

24th April, 2023


24th April has been declared as public holiday on account of Eid-Ul-Fitr, therefore, the case is adjourned. To come up for the same on 05.07.2023.



Reader

5th July, 2023

1. Learned counsel for the appellant present. Mr. Asad Ali Khan, Assistant Advocate General for the respondents present.

2. During the course of arguments it was observed that the impugned order had been passed in the year 2014 that is before the merger of FATA while the appellant has approached this Tribunal in the year 2020 i.e. after merger of FATA, as such, it is deemed appropriate to club all such matters in which the impugned orders were passed before the merger of FATA, therefore, office is directed to club all such similar nature cases. To come up on 02.11.2023 before D.B. P.P given to the parties.


(Rashida Bano)
Member (Judicial)


(Kalim Arshad Khan)
Chairman

Adnan Shah

SCANNED
5T
Fawar

14.11.2022

Appellant alongwith counsel present.

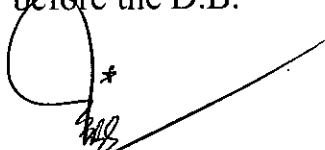
Kabir Ullah Khattak, learned Additional Advocate General for respondents present.


Learned Member (Judicial) is on leave, therefore, arguments could not be heard. Adjourned. To come up for arguments on 04.01.2023 before D.B


(Fareeha Paul)
Member (E)

04.01.2023

Appellant alongwith his counsel present. Mr. Naseer-ud-Din Shah, Assistant Advocate General for the respondents present and sought time for arguments. Adjourned. To come up for arguments on 13.01.2023 before the D.B.



(Mian Muhammad)
Member (E)


(Salah-Ud-Din)
Member (J)

13.01.2023

Lawyers are on strike today, therefore, case is adjourned to 24.04.2023 for arguments before the D.B. Office is directed to on the notice board as well as website of the Tribunal. notify the next date.


(FAREEHA PAUL)
Member (E)


(ROZINA REHMAN)
Member (J)

SCANNED
KPST
Peshawar

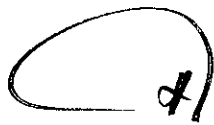
SCANNED
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Peshawar

01.07.2022

Appellant alongwith his counsel present. Mr. Abdul Nasir, Senior Clerk alongwith Mr. Naseer-ud-Din Shah, Assistant Advocate General for the respondents present.

Representative of the respondents sought further time for submission of reply/comments. Several opportunities have been given to the respondents for submission of reply/comments and on two occasions costs were also imposed upon them, therefore, the right of submission of reply/comments of respondents stand struck off. To come up for arguments on 14.10.2022 before the D.B.



(Rozina Rehman)
Member (J)

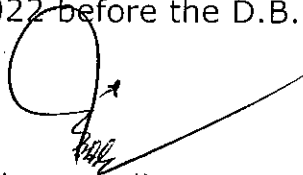


(Salah-ud-Din)
Member (J)

11.10.2022

Appellant alongwith his counsel present. Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present.

Learned counsel for the appellant seeks adjournment for preparation of arguments. Adjourned. To come up for arguments on 14.11.2022 before the D.B.



(Mian Muhammad)
Member (E)



(Salah-Ud-Din)
Member (J)

P.S.

28.07.2021 Learned Addl. A.G be reminded about the omission and for submission of Reply/comments within extended time of 10 days.


Chairman

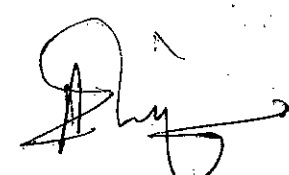
30.11.2021 Counsel for the appellant present. Mr. Kabirullah Khattak, Addl: AG for respondents present.

The order pertaining to imposition of cost of Rs. 1000/- as well as submission of reply/comments could not be complied with by the stipulated date, hence, the respondents have ceased the opportunity to submit reply/comments to the court. The case is therefore placed for regular hearing/arguments before D.B. Learned AAG, however, requested that all out efforts will be made to submit reply/comments before the D.B. To come up for arguments on 28.03.2022 before D.B.


(MIAN MUHAMMAD)
MEMBER (E)

28-3-2022

Proper DB not available the case is adjourned to come up for the same as before on 1-7-2022

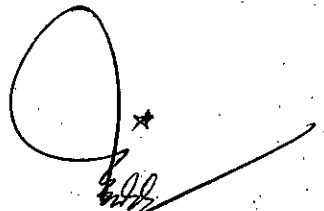

Realty

11.03.2021

Junior to counsel for the appellant present. Addl: AG
for respondents present.

Written reply not submitted despite last opportunities.
Requested for further adjournment. Adjournment granted
subject to payment of cost of Rs. 1000/- which shall be borne
by respondents from their own pockets.

Adjourned to 20.05.2021 before S.B.


(Mian Muhammad)
Member (E)

20.05.2021

Due to demise of the Worthy Chairman the Tribunal is
defunct, therefore, case is adjourned to 07.07.2021 for the same
as before.


Reader

07.07.2021

Counsel for the appellant and Mr. Kabirullah Khattak,
Addl. AG ~~present~~ for the respondents present.

Learned AAG seeks further time to submit
reply/comments. He is required to contact the official
respondents and submit reply/comments in office within 10
days, positively. If the written reply/comments are not
submitted within the stipulated time, the office shall submit
the file with a report of non-compliance. File to come up for
arguments on 30.11.2021 before the D.B.

*Stipulated period has
passed and reply
has not been submitted.*


Chairman

05.10.2020

Junior to counsel for the appellant and Addl. AG for the respondents present.

Learned AAG seeks time to furnish reply/comments. He is required to contact the respondents and facilitate the submission of requisite reply/comment on next date positively.

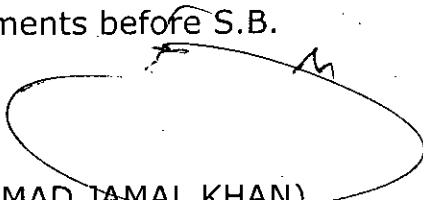
Adjourned to 26.11.2020 before S.B.


Chairman

26.11.2020

Junior counsel for appellant is present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents is also present.

Written reply on behalf of respondents not submitted. Learned Additional Advocate General is directed to ensure presence of representative of the department and submit reply on the next date positively. Adjourned to 18.01.2021 on which date file to come up for written reply/comments before S.B.



(MUHAMMAD JAMAL KHAN)
MEMBER (JUDICIAL)

18.01.2021

Appellant present through counsel.

Kabir Ullah Khattak learned Additional Advocate General present.

Written reply of respondents was not submitted. Representative of respondents is not in attendance. Case is adjourned on the request of learned A.A.G but as a last chance. To come up for written reply/comments on 11.03.2021 before S.B.


(Rozina Rehman)
Member (J)

04.08.2020

SCANNED
KPST
Peshawar

Counsel for the appellant Mr. Muhammad Ilyas Orakzai, Advocate is present. Preliminary arguments heard. Learned counsel for the appellant argued that the appellant was serving as Tehsil Naib Qasid/Tehsil Sepoy, he was imposed major penalty of dismissal from service vide order dated 01.12.2014 on the allegation of not facilitating the Political Administration in securing arrest of his son namely Umer Farooq who was allegedly involved in Anti State Activities. It was contended that the impugned order dated 01.12.2014 was passed when the appellant had been behind the bar (18.06.2014 to 16.12.2015). That the impugned order was communicated to the appellant on 03.11.2019, thereafter, the appellant filed departmental appeal on 11.12.2019 but the same was not responded within the stipulated statutory period of 90 days, hence, the instant service appeal on 16.03.2020. Learned counsel for the appellant further contended that the appellant had no nexus with his son who was allegedly involved in the Anti State Activities therefore, the impugned order is illegal, unlawful, void ab-initio, and against the principles of natural justice which is liable to be set-aside.

Appellant Deposited
Security & Process Fee

6/8/20

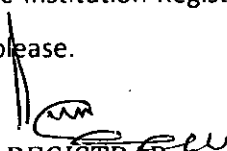


The contentions raised by learned counsel for the appellant need consideration. The instant appeal is admitted for regular hearing subject to limitation and all legal objections. The appellant is directed to deposit security and process fee within 10 days, thereafter, notice be issued to the respondents for written reply/comments for 05.10.2020.

(MIAN MUHAMMAD)
MEMBER (E)

Form- A

FORM OF ORDER SHEET

Court of _____
Case No.- 1768 /2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	16/03/2020	<p>The appeal of Mr. Kabal Khan presented today by Mr. Muhammad Ilyas Orakzai Advocate may be entered in the Institution Register and put up to the Learned Member for proper order please.</p> <p> REGISTRAR</p>
2-	19/03/2020	<p>This case is entrusted to Learning S. Bench for preliminary hearing to be put up there on <u>29/04/2020</u>.</p> <p> MEMBER</p>
	29.04.2020	<p>Due to COVID-19, the case is adjourned to 04.08.2020 for the same, before S.B.</p> <p> Reader</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR

Service Appeal No:- 1768 -P/2020

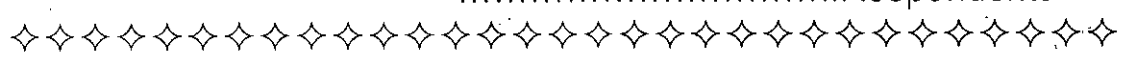
Kabal Khan S/o Nasrullah Jan, Ex-Tehsil Naib Qasid/ Tehsil Sepoy,
Cast Khoidad Khel, R/o Village Chapri, Lower Kurram, District
Kurram.

..... Appellant

Versus

1. Deputy Commissioner District Kurram
2. District Police Officer, District Kurram
3. District Accounts Officer, District Kurram
4. Government of Khyber Pakhtunkhwa, through its Secretary Home,
Civil Secretariat, Peshawar.

..... Respondents



APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL ACT, 1974 R/W KHYBER
PAKHTUNKHWA E&D RULES, 2011 AGAINST THE IMPUGNED
ORDER DATED 01/02/2014, WHEREBY THE APPELLANT
HAS BEEN DISMISSED FROM HIS SERVICE.

Prayer in Appeal:-

On acceptance of this appeal, the impugned dismissal
order dated 01/12/2014 passed by respondent No 1 may kindly be set aside and the

appellant may kindly be re-instated in service with all back benefits with such other relief as may deemed fit in the circumstances of the case may also be granted.

Respectfully Sheweth:-

1. That the appellant was appointed as Tehsil Naib Qasid/Tehsil Sepoy for Tehsil Ali Zai in the year, 1991.
(Copy of appointment order with better copy is attached).

2. That the appellant rendered about 23 years service with full devotion and dedication till impugned dismissal from service on 01/12/2014.

3. That the appellant was arrested by the Political Administration on 18/06/2014 on baseless allegation for not facilitation the Political Administration in securing arrest of Umar Farooq son of appellant whose involvement was allegedly been shown in Anti State Activities, abut which the appellant had no knowledge nor the appellant knew the whereabouts of his son named above.

4. That the appellant was spent one and half year in the Jail for no offence and when released, the appellant soon after approached the respondents for resuming his duties, where the appellant was orally informed that you had been dismissed from service, but no written order was handed over to the appellant and afterwards the appellant time and

again visited the respondent, but different dates were given to him for the receiving of the impugned order.

5. That finally the appellant was handed over the said impugned dismissal order on 03/11/2019. (Copy of impugned order with better copy are attached).
6. That being aggrieved from the impugned dismissal order the appellant submitted his departmental appeal to respondent No 4 vide Diary No 26653 dated 11/12/2019 but till now no order has yet been passed by the respondent No 4, hence the present Service Appeal inter alia on the following grounds:-
(Copy of departmental appeal is attached)

Grounds:-

- A. That the impugned dismissal order is illegal, unlawful, void, ab-initio, against the principles of natural justice, hence liable to be set aside.
- B. That the appellant had no nexus with his son named above nor had any knowledge about his whereabouts and soon after the appellant's son named above was arrested by the Political Administration was released from Jail on 17/03/2017. (Copy of release certificate is attached)

where the competent authority is going to impose any penalty etc the regular inquiry to that effect is necessary.

- I. That the appellant was not willfully absent from his duties, but his absence was due to above mentioned reason.
- J. That during his entire service period the appellant performed his duties with full devotion and honesty and no single complaint etc have been filed against the appellant in this regard the appellant's punishment in the shape of dismissal from service is very harsh and major one, hence liable to be set aside.
- K. That the instant appeal is within time and this Honourable Tribunal has the jurisdiction to entertain the instant appeal and if any delay in the filing of departmental appeal is may kindly be condoned in the larger interest of justice.
- L. That any other grounds will be raised at the time of arguments with kind permission of this Honourable Tribunal.

It is, therefore, humbly prayed that on acceptance of this appeal, the impugned dismissal order dated 01/12/2014 passed by respondent No 1 may kindly be set aside and the appellant may kindly be re-instated in service with all back benefits with such other relief as may deemed fit in the circumstances of the case may also be granted.


5

*Any other remedy which deems fit by this Honourable
Tribunal may also be granted in favour of appellant.*


Dated:- 12/03/2020

Appellant

Through:-


Muhammad Ilyas Orakzai
Advocate High Court
Peshawar.

&


Muhammad Shabir Khalil
Advocate High Court
Peshawar.

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BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR

Service Appeal No:- _____ -P/2020

Kabal Khan

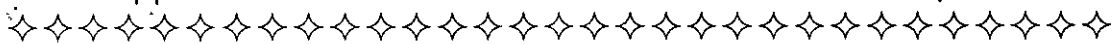
Versus

Deputy Commissioner.

District Kurram & others

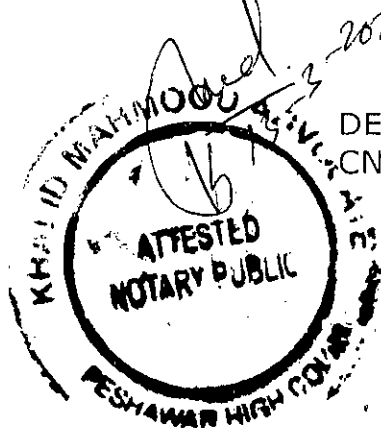
..... Appellant

..... Respondents



AFFIDAVIT

*I, Kabal Khan S/o Nasrullah Jan, Ex-Tehsil Sepoy, Cast
Khoidad Khel, R/o Village Chapri, Lower Kurram, District
Kurram, (The appellant) 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 Honourable Court.*



2020
OB JB
DEPONENT
CNIC No:- 21302-155256-1

⑦ ANX - "A"

OFFICE OF THE POLITICAL AGENT, KARACHI.

ORDER.

No. 3286

/Accts: dated Karachi on the

4/5/1979.

1. Sh. Khan s/o Farooq Jan, caste Chowdhari of Village Chappri, Kurram Agency is hereby appointed as Naib Naib in Alizai Tehsil against the vacant post with immediate effect subject to the production of medical fitness certificate and the following conditions:-

- 1- On his initial appointment he will be on probation for a period of one year.
- 2- His service will be governed by the relevant service rules.
- 3- His appointment is purely on temporary basis and liable to termination without assigning any reason during the period of probation.

Political Agent, Kurram.

No. 3287-90 /Accts:

Copy to:-

- 1- The Assistant Political Agent, Lower Kurram Circle
- 2- The Agency Accounts Officer, Kurram, Parachinar
- 3- The Individual concerned.
- 4- Office Order File.

Attested

Aty

[Signature]

Political Agent, Kurram.

OFFICE OF _____

ORDER

No. 3286/Estt: dated the 4/5/1991

Mr. Kabal Khan S/o Nasrullah Jan, caste Khoidad Khel Village Chapri Kurram Agency is hereby appointed as Tehsil Naib Qasid and Alizai Tehsil against the vacant post with immediate effect subject to the production of Political Fitness Certificate and the following conditions: -

1. On the initial appointment he will be on (sic) for a period of one year.
2. His service, will be governed by the relevant rules.
3. This appointment is purely on temporary basis and liable to termination without (sic) any reason during the period of probation.

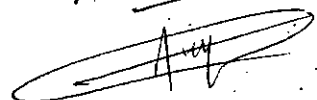
Sd/-
Political Agent, Upper.

No. 3287-90/Acctt: -

Copy to: -

1. The Assistant Political Agent, Distt Kurram.
2. The Agency Accounts Officer, Kurram, Parachinar.
3. The Indexical concerned.
4. Office order file.

Political Agent, Upper.

AHSAU


Kabul Khan
Naib-e-Asst

(9)

ANX - "B"

OFFICE OF THE
POLITICAL AGENT, KURRAM.

No. 1070-75/Kurram Levy/Actt.
Dated:- 01/1/2014.

ORDER.

Consequent upon the enquiry conducted by the Assistant Political Agent, Central Kurram vide his No 1922/PA (CK) dated 14-11-2014, against Mr. Kabul Khan s/o Nasrullah Jan and Arab Zaman s/o Kabil Khan Caste, Khoidakhel resident of village Chapri Lower Kurram, reveals that one Umer Farooq son of Kabil Khan, Tehsil Sepoy is a member of militant group headed by Fazal Saeed who is involved in anti-state activities and wanted to the Political Administration in a number of heinous crimes like target killing, kidnapping, IED Blast, suicidal bombings and waging war against the security forces/State, who is (Umer Farooq) is absconding since 2010-11. The accused officials i.e. Kabul Khan father of the accused Umer Farooq and Arab Zaman brother of the accused Umer Farooq were asked time and again to facilitate the Political administration in securing arrest of Umer Farooq but both the accused officials deliberately avoided to secure the arrest of the accused and preferred their relation over their obligation. Therefore, they both were arrested and kept behind the bars so as to exert Political pressure.

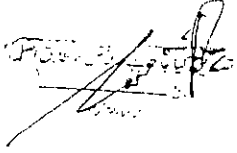
The political administration however arrange a raid over their house at Parao Chapri and succeeded in arrest of Umer Farooq from the abode of the proclaim offenders at Torawarai Central Kurram and his case is under trial in the court.

The whole exercise put the security forces in a risk which could have been resulted in a fatal incident. The accused officials did not cooperated and never extended any support to the Political Administration but rather provided opportunity to the most wanted declared criminal Umer Farooq and kept him away from the clutches of law.

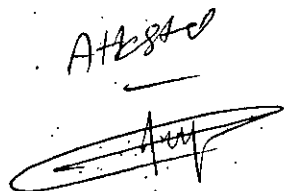
Such an act on the part of a Government Servants is tantamount to misconduct, conspiracy against the state, violation of the Kurram Levy Service Rules 2013. Criminal negligence in performance of their legitimate duties and involvement in anti state activities

In view of the above explained position & circumstantial evidences, I, Mr. Anjad Ali Khan, Political Agent, Kurram the competent authority under Civil Service (Efficiency and Discipline) Rule-2011, hereby impose a major penalty of dismissal on the accused official i.e. (Tehsil Sepoy Kabul Khan) from services with immediate effect in the best interest of public service and political administration of this Agency.

Necessary entries to the effect shall be made in his service book accordingly.



Political Agent, Kurram.

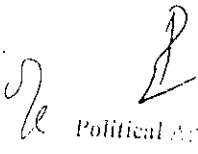


No. and date is even

Copy forwarded to the:-

1. Commandant Head Quarter Thall Scouts Thall.
2. Assistant Political Agent, Central Kurram.
3. Agency Accounts Officer, Kurram Agency.
4. Superintendent PA's Office.
5. Subedar Major, Kurram Levy Force.
6. Official Concerned.

218
2-11-2014
2-11-2014
1-50
4



Political Agent, Kurram

OFFICE OF THE
POLITICAL AGENT, KURRAM
No. 1070-75/Kurram Levy/act
Dated: - 01/12/2014

ORDER: -

Consequent upon the enquiry conducted by the Assistant Political Agent, Central Kurram vide his No. 1922/APA (CK) dated 14.11.2014, against Mr. Kabal Khan S/o Nasrullah Jan and Arab Zaman S/o Kabil Khan Caste, Khoidadkhel resident of Village Chapri Lower Kurram, reveals that one Umer Farooq son of Kabil Khan, Tehsil Sepoy is a member of militant group headed by Fazal Saeed who is involved in anti-state activities and wanted to be Political Administration in a number of heinous crimes like target killing, kidnapping, IED Blast, suicidal bombings and waging war against the security forces / State, who is (Umer Farooq) is absconding since 2010—11. The accused officials i.e. Kabal Khan father of the accused Umer Farooq and Arab Zaman brother of accused Umer Farooq were asked time and again to facilitate the Political Administration in securing arrest of Umer Farooq but both the accused officials deliberately avoided to secure the arrest of the accused and preferred their relation over their obligation. Therefore, they both were arrested and kept behind the bars so as to exert Political pressure.

The political administration however arranged a raid over their house at Parao Chapri and succeeded in arrest of Umer Farooq from the abode of the proclaimed offenders at Torawarai Central Kurram and his case is under trial in the court.

The whole exercise put the security forces in a risk which could have been in a fatal incident. The accused officials did not cooperate and never extended any support to the Political Administration but rather provided opportunity to the most wanted discharged criminal, Umer Farooq and kept him away from the clutches of law.

Such an act on the part of Government Servants is tantamount to misconduct, conspiracy against the state, violation of the Kurram Levy Service Rules 2013. Criminal negligence in performance of their legitimate duties and involvement in anti-state activities.

In view of the above explained position & circumstantial evidences, I Mr. Amjad Ali Khan, Political Agent, Kurram the competent authority under Civil Service (Efficiency and Discipline) Rule 2011, hereby impose a major penalty of dismissal on the accused official i.e. (Tehsil Sepoy Kabal Khan) from services with immediate effect in the best interest of public service and political administration of this Agency.

Necessary entries to the effect shall be made in his service book accordingly.

Sd/-
Political Agent, Kurram

No and date is even

Copy forwarded to the: -

1. Commandant Head Quarter Thall Scourts Thall.
2. Assistant Political Agent, Central Kurram.
3. Agency Accounts Officer, Kurram Agency.
4. Superintendent PA Office.
5. Subedar major, Kurram Levy Force.
6. Official concerned.

Sd/-
Political Agent, Kurram

Amjad Ali Khan
Amjad

بھضور جناب سیکرٹری ہوم صاحب صوبہ خیبر پختونخواہ،

بمقام سول سیکرٹریٹ پشاور

محکمانہ اپیل بابت نوکری بحالی

جناب عالی!

اپیلانٹ حسب ذیل عرض رماں ہے۔

۱۔ یہ کہ اپیلانٹ ضلع کرم کارہاشی، پیدائشی اور پراسن باشندہ ہے۔

۲۔ یہ کہ اپیلانٹ سال 1991ء میں بطور تحصیل نائب قاصد تحصیل علی زئی کرم میں بھرتی ہوا تھا۔

۳۔ یہ کہ اپیلانٹ نے پوری جانفشانی و ایمانداری کے ساتھ مورخہ 18/06/2014 تک ڈیوٹی سرانجام دی۔

۴۔ یہ کہ مورخہ 18/06/2014 کو اپیلانٹ کے بیٹے پر لگے ناکردہ الزامات میں پولیس کل انتظامیہ نے گرفتار کر کے پابند سلاسل کیا۔ حالانکہ اپیلانٹ برطابق قانون اس کا ذمہ دار نہ تھا کیونکہ قانون کے مطابق ایک شخص کے criminal libality اس کے باپ، بھائی یا دیگر رشتہ دار پر نہیں ڈال سکتے۔

۵۔ یہ کہ اپیلانٹ تقریباً ڈیڑھ سال تک جیل میں گزارنے کے بعد جب اپنے دفتر سے بابت نوکری معلومات کی تو اپیلانٹ کو زبانی طور پر بتایا گیا کہ آپ کو نوکری سے برخاست کیا گیا ہے۔ برخاستگی آرڈر کی بابت اپیلانٹ نے متعلقہ حکام کو کافی منت سماجت کی لیکن متعلقہ حکام نے اپیلانٹ کو مختلف طریقوں اور چیلے بہانے سے ٹرخاتے رہے۔

۶۔ یہ کہ بعد ازاں مورخہ 03/11/2019 کو متعلقہ حکام نے اپیلانٹ کو برخاستگی کا آرڈر حوالہ کیا۔ (نقل لف ہے)

۷۔ یہ کہ اپیلانٹ کے برخلاف کوئی آزاد انکوائری وغیرہ بابت الزامات نہیں کی گئی ہے اور نہ اپیلانٹ کو ذاتی طور پر سنے کا موقع فراہم کیا گیا ہے بدیں وجہ اپیلانٹ سروس پر قابل بحالی ہے۔

Issued by
Dy. Secy. 26653
Dated 11-12-19

AH
Amu

۸۔ یہ کہ ایپلانٹ کے کریڈٹ میں 22 سال کی سروس ہے جس کو متعلقہ حکام نے پس پشت ڈال کر صوابدیدی فیصلہ کیا ہے جو کہ قابل منسوخی ہے۔

۹۔ یہ کہ ایپل ہذا ادا کرنے میں دیری قصد اعمدانہ ہے بلکہ بوجہ بالا وجوہات ہے۔

لہذا استدعا ہے کہ منظوری ایپل ہذا، ایپلانٹ کو نوکری پر تمام مراعات سمیت بحال کرنے کے احکامات صادر فرمائے جائے۔

المرقوم:- 11/12/2019

کابل خان
حیدر

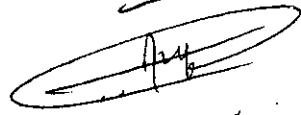
کابل خان ولد نصر اللہ خان

سکنہ قوم خوسیداد خیل چھیری پڑاؤ ضلع کرم

ایپلانٹ

موبائل نمبر 0305-9544694

ATHEP

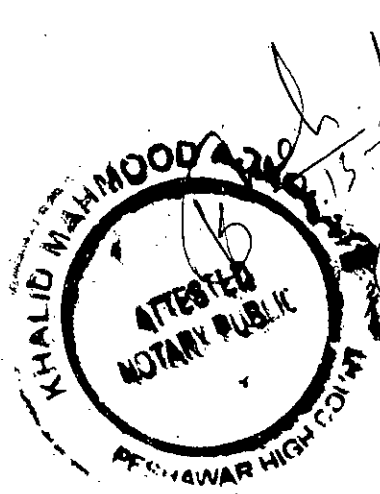


(13)

" CERTIFICATE "

x _____ x

Certified that Mr Umar Farooq s/o Qabil Khan
s/o Chappri Lower, Kurram Agency who was
sentenced for 02 years R.i by A.P.A Lower Kurram
Sadda, has been released today on 017/03/17
on expiry of sentence after earning 203
days different kinds of remissions.



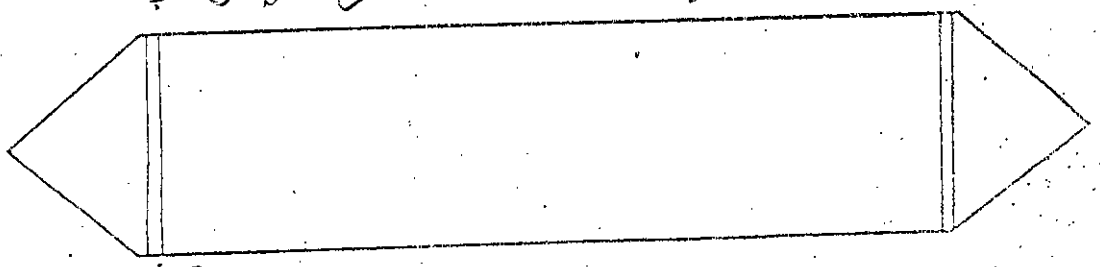
[Handwritten Signature]
SUPERINTENDENT
District Jail
Peshawar

17/3/17

PTCL 0927-2911371

[Handwritten Signature]

بعد االت بحیث تختو تخواہ سر وینز ٹریڈینگ پبلسٹی



موزخہ
مقدمہ
دعویٰ
جزم

کامل خان
بنام
2. منجانب
طیعی طیشہ طوطی طوطی

باعث تحریر آئیکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے بیرونی وجوہ دہی وکل کاروائی متعلقہ
آہن مقام تیسرا کیلئے محمد ایس ایل اور کنزی - محمد شہد ذلیل ایس ایل

مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
دیکل صاحب کو راضی نامہ کرنے و تقرر تالتہ فیصلہ برحلف دیے جو اس دہی اور اقبال دعویٰ اور
بہورت ڈگری کرنے اجراء اور صولی چیک و روپیہ عرضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم بیرونی یا ڈگری یکطرفہ یا ایبل کی برادگی اور منسوخی
بیز دائر کرنے ایبل نگرانی و نظر ثانی و بیرونی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیار حاصل ہوں گے اور اس کا ساختہ
پر واختہ متناظر قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جائد التوائے مقدمہ کے سبب سے دہن ہوگا
کوئی تاریخ پیشی مقام دورہ پر ہوا یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے کہ بیرونی
مذکورہ کریں۔ لہذا اوکالت نامہ لکھ دیا کہ سند ہے۔

Accepted
Nishu

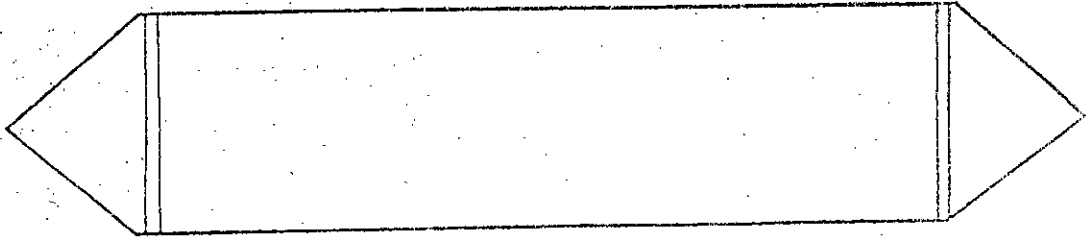
کابل کاٹ

کامل خان 19 لفظہ خان لفظہ خان لفظہ خان لفظہ خان

الرقوم 12 مارچ 2020

واہ الیہ
شعبہ
لئے منظور ہے۔

ایحدالت خیرین پختونخواہ سرگینز ٹریڈینگز پرائیویٹ لیٹیمٹ



2 منجانب
بنام طیعی طیفہ و سڈیٹ

کابل خان

موزخه
مقدمه
دعوی
جرم

باعث تحریر آنکے

مقدمہ مشد جبہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ محمد اسلم اور کنزٹی کے محمد اسلم اور کنزٹی کے محمد اسلم اور کنزٹی کے محمد اسلم اور کنزٹی کے

آن مقام قباعر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ کرنے و تقررتاالت ہ فیصلہ بر حلف دینے جو جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور صولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق زرا میں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی دہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پرواختہ متناور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانباً اتوائے مقدمہ کے سبب سے وہ ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہوا یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی مذکور کریں۔ لہذا اہدائت نامہ لکھ دیا کہ سند ہے۔

Accepted
As per
[Signature]

[Signature]

کابل خان

الرقوم 12 مارچ 2020

بنام طیعی طیفہ و سڈیٹ

کابل خان و در ایحدالت خیرین پختونخواہ