


FORM OF ORDER SHEET

Court of _____

Appeal No. 1960/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	27/09/2023	<p>The appeal of Mr. Amir Khan presented today by Mr. Sohail Sultan 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

Appeal No 1960 of 2023

Amir Khan..... (Appellant)

VERSUS

Executive Engineer C&W and others..... (Respondents)

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4.	Copy of attendance	A-1	16-18
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Appellant

Amir Khan
Through Counsel

SOHAIL SULTAN
Advocate, High Court

Office: Sultan Tower,
Makanbagh, Mingora, Swat
Cell No. 0347-9398758

①

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA AT PESHAWAR

Appeal No. 1960 of 2023

Amir Khan son of Aleem Khan resident of Mohalla
Usmankhel, Amankot, District Swat.....Appellant

VERSUS

1. Executive Engineer C&W (MAGA PROJECTS) Saidu Sharif, District Swat.
2. Superintendent Engineer C&W Saidu Sharif, District Swat.
3. Govt. of Khyber Pakhtunkhwa through Secretary C&W at Peshawar.
4. Chief Engineer (North) C&W Khyber Pakhtunkhwa at Peshawar.
5. Deputy Commissioner Swat.
6. XEN, C&W Swat at Saidu Sharif, Swat.
7. SDO C&W Swat at Saidu Sharif, Swat.

.....Respondents

SERVICE APPEAL UNDER SECTION
4, OF THE KPK SERVICE TRIBUNAL
ACT, 1974, AGAINST THE ORDER
DATED 25-05-2023, WHEREBY THE
APPELLANT WAS TERMINCATE FROM
SERVICE.

(2)

PRAYER IN APPEAL

On acceptance of this appeal the orders passed by the respondent department be declared as illegal, discriminatory, against law, void ab-initio and may graciously be set aside the same and the appellant may be reinstated on service with all back benefits.

Any other reliefs which are proper in the instant circumstances of the may also be granted though not specifically asked for.

Respectfully Sheweth,

- 1) That the appellant was appointed as Class-IV in the respondents department. (Copies of appointment letter and relevant record are attached as annexure "A")
- 2) That the appellant has performed his duties with great zeal, zest, devotion & dedication at their best level to the entire satisfaction of his senior officials. There is no complaint against the appellant. (Copy of attendance is attached)
- 3) That the appellant has been illegally terminated vide order no 3254/-2-E, dated 25/05/2023 by serving three explanation on one and the same date. (Copies of letter dated 25/05/2023 and receipts are attached as annexure "B" & "C" respectively).
- 4) That the appellant filed Department appeal before respondent No.1 on 06-06-2023. (Copy of departmental appeal is attached as annexure "D")

- (3)
- 5) That the respondent did not decide the departmental appeal within a stipulated period, hence the appellant is approaching this Honorable Tribunal for the redressal of his grievances against the action and inaction of the respondents on the following ground inter alia.

GROUND:-

- a. That the order of dismissal of the respondents department are illegal, against the rules & regulation and exercised their power not vested to them.
- b. That no show cause notice, charge sheet, personal hearing and no explanation been conducted / served against appellant, which is against the laid down rules and regulations and thus this act of the respondents is amounts to abuse of law.
- c. That the appellant is sports man and submitted an application on dated 15/05/2023 for leave to attend National Games held on 19/05/2023, the relevant clerk namely Tariq Hussain who has satisfied me that your application has been accepted, you can join sports event.(Copy of leave application is attached).

- (4)
- d. That the department issued three letters at my home address which is received on same dated on 09-05-2023, which were about show cause notice for calling explanation about absence.
 - e. That except sports events leave I have no absentees which is evident from the attendance register but despite this viz my attendances, I have been terminated from the job which is against law.
 - f. That the appellant names first letter in English A name Amir, in Attendance letter we were directed by relevant clerk that in attendance register first letter of employees name should be written which would be considered presence, and for absent employees "Ab" is written against absent employees names which is evident in attendance register. (Copy of attendance register page is attached).
 - g. That I was on valid leave on dated 18/05/2023 but in attendance register against my name attendance presence initial (A) is over writing, the issuing of show cause notice for absence from duty was for misconception because I was present on duty from my appointments date except valid leave 18/05/2023 to 25/05/2023, but in show cause notice letter absentees dated 27/03/2023 to 02/05/2023 and till date written, reply for which I have submitted but in vain, hence termination order.

- h. That in case of imposing major penalty principle of natural justice requires that a regular inquiry was to be conducted in the matter and opportunity of defense of personal hearing was to be provided to the civil servant proceeded against him otherwise the procedure against him without following the rules would be amount to condemned unheard. So, on this ground to the impugned order regarding dismissal / removal is liable to be struck down on this score alone.
- i. That the penalty of dismissal / removal from service imposed upon appellant for absence from service is illegal being violative of section 7 (a).
- j. That the appellant were illegally treated & dismissal/ removal from service is too harsh so, the impugned order is not maintainable in the eye of law.
- k. That in service law concept of penalty was to make an attempt to reform the individual wrong doer but such penalty deprived the appellant

(6)

from the right of earning, which defeat the reformatory concept of punishment in administration of justice so, the order of dismissal is not sustainable on this ground too.

- l. That the inaction of respondent department is against the law, rules, because the appellant was ill and unable to perform his duty, but the respondent department is against the law & rules not reinstate the appellant.
- m. That the apprehended forceful premature termination of appellant is unjustified illegal. The said act of the respondents is be clear & sheer violation of the Fundamental Rights of the appellant which are envisaged and guaranteed by the Constitution of the Islamic Republic of Pakistan, 1973.
- n. That the appellant has performing his duties with great zeal, zest, devotion & dedication at his best level to the entire satisfaction of his senior officials, but this aspect of the case was also over looked by the respondent department.
- o. That further grounds, with leave of this Honorable Court, would be raised at the time of arguments before this Honorable Court.

(7)
Prayer:-

Therefore in view of the above submissions, it is most humbly prayed that on acceptance of this service appeal the order dated 25-05-2023 passed by the respondent department be declared as illegal, discriminatory, against law, void ab-initio and may graciously be set aside the same and the appellant may be reinstated on service with all back benefits. Any other relief which is proper in the instant circumstances of the may also be granted though not specifically asked for.

Appellant



Amir Khan

Through Counsel



SOHAIL SULTAN

Advocate, High Court

CERTIFICATE:

(As per directions of my client) No such like Appeal earlier has been filed by the appellant on the subject matter before this Honorable Court.



ADVOCATE

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA AT PESHAWAR

Amir Khan..... (Appellant)

VERSUS

Executive Engineer C&W and others..... (Respondents)

ADDRESSES OF THE PARTIES

APPELLANT

Amir Khan son of Aleem Khan resident of Mohalla
Usmankhel, Amankot, District Swat.

CNIC No: 15602-6536603-1

Cell No: 0348-9813398

RESPONDENTS

1. Executive Engineer C&W (MAGA PROJECTS) Saidu Sharif, District Swat.
2. Superintendent Engineer C&W Saidu Sharif, District Swat.
3. Govt. of Khyber Pakhtunkhwa through Secretary C&W at Peshawar.
4. Chief Engineer (North) C&W Khyber Pakhtunkhwa at Peshawar.
5. Deputy Commissioner Swat.
6. XEN, C&W Swat at Saidu Sharif, Swat.
7. SDO C&W Swat at Saidu Sharif, Swat.

Appellant
Amir Khan

Amir
Through Counsel

Sohail Sultan
Advocate, High Court

(9)

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA AT PESHAWAR

Appeal No _____ of 2023

Amir Khan.....(Appellant)


VERSUS

Executive Engineer C&W and others.....(Respondents)

AFFIDAVIT

I, Amir Khan (appellant), do hereby solemnly affirm and declare on oath that the contents of the above titled Appeal is true and correct to the best of my knowledge and belief.


DEPONENT


Muhammad Ilyas
ADVOCATE
OATH COMMISSIONER
District Court Peshawar
No-137-Dist-26-9-2023



OFFICE OF THE EXECUTIVE ENGINEER
C&W MEGA PROJECT DIVISION SWAT

NO. 27671 2-E

DATED 10/11/2022.

APPOINTMENT ORDER.

On the recommendation of District Departmental Selection Committee meeting held on 12-10-2022 Mr. Amir Khan S/O Aleem Khan R/O Mohallah Usman Khel Amankot Tehsil Babozai District Swat is hereby appointed as "Naib Qasid (BPS-03)" in O/O the Executive Engineer C&W Mega Project Division Swat on the following terms & Conditions

1. He shall get pay at the minimum of BPS-03 (14,260-580-31,660) including usual allowances admissible under the rules. He will also be entitled to annual increment as per existing policy.
2. He shall be governed by the Khyber Pakhtunkhwa Civil Servant Act-1973 and all the laws applicable to the Civil Servants and Rules made there under.
3. He shall be initially on probation for a period of ONE YEAR extendable for further ONE YEAR.
4. His services will be liable to termination at any time without assigning any reason before the expiry of the period of probation/extended period of probation, if his performance during this period found un-satisfactory. In such an event, he will be given one month prior notice of termination from service or one month pay in lieu thereof. In case he wish to resign at any time, one month prior notice shall be necessary or in lieu thereof, one month's pay shall be forfeited.
5. He shall have to produce a Medical Certificate of fitness from the Medical Superintendent DHQ Hospital Saidu Sharif Swat, before reporting for duty as required under the rules.
6. He shall have to join duty at his own expenses.
7. If any false/bogus information found at any stage in the documents of the appointee, the appointment order will be stand cancelled.
8. If he accepts the post on the above terms and conditions, he should report to the office of undersigned within 14-days of the receipt of this offer and produce original documents for scrutiny and authentication, failing which this offer will be stand cancelled.

(Engr. Shahab Khan)
Executive Engineer
Mega Project Division Swat

Copy forwarded to:-

1. The Chief Engineer (Center) C&W Department Peshawar for information.
2. The Chief Engineer (Mega Projects) C&W Department Peshawar for information.
3. The District Comptroller of Accounts Swat.
4. The Section Officer (Establishment) C&W Department Peshawar.
5. The Cashier (Local).
6. The Official concerned Mr. Ameer Khan S/O Aleem Khan R/O Mohallah Usman Khel Amankot Tehsil Babozai District Swat"
7. Office Order File.

Attested

Advocate

Executive Engineer

11

HEC Taekwondo Men Team 34th National Games 2023

Dated: May 20th to 30th 2023

Issuance Playing Kits to the Team May 18th 2023

Name of Players	Father's Name	CNIC No	Discipline/Faculty	University Name	Contact No	Signature
Wajeh-ul-Hassan	Mustaza Hassan	14301-7767180-7		UCP	03364220249	
Abdul Gayyum Malik	M. Yaqub	38403-7125360-3		UCP	03040551966	
Ehtashamullah	Abdullah Khan	12101-5099689-3		UCP	03469730346	
Ibrar Khan	Dir. Muhammad Khan	14101-0539681-1		UCP	03445954936	
Hasnat	Nazir Ahmed	71501-2443042-7		UCP	03101225605	
Amir Khan	Aleem Khan	5602-6536603-1		UCP	03489813398	
M. Tayyab	M. Yousuf	42401-7227257-5		UCP	03039138224	
M. Owais	Abdul Hakeem	121019954408-7		UCP	03480998008	

Aoun Abbas Hashmi

Attested

Advocate

ASSOCIATION



BITA
SOCIETY FOR THE IMPROVED EDUCATION OF THE BLIND



WORLD
TAEKWONDO



Advocate



MES
2023



(12)



**34TH NATIONAL GAMES
QUETTA 2023**



CERTIFICATE OF MERIT

Certified that

Miss / Mr. Amir Khan

Participated in the Discipline of Taekwondo

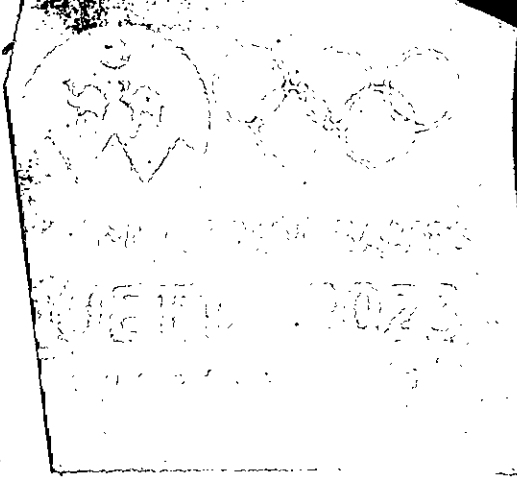
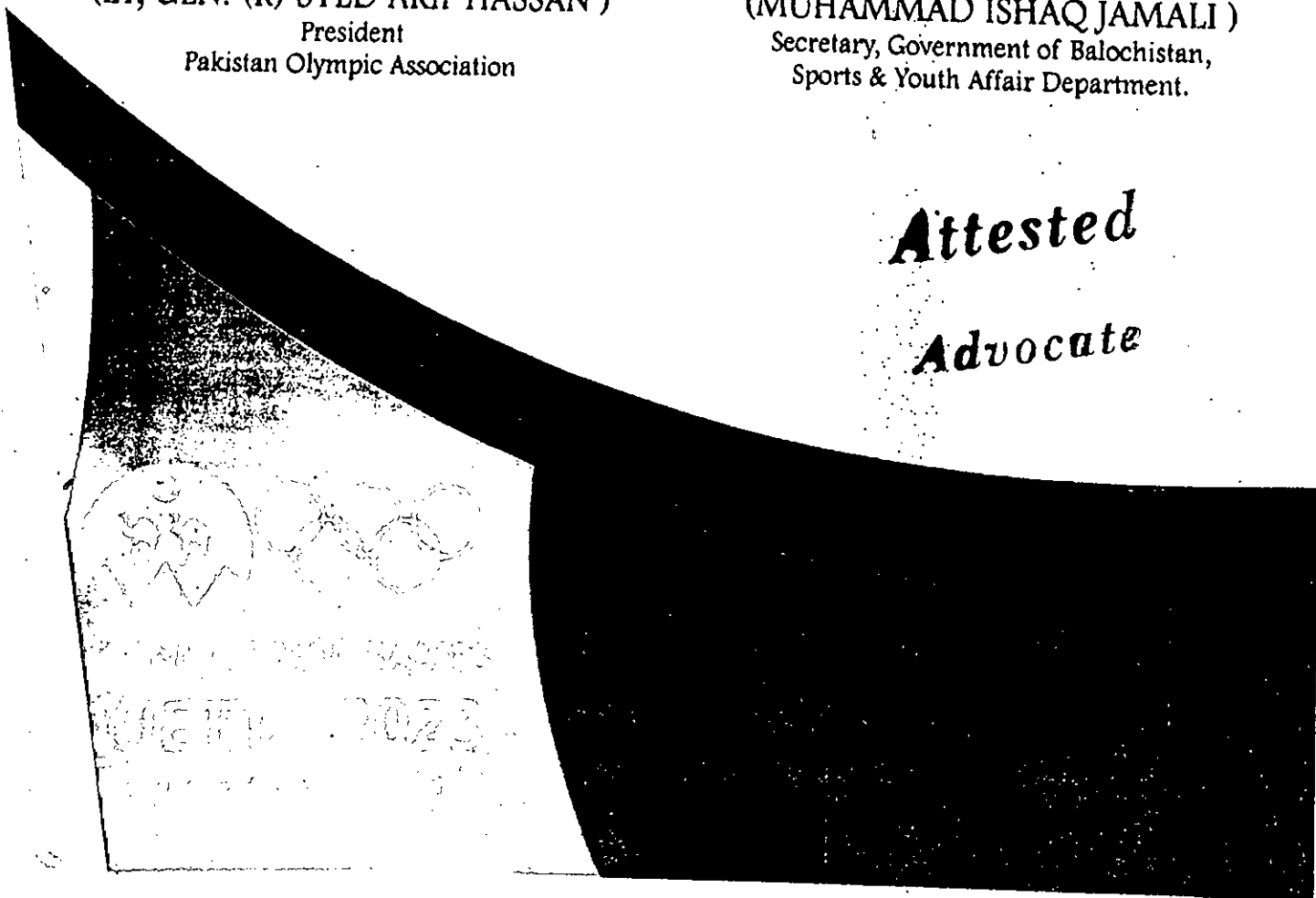
and Secured Brown Medal.

(LT, GEN. (R) SYED ARIF HASSAN)
President
Pakistan Olympic Association

(MUHAMMAD ISHAQ JAMALI)
Secretary, Government of Balochistan,
Sports & Youth Affair Department.

Attested

Advocate





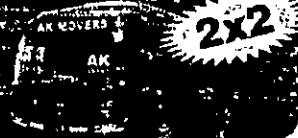
24/5
2023

testec

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Moving With Care & Smile

**AK
MOVERS**



Moving With Care & Smile

**AK
MOVERS**

All Pakistan
Bus Service

UAN: 0336-0060066 | Complain Cell: 0333-7770354

Handwritten notes in Urdu:
26/5/23
26
186
دست برداری
اسلام آباد
کرانیہ
4000

Handwritten notes in Urdu:
26/5/23
11:00
4200
2-6
اسلام آباد
کرانیہ

AK Movers (Pvt) Ltd
Cell: 0333 7776959, 0333-7770017
0333-7774550
Fax: 081-2300500
Ph: 081-2300503, 2300504
2300556, 2300557

NO SMOKING
Handwritten text in Urdu:

19/5/2023 Departure from Swat

**Attested
Advocate**

Daily Attendance Register of the

Name	for the Month of												Year						
	1	2	3	4	5	6	7	8	9	10	11	12							
1. [Name]																			
2. [Name]																			
3. Sida Malik																			
14. [Name]																			

Attested

Advocate

(17)

Daily Attendance Register of the

for the Month of

APR 2023

Year 2023

No.	Name	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 Days	
1	Mr. [Name]																																	
2	Mr. [Name]																																	
3	Mr. [Name]																																	
4	Mr. [Name]																																	
5	Mr. [Name]																																	
6	Mr. [Name]																																	
7	Mr. [Name]																																	
8	Mr. [Name]																																	
9	Mr. [Name]																																	
10	Mr. [Name]																																	
11	Mr. [Name]																																	
12	Mr. [Name]																																	
13	Mr. [Name]																																	
14	Mr. [Name]																																	

Attested

Advocate

Total Days

(18) (2)

Daily Attendance Register of the

No.	Name	Profession	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
1	Mr. T. N.																															
2	Mr.																															
3	Mr.																															
4	Mr.																															
5	Mr.																															
6	Mr.																															
7	Mr.																															
8	Mr.																															
9	Mr.																															
10	Mr.																															
11	Mr.																															
12	Mr.																															
13	Mr.																															
14	Mr.																															

for the Month of

May

Year 2023

Attested
Advocate

Total No. of Days
Remarks



OFFICE OF THE EXECUTIVE ENGINEER.
C & W (MEGA PROJECTS) DIVISION SWAT.

Ph# 0946-9240454 Fax# 0946-9240435 Email:- xen.mpswat@gmail.com

No. 3254 / 2-E. Dated 25/5/2023.

To

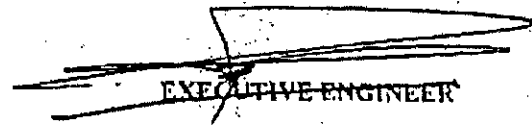
Mr. Amir Khan
S/O Aleem Khan
R/O Mohallah Usman Khel
Amankot Teh: Babozi Distt: Swat.

Subject: - **ABSENCE FROM GOVT: DUTY.**

Reference:- (i) This office letter No.3147/2-E dated 27-03-2023.
(ii) This office letter No.3168/2-E dated 11-04-2023.
(iii) This office letter No.3197/2-E dated 03-05-2023.

You were directed vide this office letters mentioned in reference that you are regularly absent from Govt: duty without any intimation / permission from this office. You were time and again verbally directed as well as in written to explain your willful absence from Govt: duty, but you failed to submit reply. Moreover you have remained absent from Govt: duties since 27-03-2023 till date. This office also stopped your monthly salary, but you did not attend the office and was regularly seen in political gathering / protests against the state. Your this negative attitude towards Govt: duty is clearly showing miss conduct and stated action required to be taken against you under E&D rules 1973. Hence the undersigned has no alternate but to terminate your services under the terms and condition at SI No.3 & 4 in your appointment order showing "that your services shall be initially on probation period of One Year extendable for further One year".

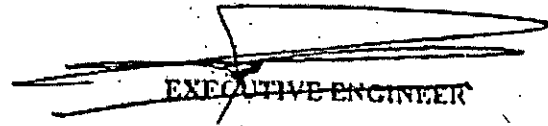
In light of the above conditions at SI No.3 & 4 your services are hereby terminated with immediate effect.


EXECUTIVE ENGINEER

Copy forwarded to:-

1. The Chief Engineer C&W Mega Projects Govt: of Khyber Pakhtunkhwa Peshawar.
2. The Superintending Engineer C&W Circle (Mega Projects) Mardan.
3. The District Complotter of Accounts Swat.
4. The P.S to Secretary C&W Department Peshawar.
5. The Divisional Accounts Officer (Local).

Attested


EXECUTIVE ENGINEER

Advocate

44 (20)

UMS I

UMS88618670

ops

PAKISTAN POST OFFICE
U.M.S. RECEIPT

re

No.....

536

Rs. 86
13

Name M. Anwar Iqbal



U.S.M.A.S.

Chail
Aman Kot

Post town of destination

Signature of booking official

Service instruction over leaf 3/5

05/25/25

No. 771 For RGL106890171 ops ps

Stamps affixed except in case of uninsured letters of not more than the initial weight proscribed in the Post Office Guide or on which no acknowledgement is due. 50-

Received a registered address to M. Anwar Iqbal Date-Stamp

Algebra

Human

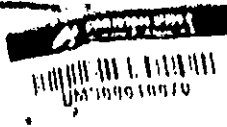
Rs. (in figures) 50 in words 50

Ps. 50

Attested

Advocate

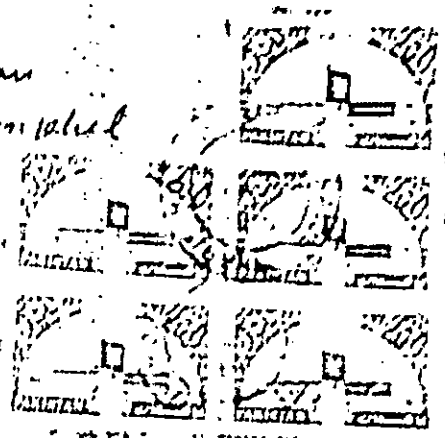
21



Registered

To, Mr. Amir Khan S/O Aleeem Khan
Vill. Amankot Mohallah Usmanpahal
Teh. Bahawal DIST. Swat.

DISPATCHER
C&W Project



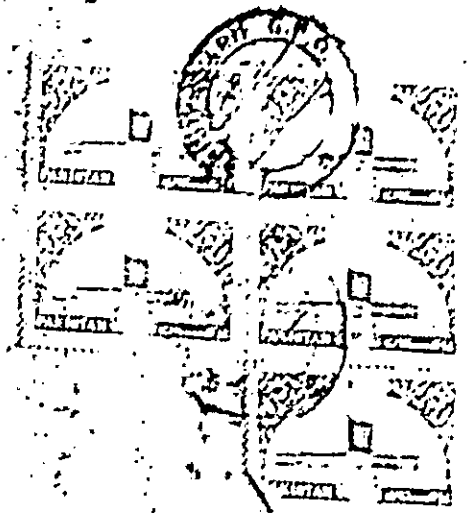
Registered

NO: 3197/2-E B 5/5/22

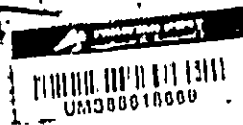
Mr. Amir Khan
Naib Qasid
S/O Aleeem Khan : village Amankot
Moh: Usman Khed : Tehsil Bahawal
Dist: Swat



Saidu Sharif G.P.O



DISPATCHER
C&W Mega Project
Swat.



Registered

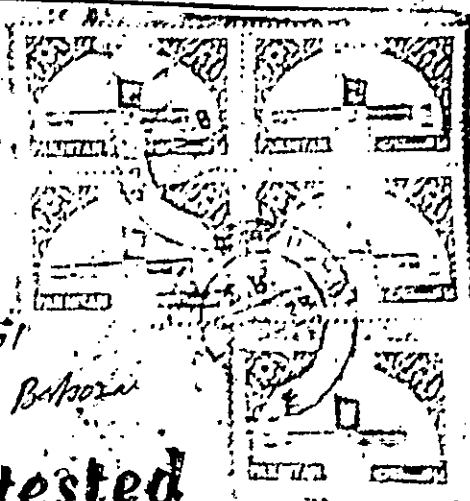
No. 3147/2-E dt. 31/3/22

To, Mr. Amir Khan
S/O Aleeem Khan Vill. Amankot
Mohallah Usmanpahal, Teh. Bahawal
DIST: Swat.

DISPATCHER
C&W Project
02/04/22

Attested

Advocate



Hot (22)

No. 771

Rs. RGL105890171
Stamps affixed except in case of
uninsured letters of not more than
the initial weight prescribed in the
Post Office Guide or on which no
acknowledgement is due.

50-

Received a registered letter addressed to W. Amir Khan Date-Stamp

Initials of Receiving Office New Delhi Write here "letter", "postcard", "packet" or "parcel" with the word "insured" before it when necessary.

Insured for Rs. (in figures) 50 (in words) Five

Insurance fee Rs. 5 Ps. 00 Weight 10 Kilo Grams

If insured.

Name and address of sender

Attested
Advocate

23



**OFFICE OF THE EXECUTIVE ENGINEER
C & W (MEGA PROJECTS) DIVISION SWAT.**

Ph# 0946-9240454 Fax# 0946-9240435 Email:- xen.mpswat@gmail.com

No. 3147 18-F Dated 31/03/2023.

To:

Mr. Amir Khan
Naib Qasid

Subject: - EXPLANATION

It has come to the notice by the undersigned that you were absent from duty from 27/03/2023 31/03/2023 without any prior permission / approval by this office.

In this connection you are hereby directed to explain your position within 3-days positively, otherwise action will taken against you under the E&D rules.

~~EXECUTIVE ENGINEER~~

O/C

Attested

Advocate



OFFICE OF THE EXECUTIVE ENGINEER
C & W (MEGA PROJECTS) DIVISION SWAT.

Ph# 0946-9240454 Fax# 0946-9240435 Email:- xen.mpswat@gmail.com

No. 3168 12-E Dated 11/4 2023.

To

Mr. Amir Khan
Naib Qasid

Subject: - EXPLANATION

Ref:- This office letter No.3147/2-E dated 31/03/2023.

You were directed to explain your position regarding absentee from office duty vide referred letter above but no reply has been received and also you were found absent further from duty with effect from 27/03/2023 11/04/2023 without any prior permission / intimation / approval by this office.

In view of the above you are hereby directed to explain your position within 3 days positively, in case of failure strict action will be taken against you under the E&D rules.

EXECUTIVE ENGINEER

Copy forwarded to:-

1. The Superintending Engineer C&W Circle (Mega Projects) Mardan for information please

EXECUTIVE ENGINEER

Attested

Advocate



OFFICE OF THE EXECUTIVE ENGINEER
C & W (MEGA PROJECTS) DIVISION SWAT.

Ph# 0946-9240454 Fax# 0946-9240435 Email:- xen.mpswat@gmail.com

No. 3197/2-E Dated 3/5/2023.

To

Mr. Amir Khan
Naib Qasid

Subject: - EXPLANATION

Ref:-
(i) This office letter No.3147/2-E dated 31/03/2023.
(ii) This office letter No.3168/2-E dated 11-04-2023.

You were directed vide referred letter No. & Date above to explain your position regarding absentee from office duty but no reply has been received and also you were found absent further from duty with effect from 27/03/2023 to 02/05/2023 without any prior permission / intimation / approval by this office.

In view of the above you are hereby once again directed to attend office for duty and also explain your position within 2-days positively, in case of failure strict action will be taken against you under the E&D rules.

Copy forwarded to:-

1. The Superintending Engineer C&W Circle (Mega Projects) Mardan for information please.
2. The Manager Faisal Bank Ltd IBB Branch Mingora Swat and requested to not pay any kind of amount from his salary account bearing No.PK73FAYS3009301000006279 Amir Khan (Photo copy of cheque book leaf / pay-slip are enclosed) for perusal please.


EXECUTIVE ENGINEER

Attested

Advocate

To,

The Executive Engineer
C&W Mega Project Division Swat.

26

D

SUBJECT: -

APPEAL FOR SET ASIDE AGAINST THE ILLEGAL ORDER OF
TERMINATION NO. 3254/2-E, DATED 25/05/2023 PASSED AGAINST THE
APPELLANT BY THE OFFICE OF THE EXECUTIVE ENGINEER C&W
(MAGA PROJECTS) DIVISION SWAT.

RESPECTFULLY SHEWETH:-

That the appellants submit as under:-

1. That the appellant is employee of above mentioned department as Naib Qasid.
2. That the appellant has illegally been terminated vide order no 3254/-2-E, dated 25/05/2023. (Copy of letter is attached).
3. That the appellant is sports man and submitted on application on dated 15/05/2023 for leave to attend National Games held on 19/05/2023, the relevant clerk namely Tariq Hussain who has satisfied me that your application has been accepted, you can join sports event. (Copy of leave application is attached).
4. That the department issued three letters at my home address which is received on same dated on 09/05/2023, which were about show cause notice for calling explanation about absence
5. That except sports events leave I have no absentees, which is evident from the attendance register but despite this viz my attendances, I have been terminated from the job which is against law.
6. That the appellant names first letter in English A, name Amir, in Attendance letter we were directed by relevant clerk that in attendance register first letter of employees name should be written which would be considered presence, and for absent employees 'Ab' is written against absent employees names which is evident in attendance register. (Copy of attendance register page is attached).
7. That I was on valid leave on dated 18/05/2023 but in attendance register against my name attendance presence initial (A) is over writing, the issuing of show cause notice for absence from duty was for misconception because I was present on duty from my appointments date except valid leave 18/05/2023 to 25/05/2023, but show cause notice letter absentees dated 27/03/2023 to 02/05/2023 and till date written, reply for which I have submitted but in vain, hence termination order.
8. That the appellant is peaceful / law-abiding citizen and belong to respectable family and has no concern with politics, the alleged charge of joining political activities is no more except bare allegation.

It is therefore humbly prayed that on acceptance of this appeal the order passed against the appellant may kindly be set aside and the appellant may kindly be reinstated any other relief which is deem fit and proper may kindly be extended to appellant.

Dated: 01/06/2023

*Amir Khan
06/06/2023 9:30 - 10:00 letters copied
not attached
126
06/06/23*

3279 2-E
Attested / 23

Advocate

Amir Khan
Appellant
Amir Khan S/O Aleem Khan
R/o Mohallah Usman Khel,
Amankoteh Babozai, District Swat
CNIC# 15602-6536603-1
MOBILE# 0348-9813398

27

بار کونسل نمبر: BC-11-2310

بار ایسوسی ایشن نمبر: _____

رابطہ نمبر: 03479398758

ای میل ایڈریس: _____

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DISTRICT BAR ASSOCIATION
DBA
SWAT

DISTRICT BAR ASSOCIATION
SWAT

ڈسٹرکٹ بار ایسوسی ایشن سوات

Service Tribunal Peshawar. بعدالت جناب H.

منجانب:	دعویٰ اورخواست: Appeal.
عامیر خان بنام State	علت نمبر: _____
	مورخہ: _____
	جرم: _____
	تھانہ: _____

بامث تحریر آگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے برائے پیروی مقدمہ

آن مقام پشاور کیلئے سبیل سلطان ایڈووکیٹ 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 سرسبزی مقدمہ، منسوخی ڈگری یکطرفہ، اجراء و پیروی کرنے کا مختار ہوگا۔ نیز دائر کرنے ایبل 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 ہمراہ 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

Peshawar. مقام کے لئے منظور ہے۔

ایڈووکیٹ دستخط:

Attested

25/9/23 المرقوم

عامیر خان ولد علی خان