


FORM OF ORDER SHEET


Court of _____

Appeal No. 1953/2023


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	26/09/2023	<p>The appeal of Mr. Junaid Gul resubmitted today by Mr. Kamran Khan Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on <u>28-09-2023</u>.</p> <p>By the order of Chairman  REGISTRAR</p>

R/sir

the desired documents have been annexed
and placed on file. Remitted for
after removing of the preliminary objections
made by the office.

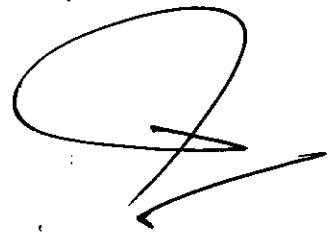

Kamran Khan
26/9/2023.

The objection of the office as well as reply of the learned Counsel regarding the same are submitted for perusal and appropriate order please.


Superintendent.

Worth Chairman.

objection sustains. The
appellant shall make good
the deficiencies within 7 days.



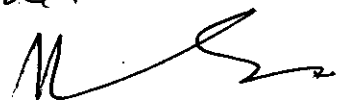
19/09/23

No: 3219/ST

Dated 18-09-2023

R/sis.

The copy of Departmental appeal and
crossed petition is not in hands of appellant.
However decision on these petitions have been
made which is placed on file. Furthermore
the mentioned documents can be requisite for
the department. Please the case be
fixed before bench along with the objection
to assist ~~them~~^{him} on the same.

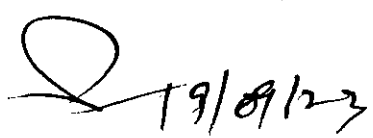


AR

office shall refrain from
again receiving appeal until
order/directive is not complied with or
deficiencies are removed

Karan Khan

19/9/23


19/09/23

The appeal submitted by Mr. Kamran Khan Advocate i.e. on 31.08.2023 is incomplete on the following score which is returned to him for completion and resubmission within 15 days.

1. Copy of Departmental Appeal and revision petition in respect of appellant mentioned in memo of appeal is not attached with appeal.

No. 3141 /S.T.

Dt. 1-9 /2023



REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Kamran Khan Adv.
High Court Peshawar.

R/611

The departmental appeal & revision Petri although mentioned in appeal but the same are not annexed in memo because the ~~same~~ copies of the same are not in possession of the appellant. further more it has only been mentioned.

Completed after completion



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

SERVICE APPEAL No. 1953 /2023

JUNAID GUL

VS

POLICE DEPTT:

INDEX

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5.	Revision Order	D	14.
6.	Vakalatnama	15.

APPELLANT

THROUGH:

Kmaran Khan
KMARAN KHAN
ADVOCATE

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 1953 / 2023

Mr. Junaid Gul, Ex-Constable No. 954,
Capital City Police, Peshawar.

..... APPELLANT

VERSUS

- 1- The Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
- 2- The Capital City Police Officer, Peshawar.
- 3- The Superintendent of Police Headquarters, Peshawar

..... RESPONDENTS

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUNGED ORDER DATED 16.09.2022 WHERE BY THE APPELLANT HAS BEEN REMOVED FROM SERVICE, AGAINST THE APPELLAT ORDER DATED 31.01.2023 WHEREBY THE DEPARTMENTAL APPAL OF THE APPELLANT HAS BEEN REJECTED AND AGAINST THE REVISIONAL ORDER DATED 28.08.2023 WHEREBY THE REVISION PETITION OF THE APPELLANT HAS BEEN REJECTED ON NO GOOD GROUNDS.

PRAYER:

That on acceptance of this appeal the impugned order dated 16.09.2022, appellate order 31.01.2023 and Revision Order dated 28.08.2023 may please be set-aside and the appellant may kindly be reinstated with all bake benefits. Any other remedy which this august Service Tribunal deems fit that may also be awarded in favor of the appellant.

R/SHEWETH:

ON FACTS:

Brief facts giving rise to the present appeal are as under:

- 1- That the appellant was serving the respondents department as constable quite efficiently and to the entire satisfaction of his High Up and no compliant what so ever made against the appellant while performing his duty.

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- 2- That while performing his duties with zeal and zest the wife of the appellant became ill where-after she was hospitalized. Copies of the medical record is attached as annexure**A**
- 3- That astonishingly vide order dated 16.09.2022 the appellant was removed from services on the basis of absence of 16 days. Copy of the impugned order dated 16.09.2022 is attached as annexure**B.**
- 4- That the appellant feeling aggrieved from the impugned order, filed departmental appeal but the same has been rejected vide appellate order dated 31.01.2023. Copy of the appellate order dated 30.01.2023 is attached as annexure**C.**
- 5- That where after the appellant filed revision petition before the respondent No.01 i.e. Inspector General of Police Khyber Pakhtunkhwa but the same has been rejected on good grounds vide order dated 28.08.2023. Copy of the revision order is attached as Annexure**D**
- 6- That having no other remedy the appellant preferred the instant service appeal on the following grounds amongst the others.

GROUND:

- A-** That impugned removal order dated 16.09.2022 appellate order dated 31.01.2023 and revision order 28.08.2023 issued by the respondents are against the law, facts and norms of natural justice hence not tenable and are liable to be set aside.
- B-** That appellant has not been treated by the respondent Department in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C-** That the codal formalities required for the departmental proceeding has not been fulfilled by the respondents while issuing the impugned orders.
- D-** That neither show cause notice nor chance of personal hearing/defense has been provided to the appellant before issuing the impugned orders.
- E-** That neither charge sheet nor statement of allegation was issued to the appellant before issuance of the impugned order.
- F-** That the enquiry officer neither recorded any statement of witnesses in the presence of the appellant nor was afforded an opportunity to cross-examine them, the appellant was condemned unheard thus the impugned order is illegal.

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G- That, the respondent department acted in arbitrary and mala fide manner while issuing the impugned removal orders dated.

H- That, no regular inquiry has been conducted in the matter which is pre-requisite as per the judgments of the Apex Supreme Court of Pakistan in punitive matters.

I- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is therefore, most humbly prayed that the appeal of the appellant may kindly be accepted as prayed for.

Dated:

APPELLANT

J. Gul
JUNAID GUL

THROUGH:

Kamran Khan
KAMRAN KHAN

Waleed Adnan
WALEED ADNAN

Muqeeb-ur-Rehman Mandokhel
**MUJEEB-UR-REHMAN
MANDOKHEL
ADVOCATES**

AFFIDAVIT

I, Junaid Gul Ex-Constable Police, do hereby solemnly affirm that the contents of this Service Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.

J. Gul
DEPONENT

Professor
Dr. Shehreen Mohammad
M.B.B.S, M.D, M.Phil, Ph.D
Professor & Head of Department
of Bio Chemistry
Muhammad College of Medicine

پروفیسر شہرین محمد

"A"
پروفیسر ایم بی بی
ڈی ایم فل پی ایچ ڈی
پروفیسر اینڈ ہیڈ ڈیپارٹمنٹ آف بائیو کیمسٹری
محمد کالج آف میڈیسن

Name Uzma Javed Age _____ Sex _____ Date 30/8/20

Clinical Record

DM
Week
D. Neurology - 22
on projects
MS - 1st
D. Control
Neurology
Uzma Javed

جنگ لاہوری گیٹ بزم پیر روڈ پشاور

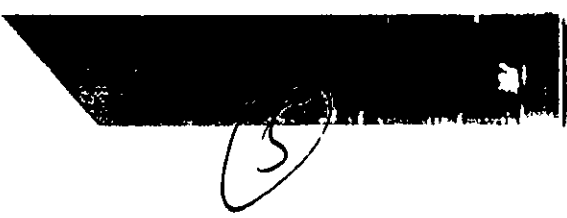
Tab Exteem Tab/Syp Mical-D Tab/Syp Actiful Tab/Syp Excholine

Patient Name: W.o Junaid gul Age: Sex f Date of Result: 30-08-2022
 Physician: Test Rea:



SHIFA

Clinical Laboratory



Reception ID: 356 Laboratory Reports Date of Entry: 30-08-2022
 Patient Name: W.o Junaid gul Age: Sex f Date of Result: 30-08-2022
 Physician: Test Rea:

Test	Result	Normal
Hemoglobin	12.3 g/dl	M (13.8 - 17.2) F (12.1 - 15.1)
WBC Count	12,600 cells/mcl	4500 - 10000
Diff Leucocytes Count		
Neutrophils	78%	40 ---- 75
Lymphocytes	20%	20 ---- 45
Monocytes	01%	02 ---- 10
Eosinophils	01%	00 ---- 06
GLUCOSE	245	mg/dl Normal Fasting 75 - 115 Random 55 - 165

Mr. Sabir
DMLT (Pak)

Dr. Muhammad Junaid Khan
M.B.B.S, D

Sub Office: Auqaf Plaza, B (28) Dabgari Garden Peshawar. Mob: 0300-584 44 86



SHIFA

Clinical Laboratory

6

Reception ID: 356	Laboratory Reports		Date of Entry: 30-08-2022
Patient Name: W.o Junaid gul	Age:	Sex: f	Date of Result: 30-08-2022
Physician:	Test Req:		

Urine Routine Examination:

Volume	20 ML	Pus Cells	30 ---- 35 /HPF
Colour	Pale Yellow	Red Cells	03 ---- 04 /HPF
pH	Acidic	Epithelial Cells	+
Protein	+	Calcium Oxalates	Nil
Glucose	++	Granular Cast	Nil
		Hyaline Cast	Nil
		A. Urates	Nil
		A. Phosphates	Nil
		Mucus Thread	Nil

Mr. Sabir
DMLT (Pak)

Dr. Muhammad Junaid Khan
MBBS, FRC

Sub Office: Auqaf Plaza, B (28) Dabgari Garden Peshawar. Mob: 0300-584 44 86



SHIFA

Clinical Laboratory

7

Reception ID: 334	Laboratory Reports	Date of Entry: 31-08-2022
Patient Name: W.o Junaid gul	Age: Sex f	Date of Result: 31-08-2022
Physician:	Test Req:	

Test	Result	Normal
Hemoglobin	12.3 g/dl	M (13.8 - 17.2) F (12.1 - 15.1)
WBC Count	15,700 cells/mcl	4500 - 10000
Diff Leucocytes Count		
Neutrophils	80%	40 ---- 75
Lymphocytes	18%	20 ---- 45
Monocytes	01%	02 ---- 10
Eosinophils	01%	00 ---- 06
GLUCOSE	345	mg/dl Normal Fasting 75 - 115 Random 55 - 165
Typhidot (IgG)		Reactive
Typhidot (IgM)		Reactive
Method		Immunochromatographic

Mr. Sabir
DMLT (Pak)

Dr. Muhammad Junaid Khan
M.S.S.S. (10/1)

Sub Office: Auqaf Plaza, B (28) Dabgari Garden Peshawar. Mob: 0300-584 44 86



International Medical Laboratory



NAME : W/O JUNAID
 SEX : FEMALE
 AGE : ?
 SPECIMEN : BLOOD URINE
 TEST REQUIRED : FBC, SUGAR R, TYPHIDOT TEST, URINE R/E

DATE : 05/09/2022
 TIME : 04:28:38
 REPORT # : 2
 REFERED BY : OPD

FBC

TEST	RESULT	UNITS	NORMAL RANGE
Haemoglobin	12.7	G/dl	M 14 ----- 18 F 12 ----- 16
TLC	10,400	/cmm	4000 - 11000
PLATELET COUNT	2,37,000	/cmm	140,000 - 400,000
DIFFERENTIAL COUNT			
Neutrophils	68	%	40 ----- 70
Lymphocytes	28	%	20 ----- 40
Eosinophils	02	%	01 ----- 06
Monocytes	02	%	02 ----- 10

All queries/Discrepancies if any may be referred to our lab with in 24 hrs of reporting for re-valuation/confirmation.

Dr. Mohammad Tariq
 HISTOPATHOLOGIST / CYTOPATHOLOGIST
 M.B.B.S, M. Phil, PMDC Registration No. 3666-N

Honihar Ullah
 MICROBIOLOGIST
 M. Phil, DMLT (Pathology)

Muhammad Bilal
 MICROBIOLOGIST
 Master Microbiology DMLT (Pathology)



International Medical Laboratory



9

NAME : W/O JUNAID

DATE : 05/09/2022

SEX : FEMALE

TIME : 04:28:38

AGE : ?

REPORT # : 2

SPECIMEN : BLOOD URINE

REFERRED BY : OPD

TEST REQUIRED : FBC, SUGAR R, TYPHIDOT TEST, URINE R/E

RESULT

TEST	RESULT	UNITS	NORMAL RANGE
SUGAR R	324	mg/dl	80 -----160

All queries/Discrepancies if any may be referred to our lab with in 24 hrs of reporting for re-valuation/confirmation...

Dr. Mohammad Tariq
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Honihar Ullah
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M. Phil, DMLT (Pathology)

Muhammad Bilal
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Master Microbiology DMLT (Pathology)

1st Floor Khattak Medical Centre, Dabgari Garde, Peshawar City. Tel:091-2566077, 0333-9397406



International Medical Laboratory



10

NAME : W/O JUNAID

DATE : 05/09/2022

SEX : FEMALE

TIME : 04:28:38

AGE : ?

REPORT # : 2

SPECIMEN : BLOOD URINE

REFERRED BY : OPD

TEST-REQUIRED : FBC, SUGAR R, TYPHIDOT TEST, URINE R/E

RESULT

TYPHIDOT TEST

IgM Positive (+ ive)

IgG Positive (+ ive)

All queries/Discrepancies if any may be referred to our lab with in 24 hrs of reporting for re-valuation/confirmation.

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International Medical Laboratory



NAME : W/O JUNAID

SEX : FEMALE

AGE : ?

SPECIMEN : BLOOD URINE

TEST REQUIRED : FBC, SUGAR R, TYPHIDOT TEST, URINE R/E

DATE : 05/09/2022

TIME : 04:28:38

REPORT # : 2

REFERRED BY : OPD

URINE R/E

PHYSICAL EXAMINATION

Quantity	20 ml
Colour	Pale Yellow
pH	Acidic

CHEMICAL EXAMINATION

Albumin	Trace
Sugar	(++)

MICROSCOPIC EXAMINATION

Pus Cells	12 --- 15	/HPF
Red Cells	02 --- 03	/HPF
Epith Cells	04 --- 06	/HPF
Ca. Oxalate	Nil	

All queries/Discrepancies if any may be referred to our lab with in 24 hrs of reporting for re-valuation/confirmation.....

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HISTOPATHOLOGIST / CYTOPATHOLOGIST
M.B.B.S, M. Phil, PMDC Registration No. 3666-N

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1st Floor Khattak Medical Centre, Dabgari Garde, Peshawar City. Tel:091-2566077, 0333-9397406

"B"
12

ORDER

This is a formal departmental proceeding against **Constable Junaid Gul No.954** on the charges/allegation that two separate departmental enquiries were initiated & conducted by DSsP Civil Secretariat & HQrs on the application submitted by complainants Nawaz Muhammad and Mehran Gul.

DSP Civil Secretariat conducted departmental enquiry on the application submitted by Nawaz Muhammad s/o Muhammad Gul 70 Shabqadar & submitted his report that the defaulter official is stigma on the face of Police department. The E.O further recommended suitable punishment for the defaulter official vide Enquiry Report No.188/R dated 10.08.2022.

DSP-HQrs conducted enquiry on the 2nd application submitted by HC Mihran Gul No.4911 & submitted his report that the defaulter official did not attend the enquiry proceedings. The E.O further recommended for taking ex-parte decision against the defaulter official vide Enquiry Report No.1577/PA dated 26.10.2022.

Upon the finding of both E.Os, he was issued final show cause notice & delivered him on home address through local Police PS Gulbahar to which he received by himself but he failed to submit reply of the said notice within stipulated period of 07-days or appear before this office as yet.

Note: On 30.08.2022, report of MM PS Urmar was obtained. He reported that the alleged official has been absented from lawful duty w.e.f 30.08.2022 till date. Beside this, the defaulter official has also been informed through Home Police Station but he failed to appear in O.R.

In light of recommendation of E.Os, the undersigned came to the conclusion that the alleged official found guilty of this misconduct. Therefore, he is removed from service under Khyber Pakhtunkhwa Police Rules-1975 with immediate effect. Hence, the period he remained absent from 30.08.2022 till date is treated as without pay.


**SUPERINTENDENT OF POLICE
HEADQUARTERS, PESHAWAR.**

OB. NO. 2392 / Dated 16/9 /2022

No. 3032-38 /PA/SP/dated Peshawar the 16/9 /2022

Copy of above is forwarded for information & n/action to:

1. The Capital City Police Officer, Peshawar.

گیت صبا - کیشن ٹیما ڈی ایس آر ایس

میزان: کئی نہیں برہدت علی صدم 16/9/2022

صبا علی

حرم گذارتن به کم سائل آریه زردی این صبا بطور کیشن
نمبر 954 سر ایچ ب ریا تمام صدم 2022/08/16 کو سائل کیوی دستیابی
بہرہ بنی صبا کیشن طبعی ادارہ سے ترقی ہوا ہستال صبا کیشن سے
حالیہ آریہ - بعد بعد میں صبا کیشن آریہ نوزاد پر آریہ سائل کو ہر
علی صدم 2022/09/16 مختلف الزامات کا بند پر نوزاد سے Remove کر دیا
ہے۔

بہرہ سائل آریہ کیشن جج صبا کیشن سے Remove کر دیا گیا ہے سائل
کو کورٹ واقع آریہ دفاع میں دیا گیا۔ مزید یہ کہ سائل کے صلہ انٹرویو
بھی بلکوز کر دیا گیا ہے بعد سائل کو صفا نہیں گیا ہے۔ سائل آریہ
بہرہ صبا کیشن کیشن کیشن سے جو آریہ کورٹ دستیابی فونش لہوری
سے ایچ ب ریا تھا۔

لکھنؤ اسٹریٹ سے کہ منظور کی ہیں یہ حکم صدم
16/9/2022 کو صدم و ناز سائل کو آریہ تمام الزامات سے نوبال
رک کا علی مجسٹریٹ 50 -
سائل علی محمد کورٹ سے

آریہ کیشن
صدم علی
نمبر 954



"C"
13

**OFFICE OF THE
CAPITAL CITY POLICE OFFICER,
PESHAWAR**

ORDER.

This order will dispose of the departmental appeal preferred by **Ex-Constable Junaid Gul No. 954**, who was awarded the major punishment of "**Dismissal from service**" under KP PR-1975 (amended 2014) by SP/HQr: Peshawar vide OB No. 2392, dated 16.09.2022.

2- Short facts leading to the instant appeal are that the defaulter Constable was proceeded against departmentally in two separate enquiries on the charges of taking money amounting to Rs. 60000/- fraudulently from the complainant Mr. Nawaz Muhammad s/o Muhammad Gul in the pretext of his appointment in Police Department and in second enquiry, he was found guilty by taking Rs. 80000/- from HC Mehran Gul No. 4911 in pretext of providing him bricks for construction. The MM Police Station Urmar also reported that the alleged official also absented himself from his lawful duty w.e.from 30.08.2022 to 16.09.2022 (16 days) without taking permission/leave of the competent authority.

3- He was issued proper Charge Sheet and Summary of Allegations by SP/HQr: Peshawar. Two separate enquiries were conducted against him through DSP/Civil Secretariat and DSP/HQr: Peshawar to scrutinize the conduct of the accused official. The inquiry officers after conducting proper inquiries submitted their findings in which he was recommended for suitable punishment and Ex-parte action respectively. The competent authority in light of the findings of the enquiry officers issued him Final Show Cause Notice, which was delivered to him on his home address through local police of PS Gulbahar but he failed to submit his reply to the said notice, hence was awarded the above major punishment.

4- He was heard in person in O.R and the relevant record along with his explanation perused. During personal hearing the appellant failed to submit any plausible explanation in his defence. He was given ample opportunity to prove his innocence but he failed to defend himself. Furthermore, previously he has been awarded major punishment twice in 2017 and 2021, but he failed to mend his ways. Therefore, keeping in view his appeal for setting aside the punishment awarded to him by SP/HQrs: Peshawar is hereby **rejected/filed**.

(MUHAMMAD IJAZ KHAN) PSP
CAPITAL CITY POLICE OFFICER,
PESHAWAR

No. 349-55 /PA dated Peshawar the 30/01 /2023

Copies for information and necessary action to the:-

1. SP/HQrs: Peshawar.
2. AD/IT CCP Peshawar.
3. OSI, Pay Officer, CRC
4. FMC along with Fouji Missal.
5. Official Concerned.

محترم صاحب انسپکٹر جنرل آف پولیس ضلع خوشنوار

13-A

درخواست نمبر دفعہ 11-A پولیس روڈ نمبر خراف

آرڈر نمبر 16/9/2022 ، 30/01/2023

صاحب عالی! سب سے پہلے عرض کرنا ہے کہ سیکشن 144 پولیس میں بلوا
کاٹھیل نزد الفضل سرائی کے واقعہ تھا۔ کہ دوران دستروں سیکشن کو
پورے 16/9/2022 کو نوٹری سے برضاست کر دیا ہے۔ جس
کے خلاف سیکشن نے درخواست اٹکل ایبل برائے جاتی نوٹری اور جنرل
کمیٹی پولیس آفیسر کے نام "نزداری جو کہ پورے 30/01/2023
کو بلاشنوائی کے خارج کر دیا ہے۔"

صاحب عالی!

سیکشن نے اپنی نوٹری انتہائی دشمن اصولی کے سرائی نام
میں ہے۔ اور دوران ملازمت کسی قسم کی غفلت نہیں ہوتی۔ لیکن
جو غیر بنیادی الزامات کے سیکشن کو پورے 16/9/2022 پر نوٹری
کے برضاست کر دیا ہے۔

لگتا ہے کہ مذکورہ درخواست میں مذکورہ آرڈر نمبر 16/9/2022
کو مستوخ کرنے کے اطمینان حاصل کرنے کے لیے سیکشن نے نوٹری پر
تمام تر شدہ اطمینان حاصل کرنے کے اطمینان صادر فرمایا ہے۔

سائبر
جنیٹل سائبر 954
پولیس آفیسر



"D"
14

**OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
PESHAWAR.**

ORDER

This order is hereby passed to dispose of Revision Petition under Rule 11-A of Khyber Pakhtunkhwa Police Rule-1975 (amended 2014) submitted **Ex-FC Junaid Gul No. 954**. The petitioner was proceeded against departmentally in two separate enquiries on the charges of taking money amounting to Rs. 60,000/- fraudulently from the complainant Mr. Nawaz Muhammad s/o Muhammad Gul in the pretext of his appointment in Police Department. In the second enquiry, he was found guilty by taking Rs. 80,000/- from HC Mehran Gul No. 4911 in the pretext of providing him bricks for construction. The MM PS Ujar also reported that the alleged official also absented himself from his lawful duty w.e.f 30.08.2021 to 16.09.2022 (16 days) without permission. Subsequently, he was dismissed from service by SP/HQrs vide OB No. 2392, dated 16.09.2022. Capital City Police Officer Peshawar rejected and filed his instant appeal vide order Endst: No. 349-55/PA, dated 30.01.2023.

Meeting of Appellate Board was held on 17.08.2023 wherein petitioner was heard in person. Petitioner contended that he is innocent.

Perusal of enquiry papers reveals that the allegations leveled against the petitioner have been proved. During hearing, petitioner failed to advance any plausible explanation in rebuttal of the charges. Furthermore, previously he has been awarded major punishment twice in 2017 and 2021, but he failed to mend his ways. The Board sees no ground and reasons for acceptance of his petition; therefore, the Board decided that his petition is hereby **rejected**.

Sd/-

AWAL KHAN, PSP

Additional Inspector General of Police,
HQrs: Khyber Pakhtunkhwa, Peshawar.

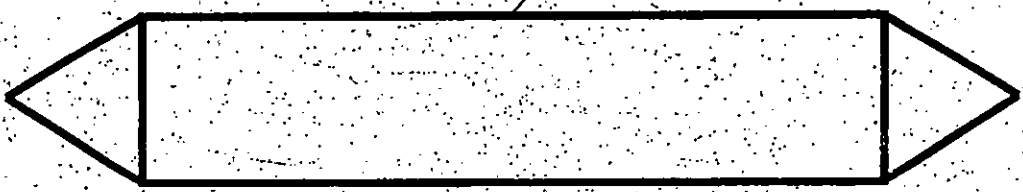
No. S/ 2/01-08 /23, dated Peshawar, the 28-08 /2023.

Copy of the above is forwarded to the:

1. Capital City Police Officer, Peshawar. One Service Roll, One Fauji Missal, & One Enquiry File of the above named **Ex-FC** received vide your office Memo: No. 4333/CRC, dated 07.03.2023 is returned herewith for your office record.
2. Superintendent of Police HQs: Peshawar.
3. AIG/Legal, Khyber Pakhtunkhwa, Peshawar.
4. PA to Addl: IGP/HQrs: Khyber Pakhtunkhwa, Peshawar.
5. PA to DIG/HQrs: Khyber Pakhtunkhwa, Peshawar.
6. Office Supdt: E-IV CPO Peshawar.


(DR. ZAHID ULLAH) PSP
AIG/Establishment,

For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.



حسدیل
2 منجانب
بنام دیسی
ڈیپارٹمنٹ

مورخہ
مقدمہ
دعویٰ
جرم

باعث تحریر آنکھ

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

آن مقام لٹڈ ہاؤس کیلئے حکام ان خان + ولید عزال + محمد الرحمان

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ پیر
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 عرضی 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 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 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
سبب سے دہوگا۔ 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۔

Handwritten signature and date: 20/23

المرقوم