


FORM OF ORDER SHEET

Court of _____

Appeal No. 2596/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	18/12/2023	<p>The appeal of Mr. Sardar Ali presented today by Mr. Umar Farooq Mohmand Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____ . Parcha Peshi is given to the counsel for the appellant.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

APPEAL NO. 2596 /2023

SARDAR ALI VS EDU: DEPTT:

INDEX

S.NO.	DOCUMENTS	ANNEXURE	PAGE
1.	Memo of appeal	1-3
2.	Copy of appointment order dated 27/08/2020	A	4
3.	Copies of Charge Report, Service Book and salaries	B	5-9
4.	Copy of letter dated 02/08/2023	B/1	10
5.	Copy of the letter dated 28/02/2023	C	11
6.	Copy of impugned order dated 16/08/2023	D	12
7.	Copy of departmental appeal	E	13-14
8.	Copy of Service Certificate =	F	15
9.	Wakalat Nama		

APPELLANT

Through:


**UMAR FAROOQ MOHMAND
ADVOCATE HIGH COURT**

1

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 2596 /2023

Mr. Sardar Ali, Ex-Chowkidar
GGPS Ghanam Shah District Mohmand

..... **APPELLANT**

VERSUS

- 1- The Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The Director Elementary & Secondary Education Department, Khyber Pakhtunkhwa, Peshawar.
- 3- District Education Officer, District Mohmand.

..... **RESPONDENTS**

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED ORDER DATED 16/08/2023, WHEREBY THE APPOINTMENT ORDER OF THE APPELLANT WAS DISOWNED BY THE RESPONDENTS AND INACTION OF THE RESPONDENTS BY NOT DECIDING THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN THE STIPULATED PERIOD OF 90 DAYS.

PRAYER:

That on acceptance of this appeal the impugned order dated 16/08/2023 may very kindly be set aside and the appellant may kindly be re-instated into service with all consequential back benefits. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

R/SWETH:

ON FACTS:

1. That appellant was initially appointed as Chowkidar (BPS-3) after proper approval of the District Selection Committee vide order dated 27/08/2020 and after appointment the appellant started performing his duty quite efficiently and to the entire satisfaction of his high ups. Copy of appointment order is attached as annexure.....**A**
2. That after appointment, the appellant submitted his charge report, whereafter service book of the petitioner was prepared and salaries of the appellant has been released. Copies of Charge Report, Service Book and salaries are attached as annexure.....**B**

2

3. That it is important to mention here that the District Account officer District Mohmand through letter dated 02/08/2023, provide full detail of the salaries of the appellant to the respondent department. Copy of letter dated 02/08/2023 is attached as annexure.....**B/1**
4. That while performing his duties, vide letter dated 28/02/2023 the salaries of the appellant has been stopped without any reason and justification, despite the fact that the appellant performing his duties as his concerned school. Copy of the letter dated 28/02/2023 is attached as annexure.....**C**
5. That the appellant approached to the respondent No 3 for release of his monthly salaries, but astonishingly the respondents issued the impugned order dated 16/08/2023, whereby the appointment order of the appellant has been disowned without conducting regular inquiry into the matter. Copy of impugned order dated 16/08/2023 is attached as annexure.....**D**
6. That the appellant feeling aggrieved from the impugned order dated 16/08/2023, the appellant filed Departmental appeal before the competent authority, but no reply has been received so far. Copy of departmental appeal is attached as annexure.....**E**
7. That appellant feeling highly aggrieved from the impugned order dated 16/08/2023 passed by the respondents and having no other remedy but to file the instant appeal on the following grounds amongst the others:-

GROUND:

- A- That impugned order dated 16/08/2023 passed by the respondents is void in nature against the law, facts and norms of natural justice, hence not tenable and is liable to be set aside.
- B- That it is important to mention here that the District Education Officer Female issued Service Certificate to the appellant in respect of his service as the appellant performing his duties under the control of the District Education Officer (F). Copy of Service Certificate is attached as annexure.....**F**
- C- That appellant has not been treated by the respondent Department in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.

(3)

- D- That the codal formalities required for the major penalty has not been fulfilled by the respondents while issuing the impugned order dated 16/08/2023.
- E- That no Show Cause Notice has been issued to the appellant by the respondent, before issuing the impugned order dated 16/08/2023.
- F- That no charge sheet and statement of allegation has not been issued to the appellant before issuing the impugned order dated 16/08/2023.
- G- That no chance of personal hearing/defense has been provided to the appellant before issuing the impugned order.
- H- That, the respondent Department acted in arbitrary and malafide manner while issuing the impugned order dated 16/08/2023.
- I- That, no regular or fact-finding inquiry has been conducted in the matter which is pre-requisite as per the judgments of the Apex Supreme Court of Pakistan in punitive matters.
- J- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

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

Dated: 15/12/2023

APPELLANT
SARDAR ALI

THROUGH:

UMER FAROOQ MOHMAND

MAHMOOD JAN

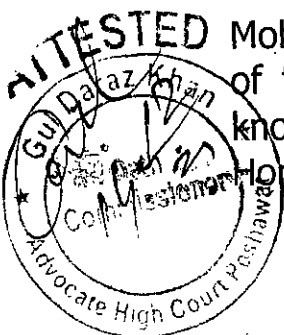
WALEED ADNAN

**&
KHAZAD GUL**

ADVOCATES HIGH COURT

AFFIDAVIT

I, Sardar Ali, Ex-Chowkidar GGPS Ghanam Shah District Mohmand, do hereby solemnly affirm and declare that the contents of the accompanying **Appeal** true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



DEPONENT

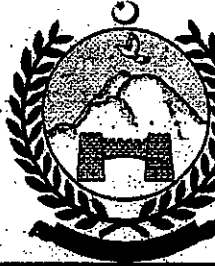


OFFICE OF THE DISTRICT EDUCATION OFFICER
MOHMAND TRIBAL DISTRICT

Ph. No. : 0924-290180

FAX : 924290180

Email : deomohmand@gmail.com



APPOINTMENT ORDER

Consequent upon the approval of the District Selection Committee in its meeting held on 18-07-2020, the competent authority has been pleased to appoint the following candidates as Class IVs against vacant posts on regular basis in BPS-03 of the basic pay scale @ Rs. (9610-390-21310) plus usual allowances as admissible under the rules in the school mentioned against each their names on the terms and conditions given below with effect from their date of taking over charge.

S.#	Name	Father/Hus/Name	Appointed as	Place of posting	Remarks
1.	Sardar All	Ismail Khan	Chowkidar	GGPS Ghanam shah	AVP

TERMS & CONDITIONS

1. NO TA/DA etc is allowed.
2. Charge reports should be submitted to all concerned in duplicate.
3. They will be governed by such rules and regulations as prescribed by the Govt: from time to time for the category of government servants to which they belong.
4. In case of resignation, one-month prior notice should be given by the official concerned otherwise one month pay will be forfeited in lieu thereof.
5. Appointment is subject to the condition that certificates / degrees/ Domicile etc must be verified from the concerned authorities by Principals / Head Masters Concerned if any documents found bogus/fake/forged, he will be terminated and his case will be reported to the law enforcing Department / agencies for further action.
6. They should take charge of their post within 30 days after the issuance of this order.
7. They will produce health fitness and age certificate from the concerned civil surgeon.
8. Their pay shall be released after proper verification of documents & testimonials from the concerned agencies by Principals / Head Masters Concerned.

(Note):

Appointment order shall be verified by the concerned Drawing and Disbursing officers personally from the office of the undersigned before handing over charge to the official.

(JADDI KHAN KHALIL)
District Education Officer
Mohmand Tribal District

Endst: No. 3991-97 / Appointments File / DSC- 18-97-2020 / Dated: 27 / 08 / 2020

Copy to the:-

1. Director of Education Elementary & Secondary Khyber Pakhtunkhwa Peshawar.
2. Director of Education NMD Secretariat Peshawar.
3. District Account Officer Mohmand Tribal District.
4. ADEOs concerned.
5. Candidates Concerned.
6. ENIS Section Local Office.
7. Office record.

District Education Officer,
Tribal District Mohmand

B (S)

CHARGE REPORT

Certified that I, Sardar Ali took over charge against vacant chowkidar post at GGPS Ghanam shah Malik Ismat tehsil Baizai Distt, Mohmand today on 28/08/2020 (AN) vide DEO Mohmand office Endst;3991-97 dated 27/08/2020.

Signature of Govt Servant

Receiving Charge *Sardar Ali*

Designation *Chowkidar*

Shah
District Education Officer
Mohmand

(16)

- 1- Name (نام) SARDAR ALI
- 2- Nationality and Religion Pakistani, MTD
(قومیت اور مذہب)
- 3- Residence Mohamad
(مستقل رہائش)
- 4- Father's name and residence Ismail Khan
(والد کا نام اور پتہ)
- 5- Date of birth by christian era as 01-01-1988
nearly as can be ascertained
(تاریخ پیدائش مطابق سن عیسوی)
- 6- Exact height by measurement 5'6"
(قد و قامت)
- 7- Personal mark of identificator Nil
(نشان شناخت)

8. Left hand/right hand thumb and finger-impressions of (Non-gazetted officer)
(مرد کی صورت میں بائیں اور عورت کی صورت میں دائیں ہاتھ کی انگلیوں کے نشانات)

Little Finger
(چھنگلیا)

Ring Finger
(چھنگلیا کے ساتھ کی انگلی)

Middle Finger
(انگشت میاں)

Fore Finger
(انگشت شہادت)

Thumb
(انگوٹھا)

9. Signature of Govt. Servent
(سرکاری ملازم کے دستخط)

10. Signature and designation of the Head of the Office or other Attesting officer
(تصدیق کنندہ افسر کے دستخط اور مہر)

District Education Officer
Machana Tribal District

Note: The entries in this page should be renewed or re-attested at least every five years and the signatures in lines 9 and 10 should be dated. Finger prints need no be taken after every 5 years under this rule.

اس صفحہ کے مندرجہ کم از کم پانچ سال بعد تصدیق ہونا ضروری ہیں اور نمبر 9 اور 10 میں دستخطوں کے نیچے تاریخ لکھنی چاہئے۔

انگلیوں کے نشانات کے لئے ہر پانچ سال کے بعد تصدیق کی ضرورت نہیں

8

9	10	11	12		13	14	15
Signature and designation of the Head of the office or other attesting officer in attestation of column 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal)	Signature of the head of the office or other Attesting officer	Nature and duration of leave taken	Allocation of period of leave of average pay up to four months (or earned leave net exceeding 120 days) to which leave salary is debitible to another Government	Signature of the Head of the office or other attesting Officer	Reference to any recorded punishment or censure, reward or praised of the Government servants
<p>دستخط افسر مجاز</p> <p>D.E.O MCHIMAT</p>	<p>تاریخ انقطاع ملازمت</p>	<p>وجوہات انقطاع ملازمت ترقی جادلہ یا برطرفی</p>	<p>دستخط افسر مجاز</p>	<p>رخصت کی نوعیت ومعیاد</p>	<p>چار ماہ تک کی رخصت کے لئے اوسط تنخواہ کا تین Government to which debitible گورنمنٹ سے رقم ادا ہوگی</p>	<p>دستخط افسر مجاز</p>	<p>سزایا جزایا غیر مناسب کارگردگی کا ریکارڈ</p>
					<p>Appointed against chao:</p>		
					<p>Post in BPS-03 @Rs. 9610-390-2130</p>		
					<p>Plus usual allowances vide</p>		
					<p>D.E.O office Ends No. 3991-97</p>		
					<p>dated 27/08/2020.</p>		
					<p>District Education Officer</p>		
					<p>Sanidan Ali</p>		
					<p>16mail Khan #21409-8106082-8</p>		
					<p>Appointed As. Chowkidar BPS-03</p>		
					<p>Vide Order No. 3991-97</p>		
					<p>Arrears Drawn Rs. 55384/2</p>		
					<p>W.E.F. 29/8/2020 To 31/8/2020</p>		
					<p>27/8/2020</p>		
					<p>31/8/2020</p>		
					<p>27/8/2020</p>		
					<p>31/8/2020</p>		

00960246 SARDAR ALI Prev. Pers No: Desig: CHOWKIDAR (00100648) Grade: 03 NTN: Buckle No.: Gazetted/Non-Gazetted: N
Father Name: ISMAIL KHAN Date Of Birth: 01.01.1982 Date Of Appointment: 29.08.2020 CNIC: 2140281060825

PAYMENTS	AMOUNT	DEDUCTIONS	AMOUNT	LOAN/FUND	PRINCIPAL	REPAID	BALANCE
0001 Basic Pay	15,420.00	3003 GPF Subscription	770.00-				
1001 House Rent Allowance	2,120.00	3501 Benevolent Fund	600.00-				
1210 Convey Allowance 20	1,785.00	3990 Emp. Edu. Fund KPK	60.00-				
1300 Medical Allowance	1,500.00	4004 R. Benefits & Death C	300.00-				
1528 Unattractive Area A	1,000.00						
2311 Dress Allowance - 20	1,000.00						
2312 Washing Allowance 20	1,000.00						
2313 Integrated Allowance	600.00						
2341 Dispr. Red All 15% 2	1,500.00						
2347 Adhoc Rel Al 15% 22{	1,500.00						

PAYMENTS 27,425.00 DEDUCTIONS 1,730.00- NET PAY 25,695.00 01.02.2023 28.02.2023
Branch Code: 251123 GHALANAI ALLIED BANK LIMITED GHALANAI MOHMAND Accnt.No: 0010076372400014



Office of the
DISTRICT ACCOUNTS OFFICE
MOHMAND AT GHALLANAI
Ph # 0924-290234-176

No: Pay Roll/DAO/Mohmand/2023-24/248-49

Dated: 02.08.2023.

To

The District Education Officer (Male)
District Mohmand at Ghallanai

SUBJECT: ENQUIRY AGAINST GHOST EMPLOYEES.

With reference to your office letter No: 7/Enquiry dated: 13.06.2023 on the subject noted above (copy attached)

In this regard, the details of payment of pay and allowances made to the officials are as under

Name	P.No	Designation	Payment period From : To	Amount	Mode of payment
Ikram Khan	963038	Chowkidar	07/2021 to 02/2023	482907/-	First two months pay through DDO & then through bank.
Muhammad manzar	960248	Chowkidar	07/2021 to 02/2023	472940/-	1 st pay through DDO & then through bank.
Sardar all	960246	Chowkidar	07/2021 to 02/2023	472940/-	1 st pay through DDO & then through bank.
Naseer Khan	960247	Chowkidar	12/2020 to 03/2023	490060/-	1 st pay through DDO & then through bank.
Mansoor Khan	962330	PST	01/2021 to 03/2023	628219/-	First three months pay through DDO & then through bank.

As per SAP record first pay was processed through DDO at that time along with acquaintance roll, furthermore expenditure was also recorded by the DDO concerned at that time as well. Hence it was the responsibility of the DDO concerned to point out these employees in the notice of the High ups at that time.

Furthermore, as per GFR Vol-I and SR Para 197 to 203, It is the responsibility of DDO to maintain record of Non-gazatted Govt. servants i.e. Service Book etc.

Hence the matter may be dealt with at your own end.

DISTRICT ACCOUNTS OFFICER
MOHMAND AT GHALLANAI

Copy forwarded to the Chairman Enquiry Committee Principal GHSS Ghallanai for information and further necessary action.

DISTRICT ACCOUNTS OFFICER
MOHMAND AT GHALLANAI



**OFFICE OF THE SUB-DIVISIONAL EDUCATION OFFICER
(M) LOWER MOHMAND SUBHAN KHWAR
MOHMAND TRIBAL DISTRICT
Email :- sdeomlowermohmand@gmail.com**



To, The District Accounts Officer,
Mohmand Tribal District

Subject: **STOPPAGE OF PAY.**
Memo:

Reference to the subject noted above and to state that the following C/iv servants are absent from duties and drawing their salary in wrong cost Center.MG6013 (Primary) SDEO Male Lower Mohmand Tribal District. Therefore, you are hereby requested to stop the pay of the following C/iv Servants from 01.03.2023, till further order.

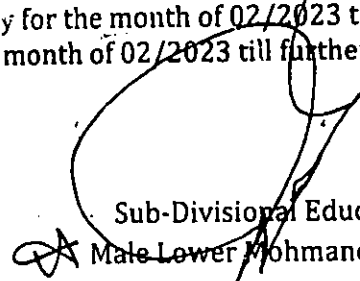
S.No	P.NO	NAME	F/NAME	DESIGNATION	CNIC NO	Branch Code	Account No:	Bank Name	NET
1)	985866	MUHAMMAD ARIF	HASSAN JAN	CHOWK:	1710116781355	1435	4109807761	NBP SHABQADAR	21
2)	985862	FAZLI HADI	MALANG JAN	CHOWK:	2140252508785	1123	10089112910014	ABL GHALLANAI	22
3)	985835	IHSAN ULLAH	PATI KHAN	CHOWK:	3740599661603	80153	3033812951	KHYBER BANK GHALLANAI	21
4)	963038	IKRAM KHAN	AMIR BADSHAH	CHOWK:	2140215503541	80153	153000003383001	KHYBER BANK GHALLANAI	26
5)	960248	MUHAMMAD MANZAR	BASHIR KHAN	CHOWK:	2140646410337	251123	10074630730010	ABL GHALLANAI	25
6)	960246	SARDAR ALI	ISMAIL KHAN	CHOWK:	2140281060825	251123	10076372400J14	ABL GHALLANAI	25
7)	960247	NASEER ALI	AZAM KHAN	CHOWK:	2140697016205	241849	1236615831001274	MCB Ghallanai	26
8)	962330	Mansoor Khan	Taj Munir	PST	2140298993347	251123	0010074075390010	ABL Ghallanai	35

Sub-Divisional Education Officer,
Male Lower Mohmand Tribal District

Endst.No. 514-21 /dated: 28 /02/2023.

Copy forwarded for information to the:-

- 1) District Education officer (M) Mohmand Tribal District.
- 2) Manager of NBP Shabqadar w/r to stop his pay for the month of 02/2023 till further order.
- 3) Manager of BOK & MCB Ghallanai w/r to stop their pay for the month of 02/2023 till further order.
- 4) Manger of ABL Ghallanai w/r to stop their pay for the month of 02/2023 till further order.


Sub-Divisional Education Officer,
Male Lower Mohmand Tribal District

D 12



**OFFICE OF THE DISTRICT EDUCATION OFFICER
DISTRICT MOHMAND**

Email:- deomohmand@gmail.com



OFFICE ORDER

1. Whereas report submitted by the SDEO (M) Lower Mohmand vide his office No.514 dated 28/02/2023 stated that the following persons were getting the salaries from his office MG 6013 but not performing duties at any school under his jurisdiction.
2. And whereas inquiry committee comprising of Mr. Aslam Khan Principal (BS-19) GHSS Ghalliana and Mr. s/clerk of this office was constituted vide this office No.8065-69 dated 29/05/2023.
3. And whereas the inquiry committee submitted its report on 21/07/2023.
4. And whereas the inquiry report was remanded to the inquiry committee with the direction to revisit its report as the report was not based on as per TORs vide this office No.8657 dated 22/07/2023.
5. And whereas the inquiry committee again submitted its report to this office on 9/8/2023 with the recommendation that the following mentioned five persons may be disowned due to the reasons that their names have not been reflected in the working papers, minutes, merit & appointment orders in the record of this office.

Now therefore, under the mandatory provisions & powers conferred under sections No 20 & 21 of the General Clauses Act 1897 amended in 1956, the DEO (M) Mohmand, as the Competent Authority is pleased to disown ab initio the appointment orders of the following persons and declare them as bogus liable to be proceeded as per PPC 419 & 420 by the law enforcing agencies in the interest of public service.

S.No.	Personal No.	Name & Designation	Father's Name
1 ✓	963038	Ikram Khan Chowkidar	Amir Badshah
2 ✓	960248	Muhammad Manzar Chowkidar ✓	Bashir Khan
3 ✓	960246	Sardar Ali Chowkidar ✓	Ismail Khan
4 ✓	960247	Naseer Ali Chowkidar ✓	Azam Khan
5 ✓	962330	Mansoor Khan PST	Taj Munir

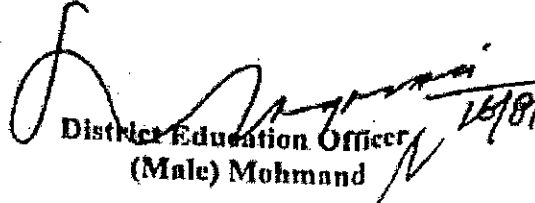
(LIAQAT ALI)
District Education Officer
(Male) Mohmand

Endst No 8824-31 / Estab (Pry)

Dated 16/8/2023

Copy forwarded to the:

- 1) PS to Secretary Elementary & Secondary Education Department Khyber Pakhtunkhwa, Peshawar.
- 2) Director of Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
- 3) Accountant General Khyber Pakhtunkhwa, Peshawar with the request to inquire the matter that who & why their salaries were started in DAO Mohmand office.
- 4) Deputy Commissioner Mohmand.
- 5) District Accounts Officer Mohmand.
- 6) DMO Education Monitoring Authority Mohmand.
- 7) SDEO concerned, being DDO for recovery of the total amount drawn illegally & deposit the same into the Govt. Exchequer as per rules & with the direction to send this order to the above disown persons.
- 8) Office Copy.


District Education Officer
(Male) Mohmand 16/8/23

To

E13

The Director (E&SE) Department,
Khyber Pakhtunkhwa,
Peshawar.

Subject: DEPARTMENTAL APPEAL AGAINST THE IMPUGNED ORDER DATED 16.08.2023 WHEREBY THE APPOINTMENT ORDER OF THE APPELLANT HAS BEEN DISOWN BY THE DISTRICT EDUCATION OFFICER.

Respected Sir,

It is most humbly stated that the appellant was initially appointed through order dated 27.08.2023 as Chowkidar (BPS-03) after proper approval of the District Selection Committee at GGPS Ghanam Shah district Mohmand and submit his charge report started performing his duties as Chowkidar (BPS-03) at concerned school to the entire satisfaction of his high ups. After gone through all legal and codal formalities the salaries of the appellant were also released.

(Copies of the appointment order and service certificate are attached.)

That after appointment till date the appellant performing his duties with zeal and zest and complaint what so ever made against the appellant.

That while performing his duties the department initiated a baseless inquiry against the appellant and on the recommendation of the sad inquiry the impugned order dated 16.08.2023 was issued whereby astonishingly the appointment order of the appellant was disowned. Copy of the impugned order is attached.

That the appellant has not been heard in person and opportunity for justification and clarification of his position has not been provided to the appellant, hence condemned unheard thus violated Article-10A of the constitution of Islamic republic of Pakistan, 1973.

No-2125
Dated-23-08-23

That no conclusive proof in that respect is available with the inquiry officers and neither an opportunity provided to the appellant against that person, whose statement were recovered.

That no show cause nor statement of allegation were issued before issuing the impugned order.

That no regular inquiry has been conducted and harsh punishment was awarded against the appellant.

(14)

That the impugned order dated 16.08.2023 is again illegal and void as the procedure provided by the Khyber Pakhtunkhwa (E&D) Rules, 2011 has not been followed.

It is, therefore, most humbly prayed that on acceptance of this Departmental appeal the impugned order dated 16.08.2023 may very kindly be set aside and the appellant may kindly be re-instated into service with all back benefits.

Dated: 23/8/2023


APPELLANT

Mr. Sardar Ali, Ex-Chwakidar BPS.03,
GGPS Ghanam Shah, Mohmand.



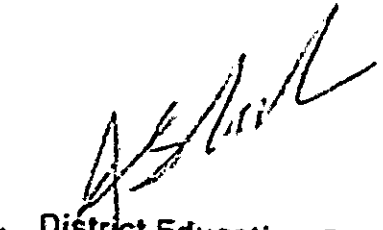
OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE)
MOHMAND TRIBAL DISTRICT

Email : - deomohmandfemale@gmail.com



SERVICE CERTIFICATE.

Certified That Mr. Sardar Ali S/o Ismail Khan working as Chowkidar
Post at GGPS Ghanam Shah Tehsil Baizai District Mohmand since 27/08/2020.
He bears good moral character.


District Education Officer,
Female Mohmand Tribal District

F
(15)

بعدالت

حکمہ کیو اے سی ڈی ایس ایف
کراچی

Appellant
سردار علی
بنام ایجنس

مورخہ
مقدمہ
دعویٰ
جرم

باعث تحریر آنکہ

مقدمہ مندرجہ عنوانہ بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ
آن مقام صدر سروسز ایف ڈی کے حکم نامہ پر ایک
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 تقررات و فیصلہ پر حلف دیے 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 صورت 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 پرداخت منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے
سبب سے ہوگا۔ 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 سندر ہے۔

20

ماہ

المرقوم

العبد العبد

مقام
کے لئے منظور ہے
Attorney and
custodian