


FORM OF ORDER SHEET

Court of _____

Appeal No. 1223/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	29/05/2023	<p>The appeal of Mr. Amir Ullah presented today by Mr. Shahid Qayum Khattak Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 31-05-2023.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

BEFORE THE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No. 1223/2023


Amir Ullah Appellant

Versus

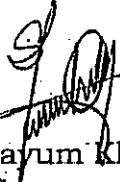
Inspector General of Police and others Respondents

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Appellant

Through


Shahid Qayum Khattak
Advocate Supreme Court
of Pakistan
Mob No. 0333-9195776

Dated: 29/05/2023

(1)

BEFORE THE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWAPESHAWAR

Service Appeal No. /2023

Amir Ullah S/o Ferooz Khan R/o Dhab Sangani, Dhab, , Tehsil and
District Karak Appellant

Versus

1. Inspector General of Police, Khyber Pakhtunkhwa, Peshawar
2. The Regional Police Officer, Kohat Region, Kohat
3. District Police Officer Karak
4. Government of Khyber Pakhtunkhwa through
Chief Secretary, Peshawar Respondents

APPEAL UNDER SECTION 4 OF SERVICE TRIBUNAL ACT, 1974
AGAINST THE ORDER DATED 15/01/2023 PASSED BY
RESPONDENT NO. 3 BY WHICH THE APPELLANT HAS BEEN
AWARDED MAJOR PUNISHMENT OF TERMINATION/REMOVAL
FROM SERVICE, AND AGAINST THE ORDER DATED 04/05/2023
PASSED BY RESPONDENT NO. 2. VIDE WHICH THE
DEPARTMENTAL REPRESENTATION/ APPEAL FILED BY
APPELLANT HAS BEEN REJECTED

PRAYER

On accepting this service appeal, the impugned orders dated
15/01/2023 and 04/05/2023 may graciously be set aside
by declaring it illegal, unlawful, without authority, based on
mala fide, void abinitio and thus not sustainable in the eyes
of law and appellant is entitled for all back benefits of pay
and service

Respectfully Sheweth;

1. That Respondent No. 3 initiated disciplinary proceeding against
appellant and issue charge sheet and statement of allegation.
(Copy attached as Annexure "A")
2. That thereafter inquiry was initiated against the appellant and

respondent No. 3 passed an order dated 15/01/2023 vide which the major punishment of "Termination /removal from service" has been passed against appellant without collecting any evidence and providing him an opportunity of hearing. (Copy of impugned order is attached as Annexure "B")

3. That appellant filed departmental appeal /representation (the facts and ground agitated therein may please be treated as part and parcel of this appeal) against the impugned order before respondent No. 2, who vide order dated 04/05/2023 (but till date not officially communicated to petitioner) rejected the same without complying codal formalities. (Copy of appeal and impugned order are attached as Annexure "C" and "D")
4. That now appellant feeling aggrieved from the above orders hence, filling this appeal on the following amongst other grounds inter alia

GROUND:

- a. That the impugned orders of the respondents are illegal, unlawful, without authority, based on mala fide intention, against the natural justice, violative of the Constitution and Service Law and equally without jurisdiction, hence the same are liable to be set aside in the best interest of justice.
- b. That the impugned orders passed by respondents are very much harsh, without any evidence based on surmises & conjectures and is equally against the principle of natural justice.
- c. That during enquiry proceedings none was examined in support of the charges leveled against appellant neither has proper opportunity of hearing been provided to appellant. No allegations mentioned above are practiced by the appellant nor proved against him through any cogent reason or evidence.
- d. That from the date of appointment appellant is performing his duty with full zeal and enthusiasm and has provided no opportunity of complaint to his superior, but till date he has not been paid his monthly salary.

- e. That the inquiry officer failed to collect any evidence in support of the charges. No one was examined as witness in presence of appellant nor was appellant confronted with any documentary or other kind of evidence on the basis of which the impugned orders were passed.
- f. That the impugned orders have been passed in violation of law and rules of disciplinary proceedings and principles of natural justice. The authority wrongly and mala fide based the impugned orders without giving any reason with proof whatsoever, therefore the impugned order is bad in law.
- g. That it is the settle principle of justice that no one should be condemn un heard but in the instant case no proper enquiry has been conducted to enquire regarding the allegations. No independent witness has been examined in front of appellant nor any opportunity of cross examination has been provided to appellant. Both the impugned orders are based on non reading and mis reading of available record.
- h. That appellant has been held liable for the fault of others as the alleged fault can not be attributed to appellant as he is not capable to manipulate the official documents.
- i. That respondent No. 2 has not decided the departmental appeal / representation in accordance to the rules and regulation which clearly shows mala fide intention thus, has no sanctity in the eyes of law thus the act of respondents are totally based on male fide intention which clearly shows discrimination and undue victimization.
- j. That appellant has been appointed after complying all the codal formalities, hence the principle of *Locus Poenitentiae* accrued in favour of appellant which has totally been ignored by the respondent specially when fault on the part of appellant has not been identified.
- k. That the appellate authority has not provided any personal hearing opportunity to the appellant nor the order passed is speaking one.

(4)

It is, therefore, most humbly prayed that on accepting this service appeal, the impugned orders dated 15/01/2023 and order dated 04/05/2023 may graciously be set aside by declaring it illegal, unlawful, without authority, based on mala fide, void abinitio, against the principle of Locus Poenitentiae and thus not sustainable in the eyes of law and appellant is entitled for all back benefits of pay and service.

It is, further submitted that respondent may further be directed to release the unpaid salaries of the appellant.

Any other relief not specifically prayed for but deems appropriate in the circumstances of the case may also be granted.



Appellant

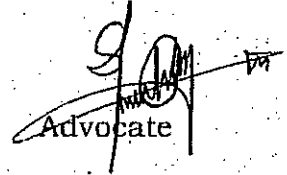
Through



Shahid Qayum Khattak
Advocate Supreme Court
of Pakistan

Dated: /05/2023

Certified that as per instruction of my client no such appeal has been filed before this Hon'ble Forum.


Advocate

AFFIDAVIT

I, Amir Ullah S/o Ferooz Khan R/o Dhab Sangani, Dhab, , Tehsil and District Karak do hereby solemnly affirm and declare on Oath that the contents of the above appeal are true and correct to the best of my knowledge and belief and nothing has been kept secret from this Hon'ble Tribunal.



Deponent

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BEFORE THE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No. /2023

Amir Ullah Appellant

Versus

Inspector General of Police and others Respondents

ADDRESSES OF THE PARTIES

APPELLANT

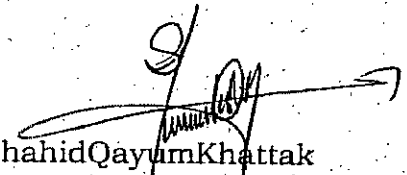
Amir Ullah S/o Ferooz Khan R/o Dhab Sangani, Dhab, , Tehsil and
District Karak

RESPONDENTS

1. Inspector General of Police, Khyber Pakhtunkhwa, Peshawar
2. The Regional Police Officer, Kohat Region, Kohat
3. District Police Officer Karak
4. Government of Khyber Pakhtunkhwa through
Chief Secretary, Peshawar


Appellant

Through


Shahid Qayum Khattak
Advocate Supreme Court
of Pakistan

Dated: 29 /05/2023

(6)

Annexure - A

No. 07 / Enq
Dated 10.1.23 / 2023

CHARGE SHEET

I, KHAN ZEB MOHMAND, District Police Officer, Karak as a competent authority, hereby charge you Recruit Constable Amir Ullah No. 5007/FRP (presently under training recruit course at PTC Hangu) as follows:-

From perusal of departmental enquiry conducted by SDPO Takhle Nasrati against defaulter recruit constables Bilal Ahmad No. 2281 of SSU/CPEC and Jamal Rasool No. 4984 of FRP, it has come to light that you recruit Constable Amir Ullah No. 5007 s/o Feroz Khan were shown as "passed" mentioned at S.No. 130 with scoring 40 marks in ETEA merit list-2021 which was directly received from CPO Peshawar whereas ETEA merit list-2021 requisitioned through RPO office vide Endst. No. 11843/EO dated 15.08.2022 from CPO Peshawar did not have your name i.e. you are a failed candidate according to ETEA merit list-2021 sent by CPO Peshawar. This act on your part indicates your intentional deception and forgery in order to gain ulterior motives. This speaks quite adverse on your part and shows your mala fide intention, willful breach and malpractice in the discharge of his official obligations. This speaks quite adverse on your part and shows your mala fide intention, willful breach and malpractice in the discharge of your official obligations."

1. By the reason of your commission/omission, constitute mis-conduct under Police disciplinary Rule-1975 (amendment Notification No. 3859/Legal, dated 27.08.2014) Govt. of Khyber Pakhtunkhwa, Police Department, you have rendered your-self liable to all or any of the penalties specified in Police Rule-1975 ibid

2. You are, therefore, required to submit your written defense within 07-days of the receipt of this charge sheet to the enquiry Officer SDPO TN is hereby appointed for the purpose of conducting enquiry.

Your written defense if any should reach to the Enquiry Officer within a stipulated period, failing which shall be presumed that you have no defense to put in and in that case ex-parte action shall be taken against you.

3. Intimate whether you desire to be heard in person.

4. A statement of allegation is enclosed.

District Police Officer, Karak

DISCIPLINARY ACTION

Mr. KHAN ZEB MOHAMMAD, District Police Officer, Karak as a competent authority, is of the opinion, Recruit Constable Amir Ullah No. 5007/FRP (presently under training recruit course at PTC Hangu) has rendered himself liable to be proceeded against on committing the following act/commission within the meaning of Police Disciplinary Rule-1975 (amendment Notification No. 3859/Legal dated 27/08/2014) Govt. of Khyber Pakhtunkhwa Police Department.

STATEMENT OF ALLEGATIONS

From perusal of departmental enquiry conducted by SDPO Makht-e-Nasr against defaulter recruit constables Bilal Ahmad No. 2281 of SSU/CPEC and Jamal Rasool No. 4884 of FRP, it has come to light that recruit Constable Amir Ullah No. 5007/s/o. Foroz Khan was shown as 'passed' mentioned at S.No. 30 with scoring 40 marks in ETEA merit list-2021 which was directly received from CPO Peshawar whereas ETEA merit list-2021 requisitioned through RPO office vide Enq. No. 11843/EG dated 15/08/2022 from CPO Peshawar did not have his name of the failed candidate according to ETEA merit list-2021 sent by CPO Peshawar. His act on his part indicates his intentional deception and forgery in order to gain ulterior motives. This speaks quite adverse on his part and shows his mala fide intention, willful breach and malpractice in the discharge of his official obligations. This speaks highly quite adverse on his part and shows the mala fide intention, willful breach and malpractice in the discharge of his official obligations.

1. The enquiry Officers SDPO Makht-e-Nasr in accordance with provision of the Police Rule-1975 (amendment Notification No. 3859/Legal dated 27/08/2014) Govt. of Khyber Pakhtunkhwa Police Department may provide reasonable opportunity of hearing to the accused official, record his finding and make within 10 days of the receipt of his order recommendation as to punishment or other appropriate action against the accused.
2. The accused official shall join the proceeding on the date, time and place fixed by the enquiry officer.

District Police Officer, Karak
No. 11843/EG /Enq. dated 15/08/2022

- Copy to:
1. The enquiry Officers for initiating proceeding against the accused, under the provision of the Police Disciplinary Rule-1975 (amendment Notification No. 3859/Legal dated 27/08/2014) Govt. of Khyber Pakhtunkhwa Police Department.
 2. Recruit Constable Amir Ullah No. 5007/FRP (presently under training recruit course at PTC Hangu)

ORDER

(8)

Annex-B

This Order will dispose off the departmental enquiry against Recruit Constable Amir Ullah No. 5007/FRP of this district Police.

From perusal of departmental enquiry conducted by SDPO Takhte Nasrati against defaulter recruit constables Bilal Ahmad No. 2281 of SSU/CPEC and Jamal Rasool No. 4984 of FRP, it has come to light that recruit Constable Amir Ullah No. 5007 s/o Feroz Khan was shown as "passed" mentioned at S.No. 130 with scoring 40 marks in ETEA merit list-2021 which was directly received from CPO Peshawar whereas ETEA merit list-2021 requisitioned through RPO office vide Endst. No. 11843/EC dated 15.08.2022 from CPO Peshawar did not have his name i.e. he is a failed candidate according to ETEA merit list-2021 sent by CPO Peshawar. This act on his part indicates his intentional deception and forgery in order to gain ulterior motives. This speaks quite adverse on his part and shows his malafide intention, willful breach and malpractice in the discharge of his official obligations. This speaks highly quite adverse on his part and shows his malafide intention, willful breach and malpractice in the discharge of his official obligations.

He was issued Charge Sheet and Statement of Allegations. Mr. Nazar Hussain, SDPO Takhte Nasrati was appointed as Enquiry Officer to conduct proper departmental enquiry against him and he was directed to submit findings in the stipulated time.

The Enquiry Officer reported that ETEA merit list-2021 which was directly received from the CPO Peshawar wherein total 130 candidates have shown passed in which the defaulter recruit Constable had also shown "pass" at S.No. 130 with scoring 40 marks upon which his recruitment order was issued by the DPO office Karak vide OB. No. 729 dated 30.12.2021 wherein Amir Ullah was recruited against the vacant post of FRP and allotted constabulary number 5007, while during the course of enquiry ETEA merit list-2021 was requisitioned from the CPO Peshawar letter No. 7185/E-IV, dated 10.08.2022 received through the RPO office Kohat vide Endst. No. 11843/EC dated 15.08.2022 and under the DPO office diary No. 3432/RK dated 18.08.2022 wherein 128 candidates have shown passed in which the defaulter recruit constable Amir Ullah was not found in the said ETEA merit list i.e. ETEA test failed candidate.

Keeping in view the above available record and facts on file, the perusal of enquiry papers, and recommendations of the Enquiry Officer, he is found guilty of the charges. He is ETEA test failed candidate and his name is not found in the ETEA merit list-2021. Therefore, in the exercise of the power conferred upon me, I, KHAN ZEB MOHMAND, District Police Officer, Karak, as competent authority under Police Rules 1975 (amended in 2014), hereby impose major punishment of termination/removal from service upon defaulter recruit Constable Amir Ullah No. 5007/FRP with immediate effect.

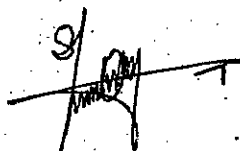
OB No. 94
Dated 15/01/2023


District Police Officer, Karak

OFFICE OF THE DISTRICT POLICE OFFICER KARAK

No. 201/EC, Karak the dated 15/02/2023

Copy of above is submitted to the Superintendent of Police, FRP Kohat Range Kohat w/r to this office letter No. 1073/Enquiry dated 10.01.2023 & your office order Endst. No. 165-86/OHC, dated 25.01.2023 for favour of information and necessary action. Issue approved order under intimation to this office, please.


District Police Officer, Karak

To,

Regional Police Officer,
Kohat Region, Kohat.

Subject: Departmental Appeal.

Respected Sir,

With due respect, appellant submitted departmental appeal the order bearing No. 94 dated 15-01-2023, passed by District Police Officer Karak, where by appellant was removed from service.

FACTS:

1. That appellant appeared and qualified ETEA test 2021 held for recruitment of constables in Khyber Pakhtunkhwa Police. Central Police Office (CPO) Peshawar circulated list of recommended and not recommended candidates by physical assessment and suitability test board letter no 720/Eiv dated 19.12.2021 where in the name of appellant exist among the recommended candidates.
2. The District police Officer karak, in compliance with the direction of CPO received above mentioned letter, appointment appellant as constable vide OB No. 719 dated 30.12.2021 after medical and character clearness, appellant was also detailed for the basic recruit Training.
3. The charge Sheet No. 07 /Enq dated 10.01.2023 were served upon appellant wherein charge of manipulated the CPO letter mentioned above were leveled against appellant. It was alleged that the appellant name was actually among the recommended candidate but wrongly shown as a failed candidates.
4. the appellant submitted reply and respond to the charge sheet, that appellant qualified test physical and medical test before the prescribed board and receipt of CPO direction vide above quoted letter was summoned by DPO karak for appointment process after appointment was detailed for training, however after the laps of six month long period the impugned order was passed; hence then departmental appeal on the following ground.

GROUND:

- a. The appellant is a native of District karak and qualify the test which was launched by the ETEA authority, therefore appellant wrongly been charged for manipulating received from CPO under the signature of AIG Establishment. There is no evidence in record, that appellant was connected with preparation of the letter. appellant was a candidate but not an employer.
- b. That an ex-paste enquiry proceeding where alleged carried out into the matter. The enquiry officer failed to trace the dealing hand behind the impugned letter and his wrongly recommended award of penalty to appellant without collecting of any evidence connecting appellant with the charge.
- c. The District police officer karak had appointment on the base of CPO direction but the District police officer karak wrongly stepped into the matter any enquiry on the part of CPO because the wrong if any was committed at CPO, therefore impugned is one sided and premature.
- d. That appellant was wrongly removed from service. The appointment of appellant was wrongly held illegal, after laps of about one year, appellant was punished for in action of other again appellant on the strength of FRP and superintendent of Police FRP Kohat was competent authority DPO karak has wrongly passed the Order.
- e. The appointment of appellant was mature as appellant served police for about one year and was undergoing training therefore; removal of appellant this belated stage all the best of unproved charged is not legally justify legally justified.
- f. The appellant belong to a poor family and had qualified ETEA Test and process good health and physique therefore termination of appellant at this stage was wrong and against the principles of natural justice.

It is therefore requested that appellant may by re-instated in the service with back benefit.

You're obediently
Aamir ullah, No. 5007
Cont. No. 0344-9808384

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Annexure - D

CHINA

The order will dispose of the departmental appeal preferred by Constable Amir Ullah No. 5007 of Karak District Police against the order of District Police Officer, Karak, whereby he was awarded major punishment of dismissal from service vide OB No. 94, dated 15.01.2023. Reasoning of the appellant was shown in the PTEA merit list No. 130 directly received to SDPO of Karak from GPO Peshawar. However, in the original PTEA's merit list duly attested by a GPO establishment, his name was not found, which shows that he had tampered the PTEA's merit list. The appellant tried to deceive the department by connection with getting appointment order. (Constable)

Proper departmental enquiry/proceedings were initiated against him and SDPO Tahiro-Nasrati Karak was nominated as Enquiry Officer. The Enquiry Officer after fulfillment of all procedural formalities submitted his findings wherein he stated that the name of the appellant does not exist in the original PTEA's merit list.


Keeping in view the recommendations of enquiry officer and other material available on record, the delinquent official was awarded major punishment of dismissal from service by the District Police Officer, Karak vide OB No. 94, dated 15.01.2023.

Feeling aggrieved from the order of District Police Officer, Karak, the appellant preferred the instant appeal. He was summoned and heard in person in Orderly Room held in this office on 02.05.2023.

From the perusal of the enquiry file, service record of the appellant and reasons advanced by him, it came to light that the name of the appellant did not exist in the original PTEA's merit list of passed candidates. Thus, he has got no rights of recruitment as Constable in Police department being failed candidate. He had managed his recruitment in Police department through fraudulent means. The retention of such individual in the Police force is detrimental to the public interest.

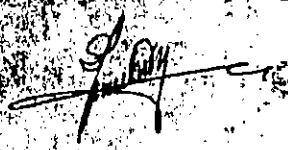
Keeping in view the above, Mr. Shar Akbar, PSP, S.St., Regional Police Officer, Karak, being the appellate authority, hereby reject the instant appeal being devoid of merit and substance.

Order Announced


Regional Police Officer,
Kohat Region

No. 1196 / EC, Dated Kohat the 14 / 05 / 2023

Copy forwarded to District Police Officer, Karak for information and necessary w/ r/o office Memo No. 275/DP, dated 10/04/2023. His Service Record is returned herewith.





111

از دفتر: سب ڈویژن پولیس آفیسر سرکل تحت نصرتی۔

فون نمبر: 0927-250850

مورخہ 23-02-14

نمبر PA 51

بجانب: جناب ڈسٹرکٹ پولیس آفیسر صاحب کرک۔

عنوان: فائیکل رپورٹ (charge sheet against Constable Amir Ullah No. 5007/FRP)

جناب عالی!

بحوالہ چارج شیٹ احکام نمبر Enq/07 مورخہ 10.01.2023 بجاریہ جناب ڈسٹرکٹ پولیس آفیسر صاحب کرک برخلاف ریکروٹ کنستبل عامر اللہ بلٹ نمبر 5007 (FRP Strength) زیر دستخطی کو مارک ہو کر زبردستی نے انکو تیری کر کے جو ذیل ہے۔

● **الزامات:**

بحوالہ چارج شیٹ نمبر Enq/07 مورخہ 10.01.2023 ریکروٹ کنستبل امیر اللہ بلٹ نمبر 5007 (FRP) پر الزام ہے کہ کنستبلان جمال رسول بلٹ نمبر 4984 اور بلال احمد بلٹ نمبر 2281 کے خلاف انکو تیری کے دوران اور بجمل ETEA میرٹ لسٹ ملاحظہ کرنے پر پایا گیا کہ مذکورہ ریکروٹ کنستبل عامر اللہ ETEA لسٹ میں فیل ہوا ہے اور کسی کے وساطت سے میرٹ لسٹ میں ردہ بدل کر کے فراڈ اور دھوکہ سے اپنا نام میرٹ لسٹ میں ڈال کر خود کو بطور کنستبل محکمہ پولیس میں بھرتی کیا ہے۔

جناب عالی!

انکو تیری فائل ملاحظہ کرنے پر پایا گیا کہ مذکورہ کنستبل CPO پشاور سے براہ راست موصول شدہ ETEA میرٹ لسٹ میں سیریل نمبر 130 پر نوٹل 40 نمبر حاصل کر کے پاس ہے، جبکہ بحوالہ لیٹر نمبر 3432/RK مورخہ 18.08.2022 دفتر جناب RPO کے قلم موصول شدہ میرٹ لسٹ پاس امیدواروں میں مذکورہ ریکروٹ کنستبل کا نام موجود نہیں ہے۔

● **بیان آڈان ریکروٹ کنستبل عامر اللہ بلٹ نمبر 5007/FRP**

ریکروٹ کنستبل عامر اللہ بلٹ نمبر 5007 بسلسلہ انکو تیری طلب کر کے جس نے زبانی تحریری اور کراس سوالات، جوابات میں بتلایا کہ اس نے سال 2021 میں محکمہ پولیس میں بذریعہ ETEA اپلائی کر کے امتحان پاس کیا۔ جو بعد میں پاس شدہ امیدواران کو بسلسلہ ناپ، تول وغیرہ طلب کر کے جن میں من ریکروٹ کنستبل بھی شامل تھا۔ بھرتی کے تمام مراحل سے گزرنے کے بعد بلٹ نمبر 5007/FRP الٹ ہو کر پولیس لائن کرک میں حاضری کر کے تقریباً ایک ماہ بعد پولیس لائن کرک سے پولیس لائن (FRP) کو ہاٹ بھجوا یا گیا، وہاں سے تقریباً 08 مہینے بعد ٹرینگ PTC سیکو بھجوائے گئے اور اب ٹرینگ کا چوتھا مہینہ چل رہا ہے کہ بسلسلہ انکو تیری حد (unqualified) ضلع واپس کیا گیا۔

باقی ETEA میرٹ لسٹ میں ردہ بدل کے بارے میں مجھے کوئی علم نہیں ہے کہ کس نے کس وجہ سے میرٹ لسٹ میں ردہ بدل کیا ہے۔ اور نہ ہی پولیس اور ETEA ڈیپارٹمنٹ میں میرا کوئی رشتہ دار ہے۔ (تحریری بیان عامر اللہ بلٹ ہے)۔

● **کیٹی انکو تیری۔**

دوران انکو تیری پایا گیا، کہ ایک ریکروٹ لسٹ (غیر مصدقہ) جس میں 130 امیدواران کامیاب ہوئے ہیں سلسلہ نمبر 130 پر کنستبل عامر اللہ کا نام موجود ہے، جبکہ دوسرے ریکروٹ لسٹ (Attested) میں کل 128 امیدواران کامیاب ہوئے ہیں، جن میں کنستبل مذکورہ عامر اللہ کا نام شامل نہیں ہے۔

جہاں تک اس بات کا تعلق کہ کہاں پر مذکورہ کنستبل عامر اللہ 5007 کا نام لسٹ میں شامل کیا گیا ہے۔ اندریں بارہ متعلقہ دفتر CPO پشاور ہی درست رپورٹ دے سکتا ہے۔ رپورٹ ہر ادنا مناسب حکم ارسال خدمت ہے۔

سب ڈویژن پولیس آفیسر سرکل تحت نصرتی۔

بیان آزاد کارپوریشن ٹیسٹل ہاسپتال کی صورت میں

جناب عالی

خواجہ چارسدہ ٹیسٹل ہاسپتال / ۱۱/۱۱/۲۰۲۳ء کو ۵۸۱۵۰۱۰۷/۱۱۱ سے ۱۰/۱۱/۲۰۲۳ کو شروع ہو کر ۱۰/۱۱/۲۰۲۳ سے شروع ہونے سے
آزاد کارپوریشن ٹیسٹل ہاسپتال کی صورت میں جاری ہے۔ اس کے لئے اس کی ایک رپورٹ تیار کی جا رہی ہے۔
اس رپورٹ میں اس کے بارے میں تمام تفصیلات اور اس کے کاروبار کے بارے میں بھی تفصیلات دی جائیں گی۔

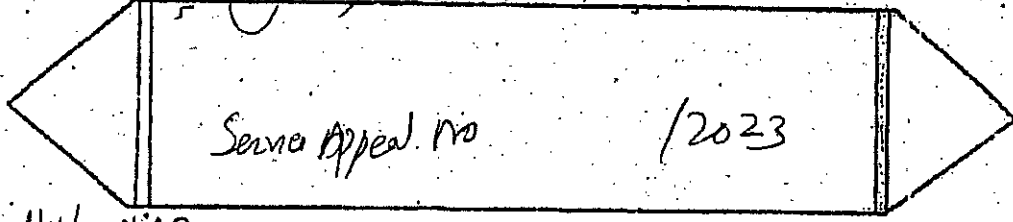
الزام کیا ہے اور اس میں سے کتنی رقم کی رقم اس کے لئے سالانہ رقم میں
پرائیویٹ ETEA کے ذریعے اس کے لئے رقم آئے گی۔ اس کے لئے رقم اس کے لئے رقم آئے گی۔
اس کے لئے رقم آئے گی۔ اس کے لئے رقم آئے گی۔ اس کے لئے رقم آئے گی۔
اس کے لئے رقم آئے گی۔ اس کے لئے رقم آئے گی۔ اس کے لئے رقم آئے گی۔
اس کے لئے رقم آئے گی۔ اس کے لئے رقم آئے گی۔ اس کے لئے رقم آئے گی۔
اس کے لئے رقم آئے گی۔ اس کے لئے رقم آئے گی۔ اس کے لئے رقم آئے گی۔

نقدی رقم ۲۵ لاکھ روپے کی رقم اس کے لئے رقم آئے گی۔ اس کے لئے رقم آئے گی۔
اس کے لئے رقم آئے گی۔ اس کے لئے رقم آئے گی۔ اس کے لئے رقم آئے گی۔
اس کے لئے رقم آئے گی۔ اس کے لئے رقم آئے گی۔ اس کے لئے رقم آئے گی۔

فرضاً ETEA ٹیسٹل ہاسپتال کی صورت میں ہونے والے تمام کاموں کے بارے میں
اس کے لئے رقم آئے گی۔ اس کے لئے رقم آئے گی۔ اس کے لئے رقم آئے گی۔
اس کے لئے رقم آئے گی۔ اس کے لئے رقم آئے گی۔ اس کے لئے رقم آئے گی۔
اس کے لئے رقم آئے گی۔ اس کے لئے رقم آئے گی۔ اس کے لئے رقم آئے گی۔

۹۲۴۶۹۲۰۸۳۸۴
۱۱۲۰۲۰۵۷۶۵۸۶۰

بعدالت صاحب سروس ٹرانسپول کیشاو



2 مخمب اپیلانٹ

عامر اللہ بنام Appeal 1

مواضع
مقدمہ
دعویٰ
چیم

bc-21-3619

باعث تحریر آنگہ NIC no. 14202-1223331-5

مقدمہ بند برج عنوان بالا اٹکس اپنی طرف سے واسطے پیروی اور جواب دہی وکل کاروائی متعلقہ
 آن مقام کیشاو کیلئے پیشاں صوبہ سندھ روہان شاہ محمد صاحب ایڈووکیٹ
 مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
 وکیل صاحب کو روشنی نامہ کرنے و تقرر ثالثیت فیصلہ برحلف دینے جواب دہی اور اقبال دعویٰ اور
 بلا ضرورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ درخواستی دعویٰ اور درخواست ہر قسم کی تصدیق
 زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز ضرورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی
 نیز دائر کرنے اپیل ٹرانسپول و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
 کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ لیا اپنے بجائے تقرر کا اختیار
 ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ اختیارات حاصل ہوں گے اور اس کا سہاقت
 پر داخبت منظور قبول ہوگا۔ اور ان مقدمہ میں جو خرچہ دہر جات اتوائے مقدمہ کے سبب سے ہوگا۔
 کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
 مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

ایڈووکیٹ
کیشاو
در ایڈ
محمد
ظہیر

عامر اللہ ولد شہزاد خان مسلمہ
دب سنگھی تحصیل ملو کوئی

البرقونم 29 ماہ صحت 2023

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