witnesses
0939-513111

Signature
کلیک: کمرہ نمبر 25-G نمبر میڈیکل کالج ڈاکٹر بوٹو

Medical Specialist
Dr. Babar Khan

M.B.B.S (KMC)
FCPS (Medicine)

Medical Officer DHQ Hospital Daggar Buner



هو الشانی

میڈیکل سپیشلسٹ
ڈاکٹر بابر خان

ایم بی بی ایس (کے ایم سی)
ایف سی پی ایس (میڈیسن)

میڈیکل آفیسر ڈی ایچ کیو ہسپتال ڈگر بونیر

Name Abdul Majid (Raja) Age _____ Sex M Date 2/5/22

Clinical Record

B.P: 130/90 e
Pulse: _____
Temp: _____
R.R: _____

Dyspepsia
Acid brash

Depressive symptoms

Appetensions &
flm

Investigation:

ACI
H. pylori
CBC

waking
on left toe
No carbonyl

CFP/
RF/RF

ATTESTED

(P T. O)

.....

.....

پنجٹی (روزانہ) ۱۵۶۰ جمہرات

0939-511000

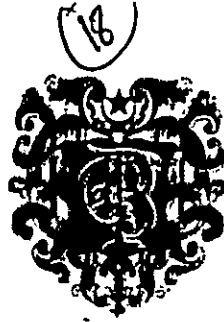
0334-8511000

.....

Medical Specialist
Dr. Babar Khan

M.B.B.S (KMC)
FCPS (Medicine)

Medical Officer DHQ Hospital Daggar Buner



سوالشان

میڈیکل سپیشلسٹ
ڈاکٹر بابر خان

ایم بی بی ایس (کے ایم سی)
ایف سی پی ایس (میڈیسن)

میڈیکل آفیسر ڈی ایچ او ہسپتال ڈگر بونیر

Name Abdul Majid Age _____ Sex M Date 3/7/22

Clinical Record

B.P: 110/70
Pulse: /
Temp: /
R.R: /

Investigation:

ELK

Treated for
depression / dyspeptic
Somatic symptoms.

partial
improvement
of depressive
symptoms.

Stomach issues
resolved.

Now,

Chest pain /

P.T.O

ATTESTED

.....

.....

.....

0939-511000

0334-8511000

.....

Professor

Dr. Noor Mohammad

MBBS, FCPS

Peshawar Medical College
Kuwait Teaching Hospital Peshawar
Medical Specialist, Hepatologist &
Gastroenterologist

(19)
Dr. Ihsan-ul-Haq

MBBS, FCPS

Fellowship in HepatoBiliary
& Liver Transplant Surgery

Dr. Abidullah

MBBS, MCPS
FCPS (I)

Pt's Name

Date

PMID
MMDR
B...

Handwritten patient name

Pop = 100/60

12/10/07

Handwritten notes in Urdu:
Address of
in D...
A...
Dea...

NOT VALID FOR COURT

ATTESTED

(M)

Handwritten signature

ہم ہجرت 8/11/17 کو والدہ ماجدہ کی عظیم نعت سے محروم ہو چکے ہیں۔ جن حضرات کی زندگی ان کی خوب عزت کرتے رہیں۔ اور ان کی ہر آن پر ایک کہتے رہیں کیونکہ یہ سرمایہ زندگی میں صرف ایک ہارتی ہیں اور ساتھ ہی ہمارے خاندان کیلئے دنیا اور آخرت کی بھلائی کیلئے دعا کی استدعا کرتے رہیں

برائے رابطہ نمبر:

BILAL MEDICAL TRUST HOSPITAL (REGISTERED)
Plr Baba Distt: Buner Tel: 0339-520481 Email: bilal_medical@yahoo.com

0340-6328277 - 0346-9417409

Gastroenterologist, Hepatologist
Medical Specialist

Dr. Inamullah

MBBS (Pesh)
FCPS-II (Pak)

451821910

گیسٹرو انٹرا ویجسٹ، ہیپاٹالوجسٹ
میڈیکل سپیشلسٹ



ڈاکٹر انعام اللہ

ایم بی بی ایس (پشاور)
ایف سی پی ایس II (پاک)

Name _____ (رضی) _____ ماہ _____ Age _____ Gender ♂ Date 11/11/21

Clinical Record

Rx

palpitation
LBP
Headache
A.P.P.??
D.M.P.

OTC:
12/1/21
|
2/1/21

Tab. ~~Libra~~ X 10
ایس 1-1

Tab. Orthofenc 507
ایس 1-1
ایس

Cap. Cefixim 4007
ایس ①

Tab. Torbis 2
ایس ①

ATTESTED

(M)

Cap. Puh 457
ایس ①

Bed rest for 3 days

0313-9971615 رابطہ:
0939-512555

پتہ: بونیر میڈیکل سنٹر یونٹ 1 (سابقہ شفاء میڈیکل کیمپس) نزد D.H.Q. ہسپتال ڈگر بونیر

کچھ جناب سپر سہیل صاحب ڈسٹرکٹ جیل ڈسٹرکٹ جیل بونیر

عنوان درخواست عسر و غلوئی قضی بوجہ بیماری

سائنس عبدالمجید کانسٹیبل ڈسٹرکٹ جیل ڈسٹرکٹ جیل بونیر

بیمہ پورے 108 دسمبر 2020 تا 30 اپریل 2022 تک

جناب عالی

آج صبح صبحان کی خدمت میں استفسار کی جاتی ہے کہ میری تقریبا 6 ماہ سے آج صبحان کے
زیر سبب طبیعت کانسٹیبل بوسٹھ ڈسٹرکٹ جیل ڈسٹرکٹ جیل بونیر میں ہو چکی تھی۔ میں ہاں زندہ کرنے
کے لئے اکثر کوششوں کے بعد ایسی ڈیوٹی دیا گیا ہے اور ایسا ہی کے ساتھ عسر و غلوئی کا علاج دیتا رہا۔ لیکن
مجھے تقریباً 2 ماہ کے اختتام پر بیمار ہونا پڑا۔ بیماری کے دوران ہی میں ڈیوٹی انجام دیتا رہا۔
لیکن میری بیماری ختم ہونے کی بجائے ٹھہری رہی جہاں تک مجھے بونیر کانسٹیبل کے مختلف ڈیوٹی
صاحبان کے پاس جانا پڑا۔ لیکن آل ڈاکٹر میری بیماری معلوم کرنے میں ناکام رہے لیکن
میرے نکل سیکھنے کے لئے میرے ساتھ جاتا رہا۔ اور وہاں پر ایچ آر ایچ (LRH)
ڈاکٹر پر مشورہ سے میرے ساتھ میرے ساتھ لیا گیا اور ساتھ ساتھ (CT Scan) بھی کیا گیا۔

میں یہ دیکھا کہ میری رواجی امراض کا شریک ہے۔ جہاں سے لے کر میرے علاج ڈاکٹر نے
جاری ہے اور میری جسم میں کافی صدمہ ہے لیکن ڈاکٹر صاحب نے دوران بیماری ڈیوٹی
کرنے سے منع نہیں کیا ہے اور جس قدر آرام کرنے کا کہا ہے۔ جہاں سے لے کر میرے علاج
میرے لئے کوئی اور ڈاکٹر نہیں ہے جس سے میری شوری عسر و غلوئی کا علاج ہوں گا۔

العارضی

آج کا علاج صبحان
عبدالمجید کانسٹیبل ڈسٹرکٹ جیل ڈسٹرکٹ جیل بونیر

مورخہ 23 اپریل 2022

ATTESTED

M

(Signature)

Dr. Sardar Alam

MBBS, RMP
Psychiatrist
FCPS -II Psychiatry
Pims Islamabad



{ ماہر امراض ذہنی نفسیاتی سرور، سرگرمی، نشیات
ذہنی اور جسمی امراض مخصوص معذور گیس }

ڈاکٹر سردار عالم

نیوروسائیکاٹرسٹ
ایم بی بی ایس، آر ایم پی
(ایف سی پی ایس) سائیکاٹرسٹ

Name Abdul Majid Age 27/1/4 Sex ♂ Date 2/2/23

Clinical Record / Rec

CR

Mr. Pt. Pt. Abdul Majid s/o. Raja Ahmed
under treatment & diagnosis of
manic depressive psychosis and depression since 3/12/21
He is now fit to join duty

ATTESTED

03439705960: موبائل نمبر
03359661687

محترم جناب سپر ٹینڈرنگ صاحب ڈسٹرکٹ جیل و...

عنوان: درخواست ٹیڑا و خاٹری و خاٹری کے ملازمت
جناب عالی

موجودہ گزارش کی جان ہے کہ بندہ ڈسٹرکٹ جیل و...
میں محنت واد در این طریقہ بہ شریکہ احسن سہرا جام...
دیا گیا لیکن 2.21 کا اقسام لپہ بھاری اور مختلف ڈاکٹر...
بے کلا 2 شروع کیا اور لپہ میں بیت جلا کہ بندہ کو...
وہاں ہی بھاری اور حق میں جیل بندہ سے بندہ ڈیوٹی دینے سے
محاصرہ کیا گیا لیکن ایک طرف بھاری اور دوسری طرف ڈاکٹر...
اور دیکھے اور بات سے بندہ اپنے طریقہ منہی انجام دینے
سے نکلے گا مگر دیکھا بد میں وجہ اب صاحبان کو 2/2...
اس حالت میں درخواستیں بھی ہیں جن میں اور اب صاحبان...
کے حالات سے یہ بھی واقف ہیں اور بندہ سے کامی
Cooperate کیے گا بندہ کو اب ڈاکٹر صاحبان نے...
یاب قرار دیا ہے اور بھاری ڈاکٹر صاحبان بندہ اب...
کرنے کے قابل ہے۔ ڈاکٹر صاحبان کے ساتھ

اپنی اپنی سہا پے کہ بندہ کو حاضر کو...
حاضر کرنے کے امکانات صادر کیے جائیں

ATTESTED

مہر

سائل مورخہ 22-2-2023

عبدالکامیل خاٹری ڈسٹرکٹ جیل و...

بندہ نے اس درخواست میں...
میں نے اپنی سہا پے...
Project...
بندہ کو...
بندہ کو...
بندہ کو...

بخدمت جناب سپرنٹنڈنٹ صاحب ڈسٹرکٹ جیل ڈگر ضلع بوئیر

عنوان: درخواست برآمد حاضری و جائین کرنے ملازمت

جناب عالی!

مودبانہ گزارش کی جاتی ہے کہ بندہ ڈسٹرکٹ جیل ڈگر میں بحیثیت وارڈراپنی فرائض بہ طریقہ احسن سرانجام دے رہا تھا لیکن 2021 کے اختتام پر بیمار ہوا اور مختلف ڈاکٹرز سے علاج شروع کیا اور بعد میں پتہ چلا کہ بندہ کو jocest اور دماغی بیماریاں لاحق ہیں ایک طرف بیماری اور دوسری طرف ڈاکٹرز کے گئے ادویات نے بندہ اپنی فرائض منصبی انجام دینے سے یکسر قاصر رہا تھا بدیں وجہ آپ صاحبان کو 3/2 دفعہ اس بابت درخواستیں بھی دیں تھیں اور آپ صاحبان ان حالات سے بہ خوبی واقف ہیں اور بندہ سے کافی Cooperation بھی کی ہے بندہ کو آپ ڈاکٹر صاحبان نے صحت یاب قرار دیا ہے اور بمطابق ڈاکٹر صاحبان بندہ اب ڈیوٹی کرنے کے قابل ہے (ڈاکٹری کاغذات لف ہیں) لہذا استدعا ہے کہ بندہ کو حاضری و سروس جانن کرنے کے احکامات صادر کئے جائیں۔

مورخہ 3/2/2023

سائل

عبدالماجد وارڈر ڈسٹرکٹ جیل ڈگر

نوٹ: بندہ بار بار ڈسٹرکٹ جیل ڈگری بمعہ درخواست ہذا گیا لیکن ان سے متعلق اہلکاران ڈگری پر لینے سے انکاری تھے اور درخواست کو Reject بھی نہیں کرے تھے، جبکہ کہا کہ آپ Dismiss ہو چکے ہیں اور Dismissal آرڈر بھی دینے کیلئے کہا، بدیں وجہ بذریعہ ڈاکخانہ ارسال کیا جاتا ہے۔

ATTESTED



مخصوص خدمات کے لئے درخواستیں جمع کروانے کے لئے جیل گارڈز کو مطلع کیا گیا ہے

عنوان: درخواست گزار عبدالمجید صاحب Dismissed cases کے لئے درخواستیں جمع کروانے کے لئے

خدمات عدالتی

میں درخواست گزار نے درخواستیں جمع کروانے کے لئے جیل گارڈز کو مطلع کیا گیا ہے

جیل گارڈز کو اطلاع دیا گیا ہے کہ وہ درخواست گزار کے لئے درخواستیں جمع کروانے کے لئے

درخواستیں جمع کروانے کے لئے جیل گارڈز کو مطلع کیا گیا ہے

اب Dismissed cases کے لئے درخواستیں جمع کروانے کے لئے

درخواست گزار نے درخواستیں جمع کروانے کے لئے جیل گارڈز کو مطلع کیا گیا ہے

درخواست گزار نے درخواستیں جمع کروانے کے لئے جیل گارڈز کو مطلع کیا گیا ہے

درخواست گزار نے درخواستیں جمع کروانے کے لئے جیل گارڈز کو مطلع کیا گیا ہے

Handwritten signature and name in Urdu.

ATTESTED

Handwritten date or reference number.

بخدمت جناب سپرنٹنڈنٹ صاحب ڈاکٹر کٹ جیل ڈگری ضلع بونیر

عنوان: درخواست بمبراد مہیا کرنے Dismisal order در دیگر متعلقہ کاغذات

جناب عالی!

گزارش کی جاتی ہے کہ سائل نے ایک درخواست بابت جانن کرنے ملازمت دی ہے جو کہ اس میں تفصیلات درج ہے اور متعلقہ جیل اہلکاران سے درخواست ہے کہ انکار کے اور سائل کو زبانی طور پر کہا کہ آپ Dismiss ہو چکے ہیں تو سائل نے اس Dsimisal order لینے کو کہا تو اس دینے سے بھی انکار کیا اس وجہ سے سائل ایک درخواست بابت مہیا کرنے کاغذات بذریعہ ڈاک خانہ بھیج رہا ہے۔

لہذا آپ صاحبان مذکورہ کاغذات سائل کو فراہم کریں تاکہ سائل بروقت قانونی کارروائی شروع کر سکے۔

العبد

عبدالماجد

3.2.2023

ATTESTED



(25)

No. 1131

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 acknowledgement is due.

Rs. Ps. AM

Received a registered* addressed to _____ Date Stamp _____

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

Insured for Rs. (in figures) _____ (in words) _____

Insurance fee Rs. _____ Ps. _____ (in words) } Weight } Kilo Grams

Name and address of sender } _____ 4/1/23

No. 1132

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 acknowledgement is due.

Rs. Ps. AM

Received a registered* addressed to _____ Date Stamp _____

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

Insured for Rs. (in figures) _____ (in words) _____

Insurance fee Rs. _____ Ps. _____ (in words) } Weight } Kilo Grams

Name and address of sender } _____ 4/2/23

ATTESTED

M

Ann G

26



OFFICE OF THE SUPERINTENDENT
CIRCLE HQ PRISON HARIPUR
No. 6881
Dated 19-08-2022
Phone/Fax: 0995-920066

OFFICE ORDER:

WHEREAS, accused warder (BPS-07) Abdul Majid S/O Faqir Gul (as detailed below) attached to District Jail Buner was proceeded against, under Rules 7 & 9 of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 amended in 2021.

S#	NAME	Design	Absence Period	Report of Sudd: Buner	of Punishment Awarded
01	Abdul Majid S/O Faqir-Gul	Warder	From 07-05-2022 to till date i.e 19-09-2022	No 1694/WF dated: 11-08-2022	Revival from Service (Ls-Parte)

AND WHEREAS, after expiry of 15 days (Fifteen) the above mentioned warder neither resume his duty nor any intimation was received from him, therefore as required under Rule-09 of ibid rules, a notice was published in daily newspaper "Daily Mashraq Peshawar" dated, 31-08-2022 by directing him to resume duty within fifteen (15) days (i.e 05-09-2022) of publication of the notice. In response of which he didn't resume his duty as per directions nor submit any oral or written defense. Justification of his misconduct and absence.

AND WHEREAS, the accused warder failed to offer any plausible defense against his willful absence as mentioned above and since his conduct is highly unsatisfactory which is willful absence from duty, his willful absence from duty for the above mentioned period stands established.

NOW THEREFORE, in exercise of powers conferred under Rule 9 of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 amended in 2021, undersigned being competent, hereby awards Major penalty as mentioned above.

SUPERINTENDENT
CIRCLE HQ PRISON HARIPUR

Encls: No: 6882-86

Copy of the above is forwarded to:-

- 1) The Inspector General of Prisons, Khyber Pakhtunkhwa Peshawar for information please.
- 2) The Superintendent DI Buner w/r to the No. 1694/WF dated 11-08-2022 for information, and making necessary entries in the Service Book of Warder concerned please.
- 3) The DAO Buner for information and necessary action please.
- 4) The Private Secretary to Special Assistant to Chief Minister for Prisons Khyber Pakhtunkhwa Peshawar for information please.
- 5) Warder Concerned at home address c/o Superintendent DI Buner.

ATTESTED

SUPERINTENDENT
CIRCLE HQ PRISON HARIPUR

BETTER COPY



OFFICE OF THE SUPERINTENDENT

CIRCLE HQs PRISON HARIPUR

No. 6881-

Dated: 19-09-2022

Phone/Fax: 0995-920066

OFFICE ORDER:

WHEREAS accused warder (BPS-07) Abdul Majid S/O Faqir Gul (as detailed below) attached to District Jail Buner was proceeded against, under Rules-3 & 9 of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 amended in 2021.

S#	NAME	Design	Absence Period	Report Of Sudt: DJ Buner	Punishment Awarded
1,	Abdul Majid S/O Faqir Gul	Warder	From 07 -05-2022 to till date i.e 19-09-2022	No. 1694/ WE dated: 11-08-2022	Removal from service (Ex- Parte)

AND WHEREAS, after expiry of 15 days (Fifteen) the above mentioned warder neither resume his duty nor any intimation was received from him, therefore as required under Rule-09 of ibid rules, notice was published in daily newspaper * Daily Mashriq Peshawar: dated, 31-08-2022 by directing him to resume duty within fifteen (15) days (till 05-05-2022) of publication of the notice. In response of published notice he didn't resume his duty as per directions nor submit any oral or written defense/ justification of his misconduct and absence.

AND WHEREAS, the accused warder failed to offer any plausible defense against his willful absence as mentioned above and since his conduct is highly unsatisfactory which is willful absence from duty, his willful absence from duty for the above mentioned period stands established.

NOW THEREFORE, in exercise of powers conferred under Rule 9 of Pakhtunkhwa Government Servants (Efficiency & Discipline) Rule 2011 amended in 2021, undersigned being competent. Hereby awards Major penalty as mentioned above

SUPERNENDENT

CIRCLE H.Q. PRISON HARIPUR

Endst: No: 6882- 86

Copy of the above forwarded to:

1. The Inspector General of Prisons, Khyber Pakhtunkhwa Peshawar for information pleases.
2. The Superintended DJ Buner w/r to No. 1694/WE dated. 11-08-2022 for information, and making necessary entere in the Service Book of Warder Concerned please.
3. The DAO Buner for information and necessary action please.
4. The Private Secretary to Special Assistant to Chief Minister for Prisons Khyber Pakhtunkhwa Peshawar for information pleases.
5. Warder Concerned at home address of Superintendent DJ Buner.

ATTESTED

SUPERNENDENT

CIRCLE H.Q. PRISON HARIPUR

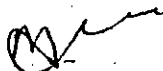
TO,

Inspector General of prison KPK at Peshawar through
Superintendent circle HQ prison Haripur.

DEPARTMENTAL APPEAL AGAINST IMPUGNED ORDER DATED 19/9/2022.

1. That the Appellant was appointed as warder and was posted in District jail Buner at Daggar vide order of appointment dated 5/5/21 and was serving the department with full zeal and zest to the entire satisfaction of his superiors. (Appointment order attached).
2. That at the end of November 2021 the appellant became ill and was in very dismal condition hence he visited several medical doctors and after detail investigation by them he was diagnosed for psychological disorder and depression and at that stage he was unable to efficiently perform his duties hence he filled an application for leave and was also performing his duties despite the facts that he was not properly able to perform his duties.
3. That in the end of April 2022 his illness became more severe and due to his illness and tranquilizers he could not perform his duties so he filled an application for leave in the very start of May 2022.(some medical documents and application for leave attached).
4. That few days before the doctor of the appellant opined that he has gained his health and can perform his duties.(opinion of the doctor attached).
5. That after the above opinion of the doctor the appellant went for performing his duties to the district jail buner at daggar but was told by the concerned that he was no more in service hence he demanded his dismissal order but he was not given any order hence he filled an application for joining his duties but the same was not taken hence he sent the afore said application and application for providing the impugned dismissal order through the post office.
6. That the appellant have now received the impugned removal order which is not according to law hence this appeal.

ATTESTED



- 7. That no charge sheet and statement of allegation were issued to the appellant. Moreover neither any opportunity of personal hearing was given to him nor was any inquiry conducted in the case on which score alone the impugned removal order is illegal and unwarranted under the law.
- 8. That the superintendent circle HQ prison Haripur has not fulfilled the legal requirement as mentioned in KP Government servant efficiency and discipline rules 2011 and have illegally removed the appellant by violating the rules of natural justice.
- 9. That the appellant has not willfully ignored his duties rather under compelling situation of his illness could not perform his duties which factum was in the Knowledge of the superintendent jail Daggar and in that respect applications had also been given for leave.

It is therefore kindly prayed that, on acceptance of this appeal the impugned order dated 19/9/2022 may kindly be set aside and the appellant may kindly be re-instated in service with all back benefits.

Dated: 13 /2/2023

Appellant

Abdul Majid s/o faqir Gul,
 Ex warde district jail daggar ,
 District Buner.

ATTESTED


OFFICE OF THE
INSPECTOR GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR

☎ 091-9210334, 9210406 📠 091-9213445

No. Estb/Ward/Orders 10990

Dated 09-03-2021

ORDER:

WHEREAS, Ex-Warder Abdul Majid S/o Faqir Gul, attached to District Jail Buner at Dagger was awarded the major penalty of "Removal from Service" by Superintendent HQs Prison Haripur vide order No. 6881 dated 19-09-2022 due to his willful absence w.e.f. 07-05-2022 till the date of his removal from service on 19-09-2022;

AND WHEREAS, the said Ex-Warder preferred his departmental appeal for setting aside the penalty awarded to him and also requested for reinstatement in service.

AND WHEREAS, he was afforded an opportunity of personal hearing on 02-03-2023. His appeal was examined in light of the available record of the case and it was observed that the penalty was awarded to him by the competent authority on his willful absence after observing all legal and codal formalities as required under Government Servants (Efficiency & Discipline) Rules, 2011. Moreover, the appeal was filed on 13-02-2023 and is time barred by 03 months and 26 days. During the course of hearing, the appellant failed to justify his innocence.

NOW THEREFORE, having considered the charges, evidences/facts on record, explanation of the accused official, the provision of rules in vogue and in exercise of powers conferred under Rule-17 of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 read with Rule-05 of Khyber Pakhtunkhwa Service Appeal Rules 1986, the decision of the competent authority is upheld and appeal of the appellant is hereby rejected being without any substance and time-barred.

ADDL: INSPECTOR GENERAL OF PRISONS,
KHYBER PAKHTUNKHWA, PESHAWAR.

ENDST: NO. 10991-951

Copy of the above is forwarded to the:

- 1 Deputy Inspector General of Prisons Regional Prison Office Haripur for information.
- 2 Superintendent, Headquarters Prison Haripur for information and necessary action with reference to his letter No. 712/WE dated 16-02-2023.
- 3 Superintendent District Jail Buner at Dagger for information and necessary action. He is directed to inform the appellant accordingly and to make necessary entry in his Service Book under proper attestation.
- 4 Mr. Abdul Majid S/o Faqir Gul (Ex-Warder) C/o Superintendent District Jail Buner at Dagger for information.
- 5 PS to Inspector General of Prisons Khyber Pakhtunkhwa Peshawar for information.

PB
[Handwritten signature]
13/03/2023

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1063
13/03/2023

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DEPUTY DIRECTOR
INSPECTORATE GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR

ATTESTED

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(44)

وکالت نامہ

Mushtaq Ahmad Advocate High Court Peshawar	ایڈووکیٹ دستخط:
BC-10-0116	بار کونسل ابار ایسوسی ایشن نمبر:
0346-9014199	رابطہ نمبر:
ڈسٹرکٹ بار ایسوسی ایشن بونیر خیبر پختونخوا	

بعدالت جناب: مسٹر جسٹس ٹریبونل سمنو میں مسٹر احمد صبر خان

دعویٰ:	منجانب: ایڈووکیٹ
علت نمبر:	
مورخہ:	بیمہ مسٹر سمنو میں
جرم:	ایچ ایچ ایچ پی پی پی
تھانہ:	

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ آن مقام مسٹر جسٹس ٹریبونل سمنو میں کیلئے مشتاق احمد خان ایڈووکیٹ کو وکیل 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 ثالث و فیصلہ بر خلاف 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 منسوخی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور 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 اختیار حاصل ہونگے اور اس کا ساختہ پر داختم قبول و منظور ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا وہ وکیل موصوف وصول کرنے کا حقدار ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مقدمہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سندر ہے۔

ATTESTED

المرقوم: 3/5/23
 الع: گواہ شد
 الع: *Attested & Accepted*

Mushtaq Ahmad
 Advout
 کے لئے قبول و منظور ہے

مقام: مسٹر جسٹس ٹریبونل سمنو میں KPK

نوٹ اس وکالت نامہ کی فوٹوکاپی ناقابل قبول ہوگی۔