


FORM OF ORDER SHEET

Court of

Appeal No.

1957/2023

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. Hussain Khan presented today by Mr. Qaisar Ali Advocate. It is fixed for preliminary hearing before touring Single Bench at Swat on</p> <p>By the order of Chairman</p>  <p>REGISTRAR</p>

BEFORE THE SERVICE TRIBUNAL KHYBER  
PAKHTUNKHWA AT PESHAWAR.

Service Appeal No. ....1957.....of 2023

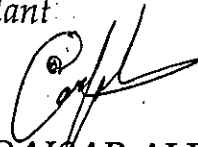
Ex Naib Qasid Hussain Khan VERSUS DFO etc

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Through

Appellant

  
QAISAR ALI

Advocate High Court  
Continental plaza Matanbagh

swat

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

Service Appeal No. ... **1957** .....of 2023

Ex Naib Qasid Hussain Khan s/o Sherawan r/o Rasha Ghatta,  
Dangram District Swat. ....Appellant

**VERSUS**

- (1) Divisional Forest Officer, Patrol Squad Forest division, Saidu Sharif, Swat.
- (2) Divisional Forest Officer Alpuri Forest, Division, Alpuri, District Shangla.
- (3) Divisional Forest Officer Daur Watershed Division, Abbottabad.
- (4) Chief Conservator of Forest, Malakand Forest Region-III, Saidu Sharif, District Swat
- (5) Conservator of Forest, Malakand Forest Circle East, Saidu Sharif Swat.
- (6) Sub-Divisional Forest Officer Litigation Saidu Sharif Swat.
- (7) Divisional Forest Officer Mardan Forest Division Mardan ( Inquiry Officer)
- (8) Conservator of Forest, Malakand Forest Circle District Swat
- (9) Government of Khyber Pakhtunkhwa through Secretary <sup>Forest</sup> General at Peshawar.....respondents

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Appeal Under Section IV of the KPK Service Tribunal Act 1974  
against the office order No.27 dated 08/02/2023 passed by respondent No. **1** vide which the learned respondent No. **1** removed the petitioner from his service.

PRAYER IN APPEAL:

On acceptance of the instant appeal, the office order dated 08/02/2023 passed by respondent No.1 may graciously be set aside and appellant may please be reinstated in his post and intervening period be treated with pay.

Respectfully Sheweth:

Brief facts of the case are as under

1. That, the appellant was appointed by the Divisional Forest Officer/ respondent No.1 as Naib Qasid-BPS-03 vide office order No. 24 dated 05/01/2017.( copy of office order No.24 dated 05/01/2017 and receipts of salaries annexure A)
2. That after four days of appointment, the respondent No.5 transferred the appellant to Alpuri Forest Division vide office order No.25 dated 09/01/2017. (Copy of officer order No.25 dated 09/01/2017 passed by respondent No.5 is annexure B)
3. That the appellant by obeying the order of the respondent No.5 reported his arrival for duty in Alpuri Forest Division and continuedly performed his duties with great zeal and zest and no oral or written complaint has neither been registered by the public nor the staff against him.
4. That the respondent No.5 wrote a letter No .212/G dated 12/12/2019 to respondent No. 6 by stating that he has not appointed the appellant and signature put on the

- designation is not tally with his own actual signature. (Copy of letter No. 212/G dated 12/12/2019 wrote by respondent No. 5 is annexure C)
5. That on the strength of the impugned letter mentioned above, the DFO Patrol Squad Forest Division Saidu Sharif Swat vide letter No .129/PS dated 02/09/2021 assigned the Sub-Divisional Forest Officer Litigation Saidu Sharif Swat for conducting inquiry and submit his inquiry report. (Copy of letter No. 129/ PS dated 02/09/2021 is annexure D)
  6. That the appellant was directed through letter No .544/DWS dated 01/10/2021 to attend office of the respondent No.3. The appellant due to personal affairs could not attend the mentioned office of the fixed date. (copy of letter No. 544/ DWS dated 01/10/2021 is annexure E)
  7. That the appellant was against directed though letter No. 650/ WDS dated 25/10/2021 to attend the office, where a questionnaire was given to him with the directions to be answered. (Copy of letter No .650/WDS dated 25/10/2021 of respondent No.3 is annexure F)
  8. That on conclusion of inquiry, the learned Divisional Forest Officer Mardan Forest Division Mardan ( Inquiry Officer) submitted his report by recommending that the appellant be removed from service, criminal action be taken and recover all the pay and allowances already drawn by appellant from Government.( copy of inquiry report is annexure G)

9. That respondent No .2 issued a Show-cause No. 2706 /G dated 17/11/2022 which was duly replied by the petitioner. (copy of notice is annexure H and reply of notice is annexure I respectively)

10. That on the strength of the impugned inquiry the learned respondent No. 3 imposed the penalties on the appellant vide office order No. 27 dated 08/02/2023.

a) The appellant is hereby removed from service with immediate effect.

b) Recovery on account of pay and allowance etc already drawn by appellant from the Government exchequer should be made from appellant through District Administration.

c) In case of non- refund of the drawn amount as stated at serial No.2 above, criminal proceeding will be initiated against him as recommended by the Enquiry Committee.( office order No. 27 dated 08/02/2023 is annexure J)

11) That feeling aggrieved from the order of the order of respondent No. 3 the petitioner filed a department appeal to the learned respondent No.5 on dated 23/02/2023, who did not decide the said appeal.(copy of departmental appeal is annexure K)

12) That the appellant being aggrieved having no alternate efficacious remedy approached this Honorable Court on the following grounds.

**GROUND**

a) That the said impugned order of removal/dismissal from service of the appellant is quite illegal, unlawful, without lawful authority, without jurisdiction. Hence the penalty imposed on him is liable to be set aside.

b) That all the concerned officers are informed while issuing any official order, how is it possible that a person gets an appointment order by putting it forged signature of an official and dispatched it to all the concerned officers, then transferred himself to the other district and continuously performed his duties for five years without any hurdle, prepared service book, made entries in dispatch register, passed medical and all the concerned officers remained unaware during this long period of time and procedure.

c) That the appellant is innocent, no proper procedure has been adopted by the concerned authorities before passing the impugned dismissal/ removal order, thus, the same is unjustified in the eyes of law and is liable to be set aside.

d) That, suppose if the posting order is fake and fictitious then all those authorized officers should be asked why they remained unaware for five years and if they were aware then why they did not take legal action?

e) That appellant time and again approached to the high up, but the authority taking a lenient view reinstated him in service.

f) That, it is wrong in every sense to punish the irresponsible and innocent person by excusing the mistakes and omissions of the responsible persons, under the law an employee cannot be removed from service on the baseless and proofless grounds, this is against his legal and fundamental rights enshrined in the service laws, rules, judgments of the superior courts and Constitution of Islamic Republic of Pakistan, 1973.

g) That major penalty of dismissal/ removal from service has been imposed against the appellant without providing him an opportunity to clarify the real situation.

h) That the respondents violated the golden principle of justice "audi alteram partem" by



passing the impugned removal order without any jurisdiction and lawful authority.

- i) That with the permission of this Honorable Court other grounds which are not mentioned in this appeal shall be argued at the time of arguments.

It is therefore, most humbly prayed that on acceptance of the instant appeal, the office order dated 08/02/2023 passed by respondent No.2 may graciously be set-aside and appellant may please be reinstated in his post and intervening period be treated with pay.

Through Appellant



QAISAR ALI  
Advocate High Court

8

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

Service Appeal No. ....of 2023

Ex Naib Qasid Hussain Khan      VERSUS      DFO etc

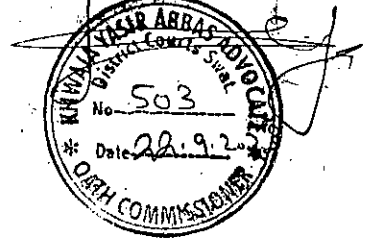
**AFFIDAVIT**

I, Ex Naib Qasid Hussain Khan s/o Sherawan r/o Rasha Ghatta,  
Dangram District Swat, do hereby state on oath that the contents of  
this appeal are true and correct to the best of my knowledge and belief  
and nothing has been kept from this august court/tribunal.

Deponent

Hussain Khan (Ex Naib Qasid)

**ATTESTED**



9

BEFORE THE SERVICE TRIBUNAL KHYBER  
PAKHTUNKHWA AT PESHAWAR.

Service Appeal No. ....of 2023

Ex Naib Qasid Hussain Khan

VERSUS

DFO etc

MEMO OF ADDRESSES

Address of the Appellant:

Ex Naib Qasid Hussain Khan s/o Sherawan r/o Rasha Ghatta, Dangram  
District Swat

Addresses of the Respondents:

- (1) Divisional Forest Officer, Patrol Squad Forest division, Saidu Sharif,  
Swat.
- (2) Divisional Forest Officer Alpuri Forest, Division, Alpuri, District  
Shangla.
- (3) Divisional Forest Officer Daur Watershed Division, Abbottabad.
- (4) Chief Conservator of Forest, Malakand Forest Region-III, Saidu Sharif,  
District Swat
- (5) Conservator of Forest, Malakand Forest Circle East, Saidu Sharif Swat.
- (6) Sub-Divisional Forest Officer Litigation Saidu Sharif Swat.
- (7) Divisional Forest Officer Mardan Forest Division Mardan ( Inquiry  
Officer)
- (8) Conservator of Forest, Malakand Forest Circle District Swat
- (9) Government of Khyber Pakhtunkhwa through Secretary General at  
Peshawar

Appellant

Through

Mr. Hussain Khan S/O Sherawan of Rasha Ghatta Dangram District Swat is hereby appointed as Naib Qasid against the existing vacancy in Malakand East Forest Circle Office in BPS-3 (Rs. ~~10,325~~ 17,790). His appointment to the post will be governed by the following terms and conditions as contained in the Government of Khyber Pakhtunkhwa Finance Department letter No. FD(SOR-II)12/2002 dated 26/10/2012.

The appointment to the post is purely temporary and will be governed by the following terms and conditions:-

- i) The appointment shall be on temporary basis and his services shall be terminable on 14 days notice without assigning any reason, irrespective of the fact that he is holding post other than the one to which he is originally recruited, or on the payment of 14 days salary in lieu thereof, on abolition of the post which ever is earlier.
- ii) In case he wishes to resign at any time one month notice shall be necessary or in lieu thereof one month pay shall be forfeited.
- iii) He shall be entitled to all facilities relating to Pay, Leave, Traveling Allowance, Annual Increment, Conveyance Allowance, House Rent Allowance, Medical Allowance etc as admissible under the rules.
- iv) He shall be liable to and governed by the Government of Khyber Pakhtunkhwa Efficiency & Disciplinary Rules, 2011 as amended from time to time and shall others ordinance/instructions of the Government in this behalf.
- v) The appointment is subject to satisfactory report of verification of his character/antecedents.
- vi) He shall produce Medical Certificate of fitness from Medical Superintendent Saidu Group of Hospital District Swat.
- vii) The offer shall be valid for thirty days. In case the terms and conditions are acceptable to him he may report for duty within the prescribed period.
- viii) He will remain on probation for period of one year in terms of section 6(2) of Khyber Pakhtunkhwa (Appointment, Promotion & Transfer) Rules, 1989.

Sd/-  
(ALI AKBAR)  
DIVISIONAL FOREST OFFICER,  
PATROL SQUAD FOREST DIVISION,  
SAIDU SHARIF SWAT.

No. 6814-17 /E,

Copy forwarded to the:-

- 1) Chief Conservator of Forests, Malakand Forest Region-III, Saidu Sharif Swat for favour of information, please.
- 2) Conservator of Forests, Malakand Forest Circle East, Saidu Sharif Swat for favour of information, please.
- 3) Mr. Hussain Khan S/O Sherawan of Rasha Ghatta Dangram District Swat for information and further necessary action.
- 4) Personal file of the Naib Qasid.

*Attested*

*Advocate*

~~Signature~~  
DIVISIONAL FOREST OFFICER,  
PATROL SQUAD FOREST DIVISION,  
SAIDU SHARIF SWAT.

۱۱  
خدمت صبا ڈیڑن فارسیٹ آفس پشورل سٹوڈنٹس فارسیٹ ڈیولپمنٹ

صبا عالمی

گزارش ہے۔ آج کو الہ آفس اور ڈیڑن 24

مکوردہ 7 ماہ 2017ء۔ 5 قہر میں اپنی ڈیولپمنٹ کیلئے حاضر ہوا۔  
لہذا درخواست ہے کہ صبا عالمی کیلئے صحت ہے۔

العارض

حسین خان ناسٹ قائمہ

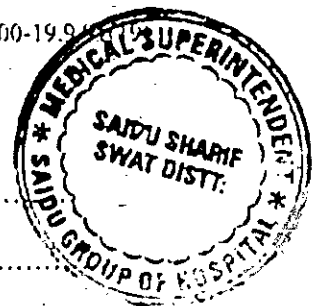
ڈی۔ اے۔ اے۔ ڈی۔ پشورل

سٹوڈنٹس فارسیٹ

Attested

Advocate

MEDICAL CERTIFICATE.



Name of Official Hussain Khan

Caste of race

Father's Name Sheraman

Residence Rashadkhata Dargam District Swat

Date of birth 01-4-1987

Exact height by measurement 5-6

Personal mark of identification Nil

Signature of the Official [Signature]

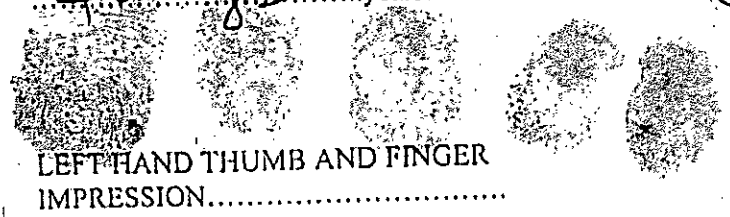
Signature of head of Office



[Signature]  
Office Seasonal Forest Officer  
Patrol Sauid Distt; Minge

I do hereby certify that I have examined Mr. Hussain Khan  
for employment in the office of the D.F.O. Patrol Sauid Swat  
and can not discover that he had any disease communicable or other constitutional infection or bodily  
infirmity except Fit

I do not consider this as disqualification for employment in the office of the D.F.O. Patrol  
Sauid Swat. His age according to his own statement 30 Years and appearance about  
40 years.



LEFT HAND THUMB AND FINGER IMPRESSION

MEDICAL SUPERINTENDENT,  
Saibu Group of Hospitals,  
Saidu Sharif Swat District.

[Signature]  
05/01/07.

Attested

Advocate

Note: The entries on this page should be renewed and re-attested as least every five years in the signature to lines 11 and 12 should be dated

1. Name Hussain Khan.

2. NIC No. 15602-7550473-1

3. Race Afghan. 4. District of Domicile Swat

5. Residence Rashagata - Dangram - Swat

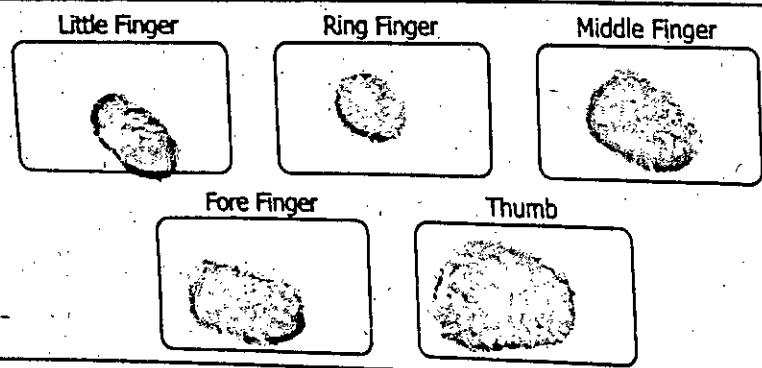
6. Father name and residence Sherawan.

7. Date of Birth by Christian era as nearly as can be ascertained: 01-4-1987

8. Exact height by measurement: 5'-6"

9. Personal Marks for Identification: Nil

10. Left Hand Thumb and Finger Impression of (Non Gazetted Officer)



*Attested*  
*Advocate*

11. Signature of Government Servant:

12. Signature & Designation of the Head of the Office, or other attesting officer. *[Signature]*  
**Divisional Forest Officer,  
Patrol Section Dera Mirjans.**

9	10	11	12	13		14	15	
				Nature & Duration of Leave taken	Leave			
					Period			Government to which debit able

Signature and Designation of the Head of the Office or Officer in attestation Column 1-8

Date of Termination or Appointment

Reason of Termination (such as promotion, Transfer, Dismissal etc)

Signature of the head of the office or other attesting officer

Allocation of period of leave on average pay up to four months for which leave salary is debit able to another government

Signature of the Head of the Office or other attesting officer

Reference to any recorded punishment or censure or reward or praise of the government servant

30/11/2017

Allowed Annual increment

Divisional Forest Officer, Alpur Forest Division, Alpur Distt. Shangla.

Service from 09-1-2017 to 31-12-2017 verified from his salary bills.

Divisional Forest Officer, Alpur Forest Division, Alpur Distt. Shangla.

30/11/2018

Allowed Annual increment, 2018

Divisional Forest Officer, Alpur Forest Division, Alpur Distt. Shangla.

Service from 01-1-2018 to 31-12-2018 verified from his salary bills.

Divisional Forest Officer, Alpur Forest Division, Alpur Distt. Shangla.

30/11/2019

Granted annual increment, 2019

Divisional Forest Officer, Alpur Forest Division, Alpur Distt. Shangla.

Service from 01-01-2019 to 31-12-2019 verified from his salary bills.

Divisional Forest Officer, Alpur Forest Division, Alpur Distt. Shangla.

30/11/2020

Granted annual increment, 2020

Divisional Forest Officer, Alpur Forest Division, Alpur Distt. Shangla.

Service from 01-01-2020 to 31-12-2020 verified from his salary bills.

Divisional Forest Officer, Alpur Forest Division, Alpur Distt. Shangla.

30/11/2021

Granted annual increment for the year 2021

Divisional Forest Officer, Alpur Forest Division, Alpur Distt. Shangla.

Suspended vide O.O. Alpur 01004/79 dated 10/6/2021.

Service from 01-01-2021 to 31-12-2021 verified from his salary bills.

Divisional Forest Officer, Alpur Forest Division, Alpur Distt. Shangla.

30/11/2021

Divisional Forest Officer, Alpur Forest Division, Alpur Distt. Shangla.

Divisional Forest Officer, Alpur Forest Division, Alpur Distt. Shangla.

Divisional Forest Officer, Alpur Forest Division, Alpur Distt. Shangla.

Attested

Advocate





9 Signature and Designation of the Head of the Office or other officer in attestation of Column 1-8.	10 Date of Termination or Appointment.	11 Reason of Termination (such as promotion, Transfer, Dismissal etc)	12 Signature of the head of the office or other attesting officer	13 Leave		14 Signature of the Head of the Office or other attesting officer	15 Reference to any recorded punishment or censure or reward or praise of the government servant	
				Nature & Duration of Leave taken	Allocation of period of leave on average pay up to four months for which leave salary is debit able to another government			
					Period			Government to which debit able
	01/7/2022	Revised Basic Pay Scale with Band, Finance Dept. No. FD/50(CSR-7)/1-1/2022 dated: 14-7-2022			01-7-2022			
			<i>[Signature]</i> Divisional Forest Officer Alpuri Forest Division Alpuri Sherga.					
			<i>[Signature]</i> Divisional Forest Officer Alpuri Forest Division Alpuri Sherga.					
		Resigned from the service with DTS patrol 3rd side. Office order No. 97 dt: 08/2/2023.						
			<i>[Signature]</i> Divisional Forest Officer Alpuri Forest Division Alpuri Sherga.					
						Attested		
						Advocate		

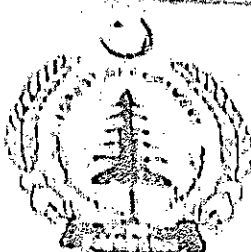
1	2	3	4	5	6	7	8
Name of Post	Substantive Whether Substantive or officiating and whether permanent or temporary	If officiating state (i) substantive appointment, or (ii) whether service counts for pension under art 371 C.S.R.	Pay in substantive post	Additional pay for officiating	Other emolument taking under the term 'Pay'	Date of Appointment	Signature Government
Naib Qasid BPS-3 (7640-240-14810) (8040-325-17790)	Tap	Tap	Rs. 8040/- Rs. 7640/-	-	-	05/01/2017	
	<u>Tap</u>				cutting attested		
					Divisional Forest Officer Patrol Squad Div: Mingora		
-/-	-/-	-/-	Rs. 8040/- Rs. 7640/-			09/01/2017	
					cutting attested		
					Divisional Forest Officer Patrol Squad Div: Mingora		
							Attested
							Advocate
-/-	-/-	-/-	8040/- 7640/-		cutting attested	09/11/2017	
					Divisional Forest Officer Mingora Division Patrol Squad Div: Shangla		
Naib Qasid BPS-3 (9610-390-21310)	Tap	Tap	Rs. 9610/-	-	-	01-7-2017	
Pay Fixed Revised Pay Scale 2017							





20

cc AMX C

OFFICE OF THE DIVISIONAL FOREST OFFICER, WORKING PLAN UNIT-V, MANSEHRA.		
No. 212 /G,	Dated	Mansehra the: 12/12/2019.

To

The Conservator of Forests,  
Malakand Forest Circle East,  
Saidu Sharif Swat.

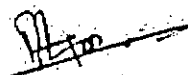
SUBJECT: OFFICE ORDER NO. 24 DATED 05/01/2017.

Memo:

It is to inform you that the subject office order had neither been issued nor signed in the tenure of the undersigned upto December 2016.


Moreover, the undersigned does not know as to whom had recorded/placed my signature which is not my original signature.

It is therefore requested that the matter may kindly be investigated under the proper laid down procedure accordingly, please.

  
(TALI AKBAR)  
DIVISIONAL FOREST OFFICER,  
WORKING PLAN MANSEHRA.

No. /WP,

Copy forwarded to the Chief Conservator of Forests, Malakand Forest Region-III, Saidu Sharif Swat for favour of information, please.

Attested  
  
Advocate

DIVISIONAL FOREST OFFICER,  
WORKING PLAN MANSEHRA.

(21)



**OFFICE OF THE  
DIVISIONAL FOREST OFFICER,  
PATROL SQUAD FOREST DIVISION,  
SAIDU SHARIF SWAT**



*Annex D*  
-----

No. \_\_\_\_\_ /PS, Phone: 0946-9240084 Dated: 02/09/2021

To  
Mr. Rafiqullah  
Sub Divisional Forest Officer-Enigation  
Saidu Sharif Swat

Subject: **ENQUIRY OF MR. HUSSAIN NAIB QASID (BPS-03)**

Memo: Reference of DFO Alpuri office letter No, 522/G Dated: 23-08-2021

Enclosed please find here with Charge Sheet along with Memo of Allegations regarding bogus appointment of Mr. Hussain Naib Qasid in Patrol Squad Forest Division Swat. You are requested to conduct proper proceedings against the official, serve him charge sheet along with Memo of Allegations issued by competent authority and records your findings along with proper recommendations and submit enquiry report within Thirty days after the receipt of this letter.

Divisional Forest Officer  
Patrol Squad Forest Division  
Saidu Sharif Swat

No. *130-33* /PS

Copy to

1. Conservator of Forest, Malakand Forest East Circle Saidu Sharif Swat for favor of information please
2. Divisional Forest Officer, Alpuri Forest Division for favor of information and with reference of his office letter No 522/G Dated 23-08-2021
3. Mr. Hussain Naib Qasid C/O DFO Alpuri for information and with the direction to appear before the enquiry officer on the date, time and place fixed by the enquiry officer for the purpose of enquiry proceedings
4. Office Record

*W. G. D. S. M. O.*  
Divisional Forest Officer  
Patrol Squad Forest Division  
Saidu Sharif Swat

*Attested*

*Signature*

*[Faint handwritten notes and signatures in the bottom left corner]*



(22) "ANNEX E"  
Divisional Forest Officer  
Daur Watershed Division  
Abbottabad

Civil Line Forest Offices Abbottabad, Khyber

Pakhtunkhwa

Tel. +92-0992-9310305 Fax. +92-0992-9310303

Email: daurdf04343@gmail.com

No. 544/DWS

Dated Abbottabad the

01/10/2021

To

Mr. Hussain, Naib Qasid  
c/o Divisional Forest Officer  
Alpuri Forest Division, Alpuri

Subject:

PERSONAL HEARING- ENQUIRY THEREOF

Memorandum

As the undersigned has been appointed as Enquiry Officer in the subject case, therefore, you are directed to attend the office of the undersigned for personal hearing on 19/10/2021 at 1100 hours alongwith reply to the charge sheet and other relevant record so that the same could be finalized at an early date.

*pull*  
(Mr. Rafiqullah)  
Divisional Forest Officer  
Daur Watershed Division  
Abbottabad

No. /DWS

Copy forwarded to :

1. The Conservator of Forests, Malakand Forest East Circle, Saidu Sharif, Swat for favour of information with reference to DFO, Patrol Squad Division, Mingora endorsement No.130-33/PS dated 02.09.2021, please.
2. The Divisional Forest Officer, Alpuri Forest Division, Alpuri for information with reference to DFO, Patrol Squad Division, Mingora endorsement No.130-33/PS dated 02.09.2021. Please deliver the attached letter to Mr. Hussain, Naib Qasid under proper receipt which should be sent to this office for record.
3. The Divisional Forest Officer, Patrol Squad Forest Division, Mingora for information with reference to this letter No.129/PS dated 02.09.2021.

Divisional Forest Officer  
Daur Watershed Division  
Abbottabad

*Attested*

*Advocate*



گزارش ہے کہ مجھ پر جو الزامات لگائے گئے ہیں اس کے تفصیل و جوابات درجہ ذیل ہے۔

1. میرا تقرری حکم نامہ DFO صاحب پٹرول سکواڈ آفس سے جاری ہوا ہے اور بحیثیت Candidate میں نے اس حکم نامے پر عمل درآمد کیا ہے، جو کہ مجھے ڈی ایف او پٹرول سکواڈ Competent Authority کے دفتر سے موصول ہوا تھا اور بحیثیت Candidate میں نے اس حکم نامہ پر عمل درآمد کیا ہے۔ اگر حکم نامہ جعلی یا غلط تھا تو یہ اس وقت تحریری طور پر لانا چاہیے تھا مگر اس وقت کچھ بھی نہیں ہوا۔ مذکورہ O/O کو کنزرویٹر آف فارسٹ اور نہ ہی چیف کنزرویٹر آف فارسٹ نے غلط قرار دیا ہے کیونکہ باقاعدہ طور پر اس O/O میں ان صاحبان کو کاپیاں کی گئی تھیں جو کہ یہی O/O کا منہ بولتا ثبوت ہے۔ اگر کوئی آفس آرڈر غلط Issue ہوتا ہے تو قانوناً اس کا ذمہ دار آفس آرڈر کرانے والا اور Issue کرانے والا ہوتا ہے نہ کہ امیدوار۔

2. دوسرے الزام کے بارے میں تفصیل جواب یہ ہے کہ آفس آرڈر Issue کرنے سے پہلے جو لوازمات کرنے ہوتے ہیں وہ متعلقہ Authority یا Dealing Hand کی ذمہ داری ہوتی ہے۔ جناب والا، قانونی طور پر یہ میری ذمہ داری نہیں لہذا یہ الزام بے بنیاد ہے۔

3. تیسرا الزام جو مجھ پر لگایا گیا ہے اس کا تعلق بھی میرے ساتھ نہیں ہے، کیونکہ Dispatch Register میں اینٹری کرنا میری ذمہ داری نہیں بلکہ Clerk اور Dealing Hand کے ذمہ داری ہوتی ہے۔

Attested

Advocate

4. مجھ پر جو چوتھا الزام لگایا گیا ہے وہ بھی مکمل طور پر غلط ہے۔ جناب عالی، میں نے باقاعدہ طور پر حاضری رپورٹ ڈی ایف او کے آفس میں جمع کیا تھا جس کی فوٹو کاپی میرے اس جواب کے ساتھ لف ہے، اور باقاعدہ طور پر میرے سروس بک میں بھی انٹری کی گئی ہے۔ میری حاضری رپورٹ پر ڈی ایف او صاحب کا دستخط کرنا یا نہ کرنا یہ ان کا کام ہے اس کا میرے ساتھ کوئی تعلق نہیں، جہاں تک حاضری رپورٹ کی جمع کرنے کی بات ہے وہ بالکل میں نے وقت پر جمع کیا ہے اور باقاعدہ طور پر اپنی تعیناتی کی جگہ پر اپنی ڈیوٹی سر انجام دیتا رہا ہوں جو کہ ہر مہینے کا Pay Bill ہے جس پر میں تنخواہ وصول کرتا ہوں یہ اس بات کا تحریری ثبوت ہے۔

لہذا درجہ بالا حقائق کو مدنظر رکھ کر مجھے لگائے گئے الزامات سے بری الزمہ قرار

دیں کر اپنی ڈیوٹی جاری کرنے کے احکامات صادر فرمائیں تو عین نوازش ہوگی۔ فقط

العارض

آپکا تابعدار

حسین خان نایب قاصد

الپورئ فارسٹ ڈویژن الپورئ

Attested

Advocate



25

ANX F<sup>2</sup>  
Annexure

Divisional Forest Officer  
Daur Watershed Division  
Abbottabad  
Civil Line Forest Offices Abbottabad, Khyber  
Pakhtunkhwa



Tel. +92-0992-9310305 Fax: +92-0992-9310303

Email: daurdfc4343@gmail.com

No. /DWS

Dated Abbottabad the

25/10/2021

To

Mr. Hussain, Naib Qasid  
c/o Divisional Forest Officer  
Alpuri Forest Division, Alpuri

Subject:

PERSONAL HEARING- ENQUIRY THEREOF

Memorandum

Reference this office letter No. 544/DWS dated 01.10.2021

You were directed vide this office letter cited above to attend the office of the undersigned on 19.10.2021 for personal hearing in connection with enquiry against you but due to declaring gazetted holiday on the fixed date on account of Eid Milad-un-Nabi, the hearing could not take place.

endorsement

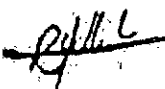
You are, therefore, directed to attend the office of the undersigned on 03.11.2021 at 1100 hours for personal hearing on the fixed date and time alongwith so that the same could be finalized at an early date.

(Mr. Rafiquliah)  
Divisional Forest Officer  
Daur Watershed Division  
Abbottabad

No. 651-53/DWS

Copy forwarded to:

1. The Conservator of Forests, Malakand Forest East Circle, Saidu Sharif, Swat for favour of information. This is in continuation of this office endorsement No.545-47/DWS dated 01.10.2021.
2. The Divisional Forest Officer, Alpuri Forest Division, Alpuri for information. He should please nominate a Prosecutor in the subject case and direct him to produce all relevant record relating to subject enquiry on the fixed date. This is in continuation of this office endorsement No.545-47/DWS dated 01.10.2021.
3. The Divisional Forest Officer, Patrol Squad Forest Division, Mingora for information. This is in continuation of this office endorsement No.545-47/DWS dated 01.10.2021.

  
Divisional Forest Officer  
Daur Watershed Division  
Abbottabad

*Attested*

*Advocate*

Encl: As above

INQUIRY REPORT REGARDING BOGUS APPOINTMENT OF MR. HUSSAIN KHAN S/O SHERWAN RESIDENT OF RASHA GHATTA DANGRAM DISTRICT SWAT

BRIEF HISTORY OF THE CASE:

During 2017, Mr. Hussain Khan s/o Sherwan resident of Rasha Ghatta Dangram District Swat was appointed by the Divisional Forest Officer Patrol Squad Forest Division Saidu Sharif Swat as Naib Qasid BPS-03 through office order No.24 dated 05.01.2017 (page 19 of inquiry file) which is stated to have been issued by Mr. Ali Akbar the then DFO Patrol Squad Forest Division Saidu Sharif Swat. Later on, he was transferred to Alpu Forest Division through office order No.25 dated 09.01.2017 (page 27) issued by the Conservator of Forests Malakand Forest Circle East Saidu Sharif Swat. In the meanwhile Mr. Ali Akbar DFO informed the Conservator of Forests Malakand Forest Circle East Saidu Sharif Swat through his letter No.212/G dated 12.12.2019 (page 51) that he has not appointed the aforesaid Naib Qasid and also the signature put on the designation is not tally with his own actual signature. Therefore, in order to probe into the matter so as to ascertain the factual position, the task of conducting inquiry was assigned to the undersigned in the capacity of Sub Divisional Forest Officer Litigation Saidu Sharif Swat vide DFO Patrol Squad Forest Division Saidu Sharif Swat letter No.129/PS, dated 2.9.2021 (page 89) <

INQUIRY PROCEEDINGS:

The concerned Naib Qasid was directed through letter No.544/DWS dated 01-10-2021 (page 101) to attend office of the DFO Daur Watershed

*Attested*

*Advocate*

Division Abbottabad on 19.10.2021 at 1100 hours alongwith reply to the charge sheet and other relevant record so as to finalize the inquiry proceedings. It is pertinent to mention here that during that time the undersigned was holding the charge of DFO Daur Watershed Division Abbottabad. But he failed to attend office of the undersigned on the aforementioned date. Therefore, he was again asked through letter No.650/WDS dated 25.10.2021 (page 107) to attend the office of undersigned on 03.11.2021 at 1100 hours. Subsequently he attended the office and furnished reply to the charge sheet wherein he could not defend himself through any solid documentary proof and has concentrated his reply on the basis that he has received monthly pay regularly which is a token to the effect that he has continuously performed his duty. A questionnaire in Urdu version was given to him which was consisting of 14 questions. Though he furnished replies to the said questionnaire which were not to the point as his answers could not satisfy the undersigned.

The DFO Patrol Squad Malakand East Circle Saidu Sharif Swat was requested to provide attested copies of some documents vide letter No.743/DWS dated 10.11.2021 (page 123) wherein one of the important documents was the dispatch register of that time. All the said documents were perused but no positive picture could be ascertained regarding completion of codal formalities before issuance of the aforementioned impugned recruitment order. Moreover, no such documents could be provided as a token to the effect that the said order has been issued officially.

*Attested*

*Advocate*

Conclusion:

After thoroughly perusal of all the relevant record, reply of the accused Naib Qasid and other official record the undersigned has arrived at the following conclusion:

- Entry of office order No.24 has been made to have been issued by the CF East on 06.01.2017 (page 135) and in bracket another date has been recorded as 09-01-2017 which has been sent to the DFO Kalam Patrol Squad.
- Entry of another office order No.25 has been recorded to have been issued by the CF East on 09-01-2017 (page 135) and sent to the DFO Alpuri.
- No entry of appointment order No.24 dated 05-01-2017 has been recorded in the dispatch register while the entry of his transfer order has been made.
- The posting order of Mr. Ali Akbar SDFO(BPS-17) as DFO Patrol Squad Swat has been issued by the Secretary to Govt. of Khyber Pakhtunkhwa Forestry Environment and Wildlife Department on 06-01-2017 which has been endorsed to the DFO Patrol Squad Swat on 09-01-2017 (page 187)
- Subsequently in compliance with the aforementioned posting order, Mr. Ali Akbar DFO has taken over the charge of DFO/DDO Patrol Squad Division Swat on 30.01.2017 as revealed from the charge assumption certificate(page 139).
- The tenure list of DFO's provided by the DFO Patrol Squad is irrelevant which cannot shows complete tenure of the DFO's Patrol Squad.

*Attested*

*Advocate*

- The above documentary proof clearly show that the appointment order of the aforementioned Naib Qasid is bogus as fake signature of Mr. Ali Akbar as DFO Patrol Squad Swat has been recorded on the designation stamp not only before his taken over the charge as DFO Patrol Squad Swat but also before issuance of his posting order by the competent authority as DFO Patrol Squad Swat.

Recommendations:

Keeping in view the aforementioned factual position it is recommended:

1. The accused Naib Qasid may be removed from service and criminal action should also be taken against him as he has betrayed the Government.
2. Recovery on account of pay and allowances already drawn by him from the Govt: exchequer should also be made from him through the District Administration.



Rafiq Ullah  
Divisional Forest Officer  
Mardan Forest Division  
Mardan  
(Inquiry Officer)

*Attested*

*Advocate*

30 "ANX H"

Advocate



OFFICE OF THE  
DIVISIONAL FOREST OFFICER  
ALPURI FOREST DIVISION ALPURI SHANGLA.  
Office No. +92-996850033 Email: [dfshangla@gmail.com](mailto:dfshangla@gmail.com)

No. 2706 /G

Dated at Alpuri: 17/11/2022

To

Mr. Hussain Khan,  
Nalb Qasid  
C/O  
SDFO, Alpuri.

Subject:

SHOW CAUSE NOTICE.

Memo:

Enclosed find herewith Show Cause Notice along with its enclosure for further necessary action.

DIVISIONAL FOREST OFFICER,  
ALPURI FOREST DIVISION,  
ALPURI SHANGLA.

Encls: As above.

No.

/G.

Copy forwarded to the:

1. Divisional Forest Officer, Patrol Squad Division Mingora for information with reference to his office letter No.673/PS, dated 11/11/2022, please.
2. Sub-Divisional Forest Officer, Alpuri for information and necessary action. He is directed to hand over the above Show Cause notice to the concerned Official under proper receipt and the receipt submit to this office for record.
3. Establishment Clerk for information.

DIVISIONAL FOREST OFFICER,  
ALPURI FOREST DIVISION,  
ALPURI SHANGLA.

Attested  
Advocate





### SHOW CAUSE NOTICE

I, Inam Ullah Khan Divisional Forest Officer Alpuri Forest Division Alpuri District Shangla as competent Authority, under Khyber Pakhtunkhwa, Government Servants (Efficiency and Discipline) Rules 2011, do hereby serve you, Mr. Hussain Khan Naib Qasid (BPS-3), Forest Department, as follow:

- i. That consequent upon the completion of enquiry conducted against you by the Enquiry Officer for which you were given opportunity of hearing.
- ii. Ongoing through the findings and recommendations of the Enquiry Officer, the material on record and other connected papers including your defense before the enquiry officer.

1. I am satisfied that you have committed the following acts/omissions specified in the Rules-8 of the said Rules:

1. Misconduct.
2. Corruption.

2. As a result thereof I, as competent Authority, have tentatively decided to impose upon you the penalties of:

- i. Dismissal from Service.
- ii. Recovery of Pay & Allowances.
- iii. Criminal proceeding.

3. You are, therefore, required to show cause as to why the aforesaid penalty should not be imposed upon you and also intimate whether you desired to be heard in person.

4. If no reply to this notice is received within 14(Fourteen) days of its receipt by you, it shall be presumed that you have no defense to put in and in that case, an ex-parte action shall be taken against you.

5. A copy of the findings of the Enquiry officer is enclosed.

(INAM ULLAH KHAN)  
DIVISIONAL FOREST OFFICER,  
ALPURI FOREST DIVISION,  
ALPURI SHANGLA.  
COMPETENT AUTHORITY.

*Attested*

*Advocate*

32

9<sup>th</sup> ANNEX I  
~~Annexure~~

To,

The Divisional Forest Officer,  
Alpuri Forest Division Alpuri.

Subject.

**SHOW CAUSE NOTICE.**

Respected Sir,

Reference your letter No.2706/G, dated 17/11/2022.

It is submitted that in the capacity of authority, your kind honour has served upon me the subject mentioned show cause notice with the directives to explain my position with regard to the leveled charges of Mis conduct and Corruption recommended against me by the enquiry committee. In this connection I explained my position on the basis of facts and ground realities as under.

Sir I have already explained my stance to the enquiry committee, who were mandatory bound to consider my narrative and exonerate me from the charges, yet may be the committee has not agreed with my explanation and recommended undue and unwarranted penalties against me. As your good honour is authority in the case therefore with hope that you're good self will agree to my present stance and accordingly will decide the baseless allegations framed against me.

Sir, I was appointed as Naib Qasid under the seal and signatures of Divisional Forest Officer Patrol Squad Forest Division Mingora Swat vide office order No.24, dated 05/01/2017. Complying with the provision of NWFP Civil Servant Act 1973 laid down in Rule-10 I was transferred to Alpuri Forest Division, where till now I am performing my duties with great zeal, zest and devotion. After my appointment as Naib Qasid my Medical examination was conducted through the authorized Medical Superintendent and accordingly my monthly salary was started and since the last five (05) years I am getting my emoluments from the Government exchequer without any intervention. Under the standing rules on the subject release of payment in the shape of pay and allowances in favour of any individual is declared government servant and digging out any charges especially attribute to his appointment serve no purpose.

The charge framed against me in belated stage is nothing, but tantamount to personal grudge with some unknown subversive elements, or the appointing officer for not fulfillment of his demand for illegal gratification. In case there was some thing wrong in the process of my appointment, the competent authority was to stop my salary for want of immediate enquiry and to decide my case on merit. At the moment when there is noting on my behalf neither I was competent for the issuance of my appointment order nor empowered to draw my salary from the government treasury,

*Attested*  
*Advocate*

any kind of biased action against me in such belated stage is totally injustice with me and my large scale family members, who are waiting for my income for feeding them. Beside I am the only earning member of my family and in case any kind of loss to my service will cause sufficient rather complete financial losses to me and my family members.

In view of such a situation and my facts based explanation in my case where I am quite innocent in the menace, it is humbly prayed that my request may very kindly be gone through on humanitarian and compassionate grounds and very kindly exonerate me from the biased, baseless and concocted allegations and give me the opportunity to serve and feed my family mostly consists upon kids without any hesitation and obliged please.

Obediently Yours

*Roman*  
2/12/22  
(Hussain Khan)  
Naib Qasid

Alpuri Forest Division Alpuri.

*Attested*

*Advocate*

BEFORE WORTHY CONSERVATOR OF FORESTS MALAKANG EAST FOREST CIRCLE  
AGAINST THE IMPUGNED ORDER NO. 27 DATED 08/1/2017 ISSUED BY THE DIVISIONAL FOREST  
OFFICER PATROL SQUAD FOREST DIVISION FOR SYMPATHATIC CONSIDERATION.

It is humbly proved that I was appointed as Naib Qasid in Patrol Squad  
Forest Division, vide office order No. 24 dated 05.01.2017. Later on against the vacant  
position of Naib Qasid in Alpuri Forest Division my services were placed at the disposal of  
DFO Alpuri and transferred vide Conservator of Forests Malakang East Forest Circle  
order No. 25 dated 09.1.2017.

Complying order of the worthy Conservator of Forests I reported my arrival  
for duty in Alpuri Forest Division, and discharged my duties with great zeal and zest. In  
the meanwhile, after serving for about 05 years, the then DFO Patrol Squad (Mr. Ali  
Akbar) denied his seal and signature affixed on my appointment order and declared my  
appointment as fake and based on fraudulent. In order to probe into the allegations  
proper enquiry was conducted and after passage of considerable (05) years, the enquiry  
committee held me guilty of the charges and recommended major penalty of (Removal  
from service, Recovery of withdrawn emoluments for the period I rendered in service.  
The authority agreed with the findings of Enquiry committee who issued his final orders  
on the basis of recommended penalties by the Enquiry Committee. Aggrieved of the  
injustice and biased decision of authority I beg to approach your kind honour for  
redressing my grievances with the following facts and figures and ground realities as  
under.

Sir, for getting employment I approached DFO Patrol Squad for giving me a  
chance of employment against the vacant post of Naib Qasid under his good supervision.  
Adhering my request, the DFO Patrol Squad very kindly appointed me as Naib Qasid in his  
office vide office order No. 24 dated 05.1.2017. Later on due to some unknown reasons  
Mr. Ali Akbar the then DFO Patrol Squad came up with the complaint to the worthy  
Conservator of Forests that my appointment ordered by him is fake and result of the  
fraudulence. Taking action on the complaint proper enquiry was conducted and enquiry  
committee held me responsible for the consequences.

In this regard it is pinpointed that there are no irregularities in the case of  
my appointment. Actually, the then DFO Patrol Squad (Mr. Ali Akbar) had appointed me  
under his original seal and signature and then transferred to Alpuri Forest Division, on  
administrative grounds by the worthy Conservator of Forests vide his office referred to  
above. In case the appointing authority was not agreed to my appointment or was  
dissatisfied with my official performance, my services were to be dispensed forthwith or  
was better to not consider my appointment. It is also worth mentioning that after lapse of  
considerable time of 05 years, adverse action was initiated against me and after  
imposition major penalties I was terminated from service without committing any sin on  
my part.

*Attested*

*Advocate*

“ ANX J ”  
Anwar

Sir I am poor man holding large scale family members, ad the salary so I  
for the last five years has totally been incurred for meeting out my house hold  
expenditures. Having neither other source of income nor any bank balance, it is difficult  
impossible for me to refund the amount drawn by me as salary for which I have  
worked devotedly without any complaint to my superiors. Similarly it is also injustice with  
me and against the standing rules that after serving continuously for 05 years and drawn  
my emoluments from the government exchequer my termination from service is  
unwarranted and is violation of both constitution and law.

CONCLUSIONS:

While summing up above exposition, the following inferences are judiciously  
drawn;

- The enquiry officer has not neither taken into account facts on ground nor provided me ample opportunity of participation into Enquiry proceedings which is contrary to Rule- 11 & 12 of the E&D rules-2011 but also contravenes fundamental Rules.
- The competent authority/DFO Patrol Squad has ordered recovery of emoluments etc through District Administration which is violation of Rule-4 of the E&D Rules-2011 because it contains two Sub-rules and neither of them envisages "provision of recovery through District Administration"
- The cumulative effect of preceding paras vividly transpires the fact that the both Enquiry proceeding as well as order of the competent authority are unlawful and infructuous and not only contravenes E&D Rules-2011 but also infringes article-8 (laws inconsistent with or in derogation of fundamental rights to be void) of the constitution of Islamic Republic of Pakistan 1973.

PRAYERS.

In view of above exposition, it is humbly prayed that my stance may very kindly be  
looked into on humanitarian and compassionate grounds and as envisaged in Rule-17  
(2)(b) of the rules ibid set aside the impugned order of the Divisional Forest Officer Patrol  
Squad and allow me to continue my usual service for the best interest of my bright future  
and to feed my poor family members without any financial constraints and obliged please.

Obedtly Yours  
Hussain Khan  
(Naib Qasid)  
Alpun Forest Division

Attested  
Advocate

ANX K  
36

WHEREAS Mr. Hussain Khan Naib Qasid (BPS-3) was proceeded against under the Khyber Pakhtunkhwa Government Servant (Efficiency and Discipline) Rules, 2011, for the charges as mentioned in the respective charge sheet and statement of allegation served upon him.

AND WHEREAS, the Enquiry Committee/Officer comprising of Mr. Rafiq Ullah Divisional Forest Officer Mardan was constituted to conduct proper inquiry against the said official.

AND WHEREAS, the Enquiry Committee/Officer after having examined the charges, evidence on record and explanation of the accused official submitted his report, wherein the charges were established against the accused official.

AND WHEREAS, the show cause notice was served upon the accused vide this office letter No. 872/PS, dated 10-01-2023, wherein, the accused asked to intimate whether he desired to be heard in person but the accused submitted his written reply and did not request for personal hearing therein. However, an ample chance was given to him by providing opportunity of personal hearing on humanitarian ground. On 26/01/2023 the accused appeared before the competent authority for personal hearing where a questioner according to the charge sheet served upon him. However, in the written reply to the show cause notice and questioner as well he could not defend himself from the charges leveled against him.

AND NOW THEREFORE, I Shah Hussain Divisional Forest Officer Patrol Squad Forest Division, Swat in exercise of power conferred upon me under rule 14(5) (ii) (7) read with rules- 4 of E&D, rules 2011, having considered the charges, evidence on record, explanation of the accused official and findings of the Enquiry Committee/Officer hereby impose the following penalties on Mr. Hussain Khan Naib Qasid:

1. The accused Naib Qasid is hereby removed from service with immediate effect.
2. Recovery on account of all pay and allowance etc already drawn by him from the Government exchequer should be made from him through District Administration.
3. In case of non-refund of the drawn amount as stated at S. No. 2 above, criminal proceeding will be initiated against him as recommended by the Enquiry Committee.

Sd/-  
(SHAH HUSSAIN)  
DIVISIONAL FOREST OFFICER,  
PATROL SQUAD FOREST DIVISION,  
SAIDU SHARIF SWAT.

No. 941-45/PS

Copy forwarded to:

1. The Chief Conservator of Forests Malakand Forest Region-III, Saidu Sharif Swat for favour of information, please.
2. The Conservator of Forests Malakand East Forest Circle, Saidu Sharif Swat for favour of information and necessary action. He is requested to conduct fact findings enquiry into the cross allegation and irregularity submitted and pointed out by the accused in his reply to the show cause notice, personal hearing and reply to the questioner (copies enclosed herewith respectively).
3. Divisional Forest Officer Alpuri Forest Division, Alpuri for information and necessary action. He is requested to implement the aforesaid penalties in letter and spirit as well as remove the name of Mr. Hussain Khan Naib Qasid from the Establishment of Alpuri Forest Division by the entry of the same in his Service Book under intimation to this office.
4. Mr. Mr. Rafiq Ullah Divisional Forest Officer Mardan for information with reference to this office letter No. 1362/A, dated 19-10-2022.
5. Mr. Hussain Khan Naib Qasid Alpuri Forest Division for information and necessary action.

E/c  
Issue order  
of removal from  
service

DFO Alpuri  
26/1/23

*[Signature]*  
DIVISIONAL FOREST OFFICER,  
PATROL SQUAD FOREST DIVISION,  
SAIDU SHARIF SWAT.

Attested


Associate

Rs: 20/-

نوٹ: اس کاٹ ہر کسی ذمہ داری ہے

بار کونسل نمبر: 66791  
 بار ایسوسی ایشن نمبر: 66791  
 رابطہ نمبر: 0346-9424914  
 ای میل ایڈریس: Spinbaz9089@gmail.com  
 Daiss Khan 35

DBA SWAT  
 DISTRICT BAR ASSOCIATION  
 SWAT

سرینل نمبر: 6723  


### ڈسٹرکٹ بار ایسوسی ایشن سوات

بعدالت جناب: **سید سید عبدالغنی سید**

منجانب: **سید سید عبدالغنی سید**  


دعویٰ اور خواست:  
 علت نمبر:  
 مورخہ:  
 جرم:  
 تھانہ:

### باعتبار آگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے برائے پیروی مقدمہ

آن مقام **سید سید عبدالغنی سید** کیلئے **سید سید عبدالغنی سید** کو مقرر کر کے اقرار کیا جاتا ہے، کہ صاحب موصوف کو مقدمہ کی کل کارروائی کو کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث کرنے، دعویٰ، جواب، دعویٰ، اقبال دعویٰ اور درخواست برائے ہر سبزی مقدمہ، منسوخی ڈگری یکطرفہ، اجراء و پیروی کرنے کا مختار ہوگا نیز دائر کرنے اپیل نگرانی، نظر ثانی و پیروی کرنے کا مختار ہوگا۔ اور مقدمہ مذکورہ کیلئے کل وقتی یا جزوی کارروائی کیلئے کسی دیگر وکیل یا مختار قانون کو اپنے ہمرازہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو بھی جملہ مذکورہ اختیارات حاصل ہوں گے، اور اس کا ساختہ و پرداختہ منظور قبول ہوگا، بدوران مقدمہ جو خرچہ و ہر جانہ کسی بھی سبب سے حاصل ہوگا، وہ وکیل موصوف وصول کرنے کا حقدار ہوگا، کوئی تاریخ پیشی مقام مذکورہ بالا سے باہر ہو، تو وکیل صاحب پیروی مقدمہ کرنے کے پابند نہ ہوں گے، مقدمہ کسی عدالت میں بعدم پیروی خارج ہونے یا ڈگری یکطرفہ ہونے کے صورت میں وکیل صاحب ذمہ دار نہیں ہوں گے،

لہذا وکالت نامہ لکھ دیا کہ سندر ہے

مقام **سید سید عبدالغنی سید** کے لئے منظور ہے۔

سید سید عبدالغنی سید  
 سید سید عبدالغنی سید

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