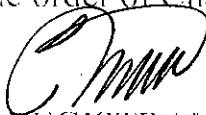


FORM OF ORDER SHEET

Court of _____

Appeal No. 1674/2023

S No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	17/08/2023	<p>The appeal of Mr. Wahid Gul is presented today by Mr. Amin ur Rehman Yusufzai Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on <u>21-08-2023</u>.</p> <p>By the order of Chairman  REGISTRAR</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 1674 of 2023

WAHID GUL (Ex-Police Constable) **Appellant**

V E R S U S

Government of Khyber Pakhtunkhwa & 3 others **Respondents**

I N D E X

S. #.	Description of Documents	Annex	Pages
1.	Grounds with memo of appeal		1-3
2.	Affidavit		4
3.	Addresses of the parties		5
4.	Order dated: 05.10.2002, commendation certificate dated: 22.12.2011, Tareefi Sanad 2018 (Sind Regiment), commendation certificate 23.09.2019, 21.05.2020 & News clippings 22.10.2011/ 24.10.2011	A-A/5	6-11
5.	Training certificate dated: 28.02.2004	B	12
6.	Notification dated: 13.02.2020	C	13-16
7.	Order dated: 21.01.2021 alongwith order dated: 27.08.2020	D	17-18
8.	Order dated: 07.10.2021	E	19
9.	Order dated: 18.10.2021	F	20
10.	Order dated: 27.02.2023 of Respondent No.3 alongwith Departmental Appeal dated: 26.08.2022	G	21-24
11.	Order dated: 23.06.2023 of Respondent No.2 alongwith Revision Petition	H	25-27
12.	Pay slip/bill dated: 10.07.2020	I	28
13.	Wakalatnama		29

[Signature]
Appellant

Through

[Signature]
Amin ur Rehman Yusufzai

[Signature]
Khalid Khan Mohmand

&

[Signature]
Muaz Ashraf Khalil

Advocates, Peshawar
3-A, Park Avenue, Bethani Plaza,
University Town, Peshawar
Email: aryusufzai@gmail.com
Cell No.0321-9022964 & 0342-9101124

Dated: 11.08.2023

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 1674 of 2023

WAHID GUL (Ex-Police Constable) S/O **ABDUL KHALIQ**
R/O Kuki Khel, Jamrud Khyber Agency. **Appellant**

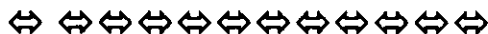
VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary Home & Tribal Affairs Department, Civil Secretariat, Peshawar.
2. Provincial Police Officer (PPO), Central Police Office (CPO) Khyber Road, Peshawar Cantt.
3. Chief City Police Officer (CCPO), Police Lines, Peshawar.
4. District Police Officer (DPO), Shahkas Tribal District Khyber. **Respondents**

SERVICE APPEAL U/S 4 OF THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL ACT, 1974 READ WITH ALL PROVISIONS OF LAW/RULES, GOVERNING THE SUBJECT, AGAINST ORDER NO.4546/PSO KHYBER, dated: 18.10.2021 OF RESPONDENT NO.4, VIDE WHICH APPELLANT HAS UNILATERALLY BEEN DISMISSED FROM SERVICE, ORDER NO.907-11/PA, DATED: 27.02.2023 OF RESPONDENT NO.3, VIDE WHICH APPEAL OF APPELLANT WAS REJECTED AND ORDER NO.1673/23 DATED: 23.06.2023 OF RESPONDENT NO.2, VIDE WHICH REVISION PETITION OF APPELLANT WAS DISMISSED AND ORDER DATED: 18.10.2021 OF RESPONDENT WAS UPHELD.

Prayer-in-Appeal:

On acceptance of instant Service Appeal, impugned order dated: 18.10.2021 (of Respondent No.4), order dated: 27.02.2023 (of Respondent No.3) and Order dated: 23.06.2023 of Respondent No.2, alongwith pre/post proceedings thereto, may be set aside and appellant may be re-instated in service with all consequential benefits, including unpaid salaries w.e.f. 10.07.2020, so as secure the ends of justice and equity.



Respectfully Sheweth:

1. That appellant was enlisted as Khasadar in the Khyber Khasadar Force (Now merged in Khyber Pakhtunkhwa Police), by the Competent Authority, vide order dated: 05.10.2002 and always performed duties with zeal/devotion and utmost satisfaction of the superiors, evident from commendation certificate dated: 22.12.2011 (granted by the then Commandant KKF/ Political Agent Khyber), Taareefi Sanad dated: 2018 (granted by the then Commanding Officer 20-Sind Regiment), commendation certificate dated: 23.09.2019 (granted by DPO, Khyber), commendation certificate dated: 21.05.2020 (granted by DPO, Khyber) and Newspapers clippings dated: 22.10.2011, 24.10.2011 etc. (Copies of order dated: 05.10.2002, commendation certificate dated: 22.12.2011, Tareefi Sanad 2018 (Sind Regiment), commendation certificate dated: 23.09.2019, 21.05.2020 & News clippings 22.10.2011/ 24.10.2011 are attached as Annexures "A to A/5" respectively)
2. That appellant gone through the basic Khasadar training, held at Shahkas Fort, under arrangements of Masood Scouts, w.e.f. 08.12.2003 to 28.02.2004, evident from training certificate dated: 28.02.2004. (Copy of training certificate dated: 28.02.2004 is attached as Annexure "B")
3. That, in eve of 25th Constitution Amendment Act, 2018, read with Section 5 of the Khyber Pakhtunkhwa Khasadar Force Act, 2019 (KP Act No. XXXIV of 2019) and Rule 3 of the Khasadar Force (absorption in Khyber Pakhtunkhwa Police) Rules, 2019, the Competent Authority, with the prior approval of the cabinet and on the recommendations of your esteemed office, ordered absorption of appellant in the Khyber Pakhtunkhwa Police, vide Notification dated: 13.02.2020. (Copy of Notification dated: 13.02.2020 is attached as Annexure "C")

- That Appellant was primarily shunt out from service, unilaterally, vide order dated: 30.05.2020, although reinstated in service, vide order dated: 21.01.2021 by the Competent Authority / Capital City Police Officer, Peshawar, but the Competent Authority, instead to reinstate him in service, in compliance with order dated: 21.01.2021 ibid, removed him from service, vide order dated: 18.10.2021, that too, without affording him opportunity of hearing and conducting regular inquiry into his guilt, therefore, condemned unheard, which attracts the doctrine of audi alteram partem is attracted.
- E. That more than 19 years' spotless career of appellant has been done away with a single stroke of pen, without care and caution of its legal consequences, hence indulgence of this Hon'ble Tribunal is solicited for smooth administration of justice and equity.
- F. That salary of appellant was stopped w.e.f. 10.07.2020 on the pretext of his dismissal from service, evident from pay slip/bill dated: 10.07.2020, although, he was performing duties till 18.10.2021 i.e. date of impugned order of his dismissal from service, which speaks volumes of malafide on part of the Respondent Department.
(Copy of pay slip/bill dated: 10.07.2020 is attached as Annexure "I")
- G. That any other ground, with the permission of this Hon'ble Tribunal, will be taken at the time of arguments.

It is, therefore, most humbly prayed that on acceptance of instant Service Appeal, impugned order dated: 18.10.2021 (of Respondent No.4), order dated: 27.02.2023 (of Respondent No.3) and Order dated: 23.06.2023 of Respondent No.2, alongwith pre/post proceedings thereto, may be set aside and appellant may be re-instated in service with all consequential benefits, including unpaid salaries w.e.f. 10.07.2020, so as secure the ends of justice and equity.

Any other relief, not specifically prayed for and deemed appropriate to this Hon'ble Tribunal in circumstances of the case may also be granted to the appellant.


Appellant

Through


Amin ur Rehman Yusufzai


Khalid Khan Mohmand

&


Muaz Ashraf Khalil

Advocates, Peshawar
3-A, Park Avenue, Bethani Plaza,
University Town, Peshawar
Email: aryusufzai@gmail.com
Cell No.0321-9022964 & 0342-9101124

Dated: 11.08.2023

4

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. _____ of 2023

WAHID GUL (Ex-Police Constable) **Appellant**

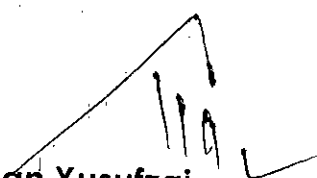
VERSUS

Government of Khyber Pakhtunkhwa & 3 others **Respondents**

AFFIDAVIT

I, **WAHID GUL (Ex-Police Constable) S/O ABDUL KHALIQ R/O Kuki Khel, Jamrud Khyber Agency**, do hereby solemnly affirm and declare on oath that the contents of accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

Identify by:

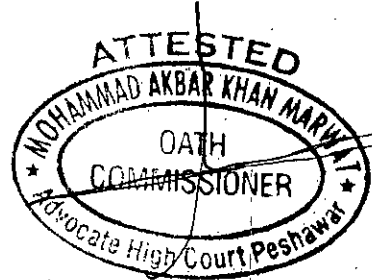


Amin ur Rehman Yusufzai
Advocate, Peshawar

DEPONENT

CNIC: 21202-6421971-5

Cell: 0302-8880009



11/08/23

5

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. _____ of 2023

WAHID GUL (Ex-Police Constable) **Appellant**

VERSUS

Government of Khyber Pakhtunkhwa & 3 others **Respondents**

ADDRESSES OF PARTIES

APPELLANT:

WAHID GUL (Ex-Police Constable) S/O ABDUL KHALIQ
R/O Kuki Khel, Jamrud Khyber Agency.


RESPONDENTS

1. Government of Khyber Pakhtunkhwa through Secretary Home & Tribal Affairs Department, Civil Secretariat, Peshawar.
2. Provincial Police Officer (PPO), Central Police Office (CPO) Khyber Road, Peshawar Cantt.
3. Chief City Police Officer (CCPO), Police Lines, Peshawar.
4. District Police Officer (DPO), Shahkas Tribal District Khyber.



Appellant

Through


Amin ur Rehman Yusufzai


Khalid Khan Mohmand

&


Muaz Ashraf Khalil
Advocates, Peshawar
3-A, Park Avenue, Bethani Plaza,
University Town, Peshawar
Email: aryusufzai@gmail.com
Cell No. 0321-9022964 & 0342-9101124

Dated: 11.08.2023

Annex "A"
A to A/S

6

(OFFICE ORDER)

Wahid Gul S/O Abdul Khaliq, Kuki Khel, is hereby enlisted as Khassadar in the Khyber Khassadar Force with effect from 13.10.2002(IN) against the vacancy caused due to the superannuation of his uncle Subedar Abdul Malik, Kuki Khel. He has been declared medically fit for Khassadari service by the M.S. AHQ Hospital, Landi-kotal vide his certificate dated 21.9.2002.

M. Ahmad
Political Agent, Khyber.

No. 1/33-36 /KC, dated Peshawar the 5/10 /2002.

Copy to the:-

- 1.
- 2.
- 3.
- 4.

Assistant Political Agent, Jamrud.
 Political Tehsildar, Jamrud.
 Agency Accounts Officer, Khyber at Peshawar.
 Subedar Major, Khyber Khassadar Force, Jamrud,
 for information & n/action.

M. Ahmad
Political Agent, Khyber.

[Signature]
ATTESTED

[Handwritten mark]

(OFFICE ORDER)

6

A

Wahid Gul S/O Abdul Khaliq, Kuki Khel, is hereby enlisted as Khassadar in the Khyber Khassdar Force with effect from 13.10.2002 (FN) against the vacancy caused due to the superannuation of his uncle Subedar Abdul Malik, Kuki Khel. He has been declared medically fit for Khassadari service by the M.S AHQ Hospital, Landi-Kotal vide his certificate dated 21.9.2002.

Sd/-
Political Agent, Khyber.

No.1133-36/KC, dated Peshawar the 5/10/2002

Copy to the:-

1. Assistant Political Agent, Jamrud.
2. Political Tehsildar, Jamrud.
3. Agency Accounts Officer, Khyber at Peshawar.
4. Subedar Major, Khyber Khassadar Froce, Jamrud.
for information & n/action.

/
Political Agent, Khyber.





POLITICAL AGENT
KHYBER AGENCY

7

Date 22/12/2011

COMMENDATION CERTIFICATE

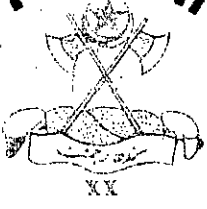
It is certified that Khassadar Wahid Gul s/o Haji Abdul Khalig Kuki Khel resident of Gudar Jamrud, Khyber Agency has played a commendable role in seizure of 180 KG Hashish, 30 KG Heroin on 15.06.2011 and considerable quantity of explosives at Takhta Baig Check Post, therefore he is granted this Commendation Certificate for his excellent job.



Political Agent, Khyber

22/12/2011

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تعمیراتی سبب

نمبر 4968 رینک حوالدار خاصہ دار نام واحد گل مجھے یہ جان کر بے حد خوشی ہوئی کہ آپ پاک فوج خصوصاً 20 سندھ رجمنٹ کے ساتھ مل کر بہت اچھا کام کر رہے ہیں۔ آپ نے ان مشکل حالات میں بہت ایمانداری اور احسن طریقے سے دو اتوئی چیک پوسٹ پر اپنی ڈیوٹی سرانجام دی جس کی وجہ سے کمانڈنگ آفیسر 20 سندھ رجمنٹ بہت خوش ہوئے اور اس لئے آپ کے اگلے رینک کیلئے سفارش کی جاتی ہے۔ یہ آپ کی محنت اور لگن کا منہ بولتا ثبوت ہے۔ میں اس موقع پر اپنی اور 20 سندھ رجمنٹ کے تمام عہدیداران کی جانب سے آپ کو دلی مبارکباد پیش کرتا ہوں اور دعا گو ہوں کہ اللہ تعالیٰ آپ کو مستقبل میں اسی طرح لگن کے ساتھ کام کرنے کی توفیق عطا فرمائے اور امید کرتا ہوں کہ آپ پاک فوج کی نیک نامی اور کامیابی کیلئے اپنا کردار بھرپور طریقے سے ادا کرتے رہیں گے۔

لیفٹیننٹ کرنل
کمانڈنگ آفیسر
(20 سندھ رجمنٹ)

2018

ll



Commendation Certificate

CLASS III
Granted by

To **District Police Officer, Khyber**
Hawaladar Wahid Gul

Son of **Haji Abdul Khaliq**

District **Khyber**

Good performance in Recognition of

Dated 23 / 9 / 2019


District Police Officer, Khyber

lll

10



DISTRICT POLICE OFFICER
KHYBER



COMMENDATION CERTIFICATE

CC-III

Granted to

CONSTABLE WAHID GUL

District Police Khyber for his good performance of duty

with cash reward of Rs. 1000/-

District Police Officer,

Khyber

No. 1400 /PSO-Khyber,

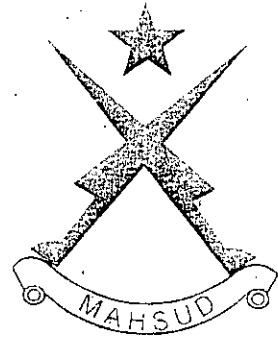
Dated: 21 /05/2020.

CC

Annex "B"

12

ACHIEVEMENT CERTIFICATE



Khassadar Training

It is certified that Mr. Wahid Gul Son of Abdul Khalic
of Khyber Agency / FR Kohat has successfully completed

Basic Khassadar Training

Held at **Shakas Fort** under arrangement **Mahsud Scouts**
with effect from **8th December 2003** to **28th February 2004.**

Mr. Wahid Gul is recommended / Not recommended
to be employed as instructor in his own organisation.

During the entire period of training he showed ^{good} conduct.

Station : Khyber Agency Peshawar
Dated : 28th February 2004

Maj
OIC Khassadar Training

Annex "C"

13

**GOVERNMENT OF THE KHYBER PAKHTUNKHWA
HOME AND TRIBAL AFFAIRS DEPARTMENT.**

NOTIFICATION

Peshawar dated the, 13/2/2020

No.SO(Police)HD/SMY 2019 Merged Area/ 373-83 In pursuance of the provisions contained in section 5 of the Khyber Pakhtunkhwa Khasadars Force Act, 2019 (Khyber Pakhtunkhwa Act No.XXXIV of 2019) read with rule 3 of the Khasadar Force (Absorption in the Khyber Pakhtunkhwa Police) Rules, 2019, the Home and Tribal Affairs Department, with the prior approval of the Cabinet and on the recommendation of the Provincial Police Officer, hereby orders absorption of the following members of Khasadars Force of Khyber Tribal District in the Khyber Pakhtunkhwa Police with effect from the date of the initial appointment of the said members:

S.#	Name	Father's Name	Previous Rank	Rank in which Absorbed
1.	Muhammad Nawaz	Khial Akbar	Subedar Major (BS-7)	Inspector (BS-16)
2.	Hikmat Khan	Bati Khan	Subedar (BS-5)	SI (BS-14)
3.	Javed Khan	Arbab Knan	Subedar (BS-5)	SI (BS-14)
4.	Said Khan	HabiburRehman	Subedar (BS-5)	SI (BS-14)
5.	Muhammad Azeem	Muhraban Shah	Subedar (BS-5)	SI (BS-14)
6.	Lawar Khan	Widan Shah	Subedar (BS-5)	SI (BS-14)
7.	Taza Khan	Juma Gul	Subedar (BS-5)	SI (BS-14)
8.	Lal Jan	Muhammad Ayub	Subedar (BS-5)	SI (BS-14)
9.	Mazhar Khan	Malik Waris Khan	Subedar (BS-5)	SI (BS-14)
10.	Amjad Khan	H.M.Arif	Subedar (BS-5)	SI (BS-14)
11.	Saced Khan No. 01	Arsala Khan	Subedar (BS-5)	SI (BS-14)
12.	Muhammad Younis	M/Z Inayat Khan	Subedar (BS-5)	SI (BS-14)
13.	Shamshad Khan	Sultan Khel	Subedar (BS-5)	SI (BS-14)
14.	Sabirullah	Lal Afzal	Subedar (BS-5)	SI (BS-14)
15.	Gul, Mat Khan No. 01	Rehmat Gul	Subedar (BS-5)	SI (BS-14)
16.	Andaz Gul	Sarwar Jan	Subedar (BS-5)	SI (BS-14)
17.	Abdul Hussain	Mir Hussain	N/Subedar (BS-4)	ASI (BS-11)
18.	Tariq Mehmood	Khadim Khan	N/Subedar (BS-4)	ASI (BS-11)
19.	Ikram Shah	Aurang Zeb	N/Subedar (BS-4)	ASI (BS-11)
20.	Hardam Gul	Sahar Gul	N/Subedar (BS-4)	ASI (BS-11)
21.	Naushad Ali	Abdul Qayum	N/Subedar (BS-4)	ASI (BS-11)
22.	Muhammad Atif	Muhammad Akbar	N/Subedar (BS-4)	ASI (BS-11)

(Handwritten signature)

14

S.#	Name	Father's Name	Previous Rank	Rank in which Absorbed
676.	Rahat Gul	Hayat Gul	Sepoy (BS-01)	Constable (BS-07)
677.	Khalid Khan No. 01	Alam Shah	Sepoy (BS-01)	Constable (BS-07)
678.	Jamshed Khan	Yaseen Khan	Sepoy (BS-01)	Constable (BS-07)
679.	Faizur Rehman	Sher Rehman	Sepoy (BS-01)	Constable (BS-07)
680.	Amal Jan	Khan Akbar	Sepoy (BS-01)	Constable (BS-07)
681.	Jehanzeb Khan	Shahzar Khan	Sepoy (BS-01)	Constable (BS-07)
682.	Ahmad Hussain	Hameed Shah	Sepoy (BS-01)	Constable (BS-07)
683.	Said Anwar	Dunya Khan	Sepoy (BS-01)	Constable (BS-07)
684.	Alam Zeb	Humayun Khan	Sepoy (BS-01)	Constable (BS-07)
685.	Zer Ullah	Razi Khan	Sepoy (BS-01)	Constable (BS-07)
686.	Saleem Khan	Ibrahim Jan	Sepoy (BS-01)	Constable (BS-07)
687.	Hazrat Ullah	Angoor Shah	Sepoy (BS-01)	Constable (BS-07)
688.	Nawab Khan	Saddar Azam	Sepoy (BS-01)	Constable (BS-07)
689.	Qismat Khan	Qasam Gul	Sepoy (BS-01)	Constable (BS-07)
690.	Gula Jan	H. Jan Muhammad	Sepoy (BS-01)	Constable (BS-07)
691.	Muhammad Saeed No. 02	Muzafar Khan	Sepoy (BS-01)	Constable (BS-07)
692.	Shah Daraz	Chaman Gul	Sepoy (BS-01)	Constable (BS-07)
693.	Hazrat Umar	Gul Rehman	Sepoy (BS-01)	Constable (BS-07)
694.	Muntazir	Nissan Gul	Sepoy (BS-01)	Constable (BS-07)
695.	Ihsanullah	Khawaj Ali	Sepoy (BS-01)	Constable (BS-07)
696.	Wali Jan	Khewa Din	Sepoy (BS-01)	Constable (BS-07)
697.	Jamroz Khan	Lal Badshah	Sepoy (BS-01)	Constable (BS-07)
698.	Darya Khan	Mahmood Akbar	Sepoy (BS-01)	Constable (BS-07)
699.	Nasar Khan No. 02	Mohib Ali	Sepoy (BS-01)	Constable (BS-07)
700.	Muhammad Hussain	Khushal Khan	Sepoy (BS-01)	Constable (BS-07)
701.	Waheed Shah	Jamail Shah	Sepoy (BS-01)	Constable (BS-07)
702.	Kifayat Ullah	Muhammad Jamil	Sepoy (BS-01)	Constable (BS-07)
703.	Abid Ullah	Sharif Ullah	Sepoy (BS-01)	Constable (BS-07)
704.	Lalmat Khan	Raza Khan	Sepoy (BS-01)	Constable (BS-07)
705.	Jehanzeb Khan	Noor Badshah	Sepoy (BS-01)	Constable (BS-07)
706.	Muhammad Amin	Khewa Khan	Sepoy (BS-01)	Constable (BS-07)
707.	Mewa Jan	Sahib Khan	Sepoy (BS-01)	Constable (BS-07)
708.	Abdul Ghani	Maskeen	Sepoy (BS-01)	Constable (BS-07)
709.	Ikramul Haq	Qudrat Khan	Sepoy (BS-01)	Constable (BS-07)
710.	Haji Muhammad No. 02	Yara Jan	Sepoy (BS-01)	Constable (BS-07)
711.	Mustajab	Noor Gul	Sepoy (BS-01)	Constable (BS-07)
712.	Sheraf Khan	Saifur Rehman	Sepoy (BS-01)	Constable (BS-07)
713.	Akha Khel	Wilayat Khan	Sepoy (BS-01)	Constable (BS-07)
714.	Bakht Rehman	Yar Rehman	Sepoy (BS-01)	Constable (BS-07)
715.	Wahid Gul	Abdul Khaliq	Sepoy (BS-01)	Constable (BS-07)
716.	Mir Afzal	Gul Nazeer	Sepoy (BS-01)	Constable (BS-07)
717.	Zaitullah	Zar Mulla	Sepoy (BS-01)	Constable (BS-07)
718.	Lal Dan	Chinar Gul	Sepoy (BS-01)	Constable (BS-07)
719.	Rabyaz Khan	Hajat Khan	Sepoy (BS-01)	Constable (BS-07)
720.	Liaqat Ali	Muhammad Amin	Sepoy (BS-01)	Constable (BS-07)
721.	Shah Faisal No. 03	Muhammad Inam	Sepoy (BS-01)	Constable (BS-07)

S.#	Name	Father's Name	Previous Rank	Rank in which Absorbed
2522.	Muhammad Tariq	Sher Zaman	Sepoy (BS-01)	Constable (BS-07)
2523.	Haji Wali	Jalal Shah	Sepoy (BS-01)	Constable (BS-07)
2524.	Muhammad Amir Khan	Roja Khan	Sepoy (BS-01)	Constable (BS-07)
2525.	Sajid Khan	Wilayat Khan	Sepoy (BS-01)	Constable (BS-07)
2526.	Awalbat Khan	Muhabat Khan	Sepoy (BS-01)	Constable (BS-07)
2527.	HabiburRehman	Raheem Shah	Sepoy (BS-01)	Constable (BS-07)
2528.	Shahid Ullah	FatehulMulk	Sepoy (BS-01)	Constable (BS-07)
2529.	Ijaz Ullah	Maloom Khan Afridi	Sepoy (BS-01)	Constable (BS-07)
2530.	Tariq Khan	Saleem Khan	Sepoy (BS-01)	Constable (BS-07)
2531.	Fazal Amin	Muhammad Alam	Sepoy (BS-01)	Constable (BS-07)
2532.	Amjad Ali	Sharab Khan	Sepoy (BS-01)	Constable (BS-07)
2533.	Afsar Ali	Muhammad Abbas	Sepoy (BS-01)	Constable (BS-07)
2534.	Salih Muhammad	Muhammad Khan	Sepoy (BS-01)	Constable (BS-07)
2535.	Sajjad Ahmad	Babu Khan	Sepoy (BS-01)	Constable (BS-07)
2536.	Zahid Ullah	Khana Gul	Sepoy (BS-01)	Constable (BS-07)
2537.	Zar Ghamin	Shameen Khan	Sepoy (BS-01)	Constable (BS-07)
2538.	Ajab Khan	Hawas Khan	Sepoy (BS-01)	Constable (BS-07)
2539.	Anwar Khan	Khan Said	Sepoy (BS-01)	Constable (BS-07)
2540.	Rab Dinar	Minar Khel	Sepoy (BS-01)	Constable (BS-07)
2541.	Ifrikhar Ahmad	Mir Ahmad	Sepoy (BS-01)	Constable (BS-07)
2542.	Adeel Haider	Noor Haider	Sepoy (BS-01)	Constable (BS-07)
2543.	Khan Nawaz	Lala Jan	Sepoy (BS-01)	Constable (BS-07)
2544.	Sohail Khan Afridi	Tahir Muhammad	Sepoy (BS-01)	Constable (BS-07)
2545.	Waleed Afridi	Saleem Javed	Sepoy (BS-01)	Constable (BS-07)
2546.	Muhammad Shakeel	Khushal Khan	Sepoy (BS-01)	Constable (BS-07)
2547.	Imtiaz Ali	Minar Gul	Sepoy (BS-01)	Constable (BS-07)
2548.	Rehmat Khan	SaifurRehman	Sepoy (BS-01)	Constable (BS-07)
2549.	Asim Khan	Farid Ullah	Sepoy (BS-01)	Constable (BS-07)
2550.	Samandar Khan	Akhtar Shah	Sepoy (BS-01)	Constable (BS-07)
2551.	Niaz Muhammad	Mehraban Shah	Sepoy (BS-01)	Constable (BS-07)
2552.	SaddiqueurRehman	Zari Shah	Sepoy (BS-01)	Constable (BS-07)
2553.	Said Nawaz	Gul Bahadar	Sepoy (BS-01)	Constable (BS-07)

2. The above absorption shall be subject to the following terms and conditions:

- (i) Their services shall be governed under the Khyber Pakhtunkhwa Police Act, 2017 and the rules made thereunder.
- (ii) A member shall not be entitled for absorption, if he has resigned from Khasadar Force Service or has been terminated from the Service ibid on account of misconduct, inefficiency or any other grounds or has been retired from Service under the Khyber Khasadars Rules-1950 and Khasadars Service Rules-2011, before commencement of the Khyber Pakhtunkhwa Khasadars Force Act, 2019 (Khyber Pakhtunkhwa Act No. XXXIV of 2019).

- (iii) Their services shall be considered regular and they shall be eligible for pension and deduction of General Provident fund in terms of the Khyber Pakhtunkhwa Civil Servant Act, 1973 (Khyber Pakhtunkhwa Act No. XVIII of 1973).
- (iv) Their seniority shall be determined in accordance with rule 6 of the Khasadars Force (Absorption in Khyber Pakhtunkhwa Police) Rules 2019.
- (v) They shall undergo training as provided in rule 5 of Khasadars Force (Absorption in Khyber Pakhtunkhwa Police) Rules, 2019.

**Secretary
to Government of the Khyber Pakhtunkhwa
Home and Tribal Affairs Department**

No. & date even.

CC to:

1. Inspector General of Police, Khyber Pakhtunkhwa.
2. Accountant General Khyber Pakhtunkhwa.
3. Regional Police Officer, Peshawar
4. District Police Officer Khyber Tribal District.
5. Deputy Commissioner Khyber Tribal District
6. PS to Chief Secretary Government of Khyber Pakhtunkhwa
7. PS to Secretary, Home & TAs Department, Khyber Pakhtunkhwa.
8. PS to Special Secretary-II, Home & TAs Department, Khyber Pakhtunkhwa.
9. PS to Secretary, Establishment Department, Khyber Pakhtunkhwa.
10. Manager Printing Press for notifying the same in the official gazette.
11. Office record file.

[Signature]
Section Officer (Levies & Khasadars)

[Signature]



OFFICE OF THE
CAPITAL CITY POLICE OFFICER
PESHAWAR

Phone No. 091-9210989
Fax No. 091-9212597

Amir D

17

ORDER.

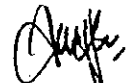
This order will dispose of the departmental appeal preferred by Ex-Constable Wahid Gul of District Police Khyber who was awarded the major punishment of "Dismissal from Service" by DPO Khyber Peshawar vide order No.1439, dated 30-05-2020.

2- He filed a departmental appeal for reinstatement in service requesting therein that no proper enquiry was conducted by DPO Khyber and dismissed from service strate away. The competent authority after hearing the appellat in orderly room reinstated him in service for the purpose of denovo enquiry to be conducted by SP/HQrs Traffic Peshawar.

3- The SP/HQrs Traffic Peshawar conducted the denovo departmental enquiry against the delinquent official. The enquiry officer in his finding submitted that he visited district Khyber in personal capacity to check out the veracity of allegations; however, no proof or evidence could be traced. The allegations leveled against the accused officials were also from some unverified sources. The enquiry officer in his conclusion submitted that Constable Wahid Gul was not found guilty of charges leveled against him. However, recommended not to be deployed at any key check posts in District Khyber and should be kept under strict vigilance and suggested that the major penalty may be converted into minor punishment and he may be resinstated in service.

4- In light of the recommendation of the enquiry officer and other material available on record, the appeal of Constable Wahid Gul for setting aside the punishment awarded to him by DPO Khyber vide No.1439, dated 30-05-2020 is accepted and the appellat is hereby reinstated in service. No benefit is granted for the period he remained out of service.

CCPO
S.O.B. No. 253
Date: 21-1-2021


(ABBAS AHSAN)PSP
CAPITAL CITY POLICE OFFICER,
PESHAWAR

No. 111-16 /PA dated Peshawar the 21-01- 2021

Copies for information and n/a to the:-

1. District Police Officer Khyber.
2. SP/HQrs Traffic Peshawar.
3. PSO/OHC /FMC District Khyber.
- ✓ 4. Official concerned.





OFFICE OF THE
CAPITAL CITY POLICE OFFICER
PESHAWAR

Phone No. 091-9210989

Fax No. 091-9212597

18

ORDER.

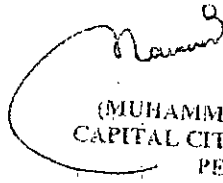
This order will dispose of the departmental appeal preferred by Ex-Constable Wahid Gul who was awarded the major punishment of "Dismissal from service" by DPO Khyber vide order No.1439, dated 30-05-2020.

2- The allegations against the Constable were that as per report of Intelligence Agencies, Constable Wahid Gul remained involved in malpractices having links with undesirable elements while posted at PPTakhtabaig, Police Station Jamrud.

3- He was served Charge Sheet and Summary of Allegations by DPO Khyber and SDPO HQs, Khyber was appointed as enquiry officer to scrutinize the conduct of delinquent official. The enquiry officer after conducting proper enquiry submitted his findings and recommended that Constable Wahid Gul may be awarded punishment according to the rules & regulations/ law in order to set an example for all criminals disguised as Police officials/officers who are the helping hands of criminals inside the department or involved in anti-social and criminal activities. The competent authority after perusal of the findings of the enquiry officer issued him Final Show Cause Notice to which his reply was also found unsatisfactory and hence he was awarded the above major punishment.

4- He was heard in person in O.R. The relevant record along with his explanation perused. During personal hearing the appellant categorically denied the allegations and stated to be innocent in the instant case. Enquiry procedure provided in Police Disciplinary Rules 1975 has not been adhered to in enquiry proceedings. This case merits a denovo enquiry through a gazetted officer in CCP Peshawar, so as to ensure complete fairness and impartiality. Therefore, I being appellant authority hereby reinstate the appellant in service for the purpose of de-novo enquiry. Chief Traffic Officer Peshawar is hereby directed to entrust the enquiry to SP/HQr Traffic Peshawar to conduct denovo enquiry afresh and submit findings to the competent authority for decision. The final outcome of the appeals shall be decided in the light of the de-novo proceedings.

2049
27-8-2020


(MUHAMMAD ALI KHAN)PSP
CAPITAL CITY POLICE OFFICER
PESHAWAR.

No. 1054-56 /PA dated Peshawar the 27-08 2020

Copies for information and n/a to the:-

1. District Police officer Khyber
2. Chief Traffic Officer Peshawar for compliance of para-4 of the order.
3. Official concerned.



Annex "E" (19)



OFFICE OF
THE DISTRICT POLICE OFFICER
KHYBER

ORDER

Constable Wahid Gul s/o Haji Abdul Khaliq No.1057 of PS Jamrud
Suspended vide this office order No.1587-91/OHC-Khyber, dated 03.06.2021 is
hereby reinstated into his service with release of pay with immediate effect.

(WASEEM RIAZ) PSP,
District Police Officer,
Khyber

No. ~~4335-38~~ /OHC-Khyber, dated 07/10/2021.

Copy of above is forwarded for information to the:-

1. DSP HQrs (Designate), Khyber.
2. PSO to DPO Khyber.
3. Accountant District Khyber for necessary action.



OFFICE OF THE
DISTRICT POLICE OFFICER
KHYBER



No. 4546 /PSO-Khyber, dated 18/10/2021.

Annex "F"

80

PUNISHMENT ORDER:

That, Constable Wahid Gul No. 1057 posted at Takhta Baig PP was reported upon that he was involved in corrupt practices and drugs selling. In this regard, a proper departmental enquiry was conducted by the then DPO Khyber and he was awarded major punishment of dismissal from service vide this office Order issued vide No. 1439/PSO-Khyber, dated 30/05/2020. Later on, he filed an appeal against the said dismissal order which was approved by the Capital City Police Officer, Peshawar vide order No. 111-16/PA, dated 21/01/2021 and he was reinstated in service without benefits for the period he remained out of service.

And that, even after reinstatement, he didn't report to District Police Lines and absented himself. Later on, he was selected for training but he didn't join the training as well. The said constable did not bother to report at Police Lines Khyber despite several notices.

And that, being reinstated into service and shown orders he went to Press Club in uniform and tried to malign Police Department and senior officers with false allegations.

And that, he was called to verify his allegations and give proofs if there were any which he failed to prove.

In view of the above, Constable Wahid Gul No. 1057 is hereby dismissed from service under Khyber Pakhtunkhwa E&D Rules 2011 (Section 7) with immediate effect.

Wasim
(WASIM RIAZ) PSP,
DISTRICT POLICE OFFICER,
KHYBER

No. 4547-51 /PSO-Khyber,

Copy of above is forwarded to:

1. The Capital City Police Officer, Peshawar.
2. DSP/Hqrs, Khyber.
3. Accountant, Khyber.
4. OASI, Lines District Khyber.
5. All concerned for necessary action.

(PC-PSO-LT-1)

CS CamScanner

[Handwritten signature]



OFFICE OF THE
CAPITAL CITY POLICE OFFICER,
PESHAWAR

Annex G

21

ORDER.

This order will dispose of the departmental appeal preferred by Ex-Constable Wahid Gul No. 1057, who was awarded the major punishment of "Dismissal from service" under KP PR-1975 (amended 2014) by DPO Khyber vide order No. 4546/PA, dated 18.10.2021.

2- Shorts facts leading to the instant appeal are that the defaulter Constable was earlier dismissed from service by the then DPO Khyber on the charges that he while posted at PP Takhta Baig District Khyber involved in corrupt practices and drug selling. He was reinstated in service by the then CCPO Peshawar vide order No. 111-16/PA, dated 21.01.2021. Even after reinstatement, he failed to report to District Police Lines Khyber and absented himself. Later on he was selected for basic recruit training at Jamrud Fort but he did not join the training as well. Moreover, being reinstated into service and shown orders, he went to Press Club in uniform and tried to malign Police Department.

3- He was heard in person in O.R and the relevant record along with his explanation perused. During personal hearing the appellant failed to submit any plausible explanation in his defence. He was given ample opportunity to prove his innocence but he could not defend himself. He was required to obey the orders of his seniors but he being a uniformed official violated the discipline rules. Therefore, his appeal for setting aside the punishment awarded to him by DPO/Khyber vide order No. 4546/PA, dated 18.10.2021 is hereby rejected/filed being also time barred for 09 months and 08 days.

(MUHAMMAD NAZ KHAN) PSP
CAPITAL CITY POLICE OFFICER,
PESHAWAR

No. 927-11 /PA. dated Peshawar the 27/12/2023

Copies for information and necessary action to the:-

1. District Police Officer Khyber, along with complete inquiry file
2. DSP/HQrs Khyber.
3. Accountant & OASI Khyber.
4. Official concerned.

Recd on 3/1/2024

[Handwritten signature]

(82)

**BEFORE THE WORTHY CHIEF CAPITAL POLICE OFFICER (CCPO) KPK,
KHYBER.**

DEPARTMENTAL APPEAL

**DEPARTMENTAL APPEAL AGAINST THE IMPUGNED
ORDER 4546/PSO KHYBER DATED: 18/10/2021
PASSED BY DISTRICT POLICE OFFICER KHYBER.**

RESPECTFULLY SHEWETH,

1. That the appellant humbly beg to submit before your good self that the appellant was working as constable in district police Khyber and always served the department diligently, honestly, efficiently and upto the entire satisfaction of his superiors. There is no iota of complaint from all four corners against the appellant at any forum rather the services rendered by the appellant were always appreciated by the high ups of the department.
2. That initially the appellant was awarded major Punishment of dismissal from services vide order No. 1439/PSO Khyber, dated: 30/05/2020. Later, on the appellant filed an appeal which was approved by the capital city police officer Peshawar Vide order No 111-16/PA, dated 21/01/2021 and he was reinstated in service.
3. That thereafter the appellant was suspended vide order No 1587-91/OHC-Khyber dated: 03.06.2021 but he was reinstated in service vide order No. 4335-38/OHC- Khyber, dated: 07-10-2021.
4. That after 10 days of reinstatement the appellant was again dismissed vide order No 4546/PSO Khyber, dated: 18/07/2021.
5. That the following allegations were leveled against the appellant
"And that, even after reinstatement, he did not report to district police lines and absented himself later on he was selected for



training but he did not join the training as well the said constable did not bother to report at police lines Khyber despite several notices”.

That said allegations are false and frivolous and do not been the merits of the case, hence are liable to be set aside.

- 6. That even after reinstatement as per record, the appellant was not dealt according to law and the appellant himself took the reinstatement orders to police line but even then no joining was made and the orders were concealed by the respondents.

GROUNDS:-

- A. That the impugned order dated: 18.10.2021 is illegal, unlawful and has been passed without appreciating the real facts of the case and even without participating the appellant into departmental proceedings hence, is liable to be set aside.
- B. That after 10 days of reinstatement the appellant was again , dismissed without conducting any inquiry, without issuing any charge sheet and show cause notice, hence the impugned order is liable to be set aside.
- C. That the appellant has been punished without issuance of any show cause notice, which is mandatory requirement of police efficiency & Discipline Rules, 2011. The entire proceedings were conducted without any show cause notice, meaning thereby, the entire superstructure built on hollow ground is liable to be dashed to ground. The impugned order is a void order and is liable to be set aside.
- D. That the appellant was not called for personal hearing and was condemned unheard while violating the Latin Maxim Audi Alterm Partem. Thus impugned order was passed in haste during the absence of the appellant without hearing the



version of the appellant and against Article 10-A of Constitution of Islamic Republic of Pakistan 1973.

E. That it was the primary duty of the authority to first prove the allegation by holding a regular inquiry as has been held by the Hon'able Tribunal and Supreme Court of Pakistan in many cases i.e. PLD 2008 SC 451, 1997 SCMR 1543. No enquiry was held in the case of appellant.

F. That the appellant has been deprived from his beard and butter to himself and his family which is against the provision of Constitution of Islamic Republic of Pakistan 1973 hence, a magnanimous view of the matter may kindly be taken.

PRAYER:

In view of nutshell of back drop, it is, most respectfully prayed that while accepting the appeal in hand, the impugned order dated: 18.10.2021 passed by District Police Officer, Khyber, may kindly be set aside and the appellant may kindly be reinstated into his service from the date of his dismissal from service along with all consequential back benefits, in the interest of justice.

I have the Honour to be

Sir,

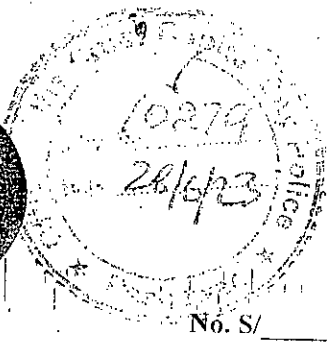
Your's Most Obedient Servant

Ex- Constable Wahid Gul

District Police Khyber

Date: 26/8/2022





Annex "H"

85

OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
Central Police Office, Peshawar.

No. S/ 1573 /23, dated Peshawar the 23/06/2023.

To : The Capital City Police Officer,
Peshawar.

Subject: - REVISION PETITION.

Memo:

The Competent Authority has examined and filed the revision petition submitted by Ex-Constable Wahid Gul No. 1057 of Khyber district Police against the penalty of dismissal from service by DPO Khyber vide Order Endst: No. 4546, dated 18.10.2021, being badly time barred.

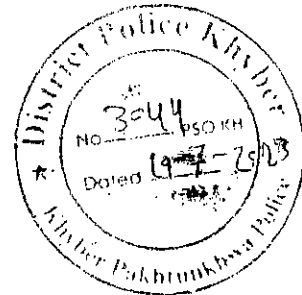
The applicant may please be informed accordingly.

(AFSAR JAN)

Registrar,

For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

P.A

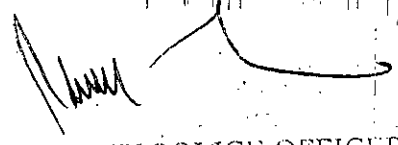


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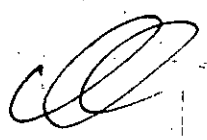
OFFICE OF THE CAPITAL CITY POLICE OFFICER, PESHAWAR

No. 12253/KD, the Peshawar dated 07/07/2023.

Copy of overleaf is forwarded to District Police Officer, Khyber for information and further necessary action.



FOR CAPITAL CITY POLICE OFFICER,
PESHAWAR.



BEFORE THE WORTHY PROVINCIAL
KHYBER

Sub: DEPARTMENT

(37)

BEFORE THE WORTHY PROVINCIAL POLICE OFFICER (PPO)
KHYBER PAKHTUNKHWA, PESHAWAR

Sub: **DEPARTMENTAL APPEAL/REPRESENTATION AGAINST ORDER NO.907-11/PA, DATED: 27.02.2023 OF THE WORTH CAPITAL CITY POLICE OFFICER, PESHAWAR, VIDE WHICH APPEAL OF APPELLANT FOR SETTING ASIDE THE PUNISHMENT AWARDED TO HIM BY DISTRICT POLICE OFFICER (DPO) KHYBER, VIDE ORDER NO.4546/PA, DATED: 18.10.2021, WAS REJECTED.**

Prayer:

On acceptance of instant appeal, impugned order dated: 18.10.2021 of District Police Officer, Khyber, alongwith pre/post proceedings thereto, including order dated: 27.02.2023 of the Capital City Police Officer (CCPO), Peshawar may be set aside and appellant may be re-instated in service with all consequential benefits.

Respected Sir,

1. That appellant was enlisted as Khassadar in the Khyber Khassadar Force (Now merged in Khyber, Pakhtunkhwa Police), by the Competent Authority, vide order dated: 05.10.2002 and always performed duties with zeal/devotion and utmost satisfaction of the superiors, evident from commendation certificate dated: 22.12.2011 (granted by the then Commandant KKF/ Political Agent Khyber), Taareefi Sanad dated: 2018 (granted by the then Commanding Officer 20-Sind Regiment), commendation certificate dated: 23.09.2019 (granted by DPO, Khyber), commendation certificate dated: 21.05.2020 (granted by DPO, Khyber) and Newspapers clippings dated: 22.10.2011, 24.10.2011 etc. **(Copies attached as ready reference)**
2. That appellant gone through the basic Khassadar training, held at Shahkas Fort, under arrangements of Masood Scouts, w.e.f. 08.12.2003 to 28.02.2004. **(Copies attached as ready reference)**
3. That, in eve of 25th Constitution Amendment Act, 2018, read with Section 5 of the Khyber Pakhtunkhwa Khassadar Force Act, 2019 (KP Act No.XXXIV of 2019) and Rule 3 of the Khassadar Force (absorption in Khyber Pakhtunkhwa Police) Rules, 2019, the Competent Authority, with the prior approval of the cabinet and on the recommendations of your esteemed office, ordered absorption of appellant in the Khyber Pakhtunkhwa Police, vide Notification dated: 13.02.2020. **(Copies attached as ready reference)**
4. That appellant was unilaterally awarded major of dismissal from service, vide order No.1439/PSO Khyber, dated: 30.05.2020, however, his appeal was allowed by the Capital City Police Officer (CCPO) and was reinstated in service, vide Order No.111-16/PA, dated: 21.01.2021 but soon thereafter suspended from service, vide order No.1587-91/OHC-Khyber, dated: 03.06.2021, which was subsequently withdrawn, vide order No.4335-38/OHC-Khyber, dated: 07.10.2021. Astonishingly, after 10 days of reinstatement, the appellant was again unilaterally dismissed from service vide order No.4546/PSO Khyber, dated: 18.07.2021. **(Copies attached as ready reference).**
5. That Appellant approached the worthy Capital City Police Officer (CCPO) through departmental appeal dated: 26.28.2021 but was not appreciated and was dismissed, vide, order dated: 27.02.2023, hence the instant appeal. **(Copies attached as ready reference)**
6. That Appellant has neither been treated in accordance with law nor he has been extended equal protection of law, enshrined in Articles 4 & 10-A of the Constitution of Islamic Republic of Pakistan, 1973.
7. That Appellant was primarily shunt out from service, unilaterally, vide order dated: 30.05.2020, although reinstated in service, vide order dated: 21.01.2021 by the Competent Authority / Capital City Police Officer, Peshawar, but the Competent Authority, instead to reinstate him in service, in compliance with order dated: 21.01.2021 ibid, again not only shown suspended but was subsequently removed from service, vide order dated: 18.07.2021, that too, without affording him opportunity of hearing and conducting of regular inquiry into his guilt, therefore, it can safely be concluded that he has been condemned unheard, hence doctrine of audi alteram partem is attracted.
8. That more than 19 years' spotless service has been done away with a single stroke of pen, without care and caution of its legal consequences, hence indulgence of your esteemed office is solicited for smooth administration of justice and equity.
9. That any other ground, with the permission of your honor, will be taken at the time of personal hearing, if granted. It is, therefore, most humbly requested that on acceptance of instant appeal, impugned order dated: 18.10.2021 of District Police Officer, Khyber, alongwith pre/post proceedings thereto, including order dated: 27.02.2023 of the Capital City Police Officer (CCPO), Peshawar may be set aside and appellant may be re-instated in service with all consequential benefits.

Yours sincerely,



WAHID GUL S/O ABDUL KHALIQ
R/O Kuki Khel, Jamrud Khyber Agency
Ex-Constable
Cell : 0302-8880009
CNIC No.21202-6421971-5

Dated: 07.06.2023



وکالت نامہ

بعدالت جناب سر سرٹ پیونہ ایسٹا
 نام صدر گے
 گورنمنٹ
 دعویٰ اجرم
 ایبل
 ایف آئی آر
 تاریخ

باعث تحریر آئیکلہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے واسطے بیرونی وجوہات کے مطابق

امین الرحمن یوسف زئی و خالد خان مہمند

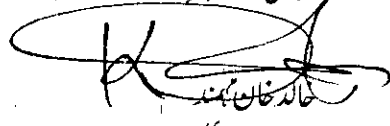
ایڈووکیٹس ہائی کورٹ

کو بدین شرط وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوتا رہوں گا۔ اور بوقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دیکر حاضر عدالت کروں گا اگر پیشی پر من مظہر حاضر نہ ہوا اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور میرے برخلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام کچہری کے کسی اور جگہ یا کچہری کے مقررہ اوقات سے پہلے یا پیچھے یا بزور تعطیل بیرونی کرنے کے ذمہ دار نہ ہوں گے۔ اگر مقدمہ علاوہ صدر مقام کچہری کے کسی اور جگہ سماعت ہونے یا بزور تعطیل یا کچہری کے اوقات کے آگے پیچھے پیش ہونے پر من مظہر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا مختار نامہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ برداشت صاحب موصوف مثل کردہ ذات خود منظور قبول ہوگا۔ اور صاحب موصوف کو عرضی دعویٰ و جواب دعویٰ اور درخواست اجراء ڈگری و نظر ثانی ایبل و نگرانی ہر قسم کی درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کے اجرا کرنے اور ہر قسم کا روپیہ وصول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اور سپرد دہائی و راضی نامہ کو فیصلہ برخلاف کرنے، اقبال دعویٰ دینے کا بھی اختیار ہوگا۔ اور بصورت ایبل و برآمدگی مقدمہ یا منسوخی ڈگری کی طرف درخواست حکم امتناعی یا قرتی یا گرفتاری نئی از اجراء ڈگری بھی موصوف کو بشرط ادائیگی علیحدہ مختار نامہ بیرونی کا اختیار ہوگا۔ اور بصورت ضرورت صاحب موصوف کو بھی اختیار ہوگا یا مقدمہ مذکورہ یا اس کے کسی جزو کی کاروائی کے واسطے یا بصورت ایبل، ایبل کے واسطے کسی دوسرے وکیل یا پھر سٹر کو بجائے اپنے یا اپنے ہمراہ مقرر کریں۔ اور ایسے مشیر قانون کو ہر امر میں وہی اور ویسے ہی اختیارات حاصل ہوں گے۔ جیسے کہ صاحب موصوف کو حاصل ہیں اور دوران مقدمہ میں جو کچھ ہر جانہ التواء پڑے گا۔ وہ صاحب موصوف کا حق ہوگا۔ اگر وکیل صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی بیرونی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔ لہذا یہ مختار نامہ لکھ دیا کہ سند رہے مورخہ _____ مضمون مختار نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

ATTESTED & ACCEPTED:

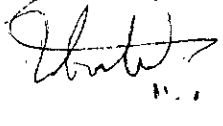

 امین الرحمن یوسف زئی

ایڈووکیٹ ہائی کورٹ اینڈ فیڈرل شریعت کورٹ آف پاکستان
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 موبائل نمبر: 0321-9022964
 شناختی کارڈ نمبر: 17301-5813582-3


 خالد خان مہمند

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 ایڈووکیٹ آئی ڈی نمبر: BC-18-1115

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معدود اسٹریٹ کھلیلی


رہنمائی