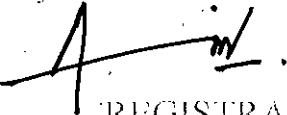


FORM OF ORDER SHEET

Court of _____

Appeal No. 1735/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	29/08/2023	<p>The appeal of Mr. Muhammad Shafique is re-submitted today by Mr. Kabir Ullah Khattak Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on <u>31-08-2023</u>.</p> <p>By the order of Chairman  REGISTRAR</p>

The appeal submitted by Mr. Kabir Ullah Khattak today i.e. on 21.08.2023 is incomplete on the following score which is returned to him for completion and resubmission within 15 days.

1. Copy of charge sheet, summary of allegation, show cause notice and enquiry report are not attached with the appeal which may be placed on it.
2. Application for condonation of delay if any is unsigned which should be signed.
3. The documents that are to be provided must be legible.

No. 8089 /S.T.

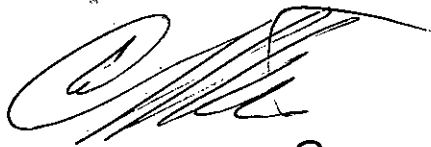
Dt. 24/08 /2023



REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Kabir Ullah Khattak
High Court Peshawar.

In Response of objection
No 1. No Show cause notice,
Charge sheet summary of allegation
has been issued or served
to the appellant, No Departmental
inquiry has been conducted against
the appellant, objection No 2 and
3 has been Removed.



24-8-23

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

Appeal No. 1735 of 2023

Muhammad Shafiq S/o Umer Deen Ex Constable No.
1269 R/o P.O Risalpur Behram Tehsil and District
Nowshera.

..... Appellant

VERSUS

1. Deputy Inspector General of Police KPK Peshawar
2. Superintendent of Police CTD Mardan Region.

..... Respondents

INDEX

S.No.	Description of documents	Annexure	Pages
1.	Memo of Appeal		1-5
2.	Application for condonation of delay		6-7
3.	Addresses of the parties		8
4.	Affidavit		9
5.	Copy of impugned order and suspension order	A&B	10-12
6.	Copy of acquittal order dated 04.01.2023	C	13
7.	Copy of Departmental appeal	D	14-16
8.	Copies of Medical prescription	E	17-22
9.	Wakalat Nama		23

Through


Kabir Ullah Khattak


Rozeeda Khan

Advocates, High Court, Peshawar

(1)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.

Appeal No. 1735 of 2023

Muhammad Shafiq S/o Umer Deen Ex Constable No.
1269 R/o P.O Risalpur Behram Tehsil and District
Nowshera.

..... Appellant

VERSUS

1. Deputy Inspector General of Police KPK Peshawar
2. Superintendent of Police CTD Mardan Region.

..... Respondents

APPEAL UNDER SECTION 4 OF THE KPK
SERVICE TRIBUNAL ACT, 1974, AGAINST
THE IMPUGNED ORDER DATED 20/05/2022
WHEREBY MAJOR PENALTY OF
DISMISSAL FROM SERVICE WAS
IMPOSED TO THE APPELLANT AGAINST
WHICH THE APPELLANT FILED
DEPARTMENTAL APPEAL ON
10.01.2023 WHICH HAS NOT BEEN
DECIDED WITHIN THE STATUTORY
PERIOD OF NINETY DAYS.

Prayer:

By acceptance of this appeal the impugned order dated 20.05.2022 may kindly be set aside and the appellant may kindly be reinstated on his service along with all back benefits.

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

(2)

Respectfully Sheweth:

FACTS

The appellant respectfully submits as under:

- 1) That the appellant has been appointed as Constable with respondent department since long time.
- 2) That after appointment the appellant performed his duty regularly with full devotion and hard work and no complaint whatsoever has been made against the appellant.
- 3) That while performing his official duty with respondent Department the impugned order has been issued against the appellant whereby the appellant has been dismissed from service on 20.05.2022 on the ground of involvement a false and fabricated criminal case FIR No. 67 dated 27.02.2022 U/S 11-A, KP CNSA P.S Sheikh Maltoon in which the appellant has been place under suspension. (Copy of impugned order and suspension order are attached as Annexure-A&B).
- 4) That the appellant has already been acquitted from the above mention criminal case by the court concerned on 04.01.2023. (Copy of acquittal order is attached as Annexure C).

(3)

- 5). That after acquittal the appellant submitted Departmental appeal on 10.01.2023. (Copy of Departmental appeal is attached as Annexure-D).
- 6). That after submitting the Departmental appeal the appellant becomes ill and due to severe illness was unable to visit to respondent department for the response of Departmental appeal. (Copy of Medical prescription is attached as Annexure-E).
- 7). That after complete recovery the appellant visited to the respondent department for the outcome of Departmental appeal on 20.07.2023 but no response whatsoever has been provided to the appellant hence the instant service appeal.
- 8). That feeling aggrieved the appellant submitted the instant Service Appeal before this Hon' able Tribunal inter alia on the following grounds.

GROUND

- A). That the impugned order dated 20/05/2022 is void ab initio orders because it has been passed without fulfilling the codal formalities.
- B). That no regular inquiry has been conducted by the respondent Department and no chance of personal hearing has been provided to the appellant in this respect the appellant relied upon the Judgment dated 2008. Page SCMR 1369.

(4)

C) That no show cause notice has been issued to the appellant by the respondent Department.

D) That it well settled principal of law no one can be condemn unheard because it is against the natural justice of law and this respect the appellant relied upon the Judgment reported on 2008 SCMR Page 678.

E). That no statement of witness has been recorded and no opportunity of cross examination has been provided to the appellant.

F). That the respondent department should be waited till the final decision of the criminal case.

G) And so concerned the alleged criminal case, the appellant has already been acquitted in the said criminal case by the court concerned.

H). That the innocent of the appellant has been shown from the acquittal order dated 04.01.2023.

I). Any other grounds will be raised at the time of arguments with prior permission of this Hon' able Tribunal.

It is therefore most humbly prayed by acceptance of this appeal the impugned order dated 20.05.2022

51
may kindly be set aside and the appellant may kindly be reinstated on his service along with all back benefits.

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

Through

طبر سرفوز
Appellant


Kabir Ullah Khattak

&
Roeda Khan

Advocates, High Court, Peshawar

(6)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.

Appeal No. _____ of 2023

Muhammad Shafiq S/o Umer Deen Ex Constable No.
1269 R/o P.O Risalpur Behram Tehsil and District
Nowshera.

..... Appellant

VERSUS

1. Deputy Inspector General of Police KPK
Peshawar
2. Superintendent of Police CTD Mardan Region.

..... Respondents

APPLICATION FOR CONDINATION OF DELAY
IF ANY

Respectfully Sheweth:

Petitioner submits as under:-

1. That the above mentioned petition is filing before this Hon' able Court in which no date is fixed for fixed for hearing so far.
2. That while performing his official duty with respondent Department the impugned order has been issued against the appellant whereby the appellant has been dismissed from service on 20.05.2022 on the ground of involvement a false and fabricated criminal case FIR No. 67 dated 27.02.2022 U/S 11-A, KP CNSA P.S Sheikh Maltoon in which the appellant has been place under suspension.

(7)

- 3). That the appellant has already been acquitted from the above mentioned criminal case by the court concerned on 04.01.2023.
- 4). That after acquittal the appellant submitted Departmental appeal on 10.01.2023.
- 5). That after submitting the Departmental appeal the appellant becomes ill and due to severe illness was unable to visit to respondent department for the response of Departmental appeal.
- 6). That there are so may Judgment of the Supreme Court that cases should be decided on merit rather than on technicality.

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

Dated: 17/08/2023

Appellant

Through

Kabir Ullah Khattak
&

Roceda Khan
Advocates, High Court, Peshawar

(8)

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

Appeal No. _____ of 2023

Muhammad Shafiq S/o Umer Deen Ex Constable No.
1269 R/o P.O Risalpur Behram Tehsil and District
Nowshera.

..... Appellant

VERSUS

1. Deputy Inspector General of Police KPK
Peshawar
2. Superintendent of Police CTD Mardan Region.

..... Respondents

ADDRESSES OF THE PARTIES

Appellant

Muhammad Shafiq S/o Umer Deen Ex Constable No. 1269
R/o P.O Risalpur Behram Tehsil and District Nowshera.

Respondents

1. Deputy Inspector General of Police KPK
Peshawar
2. Superintendent of Police CTD Mardan Region.

Through

Appellant

Kabir Ullah Khattak

Roeda Khan

Advocates, High Court, Peshawar

(9)

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

Appeal No. _____ of 2023

Muhammad Shafiq S/o Umer Deen Ex Constable No.
1269 R/o P.O Risalpur Behram Tehsil and District
Nowshera.

..... Appellant

VERSUS

1. Deputy Inspector General of Police KPK
Peshawar
2. Superintendent of Police CTD Mardan Region.

..... Respondents

AFFIDAVIT

I, Muhammad Shafiq S/o Umer Deen Ex Constable No. 1269 R/o
P.O Risalpur Behram Tehsil and District Nowshera do hereby
solemnly affirm and declare on oath that the content of the above
application are true and correct to the best of my knowledge and
belief and nothing has been kept secret and concealed from this
Hon'ble Tribunal.


DEPONENT

In the light of the finding report and perusal of enquiring papers, I agreed with the recommendations of the enquiry officer, whereas the delinquent official has been found guilty of the allegations levelled against him.

The delinquent official is therefore awarded major punishment of dismissal from service.


Superintendent of Police,
CTD, Mardan Region

No. 1044-47 CTD/Mardan-region Dated 20-05-2022

Copy to

1. Worthy Deputy Inspector General of Police, CTD KP Peshawar
2. Account Branch CTD, Mardan Region
3. All Concerned


Superintendent of Police,
CTD, Mardan Region



(A) (10)

**OFFICE OF THE SUPERINTENDENT OF POLICE
COUNTER TERRORISM DEPARTMENT
MARDAN REGION**

No. 1041/CTD/Mardan-Region

dated 20/05/2022

ORDER


The departmental proceedings against Constable Muhammad Shafiq No. 1269 of CTD Mardan Region, while posted at RIU regional head quarter CTD Mardan was initiated due to involvement in FIR No.67 dated 27-02-2022 u/s 1 IAKPCNSA ps Shaikh Maltoon District Mardan. On the receipt of this information, the said official was placed under suspension vide order No. 438-43/CTD-Mardan region dated 03.03.2022 and was also served with proper charge sheet, summary of allegations as per prevailing rules. DSP Investigation CTD Mardan region Mr Muhammad Akbar Khan was appointed as enquiry officer and was directed to probe into the allegations by steering proper enquiry and to submit his report as per rules accordingly.

The enquiry officer initiated proper departmental proceedings in the light of the allegations as described in the innards of charge sheet, whereas he summoned all the concerned, including the aberrant official and recorded statements of the concerned as well which are placed in the enquiry file.

The enquiry officer submitted his report that case of the above-mentioned constable is under trail in the court. Background of the case was that constable Muhammad Shafiq was on the way somewhere on his motorcycle on Nowshera bypass road towards Surhdheri, where SHO PS Sheikh Maltoon district Mardan Inspector Muhammad Darwesh Hassan along with other Police staff were busy in routine search of other vehicles passing by Police check post, stopped him and during his routine body search they recovered 75-gram narcotics / ice from his pocket, upon which the above-mentioned FIR was registered against him. Investigation officer of the case Sub Inspector Muhammad Iqbal marked the allegations on the said constable as true in his statement; SHO Darwesh Khan also stated about the allegation of the FIR as fact; the said constable also committed the allegations upon him u/s 161 in his statement. The statement of the constable, confirmation of his arrest at the place of occurrence and the absentee report of the said constable via DD No. 25 dated 25-02-2022 PS CTD Mardan are the enough evidences against him. Moreover, the alleged constable didn't express any personal clashes with SHO PS Sheikh Maltoon Mardan, which is also strengthening the allegations. Enquiry officer after analysing all the reports and the whole situation, marked the said constable guilty in his final report and recommended 'Major punishment'.

In the light of the finding report and perusal of enquiring papers, I agreed with the recommendations of the enquiry officer, whereas the delinquent official has been found guilty of the allegations levelled against him.

The delinquent official is therefore awarded major punishment of dismissal from service.


Superintendent of Police,
CTD, Mardan Region

No. 1044-47 CTD/Mardan-region Dated 20-05-2022

Copy to

1. Worthy Deputy Inspector General of Police, CTD KP Peshawar
2. Account Branch CTD, Mardan Region
3. All Concerned


Superintendent of Police,
CTD, Mardan Region

(11)

is
in
is

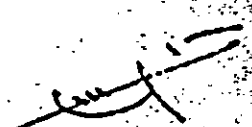
In the light of the finding report and interest of responsibility (which is approved) the recommendations of the enquiry officer, whereas the delinquent official has been found guilty of the allegations levelled against him. The delinquent official is therefore awarded major punishment of dismissal from service.


Superintendent of Police,
CTD, Mardan Region

No. 121-17 CTD/Mardan-region Dated 3.8.53

Copy to

- 1. Worthy Deputy Inspector General of Police, CTD KP Peshawar
- 2. Account Branch CTD, Mardan Region
- 3. All Concerned


Superintendent of Police,
CTD, Mardan Region



(B) (12)

**OFFICE OF THE SUPERINTENDENT OF POLICE
COUNTER TERRORISM DEPARTMENT
MARDAN REGION
Ph & Fax No.0923-568815
Email: spctdmrd@gmail.com**

No. 438/CTD/Mardan-Region dated 03/03/2022

ORDER

FC Muhammad Shafiq No. 1269 posted in RIU regional head quarter CTD Mardan is hereby placed under suspension and closed to CTD HQr Mardan Region on the account of involving in case FIR No.67 dated 27-02-2022 u/s 11AKPCNSA PS Shaikh Maltoon with immediate effect. Charge sheet and summary of allegation are being issued to him.

**Superintendent of Police,
CTD Mardan Region**

No: 438-43/CTD-Mardan Region . Dated 03/03/2022

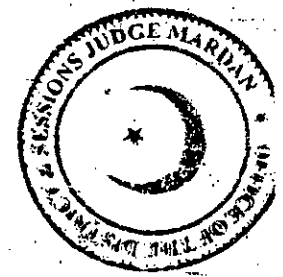
Copy to;

1. Worthy Deputy Inspector General of Police, CTD, Khyber Pakhtunkhwa, Peshawar.
2. DSP Operation CTD Mardan Region
3. SHO PS CTD Mardan Region
4. Account Branch CTD Mardan Region
5. FC Muhammad Shafiq No. 1269

**Superintendent of Police,
CTD Mardan Region**

Order 08
04.01.2023

10/1/23 4/23 23/2 10/3
10/1/23 4/23 23/2 10/3
10/1/23 4/23 23/2 10/3



Presence:

Lubna Kamil, SPP for the State;

Accused in person.

Today's proceedings were fixed for attendance of the accused as well as prosecution evidence. However, owing to the following reasons State was notified u/s 249-A Cr.PC and SPP for the State heard accordingly.

The case of the prosecution is that 75 grams of ice was recovered from the accused.

Leaving the other factors at bay for the time being, it is sufficient for making the case of the prosecution doubtful that at the time of submitting final report/challan the Investigating Officer had not received FSL report as final report had been signed on 29.02.2022 and the FSL report forwarded to the Investigating Officer on 14.03.2022. Hence, the question for consideration is that how come the Investigating Officer had been firm in his opinion without FSL report that the liquor recovered from the accused is ice. This fact creates many doubts in the case of the prosecution.

In addition to above, record suggests that allegedly the ice had been recovered from the accused on 27.02.2022 and the FSL report prepared on 10.03.2022 but no explanation had been put to forth that in whom custody the alleged ice and its sample were lying during the given time. Meaning thereby that safe custody of the sample as well as the contraband recovered is not established which is fatal for the case of the prosecution.

In view of above there is no probability of the conviction of the accused Muhammad Shafeeq in case FIR No. 67/2022 of Police Station Sheikh Maltoon. Hence, he is hereby acquitted under section 249A Cr.PC.

Case property, if any, shall be dealt in accordance with the law.

File shall be consigned to record room.

Announced in open Court;
04.01.2023

(Muhammad Anwar Khan)
Judicial Magistrate-I, Mardan

Name of Application: محمد شافیق
No. of Application: 1560
Date of presentation of application: 23-1-23
Date of preparation of copies: 24-1-23
Number of Pages: 01
Court Fees: _____
Urgent Fees: _____
Signed of copyist/Examiner: _____
Date of Delivery: 24-1-23

Certified To Be True Copy
24 JAN 2023
Examiner Copying Branch
Session Court Mardan

To

The honourable Deputy Inspector General of Police

Subject: Departmental Appeal against the impugned order passed by the honourable superintendent of police CTD Mardan region Dated 20/05/2022 as the said impugned order is against the law and facts.

Background of the case:

That as per the illegation mentioned in case fir no:67 dated 27/03/2022 u/s:11AKPCNSA PS: Sheikh Maltoon district Mardan that constable Muhammad Shafiq was on the way somewhere on his motorcycle on nowshera bypass road towards Surdheri where SHO Ps Sheikh Maltoon district Mardan sub-inspector Muhammad Darwesh Hassan along with other police staff were busy in routine search of other vehicle passing by police check post, stop him in during his routine body search the recovered 75-gram narcotics/ice from his pocket upon in which the fir No:67 was registered against him.

On the receipt of this information they said official was placed under suspension vide order No: 438/43 CTD Mardan region dated: 03/3/2022 and was also served with proper charged sheet, summary of allegation as per prevailing rules.

The DSP investigation MR Muhammad Akbar was appointed as inquiry officer and was directed to conduct Fair and proper inquiry and submit his report as per rule the inquiry officer indeed departmental proceeding and made the said constable quite and recommended for major punishment.

Grounds:

- That MR Muhammad Shafiq No 1269 posted in RIU regional headquarter CTD Mardan as constable had always performed his duties honestly and with great diligence.
- That Mr. Muhammad Shafiq did not make any mistake during the course of his duty and always remained loyal to his department.
- That there is not even a single complaint available on his whole police record and not even censured by his officers.
- That so far as Fir No:67 dated: 27/02/2002 and the section 11AKPCNSA I concerned the petitioner was charged by the complaint due to malafidely and dishonestly intention.

- 151
- That MR Muhammad Shafiq the petitioner is totally innocent and has been charged due to the ill will of the complainant.
 - That no ICE/ NARCOTICS have been recovered from the possession of the petitioner that is why no private witness was associated with the recovery memo.
 - That so far as the alleged motor bike which has been mentioned in the FIR is not the ownership of the petitioner which shows the false implication of the present petitioner.
 - That a false and fabricated case has been registered against the petitioner by the complainant Sub Inspector Darwesh Hassan Khan for certain ulterior motives.
 - That is the petitioner was arrested by the complainant in case Fir No:67
 - That the petitioner was admitted to bail was on his first hearing which shows the Non Involvement in false implication of the petitioner.
 - That the story narrated by the complainant in case fir No: 67 is totally false/fabricated and appealable to the prudent mid.
 - That after going through the whole prosecution report of case Fir No: 67 single evidence is not available which could connect the present petitioner with the commission of the above captioned offence.
 - That there is no cogent evidence available one prosecution file of case Fir No: 67 which could connect the present petitioner which the commission of mentioned offence.
 - That the case of the petitioner is under trial in the court of honorable judicial magistrate Mardan and the petitioner would be acquitted from the charges leveled against him that the inquiry conducted by the inquiry officer is one-sided and against the law and facts.
 - That the inquiry officer did not analyze all the reports and situation and does not narrated the true facts and illegally marked the petitioner guilty.

ATTESTED

- (16)
- That the order of honorable SP CTD is against the law and facts.

It is therefore very humbly prayed that on acceptance
the instant appeal the constable Muhammad Shafiq
may kindly be reinstated on his service with all back
Benefits.

Petitioner

Mr. Muhammad Shafiq

Belt No: 1269

Mobile No: 0346-7430212

10-1-23

(E) (17)

D.H.C. HOSPITAL NOWSHERA

OUT. DOOR PATIENTS TICKET



Rs. 10

S.No: 40706

Yearly OPD No: _____

Name Muhammed Shafiq Date 25.2.23

Fever with chills

Ad
NP
+ve

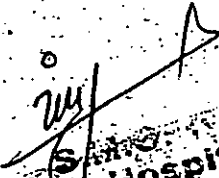
L₁₀ - DR

L₁₀ - Novid test

L₁₀ - Inu

L₁₀ - IgM

Ad Rest for at least
15 days


D.H.C. Hospital
Nowshera

(18)

D.H.Q. HOSPITAL NOWSHERA

OUT. DOOR PATIENTS TICKET



Rs. 10

S.No: 40704

Yearly OPD No: _____

Name: Muhammad Asif Date: 20-3-23

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Handwritten: OP - Infusion
at West

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Handwritten Signature
M.D.S. M.B.O.
D.H.Q. Hospital
Nowshera

109

D.H.Q. HOSPITAL NOWSHERA

OUT. DOOR PATIENTS TICKET



Rs. 10

S.No: 40703

Yearly OPD No: _____

Name Mohammed Sheraif Date 20-4-23

L. Sheraif

1 month

10

10

Ad Bed rest
10 days
Velat Jinnah

S.M.O.
D.H.Q. Hospital
Nowshera

D.H.Q. HOSPITAL NOWSHERA
OUT. DOOR PATIENTS TICKET



Rs. 10

S.No: 10802

Yearly OPD No: _____

Name Muhammed Shafiq Date 10-5-23

Lesson 250

Dr. Ghousia

Dep-vebg

Det 18th vest

for 9th vest 20 days

[Signature]
Medical Superintendent
D.H.Q Hospital
Nowshera

20

D.H.Q. HOSPITAL NOWSHERA

OUT. DOOR PATIENTS TICKET



Rs. 10

40801

S.No: _____

Yearly OPD No: _____

Name Muhamamd Sharif Date 15-6-23

Leghmen 675

Dr. Muhammad @
Ward 10

Leghmen 675
Ad Rest
15
15
15

Medical Superintendent
D.H.Q Hospital
Nowshera

D.H.Q HOSPITAL NOWSHERA
OUT. DOOR PATIENTS TICKET



Rs. 10

40702

S.No: _____

Yearly OPD No: _____


Name Muhammed shafiq Date 27-6-23

Leghumerous

900
C. Leon

Feb - Aug
rest for at

Ad Rest
least 15 days


Medical Superintendent
D.H.Q Hospital
Nowshera

(22)

D.H.Q. HOSPITAL NOWSHERA

OUT. DOOR PATIENTS TICKET



Rs. 10

S.No: 40765

Yearly OPD No: _____

Name Muhammad Saif Date 18-7-23

Ad
Hypertension

Don't stop

iq - Ristic
up - Proctidol

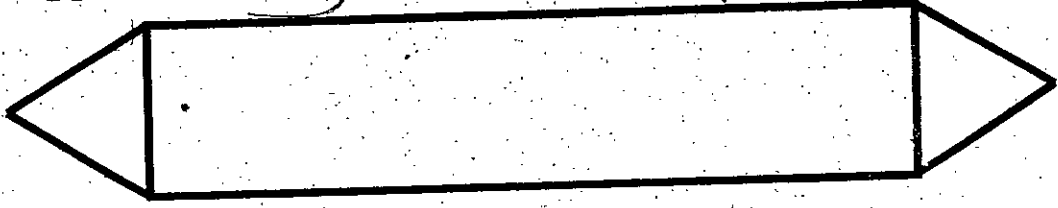
Dep - Escorin
up - Motin
up - PM
up - cast

At Rest
3 days

D.H.Q. Hospital
Nowshera

بعدالت حساب سے کارروائی کا

نمبر



مورخہ

مقدمہ

دعویٰ

جرم

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی متعلقہ

آن مقام کیلئے لکھنے والے نام کے ساتھ

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ کرنے ق تقرر ثالث و فیصلہ پر حلف دیئے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق زرائیں 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 محتاج ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکور با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ ہوں گے سب سے وہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

مستحق

2023

ماہ اگست

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المرقوم

العبد _____ واہ العبد _____

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