


FORM OF ORDER SHEET

Court of _____

Appeal No. 1503/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	19/07/2023	<p>The appeal of Mr. Tariq Gul presented today by Mr. Kabir Ullah Khattak Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 25-07-2023.</p> <p>By the order of Chairman  REGISTRAR</p>

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.**

Appeal No. 1503 of 2023

Tariq Gul Constable No. 2133 District Police Officer
Mardan.

..... Appellant

VERSUS

1. District Police Officer Mardan.
2. Regional Police Officer Mardan.
3. The Inspector General of Police KPK Peshawar.
4. Additional Inspector General of Police HQrs KPK
Peshawar.

..... Respondents

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Appellant

Through


Kabir Ullah Khattak


Roeda Khan

Advocates, High Court, Peshawar

11

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.**

Appeal No. 1503 of 2023

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Mardan.

..... Appellant

VERSUS

1. District Police Officer Mardan.
2. Regional Police Officer Mardan.
3. The Inspector General of Police KPK Peshawar.
4. Additional Inspector General of Police HQrs KPK
Peshawar.

..... Respondents

**APPEAL UNDER SECTION 4 OF THE KPK
SERVICE TRIBUNAL ACT, 1974, AGAINST
THE IMPUGNED ORDER DATED
15/11/2021 WHEREBY MINOR PENALTY
OF FORTFEITURE OF TWO YEARS
APPROVED SERVICE HAS BEEN
IMPOSED TO THE APPELLANT AGAINST
WHICH THE APPELLANT FILED
DEPARTMENTAL APPEAL ON 10.05.2023
WHICH HAS BEEN REJECTED 26.06.2023
ON NO GOOD GROUNDS.**

Prayer:

On acceptance of this appeal the impugned order dated 15.11.2021 to the extent of minor punishment of forfeiture of approve service for two years and order dated 26.06.2023 may kindly be set aside and forfeiture of approved service for two years of the appellant may kindly be restore

(2)
in favor of the appellant alongwith all back benefits.

Any other remedy which this august tribunal deems fit that may also be onward granted in favor of appellant.

Respectfully Sheweth:

FACTS

- The appellant respectfully submits as under:
 - 1) That the appellant has been appointed as Constable with respondent Department since long time.
 - 2) That after appointment the appellant performed his duty regularly with full devotion and hard work and no complaint whatsoever has been made against the appellant.
 - 3) That initially the appellant has been dismissed from service on 09.12.2020 against which the appellant filed Departmental appeal which has been rejected on 15.01.2021. (Copy of impugned order, Departmental appeal & rejection order are attached as Annexure-A, B & C).
 - 4) That the appellant submitted revision petition against the impugned order in response of which de-novo inquiry has been conducted against the appellant and for that very purpose the appellant has been reinstated for the purpose of de-novo

3)

inquiry proceeding by the respondent No. 1 by pursued of the order of worthy Additional inspector General of Police HQrs Khyber Pakhtunkhwa Peshawar office notification No. 2171-80/2021 dated 18.06.2021 on 28.06.2021. (Copy of reinstatement order is attached as Annexure-D).

- 5) That on 15.11.2021 the impugned order to the extent of minor punishment as well as leave without pay has been issued against the appellant whereby minor punishment of forfeiture of two years approved service has been imposed to the appellant. (Copy of impugned order is attached as Annexure E).
- 6) That the appellant submitted Departmental appeal on 10.05.2023 which has been rejected on 26.06.2021 on no good grounds. (Copy of Departmental appeal and rejection order are attached as Annexure-F & G).
- 7) That feeling aggrieved the appellant submitted the instant Service Appeal before this Hon' able Tribunal inter alia on the following grounds.

GROUND

A). That the impugned order dated 15/11/2021 to the extent of minor punishment and order dated 26.06.2023 are void ab initio orders

(4)
because it has been passed without fulfilling the codal formalities.

- D) That no show cause notice has been issued to the appellant by the respondent Department.
- E) That it well settled principal of law no one can be condemn unheard because it is against the natural justice of law and this respect the appellant relied upon the Judgment reported on 2008 SCMR Page 678.
- F). That no statement of witness has been recorded and no opportunity of cross examination has been provided to the appellant.
- G) That there is no prove and evidence regarding the alleged allegation level against the appellant.
- H) That no departmental and regular inquiry has been conducted against the appellant.
- I) Any other grounds will be raised at the time of arguments with prior permission of this Hon' able Tribunal.

It is therefore most humbly prayed that On acceptance of this appeal the impugned order dated 15.11.2021 to the extent of minor punishment of forfeiture of approve service for two years and order dated 26.06.2023 may kindly be set aside and forfeiture

(5)

of approved service for two years of the appellant may kindly be restore in favor of the appellant alongwith all back benefits.

Any other remedy which this august tribunal deems fit that may also onward granted in favor of appellant.

Dated 19/07/2023.

Through


Appellant


Kabir Ullah Khattak


Rozeeda Khan
Advocates, High Court, Peshawar

(6)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.**

Appeal No. _____ of 2023

Tariq Gul Constable No. 2133 District Police Officer
Mardan.

..... Appellant

VERSUS

1. District Police Officer Mardan.
2. Regional Police Officer Mardan.
3. The Inspector General of Police KPK Peshawar.
4. Additional Inspector General of Police HQrs KPK
Peshawar.

..... Respondents

ADDRESSES OF THE PARTIES

Appellant

Tariq Gul Constable No. 2133 District Police Officer
Mardan.

Respondents

1. District Police Officer Mardan.
2. Regional Police Officer Mardan.
3. The Inspector General of Police KPK Peshawar.
4. Additional Inspector General of Police HQrs KPK
Peshawar.

Tariq Gul
Appellant

Through

Kabir Ullah Khattak

Roeeda Khan

Advocates, High Court, Peshawar

(7)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.**

Appeal No. _____ of 2023

Tariq Gul Constable No. 2133 District Police Officer
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..... Appellant

VERSUS

1. District Police Officer Mardan.
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3. The Inspector General of Police KPK Peshawar.
4. Additional Inspector General of Police HQrs KPK
Peshawar.

..... Respondents

AFFIDAVIT

I, Tariq Gul Constable No. 2133 District Police Officer
Mardan do hereby solemnly affirm and declare on oath that
the content of the above application are true and correct to
the best of my knowledge and belief and nothing has been
kept secret and concealed from this Hon'ble Tribunal.


DEPONENT

(8)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.**

Appeal No. _____ of 2023

Tariq Gul Constable No. 2133 District Police Officer
Mardan.

..... Appellant

VERSUS

1. District Police Officer Mardan.
2. Regional Police Officer Mardan.
3. The Inspector General of Police KPK Peshawar.
4. Additional Inspector General of Police HQrs KPK
Peshawar.

..... Respondents

**APPLICATION FOR CONDINATION OF DELAY
IF ANY.**

Respectfully Sheweth:

Petitioner submits as under:-

1. That the above mentioned appeal is filing before this Hon' able Court in which no date is fixed for fixed for hearing so far.
2. That the impugned order dated 15/11/2021 to the extent of minor punishment and order dated 26.06.2023 are void ab initio orders because it has been passed without fulfilling the codal formalities.
3. That there is no prove or evidence regarding the allegation level against the appellant.
4. That there are so many judgment of the Supreme Court of Pakistan that cases should be decided rather then on

(9)

technology which provides that the cases shall be decided on merits rather than technicalities.

5. That there are so many judgments of the Supreme Court as well as specific provision of law that limitation has been counted from the date of communication.
6. That any other grounds will be raised at the time of arguments with the prior permission of this Hon' able court.

It is therefore, requested that the limitation period (if any) may kindly be condone in the interest of justice.


Appellant

Through


Kabir Ullah Khattak

Koeda Khan
Advocates, High Court, Peshawar



OFFICE OF THE
DISTRICT POLICE OFFICER,
MARDAN

Tel No. 0937-9230109 & Fax No. 0937-9230111
Email: dpomdn@gmail.com



No. 1316-18/PA

Dated 11/12/2020

ORDER ON ENQUIRY OF CONSTABLE TARIQ GUL NO.2133

This order will dispose-off a Departmental Enquiry under Police Rules 1975, initiated against the subject official, under the allegations that while posted at Guard Main Gate new Tehsil Katlang Logbook Entry Duty (now under suspension Police Lines) was placed under suspension & closed to Police Lines vide this office OB No.1475 dated 03-09-2020, issued vide order/endorsement No.4575-77/OSI dated 08-09-2020, on account of a complaint by Lady Constables Yusra No.2756, Shumaila No.2906, Fatima No.1315, Maria No.3275 & Aneela No.1328 vide DD report No.10 dated 02-09-2020 Police Lines Mardan, complaining therein that an unknown person from Mobile Nos: 0315-8899993 & 0313-7592974 is immorally disturbing them.

The matter was initially enquired into through DSP/HQrs Mardan, who after doing the needful, submitted his findings to this office vide his office letter No.427/HQrs dated 03-09-2020, holding responsible Constable Tariq Gul No.2133 of misconduct & recommended for proper departmental action, so he was proceeded against departmentally through Mr. Adnan Azam SDPO Rural Mardan vide this office Statement of Disciplinary Action/Charge Sheet No.349/PA dated 11-09-2020, who (F.O) after fulfilling necessary process, submitted his Finding Report to this office vide his office letter No.1015/ST dated 20-11-2020, recommending the alleged official for major punishment.

Final Order

Constable Tariq Gul was heard in OR on 09-12-2020, who failed to satisfy the undersigned, therefore, awarded him major punishment of dismissal from service with immediate effect, in exercise of the power vested in me under Police Rules-1975.

OR No. _____

Dated: 11/12/2020.

(Dr. Zahid Ullah) PSP
District Police Officer
Mardan

Copy forwarded for information & n/action to:-

- 1) The DSP/HQrs Mardan.
- 2) The P.O & E.C (Police Office) Mardan.

(۱۹۸)

مختصر جناب عزت مآب ار پی او صاحب مردان

(۱۱)

برخواست کردہ کنشیل طارق گل بلیٹ نمبر 2133 (سائل)

نام

ڈپٹی کمشنر پولیس ایف بی صاحب مردان
ڈپٹی کمشنر ایف بی صاحب مردان

اپیل بناراضگی حکم از آرڈر چیٹھی نمبر PA/18-4316 مورخہ 11/12/2020 OB نمبر 2203 مورخہ 09/12/2020

استدعائے اپیل منظور کی اپیل ہذا حکم از آرڈر نمبر OBN 2203 مورخہ 09/12/2020

از دفتر مسول علیہ موصوف حقوق سائل پر منسوخ قرار دیا جائے اور من سائل کو دوبارہ ملازمت سرکار پر بحال کرنے کے احکامات صادر فرمائے۔

سائل ذیل عرض رسائی ہے۔

یہ کہ سائل کو افسران بالانے سال 2013 میں صلاحیت و لیاقت کی بنیاد پر ضلع مردان پولیس میں بحیثیت کنشیل بھرتی کر کے سائل
برخواستگی کیا گیا تاکہ اپنی ڈیوٹی خوش اسلوبی سے سرانجام دی ہے۔

یہ کہ سائل کو موبائل کے غلط استعمال کے الزام پر بحوالہ بد بالا یہ ایک جنیشن قلم سرکاری ملازمت سے برخاست کر دیا ہے اور بحالی
PA/18-4316 مورخہ 11/12/2020 قابل بحالی اور قابل منسوخ ہے۔

یہ کہ انکو ایف بی افسر نے اپنے فائنڈنگ میں میرے لیے اخلاقیات کورس کی سزا تجویز کی تھی۔
یہ کہ سائل اپنے گھر کا واحد مرد ہے۔ گھر بار میں دیگر کوئی نگران کفیل نہیں رکھتا۔

الہذا سائل بذریعہ درخواست ہذا استدعاء کرتا ہے کہ یہ منظوری اپیل ہذا حکم فیصلہ OBN/2203 مورخہ 09/12/2020 از دفتر
مسول علیہ موصوف سائل پر غیر موثر منسوخ قرار دیا جا کر من سائل کو دوبارہ ملازمت پر بحال کر کے احکامات صادر فرمائیں۔ سائل
افسران بالا کو استندہ شکایت کا موقع نہیں دینگا اور تا عمر دعا گو رہے گا۔

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العبد

سائل برخاست کردہ کنشیل طارق گل بلیٹ نمبر 2133

(D) (13) (C) (12)

ORDER

This order will dispose-off the departmental appeal preferred by Ex-Constable Tariq Gul No. 2133 of Mardan District Police against the order of District Police Officer, Mardan, whereby he was awarded major punishment of dismissal from service vide OB No. 2203 dated 09.12.2020. The appellant was proceeded against departmentally on the allegations that he while posted at Guard Main Gate new Tehsil Katlang, found involved in eve-teasing by sending filthy messages to Lady Constables. The complainant Lady Constables made complaint alleging therein that an unknown person from Mobile Nos: 0315-8899993 & 0313-7592974 sends obnoxious messages to them.

In order to probe into the allegations, the matter was initially enquired into through Deputy Superintendent of Police Headquarters, Mardan, who after doing the needful, submitted his findings to District Police Officer, Mardan and held responsible the delinquent Officer of the misconduct because both the above mentioned numbers were in his use. Hence, he was recommended for formal departmental proceedings.

Proper departmental enquiry proceedings were initiated against him. He was issued Charge Sheet alongwith Statement of Allegations and Sub Divisional Police Officer (SDPO) Rural, Mardan was nominated as Enquiry Officer. The Enquiry Officer after fulfilling codal formalities, submitted his findings, stating therein that the allegations leveled against him had been proved. He recommended the delinquent Officer for major punishment.

He was also provided opportunity of self defense by summoning him in the Orderly Room by the District Police Officer, Mardan on 09.12.2020, but he failed to advance any cogent reason in his defense. Hence, he was awarded major punishment of dismissal from service vide OB No. 2203 dated 09.12.2020.

Feeling aggrieved from the order of District Police Officer, Mardan, the appellant preferred the instant appeal. He was summoned and heard in person in Orderly Room held in this office on 12.01.2021.

From the perusal of the enquiry file and service record of the appellant, it has been found that allegations against the appellant have been proved beyond any shadow of doubt. Being a member of disciplined/uniformed force, the involvement of the delinquent Officer in such like immoral activities brought a bad name for entire Police force in the eyes of general public, besides affecting other members of Police force. Moreover, the appellant was under

(14)

(13)

obligations to safeguard/protect the honor/dignity of the public irrespective of their gender but in the instant case the appellant himself indulged in immoral activities which is totally against the norms of disciplined force. Hence, the retention of appellant in Police Department will stigmatize the prestige of entire Police Force. Besides, during the course of personal hearing, he could not present any cogent justification to warrant interference in the order passed by the competent authority. Prior to this, the appellant had been earlier punished on various occasions on account of his misconduct. Hence, the very conduct of appellant is unbecoming of a disciplined Police Officer. Therefore, the order passed by the competent authority does not warrant any interference.

Keeping in view the above, I, Sher Akbar, PSP S.St Regional Police Officer, Mardan, being the appellate authority, find no substance in the appeal, therefore, the same is rejected and filed, being devoid of merit.

Order Announced.


Regional Police Officer,
Mardan.

No. 248 IES, Dated Mardan the 15-01- 2021.

Copy forwarded to District Police Officer, Mardan for information and necessary w/r to his office Memo: No. 362/LB dated 30.12.2020. His Service Record is returned herewith.

(****)

(D) (14)

**OFFICE OF THE
DISTRICT POLICE OFFICER,
MARDAN**

Tel No. 0937-9230109 & Fax No: 0937-9230111
Email dpo_mardan@yahoo.com


ORDER

In pursuance of the orders of worthy Additional Inspector General of Police, HQr, KP, Peshawar office notification No. 2171-80/21, dated 18.06.2021, Ex-constable Tariq Gul No. 2133 is hereby re-instated in to service for the purpose of de-novo enquiry with immediate effect.

ASP Takht Bhai is hereby nominated as enquiry officer. He shall submit his finding report within 14 days positively.

OB No. 1103

Dated. 28/06/2021.


District Police Officer
Mardan

No. 4211-12/EC, dated 29/06/2021.

Copy for information to the:-

1. PO.
2. OSI.



(u) **OFFICE OF THE
DISTRICT POLICE OFFICER,
MARDAN**

Tel No. 0937-9230109 & Fax No. 0937-9230111
Email: dpomdn@gmail.com

"E" (15)
2021

No. 437275 PA

Dated 17/11/2021

ORDER ON ENQUIRY (DE-NOVO) OF CONSTABLE TARIQ GUL NO.2133

This order will dispose-off a Departmental (De-novo) Enquiry under Police Rules 1975, initiated against the subject Police official, under the allegations that while posted at Guard Main Gate new Tehsil Katlang Logbook Entry Duty (Now PS Lund Khwar), had awarded major punishment of dismissal from service after fulfilling necessary departmental process on account of involving in immoral activities by sending filthy messages to Lady Constables through Mobile vide this office OB No.2213 dated 09-12-2020.

After rejecting departmental appeal by Worthy RPO Mardan, he (Constable Tariq Gul) has knocked the door of CPO Peshawar for re-instatement in service, where his appeal was accepted & reinstated in service by Appellate Board vide CPO Peshawar Notification No:2171-80/21 dated 18-06-2021 and with the directions to the undersigned to conduct De-novo enquiry against the appellent.

In compliance, the alleged official was reinstated in service till the conclusion of De-novo enquiry vide this office OB No.1103 dated 29-06-2021, issued vide order/endorsement No.4211-12/EC dated 29-06-2021 with proceedings him against departmentally (De-novo) through Mr. Rokhanzeb Khan SDPO Takht-Bhai, who (E.O) after fulfilling necessary process, submitted his Finding Report to this Office vide his Office letter No.993/ST dated 21-10-2021, recommending the alleged official for minor punishment.

Final Order

Constable Tariq Gul was heard in O.R on 03-11-2021, during which, he has failed to present any plausible reasons in his defense, therefore, I agreed with the suggestions of Enquiry Officer by awarding him minor punishment of forfeiture his (02) years approved service. He is re-instated in service from the date of dismissal & counted his intervening/out of service period towards service as leave without pay with immediate effect, in exercise of the power vested in me under Police Rules-1975.

OB No. 2133
Dated 15/11/2021


(Dr. Zahid Ullah) PSP
District Police Officer
Mardan

Copy forwarded for information & n/action to:-

- 1) The SDPO Takht-Bhai.
- 2) The PO & E.C (Police Office) Mardan.
- 3) The OSI (Police Office) Mardan with () Sheets.

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صاحبزادہ

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میں نے یہ سہ ماہی ہے جو کہ
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2133 منیر پور
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"B" (17)

ORDER.

This order will dispose-off the departmental appeal preferred by Constable Tariq Gul No. 2133 of Mardan District Police against the order of the then District Police Officer, Mardan, whereby he was awarded minor punishment of forfeiture of two years approved service vide OB: No. 2130 dated 15.11.2021. A departmental De-novo enquiry proceeding has been initiated against the delinquent Officer on the allegations that he while posted at Guard Main Gate new Tehsil Katlang logbook entry duty had awarded major punishment of dismissal from service after fulfilling necessary departmental proceedings on account of involvement in immoral activities by sending filthy messages to Lady Constables through Mobile vide OB: No. 2213 dated 09.12.2020.

After rejecting departmental appeal by the then Regional Police Officer, Mardan vide order endorsement No 248/ES dated 15.01.2021, the delinquent Officer preferred a Revision Petition to Central Police Office, Peshawar for re-instatement in service where his appeal was accepted and he was re-instated into service by Appellate Board vide Central Police Office, Peshawar notification No. 2171-80/21 dated 18.06.2021 with the directions to the then District Police Officer, Mardan to conduct De-novo enquiry against the delinquent Officer.

Therefore, the delinquent Officer was re-instated into service for the purpose of De-novo enquiry proceedings vide OB: No. 1103 dated 28.06.2021 by the then District Police Officer, Mardan and the then Sub Divisional Police Officer (SDPO) Takht Bhai, Mardan was nominated as Enquiry Officer. The Enquiry Officer after fulfilling codal formalities, submitted his findings report to the then District Police Officer, Mardan and recommended the delinquent Officer for minor punishment.

He was also provided opportunity of self defense by summoning him in the Orderly Room by the then District Police Officer, Mardan on 03.11.2021, but he failed to advance any cogent reason in his defense. Hence, he was awarded minor punishment of forfeiture of two years approved service and re-instated into service from the date of dismissal and counted his intervening/out of service period towards service as leave without pay vide OB: No. 2130 dated 15.11.2021.

Feeling aggrieved from the order of the then District Police Officer, Mardan, the appellant preferred the instant appeal. He was summoned and heard in person in Orderly Room held in this office on 21.06.2023.

(18)

From the perusal of the enquiry file and service record of the appellant, it has been found that allegations against the appellant have been proved beyond any shadow of doubt. Being a member of disciplined/uniformed force, the involvement of the delinquent Officer in such like immoral activities brought a bad name for entire Police force in the eyes of general public, besides affecting other members of Police force. Moreover, the appellant was under obligations to safeguard/protect the honor/dignity of the public irrespective of their gender but in the instant case the appellant himself indulged in immoral activities which is totally against the norms of disciplined force. The very conduct of appellant is unbecoming of a disciplined Police Officer. Besides, during the course of personal hearing, he could not present any cogent justification to warrant interference in the order passed by the competent authority. Prior to this, the appellant had been earlier punished on various occasions on account of his misconduct. The appellant approached this forum at a belated stage by filing the instant appeal which is badly time barred by 01 year, 05 months and 25 days without advancing any cogent reason regarding such delay. Moreover, he could not present any cogent justification to warrant interference in the order passed by the competent authority.




Keeping in view the above, I, **Muhammad Suleman, PSP Regional Police Officer, Mardan**, being the appellate authority, find no substance in the appeal, therefore, the same is rejected and filed, being devoid of merit as well as badly time barred by 01 year, 05 months and 25 days

Order Announced:

(MUHAMMAD SULEMAN) PSP
Regional Police Officer,
Mardan.

No. 4225 /ES, Dated Mardan the 26 /05/ 2023.

Copy forwarded to District Police Officer, Mardan for information and necessary w/r to his office Memo: No91/LB dated 25.05.2023. His service record is returned-herewith.

قیمت 50 روپے	53040			
ایڈوکیٹ:		پشاور بار ایسوسی ایشن، خیبر پختونخواہ		
بار کونسل / ایسوسی ایشن نمبر: 2514-09				
رابطہ نمبر: 0333026255				

بعدالت جناب: محمد علی احمد

منجانب: <u>اسلام آباد</u>	دعویٰ:
	علت نمبر:
	مورخہ:
	جرم:
	تھانہ:

باعت تحریر آئیکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ
 آن مقام اسلام آباد کیلئے کیڈو اللہ خٹک، رویل کے ذریعے پیش کیا گیا ہے۔
 کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو
 راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق
 زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز
 دائرہ کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی
 کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب
 مقرر شدہ کو کوئی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا سبب پر داخست منظور و قبول ہوگا
 دوران مقدمہ میں جو خرچہ ہر اجانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے
 باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے



المقام: اسلام آباد

Accepte 13/7

نوٹ: اس وکالت نامہ کی فونو کالی ناقابل قبول ہوگی۔