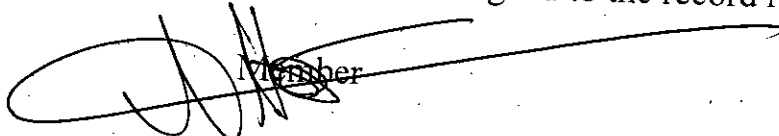


31.01.2019


Appellant absent. Learned counsel for the appellant absent. Mr. Muhammad Jan learned Deputy District Attorney present. Case called but no one present on behalf of appellant. Consequently the present service appeal is dismissed in default. No order as to costs. File be consigned to the record room.

 Member

 Member

ANNOUNCED.

29.01.2019



16.11.2018 respondents present in the court and directed to produce the copy of the inquiry report on next date of hearing. Adjournd. To come before D.B. before D.B. on 11.02.2019 before D.B.


Reader

(Hussain Shah)
Member

(Muhammad Amin Kundi)
Member

07.01.2019

Appellant absent. Learned counsel for the appellant absent. Mr. Riaz Khan Paindakheil learned Assistant Advocate General present. Adjourn. To come up for arguments on 08.01.2019 before D.B.

Member

Member

08.01.2019

None present on behalf of the appellant. Mr. Kabirullah Khattak learned Additional Advocate General alongwith Mr. Ismail Shah A/D for the respondents present. Due to general strike of the bar, the case is adjourned. To come up for arguments on 31.01.2019 before D.B


Member


Member

21.12.2016

Counsel for the appellant and Additional AG for the respondents present. Since other Member of the Bench is on leave, therefore, arguments could not be heard. To come up for arguments on 04.05.2017 before D.B.

(MUHAMMAD AMIR NAZIR)
MEMBER

04.05.2017

Agent to counsel for the appellant and Mr. Zia Ullah Government Pleader for the respondent present. Agent to counsel for the appellant requested for adjournment. Request accepted. To come up for argument on 11.08.2017 before D.B.



(Gul Zeb Khan)

(Ahmad Hassan)
Member

11.08.2017

None present on behalf of the appellant. Mr. Zia Ullah, Deputy District Attorney for the respondents present. Notice be issued to appellant and his counsel for attendance and arguments for 08.12.2017 before D.B.

(Muhammad Amin Khan Kundi)
Member (J)

(Muhammad Hamid Mughal)
Member (J)

15.10.2018

None present on behalf of the appellant and Mr. Zia Ullah learned Deputy District Attorney for the respondent present. Due to general strike of the bar, the case is adjourned. To come up on 16.11.2018 before D.B.

Member

Member


25.06.2015


Counsel for the appellant and Addl: A.G for respondents present.
Written reply not submitted despite last opportunity. The appeal is
assigned to D.B for final hearing for 23.11.2015.


Chairman

23.11.2015

None present on behalf of the appellant. Mr. Ziaullah, GP
for respondents present. To come up for arguments on


28/4/16 


Member

28.04.2016

Appellant in person and Mr. Ziaullah, GP for respondents
present. Due to strike of the Bar learned counsel for the appellant is
not available today before the Court, therefore, case is adjourned for
arguments to 10.8.2016.


Member


Member

10.08.2016

No one is present on behalf of the appellant. Addl. AG for
respondents present. Notices be issued to the appellant and his counsel. To
come up for arguments on 21-12-16.


Member


Member

21.08.2014

The Hon'ble Bench is on tour, therefore, case is adjourned to 09.12.2014.



Reader

09.12.2014

No one is present on behalf of the appellant. Mr. Muhammad Adeel Butt, AAG for the respondents present. The Tribunal is incomplete. To come up for further proceedings on 26.03.2015.



Reader.

26.03.2015

None present for appellant. Mr. Rahim Shah, Assistant alongwith Addl: A.G for official respondents No. 1, 2 and 4 present. Requested for adjournment. To come up for written reply/comments on 27.4.2015 before S.B.



Chairman

27.04.2015

Agent of counsel for the appellant and Addl: A.G for official respondents No. 1, 2 & 4 present. Written reply not submitted. Last opportunity granted for submission of written reply. To come up for written reply 25.6.2015 before S.B.



Member

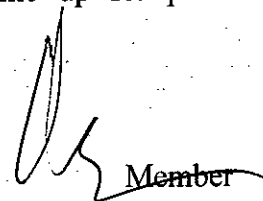
3.
Appeal No. 473/2014

Mr. Muhammad Qayyum

28.04.2014

Counsel for the appellant present and requested for

adjournment. Request accepted. To come up for preliminary hearing on 02.06.2014.


Member

4.
02.06.2014

Mr. Abdul Karim Mahsud, advocate present and filed Wakalat Nama on behalf of the appellant. Preliminary arguments heard and case file perused. Counsel for the appellant contended that the appellant has not been treated in accordance with law/rules. Against the impugned order dated 26.10.2013, he filed departmental appeal on 21.11.2013, which has not been responded within the statutory period of 90 days, hence the present appeal on 01.04.2014. Counsel for the appellant has also filed an application for condonation of delay. Points raised at the Bar need consideration. The appeal is admitted to regular hearing subject to all legal objections. The appellant is directed to deposit the security amount and process fee within 10 days. Thereafter, Notices be issued to the respondents. To come up for written reply/comments on main appeal as well as reply/arguments on application for condonation of delay on 21.08.2014.


Member

5.
02.06.2014

This case be put before the Final Bench I for further proceedings.




Chairman

Form- A

FORM OF ORDER SHEET

Court of _____

Case No. 473/2014


S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	03/04/2014	<p>The appeal of Mr. Muhammad Qayyum resubmitted today by Mian Hamayun Ahmad Kakakhel Advocate may be entered in the Institution register and put up to the Worthy Chairman for preliminary hearing.</p> <p style="text-align: right;"> REGISTRAR</p>
2	4-4-2014	<p>This case is entrusted to Primary Bench for preliminary hearing to be put up there on <u>28-4-2014</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

The appeal of Mr. Muhammad Qayum Senior Education Teacher in Govt. Institute for Blind Boys received today i.e. on 01.04.2014 is incomplete on the following score which is returned to the counsel for the appellants for completion and resubmission within 15 day.

- 1- Appeal may be page marked according to the index.
- 2- Annexures of the appeal may be attested.
- 3- Annexures of the appeal may be annexed serial wise as mentioned in the memo of appeal.
- 4- Two more copies/sets of the appeal along with annexures i.e. complete in all respect may be also be submitted with the appeal.

No. 556 /S.T,

Dt. 02/04 /2014.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Mian Hamayun Ahmad Kakakhel Adv. Pesh.

*Sir,
Re submitted
after doing
the needful.
H. Hamayun
Kakakhel*

BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PUKHTUNKHWA,
PESHAWAR

Appeal No. 473/2014

Muhammad Qayyum

VERSUS

Secretary Social Welfare and others

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S NO	DESCRIPTION	PAGE
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4.	Addresses of the parties	11
5.	Copy of the order	12
6.	Copy of the order dated 26-10-2013	13
7.	Copy of the application	14
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Appellant

Through:

Mian Humayun Ahmad Kakakhel

(MIAN HUMAYUN AHMAD KAKAKHEL)

Advocate,

High Court Peshawar

Cell # 0300-5884959

Dated: -01-04-2014

①

BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PUKHTUNKHWA,
PESHAWAR

Service Appeal No 473 / 2014

N.W.F. Province
488
01-4-2014

Muhammad Qayyum S/O Muhammad Rasool, Senior Education
Teacher in Government Institute for Blind Boys, Peshawar
(Appellant)

VERSUS

1. Secretary Social Welfare, Benevolent Funds Building,
Peshawar Cantt
2. Principal/Superintendent, Government Institute for Blind
Boys, Peshawar
3. Muhammad Iqbal, Naib Qasid, Government Institute for
Blind Boys, Peshawar
4. Education Divisional Officer,, Social Welfare, Bacha Khan
Chowk, Peshawar

(Respondents)

~~Filed to the~~
[Signature]
1/4/2014

re-submitted to ~~the~~
and filed.

[Signature]
3/4/14

Appeal under Section 4 of the NWFP Service
Tribunal Act, 1974 against the impugned order
dated 26-10-2013, whereby the additional charge
of Hostel Superintendent / Warden was withdrawn

PRAYER IN APPEAL:-

On acceptance of this appeal, the impugned order dated 26-10-2013 may graciously be set aside and consequently the additional charge of Hostel Superintendent/Warden may please be given to Appellant. Any other remedy/relief/benefits deem appropriate in the circumstances of the case may also be granted.

Respectfully Sheweth:

Brief facts given rise to the instant appeal are as under:-

- 1) That the Appellant is working on the post of Senior Special Education Teacher in Government Institute for blind boys with additional duty of Hostel Superintendent/Warden. (Copy of the order is attached herewith).
- 2) That Respondent No 2 is working in the same institute as (Principal/Superintendent), while Respondent No 3 as Naib Qasid in the same institute.
- 3) That Respondent No 2 issued office order dated 26th October, 2013 for withdrawal of additional charge of Hostel Superintendent/Warden from Appellant and retained the same with himself. (Copy of the order dated 26th October, 2013 is attached herewith).
- 4) That Respondent No 2 and 3 leveled allegations that Appellant has thumb impressed on his willingness certificate regarding the withdrawal of additional charge of

3

Superintendent/Warden, but the same is frivolous and concocted story. In fact the Respondent No 3 brought a letter and stated that this is a certificate through which the additional charge of Hostel Superintendent/Warden will remain with Appellant, hence Appellant thumb impressed.

- 5) That when the Appellant got the knowledge that the Appellant was cheated by Respondent No 3, the Appellant filed an application, which clearly shows the denial of withdrawal of additional charge. (Copy of the application is attached herewith).
- 6) That the Appellant has filed department representation/ appeal before the competent authority on 21-11-2013, but no reply whatsoever has been given by the competent authority. (Copy of the departmental appeal is attached herewith).
- 7) That the Appellant has no other remedy, but to approaches this Honourable Tribunal inter-alia on the following grounds:-

GROUNDS:-


- A) That the order dated 26-10-2013 is based on mala-fide and passed on the basis of ulterior motive to deprive the students from the best administrator of hostel.

- B) That it is pertinent to mention here that the order dated 26-10-2013 is not a speaking order, hence liable to be set aside.
- C) That the Respondent No 2 is a notorious person and public at large has protested against him in the daily newspaper, so the order is not in the interest of public, hence liable to be set aside. (Copy of the newspaper cutting is attached herewith).
- D) That the impugned order dated 26-10-2013 is based on mala-fide intention of Respondent 2 as he is intending to snatch the funds collected on the name of blinds students.
- E) That the withdrawal order dated 26-10-2013 of the Appellant is liable to be set aside on the ground that Respondent No 2 is misappropriating the fund of hostel.
- F) That withdrawal order dated 26-10-2013 of the Appellant to deprive the blinds students from the rights, which is liable to be restored in favour of Appellant.
- G) That the Appellant was deceived by Respondent No 2 and 3 on the pretext to to retain the additional charge of hostel warden but in fact it was written by Respondent No 2 regarding withdrawal of the warden charge, which is offence under the law and the Appellant has reserve the right against Respondent No 2 and 3.

(5)

H) That the other grounds not here specifically may also graciously be allowed to be raised at the time of arguments.

It is, therefore, most respectfully prayed that on acceptance of this Appeal, the impugned order dated 26-10-2013 may graciously be set aside and consequently the additional charge of Hostel Superintendent/Warden may please be given to Appellant. Any other remedy/ relief/benefits deem appropriate in the circumstances of the case may also be granted.


Appellant

Through:



(MIAN HUMAYUN AHMAD KAKAKHEL)
Advocate,
High Court Peshawar

Dated: -01-04-2014

NOTE:-

No such appeal for the same Appellant has earlier been filed by me before this Honourable Tribunal prior to instant one.


Advocate

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BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PUKHTUNKHWA,
PESHAWAR

Muhammad Qayyum

VERSUS

Secretary Social Welfare and others

AFFIDAVIT

I, Muhammad Qayyum S/O Muhammad Rasool, Senior Education Teacher in Government Institute for Blind Boys, Peshawar, do hereby solemnly affirm and declare on Oath that accompanying appeal are true and correct to be best of my knowledge and belief and nothing has been concealed or withheld from this Honourable Tribunal.


DEPONENT

Identified by:-



(MIAN HUMAYUN AHMAD KAKAKHEL)
Advocate,
High Court Peshawar



7

BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PUKHTUNKHWA,
PESHAWAR

Muhammad Qayyum

VERSUS

Secretary Social Welfare and others

Application for the suspension of operation
of impugned order dated 26-10-2013, till
the final disposal of the instant appeal

Respectfully Sheweth: -

- 1) That the instant appeal is being filed before this Honourable Court and no date has yet been fixed.
- 2) That the Applicant/Appellant requests for the grant of interim relief in the heading of application on the following grounds inter-alia:-

GROUNDS: -

- A) That due to the grounds set out in the main appeal, Applicant/Appellant got good prima facie case in his favour and is hopeful of its success.
- B) That if the order dated 26-10-2013 is not suspended/ stayed; the Applicant/Appellant would suffer irreparable loss.
- C) That due to the peculiar circumstances of case in hand, balance of convenience also lies in favour of allowing this application.

8

It is, therefore, respectfully prayed that on acceptance of this Application, the order dated 26-10-2013 may kindly be suspended/stayed till the final disposal of the case.



Applicant/Appellant

Through:

A handwritten signature in black ink, appearing to read 'Mian Humayun Ahmad Kakakhel'.

(MIAN HUMAYUN AHMAD KAKAKHEL)
Advocate,
High Court Peshawar

Dated: -01-04-2014

9

BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PUKHTUNKHWA,
PESHAWAR


Muhammad Qayyum

VERSUS

Secretary Social Welfare and others

AFFIDAVIT

I, Muhammad Qayyum S/O Muhammad Rasool, Senior Education Teacher in Government Institute for Blind Boys, Peshawar, do hereby solemnly affirm and declare on Oath that accompanying application are true and correct to be best of my knowledge and belief and nothing has been concealed or withheld from this Honourable Tribunal.


DEPONENT

Identified by:-



(MIAN HUMAYUN AHMAD KAKAKHEL)
Advocate,
High Court Peshawar


ATTESTED


BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PUKHTUNKHWA,
PESHAWAR

Muhammad Qayyum

V E R S U S

Secretary Social Welfare and others

Application for condonation of delay

Respectfully Sheweth: -

1. That the instant appeal is being filed before this Honourable Court and no date has yet been fixed.
2. That the Applicant/Appellant requests for condonation of delay in above noted appeal.
3. That the Appellant was in search of required documents, hence the instant appeal has delayed.
4. That any other grounds will be raised at the time of arguments with the permission of this Honourable Tribunal.

It is, therefore, respectfully prayed that on acceptance of this Application, the delay in the instant appeal may graciously be condoned.



Applicant/Appellant

Through:

(MIAN HUMAYUN AHMAD KAKAKHEL)
Advocate,
High Court Peshawar

Dated: -01-04-2014

(11)

BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PUKHTUNKHWA,
PESHAWAR

Muhammad Qayyum

VERSUS

Secretary Social Welfare and others

MEMO OF ADDRESSES

APPELLANT

Muhammad Qayyum S/O Muhammad Rasool, Senior Education
Teacher in Government Institute for Blind Boys, Peshawar

RESPONDENTS

1. Secretary Social Welfare, Benevolent Funds Building,
Peshawar Cantt
2. Principal/Superintendent, Government Institute for Blind
Boys, Peshawar
3. Muhammad Iqbal, Naib Qasid, Government Institute for Blind
Boys, Peshawar
4. Education Divisional Officer,, Social Welfare, Bacha Khan
Chowk, Peshawar



Appellant

A handwritten signature in black ink, appearing to read 'Mian Humayun Ahmad Kakakhel'.

Through:

(MIAN HUMAYUN AHMAD KAKAKHEL)
Advocate,
High Court Peshawar

Dated: -01-04-2014

(12)

Office of the Superintendent,
Govt: Institute for the Blind (BOYS),
Social Welfare Department, Peshawar.

NO.GIB (BOYS)/ 2374-75

Dated Peshawar The 13-02-2013

Subject: Hostel Superintendent

Office Order

The services of Mr. Nasrullah khan store keeper of Govt Institute for the blind (boys) GT road Peshawar has been withdrawn as hostel superintendent in the public interest with effect from 18-02-2013 and Mr. Muhammad qayyum Senior Special Education Teacher in Govt Institute for the blind (boys) GT road Peshawar is directed to take over the additional charge of the hostel superintendent including his own duties with immediate effect.

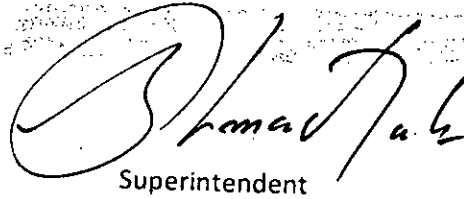
11

Superintendent

Govt: Institute for the Blind (BOYS) Peshawar

Copy to: 1) Mr. Muhammad qayyum Senior Special Education Teacher in Govt Institute for the blind (boys) GT road Peshawar.

2) Mr. Nasrullah khan store keeper of Govt Institute for the blind (boys) GT road Peshawar.


Superintendent

Govt: Institute for the Blind (BOYS) Peshawar

A.T.C.

A.T.C.

(13)

Office of the Superintendent
Govt Institute for the
Blind (Boys) Peshawar.

No. G.I.B(B) 84-85/Comm/A

Dated Peshawar the 26-10-2018

Subject:

Office Order.

The additional charge of Hostel
Superintendent/Warden is hereby withdrawn from
Mr. Qayyum Senior Sp. Education Teacher, Govt Institute
for the Blind (Boys) with immediate effect and
the charge of Hostel Superintendent/Warden has been
taken over by the under signed.

11

Superintendent
Govt. Institute for the Blind
Peshawar.

Copy to.

1) Mr. Qayyum, for information and to direct
you to hand over in proper charge of Hostel
warden/supdt. to the under signed immediately.

2) The District Officer, Sw, Peshawar. for information

A.T.C.
A.S.

Superintendent
Govt. Institute for the Blind
Peshawar.

حکم سے نکلنے کا یہی آئی ہے اور (19)

عنون کا مسئلہ کا رخ ہے اور اس سے آرڈر

کے ہیں؟

معرضہ صورت یہ ہے کہ آئیے کے ساتھ ہی

انگوٹھا جو سے خلا ہے لگا لیا ہے اور اس کے ساتھ

ہاں آئیے کے ساتھ ہے۔

نہ نکال جائے لہذا اس انگوٹھے کو دستخط سے

26/10/2013

القاریس

آئیے کے ساتھ
اس کے ساتھ
اس کے ساتھ
اس کے ساتھ
اس کے ساتھ

A.T.C.
[Signature]

محفوظ حساب نزل صاب سید نزی علیہ غفرلہ و زکوٰۃ خواہن سماجی فلاہ بیورو
حفوی تعلیم حکومت خیر بنگلہ دہ

1
21/11/13

لو اسٹریڈ آرکائیو سماجی فلاہ بیورو حفوی تعلیم خواہن
لو اسٹریڈ سٹک آفس سماجی فلاہ بیورو خواہن و حفوی تعلیم
لو اسٹریڈ سٹریٹ گورنمنٹ ناسیٹا سکول جی ٹی دوڈ سٹیٹا

مضمون ۱۱
سید نزی صاحب سے اپیل اور آپیل کی ضروری ہے (محاضرات)

حساب عالی! گزارش محفوظ اور یہ ہے کہ میں گورنمنٹ ناسیٹا سکول جی ٹی
میں حفوی سینئر معلم کے حیثیت سے خدمت میں انجام دے رہا ہوں۔ ناسیٹا
ہو۔ علی بابہ نادار بیورو کی وجہ سے ملازمت میں رکھنا سہو آپ کے زیر
حساب والا! موجودہ آپ کا بھیا بیورو سینیئر تینڈنٹ کی اجازت کو سناؤ صلاح
۱۶ تاریخ کو ہتمام اس امانت میرے سر لگانا چاہیے یہ جلد (سن سے پہلے)
78 سے ملازمت کر دیا ہو۔ کامی سینیئر تینڈنٹ آئے ہے اور میں کسی نے
اس امانت کی کوئی نہیں کی۔ یہ واحد شخص ہے جس سے یہ آیا ہے
یہ پھر صیبت میں ہے سکون سے نہیں گزارے تین آپ اس نے فصول چھیننے
تھیٹر شروع کی ہے اپنی بڑی دکھا رہا ہے اور میں نے کافی صبر و تحمل
سے کام کیا تین اس شخص سے بار بار میں نے گزارش کی ہے کہ اگر آپ کو کوئی
ناراضی ہو یا کہ فی دل میں میل ہو تو اس میں میں نے ہر انتقام کاروان ہر ٹھوکا ہوا ہے
نادار میں دوسری ناراضیوں کا بیان ہو سکتا ہے کہ اس کی تین منیٹ کردہ لو حساب اس کی
کہیں کہتا ہے کہ اس کی بدی کر دینا بھی کہتا ہے کہ اس کی تین منیٹ کردہ لو حساب اس کی
صاحب میرا ہے اللہ ہے اور اللہ تعالیٰ نے آپ کو دل کے انصاف کی کسی سلطان ہے

لہذا آپ سے اپیل ہے کہ براہ کرم میری فی صائر اس شخص نے جس نے انقاسی کاروان
محل نہ لیا جائے اور مجھے ہر جو میرے سزا صحت کے لیے معافی کا موقع ملتا ہے تمہارے حضور کے

ATC
سید نزی

مجھے یقین حاصل ہے کہ آفتاب میرے اس فن پر مشورہ ایلیا کو دل کی سندر (مقام) کو
کرتے بہت بڑے کاموں کے ماحول و طائرنگ

شکل کے

الحاصل

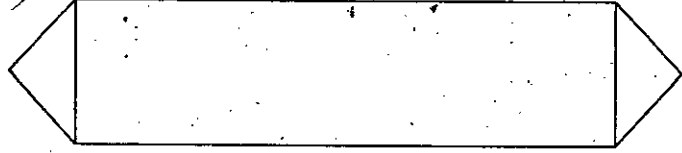
محمد تنویر

سینئر سٹوڈنٹ (مقام) کو
گورنمنٹ ٹاسیٹا سکول

نوٹ! میں نے پریذیڈنٹ بلائنڈ انشورنس (پیل) لیکچر کو آپنا آپیل کیا
جو کہ آپنا ریمیشنل سٹیٹ پیرا- آپوں نے کیا کہ یہ درخواست آپیل
میرے خلاف ہے لہذا میں اس کو نہیں بوجھتا۔ آپیل 25
2/11/2013 کو پیش ہی اس نے لینے سے ایفاریا۔

شکریہ!

ATC
محمد تنویر



2019ء منجانب ایڈووکیٹ

محمد قیوم بنام سکریٹری سوشل سروسز

و غیر ذمہ دار

مورخہ

مقدمہ

دعویٰ

جرم

باعث تحریر آنکہ

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

آن مقام لکھیاد کیلئے مساں سہ ماہیوں کے لئے حاصل کیے گئے ہیں۔ مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ پر حلف دیئے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار 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 مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے وہوگا۔ 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۔

2019ء

ماہ البرمیل

01

المرقوم

العبد گدگ الواہ العبد

مقام لکھیاد کے لئے منظور ہے۔

بعدالت ضابطہ ختون خواہ سروس ٹریبونل لٹاؤ

SA 473/2014

2014ء منجانب محمد قیوم اقبال
بنام سیکرٹری ونگ

محمد قیوم

موزخہ
مقدمہ
دعویٰ
جرم

باعث تحریر آئندہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی متعلقہ خان بی بی بھون
آن مقام لٹاؤ کیلئے عبداللہ محمد محمود و محمد لویس
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو راشی نامہ کرنے و تقرر ثالثہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور صولی چیک و روپیہ ارضی 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 اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کارروائی 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 مذکورہ بااختیارات حاصل ہوں گے اور اس کا ساختہ
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے وہوگا۔
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 لکھد یا کہ سندر ہے۔

Accepted

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A. Karim Mahsud

_____ ماہ _____ المرقوم
_____ واہ _____

A. Karim Mahsud کے لئے منظور



بمقام

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