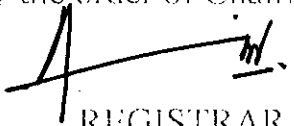


FORM OF ORDER SHEET

Court of _____

Appeal No. 1800/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	07/09/2023	<p>The appeal of Mr. Amir Ali Shah presented today by Mr. Muhammad Arshad Khan Tanoli Advocate. It is fixed for preliminary hearing before touring Single Bench at A.Abad on</p> <p>By the order of Chairman</p> <p> REGISTRAR.</p>

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

Service Appeal No. 1800/2023

Amir Ali Shah son of Mazhar Ali Shah Junior Clerk in the Prison Haripur.

...APPELLANT

VERSUS

Government of KP through Secretary Home and Tribunal Affairs
Department Khyber Pakhtunkhwa, Peshawar & others.

...RESPONDENTS

SERVICE APPEAL

INDEX

<i>S.#</i>	<i>Description</i>	<i>Page No.</i>	<i>Annexure</i>
1.	Service appeal along with affidavit	1 to 11	
2.	Copy of letters No.8142 and 8143	<u>12-13</u>	"A" & "B"
3.	Copy of departmental appeal and letter No. 51249-1 dated 18/04/2023	<u>14-20</u>	"C"
4.	Wakalatnama	<u>21</u>	

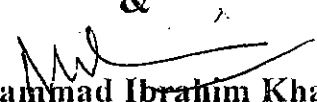
...APPELLANT

Through

Dated: _____/2023


(Muhammad Arshad Khan Tanoli)
Advocate High Court, Abbottabad

&


(Muhammad Ibrahim Khan)
Advocate High Court, Abbottabad

BEFORE THE CHAIRMAN SERVICE TRIBUNAL,
KHYBER PAKHTUNKHWA, PESHAWAR

Service Appeal No. 1800/2023

Amir Ali Shah son of Mazhar Ali Shah Junior Clerk in the Prison Haripur.

...APPELLANT

VERSUS

1. Government of KP through Secretary Home and Tribunal Affairs Department Khyber Pakhtunkhwa, Peshawar.
2. Inspector General of Prison Khyber Pakhtunkhwa, Peshawar.
3. Superintendent Central Prison, Haripur.
4. Superintendent Sub Jail Dasso, Kohistan.

...RESPONDENTS

**SERVICE APPEAL UNDER SECTION 4 OF
KPK SERVICE TRIBUNAL ACT, 1974, FOR
DECLARATION TO THE EFFECT THAT THE
ADVERSE REMARKS IN THE ACRS FOR THE
PERIOD FROM 01/01/2022 TO 08/06/2022 ARE
TO BE EXPUNGED FROM THE SAID ACR
BECAUSE AS PER PART-II COLUMN OF ACR
WITHOUT SPECIFICALLY NEGATING
ACHIEVEMENTS/ASSIGNED DUTIES
AWARDING OF ADVERSE REMARKS ARE
NULLITY IN LAW. THE APPELLANT HAS**

SERVED FROM DAWN TO DUSK IN THE RESPONDENTS' DEPARTMENT AND DURING THE PERIOD FROM 01/01/2022 TO 08/06/2022. THE APPELLANT HAS NOT BEEN COUNSELED VERBALLY OR THROUGH ANY LETTER. IN SUCH A SITUATION, ADVERSE REMARKS ARE PERVERSE, PUNGENT AND BASED ON MALAFIDE INTENTIONS AND THE SAME ARE LIABLE TO BE EXPUNGED.

PRAYER: ON ACCEPTANCE OF THE INSTANT SERVICE APPEAL OF THE APPELLANT ADVERSE REMARKS IN THE ACR'S FROM 01/01/2022 TO 08/06/2022 MAY GRACIOUSLY BE ORDERED TO BE EXPUNGED AND THE RESPONDENTS MAY FURTHER BE DIRECTED TO PROMOTE THE APPELLANT TO THE NEXT HIGHER RANK/ DESIGNATION ON THE PRINCIPLE OF SENIORITY CUM FITNESS. ANY OTHER RELIEF WHICH THIS HONOURABLE TRIBUNAL MAY DEEMS FIT AND PROPER MAY ALSO BE GRANTED TO THE APPELLANT.

Respectfully Sheweth;-

Facts, giving rise to the instant service appeal are arrayed as under;-

1. That the appellant is serving as Junior Clerk in the Prison Haripur and leaves no stone unturned in the smooth running of the show.
2. That the appellant is regularly serving with due diligence as well as devotion as per law.
3. That the authorities concerned awarded adverse remarks in the ACR for the period of 01/01/2022 to 08/06/2022. It is worth to mention here that the respondents did not issue letters for counseling but all of a sudden without proper assessment of performance of the appellant, the ACR for period from 01/01/2022 to 08/06/2022 has illegally been awarded adverse which has badly disturbed the process of promotion of the appellant. In this regard Letter No.IG-8142 dated 20/02/2023 and letter No. 8143

dated 20/02/2023 wherein the appellant was intimated that his ACRs for the said period are adverse. Copy of letters No.8142 and 8143 are attached as Annexure "A" & "B".

4. That the appellant after receiving the intimation of adverse remarks by the respondent No.2, appellant filed the departmental appeal to the respondent No. 2 who intimated vide letter NO. 15249-1 dated 18/04/2023 that appeal may be prefer to Secretary Home & Tribunal Affair Department Khyber Pakhtunkhwa Peshawar being authority concerned. Copy of departmental appeal and letter No. 51249-1 dated 18/04/2023 are attached as Annexure "C". Hence, instant service appeal filed, inter-alia on following grounds;-

GROUND:-

- a. That the adverse remarks in the ACR for the period of 01/01/2022 to 08/06/2022 are perverse,

discriminatory, against the law and based on malafide intentions just to give wrongful loss to the appellant in terms of promotion etc. Therefore, the adverse remarks are liable to be expunged from the ACR.

- b. That the respondents' department did not issue any letter regarding poor performance of the appellant from 01/01/2022 to 08/06/2022 which was the mandate of law and mandatory requirement was not followed prior to awarding of adverse remarks. In the absence of following requisite prescribe procedure, the adverse remarks in the ACR have been expunged by superior courts because remarks are considered as malafide.
- c. That the appellant is eligible for promotion on the principle of seniority cum fitness provided, illegal adverse remarks form the ACR of the Appellant for the period from

01/01/2022 to 08/06/2022 are expunged. The court should not fold up its hands while granting the relief to the aggrieved appellant.

- d. That the respondent department without any plausible reasons, awarded adverse remarks in the ACR for the period from 01/06/2022 to 08/06/2022 which has badly effects the valuable rights of the promotion of the appellant.
- e. That this fact may not be left to fade in oblivion that the appellant completed and accomplished the assigned task as per Standard Operational Procedure (SOP) as per law, when authorities if found any bottle neck in performance of duties of the employee the department was to issue explanation/guidance through counseling letters but no such letters were issued which speaks that the appellant served the department with

due care and caution as per law therefore the adverse remarks are liable to be expunged.

- f. That the initiating officer of ACR as well as endorsing higher officer of the department with malafide intention spoiled the career penalized the appellant due to no fault on fault on his part. It is further submitted that authorities concerned has made the appellant as scapegoat and made room for promotion to other blue eyed in place of the appellant.
- g. That the instant service appeal is filed well within time.
- h. That being a service matter, this Honourable Tribunal has jurisdiction to entertain the lis.

It is therefore most humbly prayed that on acceptance of the instant service appeal of the appellant adverse remarks in the ACR for the

period of from 01/01/2022 to 08/06/2022 may graciously be ordered to be expunged and the respondents may further be directed to promote the appellant to the next higher rank/ designation on the principle of seniority cum fitness. Any other relief which this honourable Tribunal may deem fit and proper may also be granted to the appellant.



...APPELLANT

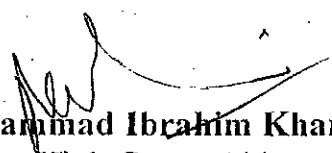
Through

Dated: _____/2023



(Muhammad Arshad Khan Taholi)
Advocate High Court, Abbottabad

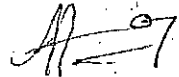
&



(Muhammad Ibrahim Khan)
Advocate High Court, Abbottabad

VERIFICATION:-

Verified on oath that the contents of foregoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Tribunal.



...APPELLANT

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

Service Appeal No. _____/2023

Amir Ali Shah son of Mazhar Ali Shah Junior Clerk in the Prison Haripur.

...APPELLANT

VERSUS

Government of KP through Secretary Home and Tribal Affairs
Department Khyber Pakhtunkhwa, Peshawar & others.

...RESPONDENTS

SERVICE APPEAL

AFFIDAVIT

I, *Amir Ali Shah son of Mazhar Ali Shah Junior Clerk in the Prison Haripur*, do hereby solemnly affirm and declare that the contents of forgoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.


DEPONENT

P-12

INSPECTORATE GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR

☎ 001-0210334, 0210400 📠 001-0210445

No. 17-8142

Dated 20-02-2022

Mr. Aamir Ali Shah, Junior Clerk,
Posted at Sub Jail Dassa Kohistan

Annex-A

Subject PER FOR THE YEAR 2022
Memo.


In your P.E.R for the period from 01-01-2022 to 08-06-2022, the following adverse remarks have been recorded:

PART-II

- 8- Cooperation and lack-----Below average
- 9- Amenability to discipline-----Below average
- 10- Skill in drafting-----Below average

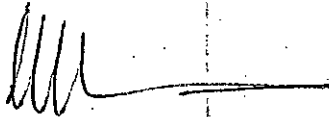
PEN PICTURE

"He is non-cooperative and ill disciplined. He has to work hard to bring positive changes in his attitude while discharging his official duties."


DEPUTY-DIRECTOR(E)
INSPECTORATE GENERAL OF PRISONS,
KHYBER PAKHTUNKHWA PESHAWAR







P-13

INSPECTORATE GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR

☎ 091-9210334, 9210408 ☎ 091-9210345

No. 166 21/11/2022

Dated 20-11-2022

CONFIDENTIAL/REGISTERED

To,

The Superintendent,
Sub Jail Dassu. *Kehis/4.1*

Annex - B

Subject: P.E.R FOR THE YEAR ENDING 2022
Memo,

The enclosed memo, No. 8143 dated 20-11-2022

addressed to Mr. Amir Ali Shah Junior Clerk is sent herewith in duplicate. The original copy may be delivered to him and the duplicate copy duly signed and dated by him in token of having received the same, may please be returned to this office.

(Signature) 20/11/2022
DEPUTY DIRECTOR (E)
INSPECTORATE GENERAL OF PRISONS,
KHYBER PAKHTUNKHWA PESHAWAR

Attested
UN

Office of the Attorney General
Office of the Supreme Court of Pakistan
Plot No. 5, Ginnah Plaza / Adjacent to
District Bar / Abbottabad

Annex-C

The Worthy Inspector General Of Prisons,
Khyber Pakhtunkhwa Peshawar.

Through Proper Channel:
(Superintendent Sub Jail Dassu, Kohistan).

P-14

Subject: P.E.R FOR THE YEAR ENDING 2022.

Kindly refer to your office letter No. 8142 dated: 20-02-2023, received through Superintendent Sub Jail Dassu, Kohistan vide your good office letter No. 8143 dated: 20-02-2023 on the subject above, please.

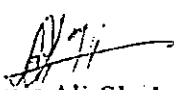
Respected Sir;

It is submitted that I Amir Ali Shah, Junior Clerk attached to Sub Jail Dassu, Kohistan. I have performed duties with full devotion and responsibility under supervision of Mr. Hamid Khan Superintendent Jail, however as mentioned in your letter under reference adverse remarks has been recorded by him in my ACR for the year 2022, which are not based on fact and needs justification that on what grounds my performance is declared below average as the remarks of the former Superintendent Jail regarding my performance were up to the mark during my previous ACR. ~~Be~~ ~~cause~~ that if my performance was not good in the year 2022, then why the Superintendent Jail ~~is~~ ~~not~~ ~~based~~ me any warning/advice notice to mend my way and improve my performance. It ~~is~~ ~~not~~ ~~based~~ the element that my ACR for the year 2022 doesn't seems realistic.

In view of above mentioned factual position, I humbly request your good self that keeping in view my previous service record and recent performance, my case of ACR may be reconsidered and the adverse remarks recorded therein may please be replaced by my actual performance which was ~~good~~ and satisfactory.

Submitted for information and your kind consideration, please.

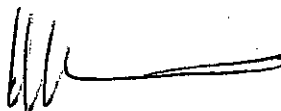
Yours, Sincerely


Amir Ali Shah
Junior Clerk

Sub Jail Dassu Kohistan

Dated 20-05-2023

Attested





Annex-C

INSPECTORATE GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR

☎ 091-9210334, 9210406

☎ 091-9213445

P-15

No. 111 15249 1-

Dated 12 04 - 2023 1-

To,

The Superintendent
Sub Jail Deras Kohistan

Subject:
Memo;

PER FOR THE YEAR 2022-----APPEAL

I am directed to refer to your letter No. 350/IE dated 31-03-2023 on the subject and to convey that the Appellate authority in the instant case is Secretary Home & TAs Department Khyber Pakhtunkhwa, therefore, the applicant (Junior Clerk) ^{call for it} may be directed to prefer his appeal to the Appellate authority concerned, if so desired, please.

Alleged

ME

[Signature]
18/4/2023

ASSISTANT DIRECTOR
INSPECTORATE GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR

فہرست

فہرست عالی = گزارشات عدلیہ سال 2022 سے 2022/11/1 سے 2022/6/8
 سال 2022 Adverse remarks دینے کے جو
 تعلقہ قانون ہے اس کے میں اس کی کئی ص
 اس کو قلم برائے یہاں کے پاس اس کے
 Adverse remarks سال 2022
 2022 مطلقہ صرف قانونی - قذف واقعات
 اور میں اس نے دوران سال 2022 اس لئے
 سے اس نے قذف اس لئے اہم دینے اور اس دوران
 بھی روکنا اور نہ ہی کوئی کڑی جاری ہو
 Adverse remarks قابل قذف میں

Adverse Remarks

11/22 سے 6/22 کے میں کو قذف کیا جا کے

18/5
23

عالمی سٹاک جو سٹریٹنگ سے میل ہوئی پور

AT 91

Attested

Handwritten signature



OFFICE OF THE SUPERINTENDENT
CENTRAL PRISON HARIPUR
No. 324/4 Dated 09/01/2023
Ph/Fax: 0995-920066-920055
E-MAIL: centralprisonhr@gmail.com

To

Muhammad Hamid,
Superintendent,
District Jail Abbottabad.

P-17

Subject: **PERFORMANCE EVALUATION REPORTS FOR THE YEAR
ENDING 2022**

Memo:

Kindly refer to the worthy Inspector General of Prisons Khyber Pakhtunkhwa Peshawar No. 45367-419, dated 16.12.2022 on the subject noted above.

Enclosed please find herewith performance evaluation report in respect of the following officers/officials attached to Central Prison Haripur for reporting therein, for the period from 01.01.2022 to 15.08.2022, then onward submission to quarter concerned please:-

S.No	Name of Officers/Officials	Designation
1	Syed Akhtar Hussain Shah	Deputy Superintendent Jail (BPS-17)
2	Mst. Fouzia Taj	Deputy Superintendent Jail (BPS-17)
3	Muhammad Aamir	Budget & Accounts officer (BPS-17)
4	Mr. Tariq Sheikh	Senior Instructor (BPS-17)
5	Mr. Muqaddas Khan	Assistant Superintendent Jail (BPS-16)
6	Mr. Saood Ahmad Khan	Assistant Superintendent Jail (BPS-16)
7	Mr. Shabir Ahmad	Assistant Superintendent Jail (BPS-16)
8	Mr. Waqas Ali	Assistant Superintendent Jail (BPS-16)
9	Mr. Usman Javed	Assistant Superintendent Jail (BPS-16)
10	Mr. Inam Ullah	Assistant Superintendent Jail (BPS-16)
11	Muhammad Irfan Arif	Assistant Superintendent Jail (BPS-16)
12	Mr. Shaikh Ahtesham	Assistant (BPS-16)
13	Mr. Gul Dad Khan	Assistant (BPS-16)
14	Mr. Hayat Ali Shah	Computer Operator PMIS(BPS-16)
15	Mr. Qaisar Hamayun	Network Engineer (BPS-16)
16	Mr. Shahab Khan	Computer Operator PMIS(BPS-16)
17	Mr. Sheraz	Computer Operator PMIS(BPS-16)
18	Syed Majid Ali Shah	Computer Operator PMIS(BPS-16)
19	Mr. Fida Ali	Religious Teacher (BPS-15)
20	Muhammad Naveed Akhtar	Senior Vernacular Teacher (BPS-15)
21	Muhammad Yousaf	Senior Clerk (BPS-14)
22	Mr. Shams Ur Rehman	Instructor (BPS-14)
23	Muhammad Javed	Instructor (BPS-14)
24	Mr. Nifaz Ali	Tailoring Instructor (BPS-14)
25	Mr. Wajid Khan	Technician (BPS-14)
26	Mr. Ghulam Mujtaba	Junior Lab Technician (BPS-12)

Allohd

Me

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OFFICE OF THE SUPERINTENDENT

CENTRAL PRISON HARIPUR

No. _____ / Dated ____ / ____ / 2023

Ph/Fax: 0995-920066-920055

E-MAIL: centralprisonhr@gmail.com

27	Mr. Badar Munir	Junior Technician pharmacy (BPS-12)
28	Mr. Fazal Zada	Junior Technician pharmacy (BPS-12)
29	Mr. Aftab Ahmad	Junior Technician pharmacy (BPS-12)
30	Mr. Rashid Ahmad	Junior Dental Technician (BPS-12)
31	Mr. Khalid Mehmood	Junior Vernacular Teacher (BPS-12)
32	Muhammad Fawad Khan	Computer Operator PMIS(BPS-12)
33	Mr. Amir Iqbal	Computer Operator PMIS(BPS-12)
34	Mr. Attiq ur Rehman	Junior Clerk (BPS-11)
35	Mr. Aamir Ali Shah	Junior Clerk (BPS-11)
36	Mr. Javed Khan	Drill Instructor (BPS-11)
37	Muhammad Afzal	Driver (BPS-06)
38	Mr. Zakir Hussain	Driver (BPS-06)
39	Muhammad Saleem	Masson (BPS-05)
40	Mr. Zahid Hussain	Carpenter (BPS-05)
41	Muhammad Faheem	Electrician (BPS-05)
42	Mr. Sheraz Ahmad	Tube Well Operator (BPS-05)
43	Mr. Ali Sher Ahmad	Weaving Master (BPS-05)

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[Signature]
o/c SUPERINTENDENT
CENTRAL PRISON HARIPUR

Endst: No 325 /

Copy of the above is forwarded to the Inspector General of Prisons Khyber Pakhtunkhwa Peshawar for information with reference to above referred No. Please.

[Signature]
o/c SUPERINTENDENT
CENTRAL PRISON HARIPUR

Attested

[Signature]

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OFFICE OF THE SUPERINTENDENT
CENTRAL PRISON HARIPUR
No. 218/WF/ Dated 10/01/2022
Ph/Fax: 0995-920066-920055
E-MAIL: centralprisonhr@gmail.com

To

The Inspector General of Prisons,
Khyber Pakhtunkhwa, Peshawar.

P-19

Subject: **PERFORMANCE EVALUATION REPORTS FOR THE YEAR
ENDING 2021.**

Respected Sir,

Kindly Refer to the No. 39706-57, dated 08.12.2021 on the subject noted above.

Enclosed please find herewith Performance Evaluation Report for the year ending 2021, in respect of following officers / officials attached to this Jail duly reported in by the undersigned:-

S.No	Name of Officers/Officials	Designation
1.	Dr. Muhammad Ayaz	Senior Medical Officer (BPS-18)
2.	Dr. Sher Muhammad	Medical Officer (BPS-17)
3.	Miss. Sania Kanwal	Women Medical Officer (BPS-17)
4.	Syed Akhtar Hussain Shah	Deputy Superintendent Jail (BPS-17)
5.	Miss. Fouzia Naz Elahi	Lady Deputy Superintendent Jail (BPS-17)
6.	Mr. Aurangzeb	Budget & Accounts Officer (BPS-17)
7.	Muhammad Aamir	Budget & Accounts Officer (BPS-17)
× 8.	Mr. Anayat Ur Rehman	Superintendent (BPS-17)
9.	Mr. Tariq Sheikh	Senior Instructor (BPS-17)
10.	Miss. Rida Kanwal	Psychologist (BPS-17)
11.	Mr. Javaid Usman	Network Administrator (BPS-17)
× 12.	Mr. Usman Javed	Assistant Superintendent Jail (BPS-16)
× 13.	Mr. Muqaddas Khan	Assistant Superintendent Jail (BPS-16)
× 14.	Muhammad Haris	Assistant Superintendent Jail (BPS-16)
× 15.	Mr. Inam Ullah	Assistant Superintendent Jail (BPS-16)
× 16.	Mr. Hazrat Hussain	Assistant Superintendent Jail (BPS-16)
× 17.	Muhammad Ibrahim	Assistant Superintendent Jail (BPS-16)
18.	Muhammad Irfan Arif	Assistant Superintendent Jail (BPS-16)
19.	Mr. Shaikh Ahtesham	Assistant (BPS-16)
20.	Mr. Gul Dad Khan	Assistant (BPS-16)
× 21.	Mr. Abdul Hameed Abbasi	Assistant (BPS-16)
22.	Mr. Hayat Ali Shah	Computer Operator (BPS-16)
× 23.	Mr. Gulfam	Chief Technician Pharmacy (BPS-16)
24.	Mr. Khairullah	Senior Technician Pharmacy (BPS-16)
25.	Muhammad Naveed Akhtar	Senior Vernacular Teacher (BPS-15)
26.	Mr. Fida Ali	Religious Teacher (BPS-15)
27.	Mr. Wajid Khan	Technician Pharmacy (BPS-14)
28.	Muhammad Yousaf	Senior Clerk (BPS-14)
29.	Muhammad Aqil Shah	Senior Clerk (BPS-14)
× 30.	Muhammad Qaiser	Senior Clerk (BPS-14)
31.	Mr. Nifaz Ali	Instructor Tailoring (BPS-14)
32.	Mr. Shams Ur Rehman	Instructor (BPS-14)
33.	Mr. Khalid Mehmood	Junior Vernacular Teacher (BPS-12)
34.	Mr. Rahim Ullah	Junior Technician Pharmacy (BPS-12)

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Attested



OFFICE OF THE SUPERINTENDENT
CENTRAL PRISON HARIPUR

No. _____ / Dated _____ / 2022

Ph/Fax: 0995-920066-920055

E-MAIL: centralprisonhr@gmail.com

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35.	Mr. Ihsan Ullah	Junior Technician Pharmacy(BPS-12)
36.	Mr. Badar Munir	Junior Technician Pharmacy(BPS-12)
37.	Mr. Rizwan Ullah	Junior Technician Pharmacy(BPS-12)
38.	Mr. Rashid Ahmad	Junior Technician Pharmacy(BPS-12)
39.	Mr. Aamir Ali Shah	Junior Clerk (BPS-11)
40.	Mr. Atiq Ur Rehman	Junior Clerk (BPS-11)
41.	Muhammad Javed	Drill Instructor (BPS-11)
42.	Mr. Javed Khan	Drill Instructor (BPS-11)
43.	Muhammad Afzal	Driver (BPS-06)
44.	Mr. Zakir Hussain	Driver (BPS-06)
45.	Mr. Sheraz Ahmad	Tube Well Operator (BPS-05)
46.	Mr. Ali Sher Ahmad	Weaving Master (BPS-05)
47.	Mr. Zahid Hussain	Carpenter (BPS-05)
48.	Mr. Saleem	Masson (BPS-05)
49.	Muhammad Khalid	Motor Mechanic (BPS-05)
50.	Muhammad Faheem	Electrician (BPS-05)

This is for kind information and further perusal please.

[Signature]
SUPERINTENDENT
CENTRAL PRISON HARIPUR

Endst: No 219- /

Copy of the above is forwarded to the PS to Special Assistant to
Chief Minister for Prisons Khyber Pakhtunkhwa Peshawar for information please.

[Signature]
SUPERINTENDENT
CENTRAL PRISON HARIPUR

[Handwritten Signature]

[Handwritten Signature]

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وکالت نامہ

کورٹ فیس

بعدالت سروس سٹریٹجی کپک لٹاڈ

عنوان: عالمی سٹار نام گورنمنٹ مینز

منجانب: ریبلنٹ

نوعیت مقدمہ:

باعث تحریر آئیکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب وہی کل کاروائی متعلقہ آں مقام محمد ارشد خان تنوی ریلوے سیکرٹریٹ آف پاکستان کو وکیل مقرر کرنے کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا نیز وکیل صاحب موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا ساختہ پرداختہ مجھ کو منظور و قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہر جانہ التوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوں گے۔ نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں کوئی جزو بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراد استجارت نالاش بصیغہ مفلسی کے دائر کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کیا تاکہ سند رہے۔

المقوم:

بمقام:

Accepted

السید