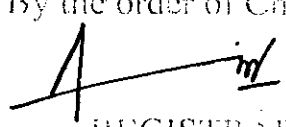


FORM OF ORDER SHEET

Court of

Appeal No. 1711/2023


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	21/08/2023	<p>The appeal of Mr. Niaz Ali Khan is re-submitted today by Mr. Arshad Ali Nowsherwi Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on <u>24-08-2023</u>.</p> <p>By the order of Chairman  REGISTRAR</p>

The appeal of Mr. Niaz Ali Khan son of Khan Wali Khan Ex JHC District Lakki Marwat received today i.e on 11.08.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Annexures-A, C & D are illegible which may be replaced by legible/better one.
- 2- Necessary party be made in the heading of the appeal.

No. 3047 /S.T.

Dt. 15/8 /2023.

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Arshad Ali Nowsherwi Adv.  
High Court Peshawar.

Sir,  
As per your office direction I have removed all the objections in the instant case and may kindly be filed within

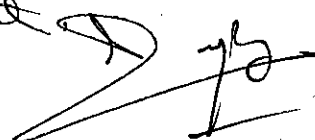
Two days.

  
19/8/2023.

As as for objection no 2 is concerned

No need of necessary party.

Please put before the court



21/8/23

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

Service Appeal No. 1711 /2023

Niaz Ali Khan ..... APPELLANT

VERSUS

Additional IGP & others. .... RESPONDENTS

**I N D E X**

S.No.	Description of Documents	Annex	Pages
1.	Service Appeal		1-6
2.	Affidavit		7
3.	Addresses of the Parties		8
4.	Copy of the Show Cause Notice	A	9
5.	Copy of the reply of Show Cause Notice	B	10
6.	Copy of the initially passed impugned order of respondent No.2	C	11
7.	Copy of the impugned order of respondent No.1 and appeal (copy)	D	12-14
8.	wakalatnama + CNIC		15-16

Through

Appellant

**Arshad Ali Nowsherwi**  
Advocate Supreme Court  
of Pakistan

&

**Amjad Nawaz**  
Advocate, Peshawar.

**Tahir Shah Advocate**  
Tahir Shah

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,  
PESHAWAR

Service Appeal No. 1711 /2023

Niaz Ali Khan S/o Khan Wali Khan *Ex. iHC Now*  
LHC/2013 Police Station Dadi Wala Unit Investigation  
District Lakki Marwat.  
R/o Mohalla Sari Khel, Sarai Naurang,  
District Lakki Marwat.

.....APPELLANT

VERSUS

1. Additional Inspector General of Police,  
Headquarters, Khyber Pakhtunkhwa, Peshawar,
2. Regional Police Officer, Bannu Region, Bannu.

.....RESPONDENTS

APPEAL U/S 4 OF THE SERVICE TRIBUNAL ACT,  
1974 AGAINST THE IMPUGNED ORDER DATED  
21.07.2023, OF RESPONDENT NO.1, IN BACKING  
OF THE EARLIER DEPARTMENTAL ORDER  
DATED: 27.03.2023 PASSED BY RESPONDENT  
NO.2, THE APPELLANT WAS AWARDED  
PUNISHMENT OF REVERTED TO A LOWER RANK  
WITH IMMEDIATE EFFECT, HENCE BOTH THE  
ABOVE IMPUGNED ORDERS OF RESPONDENT  
NO.1 & 2 RESPECTIVELY, ARE ILLEGAL IN  
NATURE, UNLAWFUL, AGAINST THE FACTS AND  
CIRCUMSTANCES OF THE CASE OF APPELLANT,  
THEREFORE LIABLE TO BE SET AT NAUGHT.

**Respectfully Sheweth:**

1. That appellant joined the respondents' Department as a Constable on 10.07.2002, performing his duties with zeal & zest, with utmost satisfaction of his superior authorities throughout comprising of the over & above 21 years.
2. That on 05.10.2022, appellant was deployed at police station Kaki as IHC/MHC, whereby just to avoid any unpleasant situation, due to the reasons of refreshment and food of the official of police station, the arrangement of the cook, is acquired by the SHO concern, and Mr. Ihsanullah FC 53, appointed by the office of RPO Bannu as Cook Constable.
3. The alleged allegation surprisingly firstly reveal to the appellant vide served Show Cause Notice dated: 12.01.2023, according to which, allegation leveled against the appellant in the alleged manner, about specifying the hand on glove with the above appointed Cook Constable, as the said Cook left his duty without intimation to his superior officers by replacing his substitute named "Tabidar" Private Person, the alternate Cook, so in this very strange contention, appellant was proceeded accordingly rather departmentally. **(COPY OF THE SHOW CAUSE NOTICE IS ANNEXED)**
4. That on 19.01.2023, In reply of the initially served Show Cause Notice, appellant categorically denied the contention raised in the Show Cause Notice,

with the special stance that since appellant is a constable rank police official, having nothing to do with the working priorities of any such rank official, as it is the progrative as priority of the incharge police station, and in this respect it is believed in factual as well as in legal form that the services of the appellant cannot be held liable for the same. **(COPY OF THE REPLY OF SHOW CAUSE NOTICE IS ANNEXED)**

5. That the thereafter taken departmentally, under the flow of departmental proceedings against the appellant, and consequently the respondent No.2 vide his impugned order dated: 27.03.2023 punished to the appellant for reverted to a Lower Rank. **(COPY OF THE INITIALLY PASSED IMPUGNED ORDER OF RESPONDENT NO.2 IS ANNEXED HEREWITH)**
6. Aggrieved with the above initial order of respondent No.2, appellant preferred an appeal dated: 11.04.2023 before the respondent No.1, which was also with the same result vide impugned order dated: 21.07.2023. **(COPY OF THE IMPUGNED ORDER OF RESPONDENT NO.1 IS ALSO ANNEXED HEREWITH)**
7. That dissatisfied with both the impugned orders of respondent No.1 & 2 respectively, appellant is invoking appellate jurisdiction of this learned fora within the meaning of section 4 of Khyber Pakhtunkhwa Service Tribunal Act, 1975 inter alia on the following grounds;

GROUNDS:

- A. That the impugned order of Reverted into Lower Rank passed by both the respondents No.1 & 2 respectively is not in accordance with law, rules and the principles of natural justice, hence it is liable to be set aside.
- B. That both the impugned orders of respondent No.1 & 2 are unspeaking, therefore unwarranted, unsustainable in the eye of the law, due to the reasons that the specification of the period of Revert to the Lower Rank of the appellant, is not unveiled, hence on this score alone the impugned orders has no foundation, as per dictum set by superior courts of Pakistan inn such like cases.
- C. No doubt, appellant remained PTC instructor from 2007 to 2009 and law instructor from 2015 to 2017 by extending his extra ordinary services to the department in the special circumstances, asked to advance by the department, which comprehensively been advanced and even thereafter too, by retaining the IHC rank, appellant never go against the procedural superiority of any nature in any mean whatsoever, therefore, the allegations leveled against the appellant are nothings but categorical discrimination.
- D. It is a simple case of discriminatively treatment to the appellant by respondent No.1 & 2, whereby no personal hearing or proper course of investigation <sup>and</sup> <sub>inquiry</sub> through appointed officer concern or committee

whatsoever, is conducted, therefore, in this special case all of the basic ingredients of inquiry is not complied with by the respondent and with the stroke of pronouncement, the above impugned order has been passed in coercive manner.

- E. That due process of law has not been followed which is mandatory in the eyes of law.
- F. That the order is also in violation of Article 10-A of the constitution, the said provision has envisaged. Hence the fundamental right of the appellant was violated which alone has made the enquiry and the impugned order legally questionable and of no legal consequences upon the rights of the appellant.
- G. That the appellant has completely innocent and he didn't commit any excessive, beyond his mandate act to hand on glove to any other of such rank, and it even cannot be, so required to be treated accordingly.
- H. That total liability as well as responsibility was the incharge of the police station and not of the appellant, so in this respect it is unfortunate to say that no departmental proceedings in any means is taken against incharge police station, but against the appellant solely, so this act of the respondent department is sheer violation of equal treatment.
- I. That any other ground with the permission of this Hon'ble Tribunal, will be raised at the time of arguments.




It is humbly prayed that on acceptance of the instant appeal, orders dated: 27.3.2023 & 21.07.2023 of the both the respondents may be set aside and appellant be restored to rank of ~~SP-1~~ <sup>IHC</sup> ~~SP-1~~ with all consequential benefits, with such other relief as may be deemed proper and must in circumstances of the case.

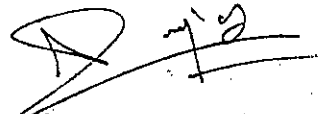
Any other relief deems fit and appropriate in the circumstances of the case may also be granted.

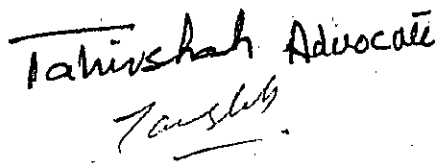
Through

Appellant

  
Arshad Ali Nowsherwi  
Advocate Supreme Court  
of Pakistan

&

  
Amjad Nawaz  
Advocate, Peshawar.

  
Tahir Shah Advocate  
Tahir Shah

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,  
PESHAWAR

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

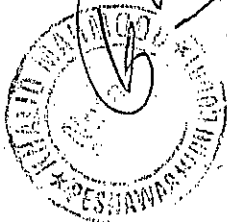
Niaz Ali Khan ..... APPELLANT

VERSUS

Additional IGP & others. .... RESPONDENTS

AFFIDAVIT

I, Niaz Ali Khan S/o Khan Wali Khan LHC/2013 Police Station Dadi Wala Unit Investigation District Lakki Marwat, R/o Mohalla Sari Khel, Sarai Naurang, District Lakki Marwat, do hereby solemnly affirm and declare on oath that the contents of the 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.



*Niaz*

DEPONENT

CNIC # 11201-0374884-9  
Cell # 0331-9194176

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

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

Niaz Ali Khan . . . . . **APPELLANT**

**VERSUS**

Additional IGP & others. . . . . **RESPONDENTS**

**ADDRESSES OF THE PARTIES**

**APPELLANT:**

Niaz Ali Khan S/o Khan Wali Khan  
LHC/2013 Police Station Dadi Wala Unit Investigation  
District Lakki Marwat.  
R/o Mohalla Sari Khel, Sarai Naurang,  
District Lakki Marwat.

**RESPONDENTS:**

1. Additional Inspector General of Police,  
Headquarters, Khyber Pakhtunkhwa, Peshawar.
2. Regional Police Officer, Bannu Region, Bannu.

Through

Appellant

**Arshad Ali Nowsherwi**  
Advocate Supreme Court  
of Pakistan

&

**Amjad Nawaz**  
Advocate, Peshawar.

Annex-A (9)

**SHOW CAUSE NOTICE**

You, IIC Niaz Ali No.213/905 while posted as MHC PS Kaki, District Bannu have rendered yourself liable to be proceeded under rule 5(3) of the Khyber Pakhtunkhwa, Police Rules, 1975 (amended in 2014) for committing the following misconduct:-

- That as per reliable source you while posted as MHC PS Kaki were hand and glove with Cook Constable Ihsanullah No.53 who had hired a private person for performing his duties in his place while he himself was running a private business.
- That you did not bring the matter in the notice of your seniors and reportedly might have referred the same to your successor for extending undue favour to the said cook constable.

That by taking cognizance of the matter, the undersigned as competent authority under the said rules, propose stern action against you by awarding one of the major punishments as provided in the rules.

You are, therefore called upon to show cause as to why you should not be imposed upon one of the major punishments for the said default misconduct under Khyber Pakhtunkhwa, Police Rules 1975 (amended in 2014).

You should submit reply to this show cause notice within seven (07) days of the receipt of this notice, failing which an ex parte action shall be taken against you.

You are further directed to inform the undersigned that as to whether you wish to be heard in person or not.

*Handwritten signature and scribbles*

Regional Police Officer,  
Bannu Region  
Bannu

IIC-Niaz Ali No.213/905  
The then MHC PS Kaki, Bannu  
Now at PS Lakki.  
No. 05 /PA, Dated: 12/01/2023.  
CC:

DPO Lakki for information, please.

*Handwritten signatures and scribbles*

Regional Police Officer,  
Bannu Region  
Bannu



ORDER

This order will dispose of Show Cause Notice served upon IIC Niaz Ali No.213, while posted as MHC PS Kaki, District Bannu has rendered himself liable to be proceeded under rule 5(3) of the Khyber Pakhtunkhwa, Police Rules, 1975 (amended in 2014) for committing the following misconduct conveyed to him vide this office No.05/PA dated 12.01.2023:-

- That as per credible information, he was found in glove with Cook constable Ihsanullah No.53 as the said cook constable had hired a private person for performing his duties in his place while he himself was running private business.
- That IIC Niaz Ali ( then MHC Kaki) did not bring the matter to the notice of his seniors and extended undue favour to the said cook constable.

Reply to the Show Cause Notice was received and he was heard in person during orderly room held in RPO Office Bannu on 16.02.2023. His plea was not found convincing, as he, above named cook constable and other colleagues categorically admitted that one "Tabidar Uncle" had been performing as Cook in P.S Kaki. The said cook constable further added that he was suffering from allergy; therefore he had hired the above mentioned person. IIC Niaz Ali (then MHC Kaki) and the above named cook constable cheated their superior officers. The cook constable was taking full pay from the government and hiring a private person for performing duties in his place @ of Rs:8000/- per month while the cook constable himself was running a private business. It is not only against discipline but also ignoble.

Therefore, I, Syed Ashfaq Anwar, PSP, Regional Police Officer, Bannu Region Bannu, in exercise of the powers vested in me under Khyber Pakhtunkhwa Police Rules, 1975 (amended in 2014) am constrained to disagree with his plea. He is hereby reverted to a lower rank with immediate effect.

ORDER ANNOUNCED

OB No. 58  
Dated: 27/03/2023.

Regional Police Officer,  
Bannu Region,  
Bannu

No. 907 /EC, dated Bannu the 27/03/2023  
Cc:

- > DPO-Bannu for information and necessary.
- > DAO Bannu for information and necessary.
- > OS/EC RPO Office Bannu.

*[Handwritten signature]*

Regional Police Officer,  
Bannu Region,  
Bannu

1

121

1

بخدمت جناب پروڈیشنل پولیس آفیسر صاحب خیبر پختونخواہ پشاور

موضوع: اہل برعاف آزاد نمبر 58-OD مورہ 27-03-2023 / 907-UC مورہ 27-03-2023 ہدیہ چھبہ بھی پولیس آفیسر صاحب خولہ

جناب عالی

معروض خدمت ہوں کہ من سائل مورہ 10/07/2002 کو بطور کانسٹیبل محکمہ پولیس میں آسٹریٹن بالا صاحبان نے بھرتی فرمایا۔ من سائل کا تعلیمی معیار ایف اے ہے۔ پولیس ٹریننگ کالج ہنگو سے پاس کیا ہے۔ وٹا نو ٹا ٹائف کورسز ATS عملی اسلام آباد سے گیس کورس، سیکشن کورس، لور کورس، انٹرمیڈیٹ کورسز PTC ہنگو سے کئے ہیں۔ سال 2007 تا 2009 انٹرکٹر PTC ہنگو میں رہ چکا ہے۔ RTW 2015 تا 2017 کو ہاٹ میں لاہ انٹرکٹر 2020 تا 2022 تک پولیس ٹریننگ سکول کوہاٹ میں لاہ انٹرکٹر کے خدمات سرانجام دے چکا ہوں۔ ضلع بنوں کے مختلف قتلوں میں بطور MHC مختلف چوکیات میں بطور انچارج کی ڈیوٹی سرانجام دے چکا ہوں۔ سال 2008 میں PTC ہنگو سے ضلع بنوں کے پریشن میں حصہ لیا تھا۔ سال 2006 اور 2007 میں ضلع کئی مروت سے سوات پریشن میں شامل تھا۔ حال ہی میں ضلع کئی مروت میں جاری شدہ پریشن میں بھی سائل آرمی کے ساتھ فرنٹ لائن پہ شامل حال رہا۔

سائل کے والد صاحب خان ولی خان محکمہ پولیس ٹریننگ کالج ہنگو میں بطور ڈول انٹرکٹر اور چیف ڈول انٹرکٹر کے عہدے پر کافی عرصہ رہ کر پولیس آسٹریٹن جین کر چکے ہیں۔ جس کی قابلیت محکمہ پولیس کے سینئر اور کافی سینسٹراب بھی قدر کی نگاہ سے دیکھتے ہیں۔

جناب والا من سائل آسٹریٹن بالا صاحبان کے حکم پر بطور محرم 15 اکتوبر 2022 کو تعینات فرمایا۔ جو کہ صرف 1/2 - 2 بطور محرم تھا۔ کئی رہ چکا ہوں۔ مجھ سے قبل احسان اللہ 53/FC ہوں جو کہ جناب ڈی پی او صاحب بنوں نے تعینات کئی میں بطور ٹک کانسٹیبل تعینات کیا تھا۔ عموماً تعینات میں SHO صاحب اپنے ماتحت عملہ کو نمبر پر شاہاشی دیتا ہے۔ جو کہ 1/2 رات کے لئے گھر چھوڑتے ہیں۔ اسی طرح جب کانسٹیبل احسان اللہ 53 کو SHO صاحب شاہاشی دیتا تھا وہ اپنے تعینات نفری روٹی کے لئے ایک پرائیویٹ شخص نامی تابعدار کو بھلا کر احسان اللہ 53/FC کی جگہ میں کاکام کروا دیتا تھا۔ اس میں من سائل کی کوئی کوتاہی یا قصور نہیں ہے۔

Arif

جناب (PPO) صاحب بنوں نے مجھے اس پر رپورٹ فرمائی ہے۔ جس کا نوٹو کاپی آرڈر مراہف ہے۔ ایک ہیڈ کانسٹیبل کا اس میں کیا تصور ہے۔ جناب SHO صاحب نے خوردوشی پر جناب DIG صاحب کو بتایا کہ کانسٹیبل احسان اللہ S3 کو من SHO صاحب نے شاباشی پر چھوڑا ہے۔ اور دوسرا شخص تابعدار سے میس کا کام لیتا رہا۔ جناب DIG صاحب کو کسی نے گناہ ڈائری کر کے مجھے سزا دی ہے۔ حالانکہ گناہ شکایات پر کسی کے خلاف کارروائی کرنا بحوالہ سول سروس PLC 1043 سال 2012 طیر 6 دہائی ہے۔ اس کے علاوہ سال 2008 میں بابت گناہ ڈائری پر کارروائی نہ کرنے لیکچر انگریزی لیسری 251-58 OGY Dated 25/04/2008 جاری ہے جناب انسپیکٹر جنرل آف پولیس ملک نوید صاحب ریٹائر سال 2011 میں لیکچر انگریزی لیسری 951-90 B&I / Dated 11/06/2011 جاری ہے جناب انگریزی ایڈا نسیکشن آفیسر جناب سلطان حفیظ صاحب اور کڑی جاری کیا ہے۔ مراہف ہے۔ اندر میں سلسلہ بابت گناہ درخواست / ڈائری پر کسی قسم کی کارروائی نہ کرنے کے بارے ہائی کورٹ اسلام آباد سے (C.S) PLC No 154 سال 2023 کی جاری کیا ہے اس طرح سپریم کورٹ آف پاکستان نے بھی بابت گناہ ڈائری پر کسی قسم کی کارروائی نہ کرنے پر SGM R 181 سال 2012 کی جاری کیا ہے۔ تمام کاپیاں مراہف اہل ہڈا کی ہے۔ پولیس آفیسر کو معمولی خلاف ڈسپن پر بڑی سزا دینے سے پولیس آفیسر کی دل ازاری ہوتی ہے۔ جس پر بھی PLD جاری ہو چکا ہے۔

لہذا استدعا ہے کہ میرے چھوٹے بچوں پر رحم کیا جائے۔ جملہ حالات و واقعات بالا کو مد نظر رکھا کر مجھے اپنے عہدے پر ریویشن سے

بھال فرمادے۔ کیونکہ سائل کا اس میں کوئی تصور نہیں ہے۔ سائل دعا کو ورنہ ہے گا۔

نوٹ: انگریزی لیکچر سائٹ بلا ہیرہ لکھ ہے۔

سورہ: 04/2023

العارض

SRC

نیاز علی خان 213/LHC متعینہ تھانہ جانی میں ضلع بنوں  
for a \$  
Process:

Niaz  
0331-9194176

NIC: 11201-0374834-9

Distric Police Officer  
BANBU

Niaz

3264  
11/6





OFFICE OF THE  
INSPECTOR GENERAL OF POLICE  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Amca-D

7-16/023

781  
2/8/23

ORDER

This order is hereby passed in dispose of Revision Petition under Rule 11-A of Khyber Pakhtunkhwa Police Rule-1975 (amended 2014) submitted LIC Nuz Ali No. 213. The petitioner was awarded punishment of reversion from the rank of LIC to LHC by RPO Bannu vide OIB No. 58, dated 27.03.2023 on the allegations that he was hand in glove with cook constable Ihsan Ullah No.53 as the said cook constable had hired a private person for performing his duties in his place while he himself was running private business. He did not bring this matter into the notice of his seniors and extended undue favor to the said cook constable. The cook constable was getting full salary from the Govt. while the private person was paid 8000/- to perform duties at his place.

Meeting of Appellate Board was held on 02.06.2023 wherein petitioner was heard in person. Petitioner contended that he is innocent.

Perusal of enquiry papers reveals that the allegations leveled against the petitioner have been proved. During hearing, petitioner failed to advance any plausible explanation in rebuttal of the charges. The Board sees no ground and reasons for acceptance of his petition; therefore, the Board decided that his petition is hereby Rejected.

Sd/-

RIZWAN MANZOOR, PSP  
Additional Inspector General of Police,  
HQs: Khyber Pakhtunkhwa, Peshawar

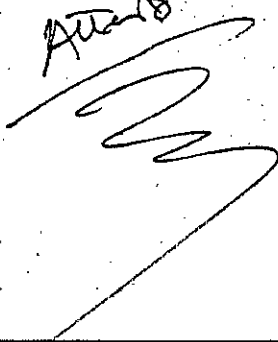
No. SI/1916-21/23, dated Peshawar, the 21-07-2023.


Copy of the above is forwarded to the:

1. Regional Police Officer, Bannu, One Service Roll alongwith Fuji Missal (Containing Enquiry File), of the above named LIC received vide your office Memo No. 16274/C dated 26.05.2023 is returned herewith for your office record.
2. District Police Officer, Bannu.
3. AIG/Legal, Khyber Pakhtunkhwa, Peshawar.
4. PA to Addl: RGP/HQs: Khyber Pakhtunkhwa, Peshawar.
5. PA to DIG/HQs: Khyber Pakhtunkhwa, Peshawar.
6. PA to Registrar CPO Peshawar.
7. Office Supdt. B-IV CPO Peshawar.

No 2491/16C  
dt 01/8/23 DPO/Bannu  
FK

Atarab



  
(DR. ZAHEED ULLAH) PSP  
AIG/Legal, Peshawar.  
For Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar

# POWER OF ATTORNEY

BEFORE THE ~~COURT OF~~ HONORABLE SERVICE TRIBUNAL CP Peshawar

نیاز علی خان

Versus

کورٹ

I/We, Appellant the above named Petitioner do hereby appoint & constitute **ARSHAD ALI NOSHERWI**, ADVOCATE SUPREME COURT OF PAKISTAN, as counsel in the above mentioned case, to do all or any of the following acts, deeds and things:-

1. To appear, act and plead for me/us in the above mentioned case in this Court/Tribunal or any other court/tribunal in which the same may be tried or heard and any other proceedings arising out of or connected therewith.
2. To sign, verify and file Plaint/Written Statement or withdraw all proceedings, petitions, suit appeals, revision, review, affidavits and applications for compromise or withdrawal, or for submission to arbitration of the said case, or any other document, as may be deemed necessary or advisable by him for proper conduct, prosecution or defence of the said case at any stage.
3. To do and perform all other acts which may be deemed necessary or advisable during the course of the proceedings.

## AND HEREBY AGREE:-

- a) To ratify whatever the said Advocate may do in the proceedings in my interest
- b) Not to hold the Advocate responsible if the said case be proceeded ex-parte or dismissed in default in consequence of their absence from the Court/Tribunal when it is called for hearing or is decided against me/us.
- c) That the Advocate shall be entitled to withdraw from the prosecution of the said case if the whole OR any part of the agreed fee remains unpaid.

In witness whereof I/we have signed this Power of Attorney/Wakalat-Nama hereunder the contents of which have been read/explained to me/us and fully understood by me/us this \_\_\_\_\_ day of \_\_\_\_\_ at Peshawar.

Signature of Executant(s)

نیاز علی خان

Attested & Accepted

Arshad Ali Nosherwi

**ARSHAD ALI NOSHERWI (BC-10-7834)**

ADVOCATE SUPREME COURT OF PAKISTAN,

Cell:+92-300-5924992 - 0311-9972660

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Nowsherwi Law Associates,

212, Second Floor, New Qatar Hotel, Sikandar Town,

G.T. Road, Peshawar City.

Amjad Nawaz

9 TARIQ SHAH  
LAWYER  
ADVOCATES