

**BEFORE THE KHYBER PAKHTUNKHWASERVICE**  
**TRIBUNAL PESHAWAR**

Implementation No. 623 /2023

**Appeal No - 1635/2023**

**Muhammad Bilal**

Versus

**Govt; of KPK & others**

(Appellant)

(Respondents)

**IMPLEMENTATION PETITION**

**INDEX**

Sr. #	Particulars of Documents	Annexure	Page
1	Reply with Affidavit	--	1-6
2	Copy of arrival, charge report, Source form-II	K, L & M	7-8-9-10
3	Copies of attendance register	N	10-12
4	Copy of letter from incharge headmaster	O	13
5	Copy of order No. 16087 and 16088 both dated 06/09/2023	P & Q	14-15
6	Miscellaneous		16
7	Waqalt Nama		17

Dated: /09/2023

Your Humble Respondent No.4

  
**Muhammad Rasheed**

Through counsel 

**Muhammad Abdullah Baloch**  
Advocate Supreme Court

D. I. Khan  
0314-6932557

①

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

Implementation petition No. 623/2023

Khyber Pakhtunkhwa  
Service Tribunal

Case No. 763

Date: 22/9/23

**Muhammad Bilal**

Versus

**Govt; of KPK & others**

(Appellant)

(Respondents)

**IMPLEMENTATION PETITION**

**Subject: WRITTEN REPLY ON BEHALF RESPONDENT #4**  
**(Muhammad Rasheed).**

Respected Sir,

Respondent # 4, humbly submits the reply as follows.

**PRELIMINARY OBJECTIONS:**

1. That the appellant has got no cause of action and locus standi to file instant implementation petition.
2. That order of the worthy Tribunal dated 11/08/2023 had become infructuous as posting/transfer order dated 14/07/2023 had already been acted upon. The present appellant had relieved the charge of ADEO (P&D) on 26/07/2023.
3. That appellant has concealed material facts from this worthy Tribunal.
4. That the instant implementation petition is devoid of merits and is defiance of law, hence liable to be dismissed.
5. That the present implementation petition is not maintainable and incompetent in eye of law in present form.
6. That this Honourable Service Tribunal has no jurisdiction to entertain the instant petition.
7. That the appellant has not come to the court with clean hands and has suppressed all relevant facts. Transfer/posting Order is in accordance with law and was issued in public interest.

**REPLY ON FACTS**

- i. Para#1 is incorrect as drafted. The appellant has concealed a material fact that he had been serving in management cadre since 06/02/2020 as previously he had been serving ADEO EST and after 11/06/2021 as ADEO (P&D). The appellant only possesses maximum 6 years length of service, whereas the answering respondent has been serving the department since last 33 years. Transfer is the part of job, therefore, appellant should not have any objection on his transfer such like he was transferred to the post of ADEO (P&D) and he did not have any objection. Hence, the claim of the appellant is against the law and did not sustainable in the eye of law.
- ii. Para#2 is not relating to the answering respondent. Pertains to record.
- iii. Para#3 is incorrect, hence not admitted. The petitioner concealed facts before the Honourable Tribunal that posting/transfer order dated 14/07/2023 had already been acted upon. The petitioner had relived the charge on 26/07/2023 even then did not disclose the fact before the worthy Tribunal. Copies of Arrival report; charge report and Source Form II are annexed as **Annexure K, L & M** respectively.
- iv. Para#4 is incorrect. Not admitted. The present implementation petition was filed on 11/09/2023 but in the instant para the present petitioner has misrepresented the fact qua the actualization of order dated 14/07/2023. Since arrival i.e 17/07/2023 till date, the answering respondent has been performing his duties as ADEO (P & D). Copies of attendance register are annexed as **Annexure N**. Moreover honoring the order of the worthy Tribunal the Director Education issued notification bearing

*Handwritten signature*

No. 2598-2602 dated 24/08/2023. However vide subsequent order of the Director Education the status of the parties remain intact. Moreover, the said notification dated 24/08/2023 issued by the Director Education not according to the spirit of the order of the Worthy Tribunal dated 11/08/2023.

- v. Para No. 5 is incorrect. Not admitted. The para is based on surmises and conjunctures and is the result of petitioner's own interpretation. Petitioner has never ever assumed his position as ADEO (P&D) DIKhan after relieving his charge. The petitioner himself admits in the instant para that he had been duly informed by the department that order dated 14/07/2023 was already acted upon. Thus, the petitioner is manipulating the facts. The para is vehemently denied.
- vi. The Para pertains to the record however, reflects the fact that at the time of institution of instant implementation petition, the petitioner had knowledge about all the notifications and orders. In fact the notification dated 08/09/2023 was issued for the purpose of removing the anomaly and to clarify the situation. The said notification clearly expressed the transfer/posting order dated 14/07/2023 **had already been acted upon**.
- vii. Para is incorrect. Not admitted. The present petition has no grievances and causes to file the instant petition.

*Chand Shekhar*

### **REPLY ON GROUNDS**

- a. Para is incorrect; hence, not admitted. The petitioner is making his own interpretation of the order dated 11/08/2023 of the Worthy Tribunal wherein the word "if not acted upon" was written. On 11/08/2023 it was a petitioner who knew the fact that transfer/posting order had already been acted upon but he deliberately with mala-fide intention did not tell the Worthy Tribunal about the true facts and successes to get order dated 11/08/2023. The worthy Tribunal was pleased to suspend the

transfer order (14/07/2023) vide order dated 11/08/2023 in the following manners;

"In the meanwhile operation of impugn order suspended till the date fixed, if not already acted upon."

It is most humbly stated that posting transfer order had already been acted upon at the time of issuance of order of Worthy Tribunal dated 11/08/2023. Despite having knowledge about this fact that transfer/posting order had already been acted upon, even then the present petitioner/appellant filed the instant implementation petition on 11/09/2023. Approximately after two months of the actualization of the said transfer/posting order. That department also, despite having the knowledge that the transfer order had already been acted upon, even than honoring the order of Worthy Service Tribunal (11/08/2023) issued a notification dated 24/08/2023. However vide notification dated 08/09/2023 clarifying all the legal/ factual aspect of the case.

b. Para b is incorrect, hence, not admitted. Strongly denied. Detailed reply has been given in above pare, may kindly be reiterated. The appellant's transfer Notification dated 14/07/2023 was issued according to law and in public interest. The appellant cannot claim his transfer/posting as of his right. Most particularly when he has already passed his tenure. No discrimination had been made with the present appellant. Notification dated 14/07/2023 is accordance with law and government policies. The petitioner is just manipulating the facts and is liable to disciplinary proceedings.

*Approved  
Order*

c. Incorrect. Not admitted. Order dated 14/07/2023 was completely acted upon. The answering respondent after his arrival and assumed the charge on 26/07/2023. The present petitioner relived the charge i.e 26/07/2023. The Incharge/Headmaster of GMS, Wanda Umer Khan issued a letter to the concern DEO that the present petitioner is absent from duty. Copy of the letter is annexed as Annexure "O". The transfer order was issued in public interest and according to law. Notification dated 24/08/2023 was against the law and against true spirit of the order of the Worthy Tribunal. Copy of order No.

5

16087 and 16088 both dated 06/09/2023 are annexed as **Annexure P & Q.**

- d. Para d is incorrect as drafted, hence, not admitted. Strongly denied. Para is the result of self-interpretation of the petitioner. The petitioner having only 6 years of his service length has become so blue eyed of the department and so influential that he tried to managed to damage the record of answering respondent at account office. The present posting order was effective within the territorial limits of tehsil DIKhan and the mentioned letter from election commissions has no nexuses with the transfer of the petitioner at GMS, Wanda Umer Khan.
- e. Incorrect, not admitted. Strongly denied. Detail reply has been given in the above paras. Moreover the petitioner is liable for strict disciplinary proceedings for manipulating the facts before the worthy Tribunal.
- f. Para is legal.

***It is therefore requested that present implantation petition may kindly be dismissed with cost.***

Dated: /09/2023

Your Humble Respondent No.4



**Muhammad Rasheed**



Through counsel

**Muhammad Abdullah Baloch**  
Advocate Supreme Court

03146932557

D. I. Khan

**VERIFICATION**

Verified this 22<sup>nd</sup> day of September, 2023 that the contents of this written reply are true and correct and that nothing has been concealed from this Honourable Court.

  
**Respondent No.4**

**AFFIDAVIT**

I, **Muhammad Rasheed**, the respondent#4, do hereby solemnly affirm & declare on oath that the contents of this written reply are true & correct to the best of my knowledge and belief, nothing has been concealed from this Honourable Court and contents of the service appeal and the affidavit thereon are false.

  
**Deponent**



22/9/23

7

Answer K

The District Education Officer (Male)  
D.I Khan

Subject

ARRIVAL REPORT

Respected Sir,

In compliance of Directorate of Elementary & Secondary Education (Hyd)  
Paahtunkhwa Endst No. 7156-EO/F No.54/ADIODs/Transfer/D.I Khan Dated 14-07-2023, I submit my arrival  
report on 17-07-2023 for duty as ADEO (P&D) in your kind office.

Arrival Accepted on  
17/07/2023

*[Signature]*  
District Education Officer  
(M) D.I. Khan

*[Signature]*  
MUHAMMAD RASHEED (G)  
GMS WANDA LIMAI KHAN  
D.I. KHAN

Attested to be true  
copy.  
Called P.P.P  
21/09



8

ANNEX - L

# CERTIFICATE OF TRANSFER OF CHARGE

1) Certified that we have on the fore/after noon respectively made over the charge ADD (P&D) in office of the DIO (Male) DIKhan in compliance with the transfer order issued by the Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar, Peshawar vide Ltrst no. 7156-60E no 54/AD/Os Transfer/DI.Khan Dated Peshawar the 14.07.2023 at S. No 05

2) Particulars of each important and confidential documents handed over noted on the reverse

Signature of Relieved

Govt. Servant: [Signature]

Designation: Mulhammad Bilal ADEO

Station: DIO (MALE) DIKHAN

Dated: \_\_\_\_\_

Signature of Relieving

Govt. Servant: [Signature]

Designation: Mulhammad Bilal ADEO

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)

DIKHAN

Endst: No. 13854-58

Dated: DIKhan the: 26/07/2023

Copy for information forwarded to the:

- 1- Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar
- 2- District Accounts Officer DIKhan
- 3- Headmaster GMS Wanda Umar Khan DIKhan.
- 4- Officials Concerned.
- 5- Master File.

[Signature]  
 DISTRICT EDUCATION OFFICER  
 (MALE) DIKHAN

Attested to be true  
 copy.  
[Signature]  
 21/09/2023



PAY ROLL SYSTEM  
AMENDMENT FORM  
SINGLE EMPLOYEE ENTRY

TEA 560  
15/08/23

OFFICE OF THE \_\_\_\_\_ Dy. Dist. Edu. Officer (M.C.) Dikhan  
FOR THE MONTH OF \_\_\_\_\_ 1 120

UDO Code (Cost Center) 006297 Description \_\_\_\_\_

Personnel Number 00189849 Employee Name M. HANISAD RASID KHAN

Grade (Pay Scale Group) 16 A DECC (1)

National ID Card No. \_\_\_\_\_

City Dist.  Start  Stop

Attached to \_\_\_\_\_  
Crucial case \_\_\_\_\_

JRM PAY 02

Page No. \_\_\_\_\_

Info Type	GENERAL DATE CHANGE		CHANGE IN PAYMENTS / DEDUCTIONS					Effective Date	Remarks
	Field ID	New Contents	Wage Type	Amount					
				Ruppes	Paise	Ans			
		Pay active and transfer	(A)						change in E...
			(B)						...
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[Signature]  
Prepared By

[Signature]  
Audited/Checked By

Entered / Verified

Printed by: IRMADAT, ADP OFFICE

AL AMMS - M 9

10

# Daily Attendance Register of the DEO (M), D. J. KHOR

DATE AND HOURS

for the Month of

July/2024

OF ATTENDANCE

Serial No.	Name	Rank	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	Total No. of Days			
49	Anwar Shah	SPD	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	31		
50	Farooq Shah	TT	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	31	
51	Durjan Samuel	PST	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	31	
52	Hafiz Ahmad	Lit B	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	31	
53	Muhammad Rashed	Do (M.D.J.)	KHOR												X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	31		
54	Khannullah	TT	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	31
55			X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	31
56	Ghulam Farid	PST	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	31
57	Dilraj Singh	PST	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	31

10/7/24  
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 31/7/24

# Daily Attendance Register of the DEADLY DIBLA

for the Month of

August 2022

OF ATTENDANCE

DATE AND HOURS

Serial No.	Name	Rank	DATE AND HOURS												13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	Total No of Days	Remarks	
			1	2	3	4	5	6	7	8	9	10	11	12																						
50	<del>Amir Samir</del>	II						X							X																					
51	Amir Samir	II	P	P	P	P	X	P	P	P	P	P			X																					
52	Amir Samir	II					X								X																					
53	Amir Samir	II	P	P	P	P	X	P	P	P	P	P			X																					
54	Amir Samir	II					X								X																					
55	Amir Samir	II	P	P	P	P	X	P	P	P	P	P			X																					
56	Amir Samir	II					X								X																					
57	Amir Samir	II	P	P	P	P	X	P	P	P	P	P			X																					
58	Amir Samir	II					X								X																					
59	Dilewal Shah	BSI	X	X	X	X	X	X	X	X	X	X			X																					

Handwritten signature and notes in the bottom right corner of the register.

**Daily Attendance Register of the** DE O.M. D. Unit  
 DATE AND HOURS

for the Month of September  
 OF ATTENDANCE

Serial No.	Name	Rank	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30
1	M. Rashid Khan	PxD																														
2	Saeed Hussain	Supant																														
3	Asmatullah	P.M. ADEO																														
4	Shah-e-Ahmad	Spote ADEO																														
5	Fayyaz Afzal	Sec ADEO																														
6	Rehmatullah	Clk ADEO																														
	Muhammed Khaliq	BAC																														
7																																
8	Syed Imran Ali	Shk AISH P																														
9	Syed Arsalan	Shk C/O																														
10	Tanveer Ahmad	C/O																														
11	Muhammed Ayub	Asst																														

Handwritten notes and signatures on the right side of the page, including a large circular stamp and illegible text.

Annex - 0

(13)

بخدمت جناب ڈسٹرکٹ ایجوکیشن آفیسر صاحب (مردانہ) ڈیرہ اسماعیل خان

عنوان -- وضاحت طلبی۔

جناب عالی!

نزارش بکسور انور یہ ہے کہ 28 اگست 2023 کو GHSS No.4 میں تمام مڈل سکولوں کی میٹنگ کال کی گئی تھی۔

بد قسمتی سے میری بیوی بیمار تھی۔ میں اس کے ساتھ اسلام آباد گیا تھا۔ مجھے میٹنگ کا کوئی لیٹر نہیں ملا۔ جب کہ ہمارے ہیڈ ماسٹر صاحب ADEO(P&D) ڈیرہ اسماعیل خان تعینات ہو گیا تھا۔ اور وہ 15 جولائی 2023 کو ریلیو ہو چکا تھا۔

محمد بلال ہیڈ ماسٹر صاحب GMS Wanda Umar Khan حال سکول میں حاضر نہ ہو سکا۔

لہذا ہم میٹنگ میں حاضر نہ ہو سکے۔ امید ہے کہ آپ صاحبان درگزر فرمائیں گے۔

حضور کی عین نوازش ہوگی۔

فقط / مورخہ: 31-08-2023

ارض

خورشیدانندہ CT پورنٹ مڈل سکول وانڈہ عمر خان، ڈیرہ اسماعیل خان

ATK's school  
copy  
24/08/23  
true

OFFICE OF THE DISTRICT EDUCATION OFFICER  
(MALE) DIKHAN.

Annex-P  
14

No. 1687

Dated Dikhan the 06 / 09 /2023.


To

The Director,  
E&SE Khyber Pakhtunkhwa,  
Peshawar.

Subject:- APPEAL/APPLICATION.

Memo:-

Please Enclosed find here with self-explanatory Application in respect of Mr. Muhammad Rasheed EX-ADEO ( P&D) , with the remarks that his orders was acted upon accordingly, His Charge Report/Arrival Report and Source-II form are attached. Hence the same is send for your kind necessary action Please.

  
DISTRICT EDUCATION OFFICER  
(MALE) DERA ISMAIL KHAN.

Attested to be true  
copy  
21/09/2023



**OFFICE OF THE DISTRICT EDUCATION OFFICER  
(MALE) DIKHAN.**

AMX-Q  
15

No. 1688 /

Dated Dikhan the 06 / 09 /2023.

To

The Secretary,  
E&SED Khyber Pakhtunkhwa,  
Peshawar.

Subject:- APPEAL/APPLICATION.

Memo:-

Please Enclosed find here with self-explanatory Application in respect of Mr. Muhammad Rasheed EX-ADEO ( P&D) , with the remarks that his orders was acted upon accordingly, His Charge Report/Arrival Report and Source-II form are attached. Hence the same is send for your kind necessary action Please.

DISTRICT EDUCATION OFFICER  
(MALE) DERA ISMAIL KHAN.

Attended to be true  
COPR  
21/09



(8)

(16)

**DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION**  
**DEPARTMENT KHYBER PAKHTUNKHWA, PESHAWAR**

**NOTIFICATION.**

1. Whereas, the appellant, namely Muhammad Bilal SST(BS-16)/ADEO P&D at the office of District Education Officer (M) D.I Khan has invoked the constitutional jurisdiction under Article-212 of Islamic Republic of Pakistan, 1973 through filing Service Appeal No. 1635/2023 before the Honorable Khyber Pakhtunkhwa Service Tribunal Peshawar against the Notification dated 14-07-2023, whereby, the appellant has been transferred from the post of ADEO (P&D) to GPO Wanda Umar Khan. Moreover, the appellant has also filed application for suspension of operation of the impugned order before the Honorable Court.
2. And whereas, as a result thereof, vide order dated 11-08-2023 of the Honorable Service Tribunal, Peshawar, the operation of the impugned order has been suspended with the condition "It not already acted upon". In this regard, the Competent Authority complied with the order and of the Honorable Tribunal & vide Notification bearing Endst No. 2598-2602 dated 24-08-2023 the impugned order dated 24-07-2023 was notified "as held in abeyance".
3. And whereas, in the meanwhile, the DEO (M) D.I Khan has submitted report to the Directorate E&SE vide office letter No.16087 dated 06-09-2023 by stating therein that the impugned order dated 24-07-2023 has already been acted upon by the appellant as evident from the charge relinquished & arrival report as well as source-II submitted to the DAO concerned.
4. And whereas, in view of the report of the DEO (M) D.I Khan, it is evident that the condition status-quo order dated 11-08-2023 is no more in field in favor of the appellant as per the directions of the Honorable Tribunal, hence, to meet the ends of justice, the Notification dated 24-08-2023 is liable to be re-called.

Now therefore, in compliance of the order dated 11-08-2023 of the Honorable Khyber Pakhtunkhwa Service Tribunal Peshawar & after having gone through the whole case record including report of the DEO (M) D.I Khan dated 06-09-2023, the undersigned, being Competent Authority in the instant case, is of the considered view that the status-quo granted vide the order dated 11-08-2023 is no more in field as it has already been acted upon by the appellant, hence, the Notification bearing Endst No. 2598-2602 dated 24-08-2023 is hereby re-called till the final disposal of the pending Service Appeal No. 1635/2023 before the Honorable Khyber Pakhtunkhwa Service Tribunal Peshawar with immediate effect in the interest of public service.

(Dr. Iqbal Khan)  
DIRECTOR  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

Endst: No: 4261-66 /F.No. 54/ADEOs/(M)/Transfers D.I.Khan

Dated Peshawar the: 08/09/2023

**Copy forwarded for information & n/action to the:-**

1. Learned Registrar Khyber Pakhtunkhwa Service Tribunal Peshawar.
2. Learned AAG Khyber Pakhtunkhwa Service Tribunal Peshawar.
3. District Education Officer (Male) D.I.Khan.
4. District Accounts Officer D.I.Khan.
5. Section Officer (Lit-II) E&SE Department Khyber Pakhtunkhwa.
6. Deputy Director (Legal) E&SE Khyber Pakhtunkhwa.
7. Officer concerned.
8. Office copy.

(Signature) 8/9/23  
Assistant Director (Estab-1, M)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

ATTN: To be  
Done  
2/10/23



MUHAMMAD ABDULLAH  
Advocate Supreme Court of Pakistan  
12101-0988149-7

17

LIFE MEMBER

ABID SHAHID ZUBERI  
President

MUQTEDIR AMTAR SHABIR  
Secretary



# وکالت نامہ

کیس کی قیمت ایک سو روپیہ

کورٹ فیس

Before the worthy Service Tribunal بعد ازاں جناب  
 Rept # 4 منجانب محمد رشید  
 Camp: D.I. Khan  
 Na Bilal Govt: of KPK  
 دعویٰ یا جرم  
 Implementation # 623/2023  
 تفصیل دعویٰ یا جرم  
 باعث تخریر آنکہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف واسطے پیروی و جوابدہی برائے پیشی یا تصفیہ مقدمہ بمقام  
Muhammad Abdullah Baloch AS  
 کو حسب ذیل شرائط پر یکمل مقرر کیا ہے، کہ میں ہر پیشی پر خود بذریعہ اختیار خاص رو برو عدالت حاضر ہونا ہوں گا۔ اور ہر وقت پکارے جانے والے مقدمہ وکیل صاحب  
 موصوف کو اطلاع دیکر حاضر عدالت کروں گا، اگر پیشی پر مظہر حاضر نہ ہوا۔ اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور پر میرے برخلاف ہو گیا۔ تو صاحب موصوف  
 اسکے کسی طرح ذمہ دار نہ ہوں گے، نیز وکیل صاحب موصوف صدر مقام بکھری کے علاوہ کسی جگہ یا بکھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل پیروی کرنے کے  
 ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام بکھری کے علاوہ کسی جگہ یا بکھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل پیروی کرنے کے ذمہ دار نہ  
 ہوں گے۔ اور مقدمہ صدر مقام بکھری کے علاوہ از جگہ سماعت ہونے یا بروز تعطیل یا بکھری کے اوقات کے آگے پیچھے پیش ہونے پر مظہر کو کوئی نقصان پہنچے تو اس کے ذمہ  
 دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا عائد واپس کرنے کے بھی موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پر داخلہ صاحب موصوف مثل کردہ  
 ذات خود منظور قبول ہوگا۔ اور صاحب موصوف کو مرضی دعویٰ، یا جواب دعویٰ یا درخواست اجراءے ذکر و نظر ثانی اپیل گرانہ و ہر قسم درخواست پر دستخط و تصدیق کرنے کا  
 بھی اختیار ہوگا۔ اور کسی حکم یا ذکر یا کرانے اور ہر قسم کارروائی وصول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اور اس پر غائبی یا راضی نامہ دینے پر  
 حلف کرنے، اقبال دعویٰ کا بھی اختیار ہوگا۔ اور بصورت مقرر ہونے تاریخ پیشی مقدمہ مذکورہ بیرون از بکھری صدر پیروی مقدمہ مذکورہ نظر ثانی و اپیل و گرانہ و برآمدگی  
 مقدمہ یا منطوقی ذکر یا بکھری یا درخواست علم انتہائی یا قریبی یا گرفتاری قبل از فیصلہ اجراءے ذکر یا بھی صاحب موصوف کو بشرط ادا سنگی علیحدہ علیحدہ پیروی کا اختیار ہوگا  
 اور تمام ساختہ پر داخلہ صاحب موصوف مثل کردہ ذات خود منظور قبول ہوگا۔ اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ مذکورہ یا اسکے کسی جزو  
 کی کارروائی یا بصورت درخواست نظر ثانی اپیل یا گرانہ یا دیگر معاملہ مقدمہ مذکورہ کی دوسرے وکیل یا بیرسٹر کو اپنے بجائے یا اپنے امراء مقرر کریں۔ اور اپنے مشیر قانون کو  
 بھی ہر امر میں وہی اور دینے اختیارات حاصل ہوں گے، جیسے صاحب موصوف کو حاصل ہیں، اور دوران مقدمہ میں جو کچھ ہر چنانہ الزام پڑے گا، وہ صاحب  
 موصوف کا حق ہوگا۔ مگر صاحب موصوف کو پوری نہیں تاریخ پیشی سے پہلے ادا نہ کروں گا۔ تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی پیروی نہ کریں اور ایسی  
 صورت میں میرا کوئی مطالبہ کسی حکم کا صاحب موصوف کے برخلاف نہیں ہوگا۔

مضمون وکالت نامہ سن لیا ہے۔ اور اچھی طرح سمجھ لیا ہے اور منظور ہے

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Report: 4  
19. Rashid

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D. I. Khan