FORM OF ORDER SHEET

Court of___ _____

2204/2023

.

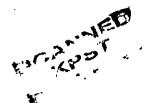
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	23/10/2023	The appeal of Mr. Sabir Hussain presented toda by Mr. Muhammad Abdullah Baloch Advocate. It is fixed fo
· .		preliminary hearing before touring Single Bench at D.I.Kha
	• •	on <u>20-11-2023</u>
	•	
	•	By the order of Chairman
	•	REGISTRAR
	· ·	د.
	· .	
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- <i></i> .	<u> </u>	

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL. PESHAWAR, CAMP DIKHAN.

In Service Appeal No. 2204 /2023

Sabir Hussain (Appellant) Versus ,

Govt; of KPK etc (<u>Respondents</u>)



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C No	Description of documents	Annexure	Pages
	Memorandum of Appeal and	9 6 9	1-5
2.	affidavit Copies of charge sheet, statement of allegations and letter No. 3711/ES dated 27/05/2023	A	6-8
3	Copy of RPO order No. 3709/ES dated 27/05/2023	B	9-9
<u>4</u> 5	Copy of impugn order dated		12-12
6		E	13-16
7	Vakalatnama		

Dated: ____/10/2023

Your humble appellant

Sabir Hussain

Through counse (r)

Muhammad Abdullah Baloch Advocate Supreme Court

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR, CAMP DIKHAN.

SERVICE APPEAL No. 2204 /2023

Sabir Hussain No. D/51, Sub-inspector presently posted as SHO/MKh District police Bannu.

<u>Appellant</u>

VERSUES

- 1. The Inspector General of Police, Central Police Office, IGP, Peshawar.
- 2. The Addl: Inspector General of Police, Head Quarters, CPO, Peshawar.
- 3. Regional Police Officer, DIKhan Range Dera Ismail Khan.
- 4. District Police Officer Dera Ismail Khan.

Respondents



SERVICE APPEAL UNDER SECTION 4 OF SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED ORDER NO. 4497-99/ES DATED 22/06/2023 WHEREBY THE APPELLANT HAS BEEN AWARDED "MAJOR PUNISHMENT OF REDUCTION IN RANK FROM INSPECTOR TO SUB-INSPECTOR WITH IMMEDIATE EFFECT" AND SERVICE APPEAL AGAINST INDISICION OF THE DEPARTMENTAL APPEAL OF THE APPELANT.

Note: That the addresses of the Parties given in the heading of the Petition are true and correct for the purpose of service.

Respected Sir;

- 1. That the appellant is serving as Sub-inspector in district Police DIKhan and is currently posted as SHO/MKh District police Bannu.
- 2. That the appellant was appointed as Assistant Sub Inspector in KPK Police Department on the recommendation of KPK Public Service Commission on 17/03/2010. The appellant was promoted as Inspector on 16/04/2020.
- 3. That during the entire service record the appellant have served in Kohat range, Charsada range, Bannu range, in CTD and as SHO in multiple police stations and even served at extremely hard areas. Due to the meritorious services of the appellant has been awarded reward of CC-1 with cash by the PPO, several times and similarly has been awarded multiple certificates and award from the department.

directions to the Incharge Khutti check post namely Riaz Hussain IHC. The official communication which is regarded as internal secret communication, was mistakenly or intentionally shared in social media by the said IHC Riaz Hussain. The Worthy RPO DIKhan region issued charge sheet and statement of allegations vide letter No. 3711/ES dated 27/05/2023. Copies are annexed as **Annexure A.** The appellant was also suspended vide RPO order No. 3709/ES dated 27/05/2023. Copy is annexed as **Annexure B.** The appellant duly submitted his written reply. Copy of reply of the appellant is annexed as **Annexure C.** During the inquiry proceeding, the inquiry officer held the present appellant also responsible for that and RPO DIKhan issued impugned Order No.4497/ES dated 22/06/2023 and awarded major punishment of reduction in rank from inspector to Sub-inspector with immediate effect. Copy of Impugn order dated 22/06/2023 is annexed as **"Annexure-D".**

- 5. That after the issuance of impugned order, the appellant preferred a departmental appeal/representation on 26/06/2023. Copy of a departmental appeal is annexed as "<u>Annexure-E"</u>.
- 6. That uptill now no response has been shown from the respondents and after the laps of statutory limitation of departmental appeal, cause of action has been accrued to the appellant for instant appeal hence, the instant service appeal, inter alia on the following grounds.

GROUNDS

- 1. That the impugn order is against Law and facts and against service rules, void and is in sheer violation of Police rules, 1975 amended 2014.
- 2. That charge sheet and statement of allegation are patently illegal, void abinitio, unwarranted and legally not sustainable in the eye of law. The same were issued by respondent No. 3 (RPO DIKhan region), who was not a competent authority under KP Police rules, 1975 amended 2014, thus the impugn order is liable to be set aside on this score alone.
- 3. That as the record reflects that respondent No. 03's grievances were involved in the present inquiry. Therefore the element of anger and partiality could not be ruled out in the present case. Thus in the present eventuality respondent No. 03 was not justified to issue the impugn order.
- 4. That the appellant was not treated in accordance with law and the actions of the respondents are mala-fide being discriminatory and harsh. That appellant has been made scape goat in the instant inquiry proceeding and in the case.

- 5. That the Appellant has been subjected to injustice and the case of Appellant has not been dealt with under the principle of the fair play.
- 6. That statement of allegation contains the allegation of making viral a conversation on social media. The same allegations were also issued to those police officials who either, mistakenly or intentionally made the video viral. Thus the present appellant had no role with/in this allegation. But the Learned Inquiry officer held the present appellant responsible even for this allegation.
- 7. That the impugned order is against the settled laws and rules of KP Police Rules. Hence, ineffective upon the rights of appellant. The learned inquiry officer did not follow the prescribe procedure and failed to distinguish the case of appellant with rest of the delinquent police officials.
- 8. That this Hon'ble Tribunal is competent and has ample powers to adjudge the matter under Appeal.
- 9. That the counsel for Appellant may be allowed to argue additional grounds at the time of arguments.

It is, therefore, respectfully prayed that on acceptance of this appeal, the impugned order No. 4497-99/ES dated 22/06/2023 whereby the appellant has been awarded "major punishment of reduction in rank from Inspector to Sub-Inspector with immediate effect", being void, illegal may please be set aside and appellant may kindly be restored to his actual post/position as Inspector along with all back benefits.

Any other relief deems fit and appropriate in given circumstances may also be granted in larger interest of justice.

Yours Humble Appellant

(Sabir Hussain) Through Counsel

Mohammad Abdullah Baloch (Advocate Supreme Court)

Dated: /10/2023

VERIFICATION

Verified on oath at DIKhan, this th day of October, 2023, that all contents of the above appeal are true and correct and appellant have not filed an appeal regarding the subject controversy, earlier in this august Tribunal.

Dated; /10/2023

Appellant

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR, CAMP DIKHAN,

In Service Appeal No.____/2023

Sabir Hussain (<u>Appellant</u>) Versus

Govt; of KPK etc) (<u>Respondents</u>)

SERVICE APPEAL

AFFIDAVIT

I, **Sabir Hussain**, appellant herein, do hereby solemnly affirm on oath that all parawise contents of the accompanying appeal are true and correct to the best of my knowledge, belief and information; that nothing has been concealed or kept secret from this worthy Tribunal.

Dated /10/2023

Deponent

Ч,

OFFICE OF THE
REGIONAL POLICE OFFICER
DERA ISMAIL KHAN REGION
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dated DI Khan the

/2023

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No.

The District Police Officer, DI Khan.

Attested to related

DISCIPLINARY

Subject:

Enclosed please find herewith Charge Sheet and Statement of Allegations in respect of Mr. Sabir Hussain, Inspector acting SDPO Saddar, DI Khan with the direction to conduct proper departmental inquiry for the misconduct contained in charge sheet/statement of allegations against him and report within three days positivity.

ACTION

AFRIDI) BDDF PSP

Regional Police Officer, Dera Ismail Khan Region



CHARGE SHEET

I, ABDUL GHAFOOR AFRIDI, PSP; Regional Police Officer, Dera Ismail Khan, as competent authority, under Rue 6 of Police Rules 1975 amended 2014 hereby charge you Inspector Sabir Hussain No. D/51 (acting SDPO Saddar, DI Khan) as follow:-

1. Being involved in getting illegal gratification and smuggling of NCP Vehicles/Articles/Food commodities. Besides this also viral a conversation on Social Media in which you have to used rank/designation of Senior Officers with I/C of the Check Post Khutti in the jurisdiction of PS Dera Town DI Khan as safeguard for your such illicit activities.

2. These acts of your omissions and commissions constitute the offence of misconduct as defined under rule 5 clause 1 of the Police Rules 1975 (amended vide Notification No: 3859/Legal, dated 27/08/2014).

By reasons of the above, you appeared to be guilty of misconduct under Rule 5 of Police Rules 1975 amended 2014 and have rendered your-self liable to all or any of the penalties specified in the Rules ibid.

You are, therefore, required to submit your written defence within seven days of the receipt of this Charge Sheet to the Enquiry Officer as the case may be.

Your written defence, if any, should reach the Enquiry Officer within the specified period, failing which it shall be presumed that you have no defence to put in and in that case ex-parte action shall follow against you.

Intimate whether you desire to be heard in person.

A Statement of allegation is enclosed.

(ABDHE C

Regional Police Officer, Dera Ismail Khan Region

DISCIPLINARY ACTION

I, ABDUL GHAFOOR AFRIDI, PSP, Regional Police Officer, Dera Ismail Khan, am of the opinion that Inspector Sabir Hussain No. D/51 (acting SDPO Saddar, DI Khan) has rendered himself liable to be proceeded against departmentally, as he has committed the following acts/ omissions within the meaning of Rule 5 of Police Rules 1975 amended 2014.

STATEMENT OF ALLEGATION

1. Being involved in getting illegal gratification and smuggling of NCP Vehicles/Articles/Food commodities. Besides this also viral a conversation on Social Media in which he has to use the Rank/Designation of Senior Officers with I/C of the Check Post Khutti in the jurisdiction of PS Dera Town DI Khan as safeguard for his such illicit activities.

2. These acts of your omissions and commissions constitute the offence of misconduct as defined under rule 5 clause 1 of the Police Rules 1975 (amended vide Notification No: 3859/Legal, dated 27/08/2014).

For the purpose of enquiry against the said accused with reference to the above allegation, Mr. ABDUL RAUF BABER, District Police Officer, DI Khan is hereby appointed as Enquiry Officer to conduct proper departmental enquiry under the Rule 6 of Police Rules 1975 amended 2014.

The Enquiry Officer shall, in accordance with the provision of the said Rules, provide reasonable opportunity of the hearing to the accused, record and submit its findings and make, within twenty five days of the receipt of this order, recommendations as to punishment or other appropriate action against the accused official.

The defaulter official and a well conversant representative of the department shall in the proceedings on the date, time and place fixed by the Enquiry Officer.

SOR AFRIDI) ABBUL

PSP

Regional Police Officer, Dera Ismail Khan Region

* OFFICE OF THE REGIONAL POLICE OFFICER DERA ISMAIL KHAN REGION

nex

No. 3709 /ES Sa Dated DI Khan Region the

/05/2023

ORDER

The following Police Officers of District DI Khan are hereby placed under suspension and closed to Police Lines DI Khan being involved in getting illegal gratification and smuggling of NCP Vehicles/Articles/Food commodities. Besides this also viral a conversation in which they used rank/designation of senior officers for their such illicit activities with immediate effect:-

- 1. Inspector Sabir Hussain Acting DSP/Saddar DI Khan.
- 2. Head Constable Saif Ullah Khan No. 872 I/C CP, Khutti.
- 3. Head Constable Muhammad Riaz No. 1663 CP, Khutti.

ERITÍ) (ABDU PSP

Regional Police Officer, Dera Ismail Khan Region

No. 3710 /ES

Copy for information & necessary action to District Police Officer, DI Khan with the directions to initiate departmental proceeding against the Police Personnel mentioned at Serial No. 2 & 3 and finding report to this effect be submitted for the perusal of undersigned/further process.

(ABDH ATRID PSP

Regional Police Officer, / Dera Ismail Khan Region

Anner: " C? elligitation advise Real and state of alle for مروض مونكر بوالروايت شره sms (آدي) فالف كروبر KSDPO John Selig all vise is surplice light, He, which in disconsol 6003600 and 3 , bud Le illight of the off of a set of the sincles التي كر ما در كارى وغير كو برابر چيك اس كام مدان حفرات مساعوتي دفائي وترى مي سي آلك plus effit to Dig vie un all our della. المعجم إقريرى مالك متو فيترف في مارك ولي في المند Sour Tweed des & Lopig & Un des Tronolous file of the and the offer Sold Super and Super Sup ising \$ 300000000-26 Oftin Sind us les l'is Crizor i & Lo Dig Sit why as a for a start of a colo ijusilite as while in the 1 PT.º //

- 5 2 gold and a selection of the select J. B. S. in Son is and here but by epu اللي عالمة تاجا شرطي مع شن إرت او جاكلية كاجاد ب بنا بد مول سول عمار ما بد تر مول مول ist is still but bene with a file of it Sisme Couversation & EULP (les los 615/1385. مرد واز این از از این می وای می of a spo را می لا المر وارد م بالم جم مسجز را عن علا ف طان لو هو استرا سر المرا من الم ون س الم الم الم الم الم الم الم diversities and us to inter is the state - wes 56/4 0100 - J, 1 (, 1), 1 (), 1 (), 1), 2 , 2 , 4 , 1) , 1 () , 1) عل من لاتى تى رغب كسى قى كالالى مى رسوت كورىم د وغيره شامل نه كم ورض فرما في طوب -Imp Div

05/6/023 03467845080

we ,	Mr Anner:	"D'
No. 44 97 /ES	OFFICE OF THE REGIONAL POLICE OFFICER DERA ISMAIL KHAN REGION OP00-9280291 Fax # 9280290 <u>St</u> dated D.I.Khan the	$\frac{2}{12} = 26 - \frac{2}{242}$
<u>ORDER</u>		<u>, Aca /06/2023</u>

This order means to disposes off departmental enquiry against Inspector Sabir Hussain NO D/51 of District Police D.I.Khan on the following allegation that :

Being involved in getting illegal gratification and smuggling of NCP Vehicle/Articles/Food commodities. Besides this also view a conversation on social media in which he has to used rank/ designation of Senior Officers with I/C of the Police Check post Khutti in the jurisdiction of PS Dera Town D.I.Khan s safeguard for his such illicit activities. The above commissions/ ommissions falls under the purvies of misconduct and inefficiency that renders him liable to be punished under Khyber Pakhtunkhwa Pesuhwar, police rules 1975 amended 2014.

- i. RPO D.I.Khan servel the defaulter with the charge sheet. Enquiry into the matter was go conducted into through DPO D.I.Khan who in his finding, proved the allegation level against him and recommended for major punishment.
- ii. Later on he was properly issued Final Shoe Cause Notice, to which he replied nd placed on file.
- (ii) He was given in opportunity of personal hearing and after perusal of his written as well as oral explanations, for a same found unsatisfactory.
- iv. Keeping in view, I Abdul Ghafoor Afridi PSP Regional Police Officer, Dera Ismail Khan in exercise of the Powers conferred upon me under Rule- 5(5) of Police Rules 1975, amended 2014 hereby awarded him "major punishment of reduction in rank from inspector to sub-inspector with immediate effect.

Order Announces

(ABDUL GH or afridhpsp Regional Police Officer Dera Ismail Khan

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(a) Const designation and

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No. 44.33 - 47.5Copies to

The inspector General of Police Khyber Pakhtunkhwa Peshawah
DPO D.I.Khan with reference to his office letter No. 362/ES dated 12,06.2023

(ABDUL GHATOOR AFRIDI)PSP Regional Police Officer Dera Ismail Khun 14 Paul il initiation ssaln

BETTER COPY

12/A

OFFICE OF THE REGIONAL POLICE OFFICER DERA ISMAIL KHAN REGION

0966-9280291 Fax# 9280290

dated D.I.Khan the

22/06/2023

<u>ORDER</u>

/ES

No. 4497

This order means to disposes off department enquiry against Inspector Sabir Hussain No D/51 of District Police D.I.Khan on the following allegation that:-

Being involved in getting illegal gratification and smuggling of NCP Vehicle/Articles/Food commodities. Besides this also viral a conversation on social media in which he has to used rank/ designation of Senior Officers with I/C of the Police Check post Khutti in the jurisdiction of PS Dera Town D.I.Khan's safeguard for his such illicit activities. The above commissions/omissions falls under the purvies of misconduct and inefficiency that renders him liable to be punished under Khyber Pakhtunkhwa Peshawar, police rules 1975 amended 2014.

i. RPO D.I.Khan serve the defaulter with the charge sheet. Enquiry into the matter was go conducted into through DPO, DIKhan who in his finding, proved the allegation level against him and recommended for major punishment.

ii. Later on he was properly issued Final Show Cause Notice, to which he replied and placed on file.

- iii. He was given opportunity of personal hearing and after perusal of his written as well as oral explanations, which was found unsatisfactory.
- iv. Keeping in view, I Abdul Ghafoor Afridi PSP Regional Police Officer, Dera Ismail Khan in exercise of the powers conferred upon me under Rule- 5(5) of Police Rules 1975, amended 2014 hereby award him "major punishment of reduction in rank from inspector to sub-inspector with immediate effect".

Order Announced.

- Sol -(ABDUL GHAFOOR AFRIDI) PSP Regional Police Officer, Dera Ismail Khan

No.4498-99

dated: 22/6/2023

Copy to

1. The Inspector General of Police Khyber Pakhtunkhwa, Peshawar.

2. The DPO, D.I.Khan with reference to his office letter No.362/ES dated: 12/6/2023.

(ABDUL GHAFOOR AFRIDI) PSP Regional Police Officer, Dera Ismail Khan

me y



OFFICE OF THE DISTRICT POLICE OFFICER, DERA ISMAIL KHAN © 0966-9280062 Fax # 9280293

3/ec. No.

dated D.I.Khan the

10 6/2023 0 7

To: The Regional Police Officer, Dera Ismail Khan Region

Subject: <u>APPLICATION/APPEAL.</u> Memo:

It is submitted that Sub-Inspector Sabir Hussain No D/51 ,of this district police preferred an application/appeal against the punishment of *Reduction In Rank* awarded to him vide your good office Order Endst.No.4498-99/ES dated 22.06.2023.

His application along with attested copy of order bearing OB No.1544 dated 23.06.2023 is enclosed herewith for your kind perusal & onwards submission to quarter concerned, please.

District Police)Officer. Dera Ismail Khan

NOTE SHEET

01. Inspector Sabir Hussain No.D/51 of this District Police, preferred a departmental appeal / representation against W/RPO DIKhan office order No.4497-99/ES dated 22.06.2023.

02. If approved, may send his appeal to Worthy Inspector General of Police KPK, Peshawar through Worthy Range Chief DIKhan or otherwise, please.

03.

Submitted for order please.

T: CLERK ES:

04.

05.

WORTHY DPO/DIKHAN

بحضور والاشان جناب انسپکٹر جنرل آف پولیس خیبر پختونخواہ

عنوان: اَبْلَ رَمْ بابت دوباره بحالی ریک انسیکژ (محکمہ پولیس)

جناب عالى!

بحواله لیٹرنمبری 4497-99/ES مورخہ: 22.06.2023 جناب RPO صاحب ڈیرہ اساعیل خان نے انسیکٹر کے عہدہ سے Demote کرکے

بسلسله تحکماندانگوائری سب انسپکٹر بنادیا ہے۔ بیر کہ سائل ذیل عرض گزارہے۔ 1۔ سائل 17.03.2010 کو پلبک سروس کمیشن کے تھروبطور PASI بھرتی ہوااور تحکمانہ فرائض سرانجام دیتے ہوئے مورضہ 16.04.2020 کوبطور انسپکٹر کے عہدہ پر پرموٹ کیا جاچکا ہے۔

2۔ بیرکہ سائل نے اپنی سروس کے دوران کو ہاٹ ریٹے ، بنوں ریٹے , CTD اور مقامی ڈسٹر کٹ ڈیرہ اساعیل خان میں بطور Oilo SHO مختلف تھا نہ جات میں ڈیوٹی سرانجام دے چکا ہے اور بدوران سروس کو ہاٹ میں تھانہ جنگل خیل بنوں میں تھا نہ کینٹ اور ڈیرہ اساعیل خان میں تمام تھا نہ جات خاص کر کلا چی ، یارک ، چودھوان اور تھا نہ کینٹ کے مشکل ترین تھا نہ جات میں کا رسر کا رانجام دے چکا ہے۔

3۔ بیرکہ سائل بدوران سروی انتہائی مشکل حالات میں بھی کافی کامیاب وکامران رہااور آفسران بالا کے اعتاد کی وجہ سے کافی کامیابیال خاصل کیں جن میں ۔۔ سائل کو 3 دفعہ جناب PPO صاحب کی طرف سے 1-CC معہ نقدانعام ایں طرح RPO صاحبان و DPO صاحبان کی طرف سے بھی جملہ متعدد 5/50 اچھی کارکردگی کی بنیاد پر سرٹیفیکیٹ معہ نقدانعامات سے نوازا گیا ہے بطور ثبوت جملہ انٹریز لف اعمال نامہ ہیں ۔

4۔ بیہ کہ سائل نے حال ہی میں بطور SHO کینٹ نعینات تھا تو مشہور ٹیلی ٹارفر نچائز ڈیمیتی کواندر (3) یوم ملز مان کوٹریس کر کے شلع کلی مروت علاقہ تحوژی میں ملز مان سے مقابلہ کرنے ہوئے ایک ملزم کوانکونٹر کے دوران ہلاک جبکہ (2) ملز مان برموقع گرفتارکر کے جملہ چوری شدہ مال مسروقہ برآ مد کیا اسی طرح تھانہ یارک میں بھی مشہور دبدنا م زمانہ منشیات فروش وقاتل نوراسلم کواندر (1/2) گھنٹے بدوران گرفتارک مزاحت و مقابلہ پولیس کرنے پر ہلاک کیا اوراہل علاقہ تحوژی میں دلواہا ہ

5۔ بیک برائل مورخہ 2023.05.00 کو اچھی کارکردگی کی بنا پر جناب RPO صاحب نے بطور SDPO صدر سرکل ڈیرہ اساعیل خان تعینات کیا مورخ 25.05.2023 کی شب آفسران بالا کی ہدایت اور عوام کی شکایت پر انچارج کھتی چیک پوسٹ ریاض حسین IHC کو بذرایعہ دانس ایپ واکس میں نے دراید چند ہدایات دیں جو کہ انچارج چیک پوسٹ کی غفلت اور ذاتی عناد کی وجہ سے وائرل کرنے پر من SDPO کو جناب RPO صاحب نے بحوالہ لیٹر نمبر ہدایات دیں جو کہ انچارج چیک پوسٹ کی غفلت اور ذاتی عناد کی وجہ سے وائرل کرنے پر من SDPO کو جناب RPO صاحب نے بحوالہ لیٹر نمبر ہدایات دیں جو کہ انچارج چیک پوسٹ کی غفلت اور ذاتی عناد کی وجہ سے وائرل کرنے پر من SDPO کو جناب RPO صاحب نے بحوالہ لیٹر نمبر میں A497-99/ES مورخہ: 22.06.2023 کو انگوائری میں قصور دارتھ ہر اکر بطور سب انسپکٹر Demote کردیا حالان کہ من سائل کا کسی تسم کا کو کی قصور نہ ہے اور نہ ب

من سائل کی تحکمانہ خدمات کومدنظرر کھتے ہوئے تحکمانہ انکوائری میں دی گٹی سز اکوشتم کرکے واپس اپنے اصل رینک پر بخال کرنے کا حکم صا درفر مایا جادے۔ سائل تا زیست دعا گور ہےگا۔ مورجہ، 2023 6.06

مورد. 2023 سب انسپکرصا برحسین نمبر D-51 متعینہ ڈسٹر کٹ ڈیرہ اسماعیل خان

بكارسركار معروض بول كدمن انسيكثر كو بحوالد أرد رنمبر 99/ES- 4497 مورجه 2023: 26 22 مجاريد جناب RPQ صاحب Demote کیا جا کرسب انسپکٹر بنادیا گیا ہے۔ اندریں جناب ایپل کاحق رکھتے ہوئے آنجناب RPO صاحب کواپیل کرنا

لہٰ زااستد عاہے کہ من سائل کی درخواست بمرادا پیل دفترَ جناب PPO صاحب بھوائی جاوے۔

مورفة. 2023. 26.06

عين نوازش ہوگی۔

-----ارض -انسپکترصابر حسین D-51 در ده اساعیل خان

جناب عالى!

چاہتاہے۔

وكالت نا 110 Incur Service Tribunal Complat Dillchan دعوى ياجرم. لفصيل دعوى بإجرم باعث كريرآنك E & DI. Khan مقدمه مندرجه بالاعنوان بين ابني طرف داسط بيردى وجواب واى برائح يبيشي ياتصفيه مقدمه بنام MUhammad Abdullah Baloch HSC . کو جسب ذیل شرائط پر وکیل ، غرر کیا ہے کہ میں بیش پر خود یا بذا بذرائیہ رو برو عدالت حاضر ہوتا رہوں گا ادر ہر وقت لکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا اگر بیٹی پر مظہر حاضر نہ ہو اور مقدمہ میری غیر حاضری کی وجہ سے سی طور میرے خلاف ہو گیا تو صاحب موصاف اس سے سمی طرح ذمہ دار نہ ہول کے نیز دیک صاحب موصوف صدر مقام تجہری کے علادہ یا تجہری کے اوقات سے پہلے یا پیچھے یا بردر تعطیل بیردی کرنے کے ذمہ دار نہ ہوں کے اور مقدمہ صدر کچبری کے علاوہ اور جگہ ساعت ہونے یا بروز تعطیل یا کچبری کے اوقات کے آگے یا پیچیے چین ہونے یر مظہر کوئی نفصان بنیج تو اس کے ذمہ دار یا اسلے واسطے سمی معادضہ کے ادا کرنے یا محنت نہ واپس کرنے کے مجھی صاحب موصوف ذمہ دار نہ ہوں گے مجھ کو کل ساخته بر داخته صاحب موصوف مثل کرده ذات خود منظور قبول مو کا ادر صاحب موصوف کو عرض دموی یا جواب دموی یا درخواست اجراه اسائ ذکری نظرنانی ایل نگرانی و ہر قسم در همواست ہر قسم کے بیان ویے اور پر تالثی یا راضی نامہ و فیصلہ بر حلف کرنے اقبال دعوی کا بھی اختیار ہو گا اور بصورت مقرر ہونے تاریخ پیش مقدمه مرکور بیرون از کچهری صدر بیردی مقدمه مرکور نظر تانی اتیل و گمرانی و برآ مدگی مقدمه یا منسوقی ذکری یک طرفه یا درخواست تعلم امتناع یا قرتی 🚬 یا گرفتار بی قبل از فصله اجرائے ڈگری مجمی صاحب موصوف کو بشرط ادائیکی علیحدہ مختانہ پیروی کا اختیار ہو گا ادر تمام ساختہ پرداختہ صاحب موصوف مثل کردہ از خود منظور و قبول مو گا ادر بصورت ضرورت صاحب موسوف کو بید بھی اختیار ہو کہ مقدمہ مرکورہ یا اس کے کسی جزو کی کاروائی یا بصورت درخواست نظر تانی ابیل گرانی یا دیگر معامله و قدمه ندکوره کمی دوسرے دیکل یا ہر سٹر کو اپنے بجائے یا اپنے ہمراہ مقرر کریں ادر ایسے مثیر قانون کو بھی ہر امر میں وہی اور دیسے اختیارات حاصل ہوں کے جیسے صاحب موصوف کو حاصل بیں اور دوران مقدمہ میں جو کچھ ہر جانہ التواء پڑے گا وہ صاحب موصوف کا حق ہو گا تمر صاحب موصوف کو پوری فیس تاریخ بیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پودا افتیار ہو گا کہ مقدمہ کی پردی نہ کریں ادر ایس صورت ہیں میرا کوئی مطالبہ سمی فتم کا صاحب موصوف کے پرخلاف تہیں ہوگا لبدادكالت نامدلكهد بإبتا كمسندرب تضمون وكالت نامدين لبإبة اوراحيهي طرح سمجه لبإب اورمنظور ب 03146932557. سن كابيرسنشراندردن بين زر ماركيت بالتديل جانز بوش فريره اساعيل خان فون: 714812