

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Appeal No. 582/2019

Date of Institution ... 06.05.2019

Date of Decision ... 30.07.2019

Abdul Sami, Accountant (BPS-16), District Population Welfare Office, Swat.
... (Appellant).

VERSUS

Directorate General Population Welfare Department and six others.
... (Respondents)

Present.

Miss. Roeeda Khan,
Advocate. ... For appellant

MR. HAMID FAROOQ DURRANI, ... CHAIRMAN

JUDGMENTHAMID FAROOQ DURRANI, CHAIRMAN:-

1. The appellant is aggrieved of notification dated 08.11.2017, whereby the private respondents in the appeal were promoted to BPS-17. It is the claim of appellant that the said respondents were juniors to him and that he was unlawfully ignored for the purpose of promotion.
2. Learned counsel for the appellant heard and available record gone through.
3. It transpires from the record that the impugned notification was passed on 08.11.2017 where-against purportedly departmental appeal was preferred by the appellant on 21.12.2018. It is, however, duly noted in the



departmental appeal that the same was fifth in number while copy of any of the previous appeals was not provided with the brief.

4. It is no where provided in the law that a civil servant could file successive departmental appeals. Rather, the appellant was obligated to have preferred a service appeal before the Tribunal upon rejection of his departmental appeal or in case it was not responded to within period provided for the purpose.

5. There is yet another aspect of the case in hand. The departmental appeal, as per the appellant, was preferred on 21.12.2018 while the appeal in hand was filed on 06.05.2019. In the said manner, instant appeal is clearly barred by time allowed for the purpose. Learned counsel, in the context of limitation, referred to judgment reported as 2002 PLC (C.S) 1388 and judgment of this Tribunal in service appeal No. 760/2011. The two cited judgment do not seem to be relevant for the purpose as the service appeals decided thereby were not beyond the period of limitation.

6. In view of the above, the appeal in hand is found meritless, warranting its admission for regular hearing. The same is, therefore, dismissed in limine. File be consigned to the record room.

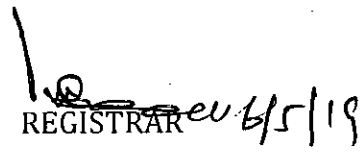
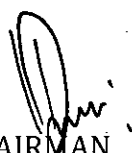



(HAMID FAROOQ DURRANI)
CHAIRMAN

ANNOUNCED
30.07.2019

Form- A
FORM OF ORDER SHEET

Court of _____
Case No. 582/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	06/05/2019	<p>The appeal of Mr. Abdul Sami presented today by Roeeda Khan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-	09/05/19	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>20/06/19</u></p> <p style="text-align: right;"> CHAIRMAN</p>
20.06.2019		<p>Counsel for the appellant present and requested for adjournment. Adjourned to 30.07.2019 for preliminary hearing before S.B.</p> <p style="text-align: right;"> (Muhammad Amin Khan Kundi) Member</p>

BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

In Re S.A No. 582 /2019

Abdul Sami

VERSUS


Directorate General Population Welfare Department and
Others

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9.	Wakalatnama		


APPELLANT

Through


Roeda Khan
Advocate, High Court
Peshawar.

Dated: 30/04/2019

(1)

BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

In Re S.A No. 582/2019

Diary No. 709
Dated 06/5/2019

Abdul Sami Accountant BPS-16, District Population
Welfare Officer, Swat.

Appellant

VERSUS

1. Directorate General Population Welfare Department.
2. District Population Welfare Office Mardan.
3. Secretary Government of Khyber Pakhtunkhwa Population Welfare Department.
4. Mohammad Kashif Khan Account BPS 17 Director General Population Welfare Office Peshawar
5. Amin Khan S/o Saif-ur-Rehman, Assistant Director BPS 17 Director General Population Welfare Office Peshawar
6. Abdul Salam S/O Mohammad Ishaque Assistant Director BPS 17 Director General Population Welfare Office Peshawar
7. Shahid Murad S/O Murad Khan Deputy Demographer BPS 17 District Population Welfare Office Peshawar.

Respondents

Filed to-day

Registrar
45/19

APPEAL U/S-4 OF THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL ACT 1974 AGAINST THE NOTIFICATION DATED 08/11/2017 WHEREBY THE PRIVATE RESPONDENT WERE PROMOTED TO BPS-17 DESPITE BEING JUNIORS AND THE APPELLANT WAS IGNORED AGAINST WHICH THE APPELLANT FILED A DEPARTMENTAL APPEAL WHICH WAS NOT RESPONDED WITHIN STATUTORY PERIOD.

Prayer:-

ON ACCEPTANCE OF THIS SERVICE APPEAL THE IMPUGNED ORDER DATED 08/11/2017 MAY VERY KINDLY BE SET ASIDE AND THE RESPONDENT DEPARTMENT MAY KINDLY BE DIRECTED TO PROMOTE THE APPELLANT BEING ELIGIBLE AND THE RESPONDENT DEPARTMENT MAY FURTHER BE DIRECTED TO MAINTAIN PROPER SENIORITY LIST AS PER RULES 17 OF APT RULES ALONG WITH ALL BACK BENEFITS.

Respectfully Sheweth,

1. That the appellant is initially appointed as Account Assistants BPS-11 on 31/08/2000. (Copy of appointment order is annexed as annexure "A")
2. That the appellant according to merit list was placed at serial No.2 and had obtained 74 marks. (Copy of merit list is attached as annexure "B")
3. That after appointment the appellant performed his duty with hard work and full devotion and no complaint whatsoever has been made against the appellant.
4. That due to hard work and unblemished service record the appellant has been promoted to BPS-16.

3)

5. That the Respondent department issued a notification dated 08/11/2017 whereby the private Respondent has been illegally promoted to BPS 17 while the appellant has been ignored being senior and eligible (**Copy of a promotion orders is annexed as annexure "E"**)
6. That the appellant filed a departmental appeal within 30 days of the communication of the impuned promotim order dated 08/11/2017 which has not been decided by the Respondent department within the statutory period. (**Copy of a departmental appeal is annexed as annexure "F"**)
7. That feeling aggrieved the Appellant prefers the instant service appeal before this Hon'ble Tribunal on the following grounds inter alia:-

GROUND:-

- A. That the appellant has not been treated in accordance with law and hence his rights secured and guaranteed under the Constitution of 1973 were badly violated.
- B. That in accordance with law the Respondents were required to have

4)

processed the case of promotion etc of the appellant also, however it was refused, thus the appellant has been deprived of his vested right of consideration for seniority.

C. That according to Rules 17 of APT, the Respondent department is required to maintain the seniority list on the basis of merit list instead of arrival.

D. That the promotion of the private Respondent is against the rule and law and ignorance of the appellant is a clear cut violation of rules and law.

E. That any other ground not raised here may graciously be allowed to be raised at the time full of arguments on the instant service appeal.


It is therefore, most humbly prayed that on acceptance of this service appeal the impugned order dated 08/11/2017 may very kindly be set aside and the respondent department may kindly be directed to promote the appellant being eligible and the respondent department may further be directed to maintain proper seniority list as per rules 17 of APT rules along with all back benefits.

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*Any other relief not specifically asked for
may also graciously be extended in favour of
the Appellant in the circumstances of the case.*


APPELLANT

Through


Roeeda Khan
Advocate, High Court
Peshawar.

Dated: 30/04/2019

NOTE:-

As per information furnished by my client, no such like appeal for the same petitioner, upon the same subject matter has earlier been filed, prior to the instant one, before this Hon'ble Tribunal.


Advocate.

(6)

BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

In Re S.A No. _____/2019

Abdul Sami

VERSUS


Directorate General Population Welfare Department and Others

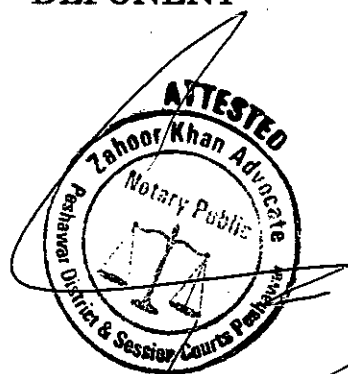
AFFIDAVIT

I, **Abdul Sami Accountant BPS-16, District Population Welfare Officer, Swat**, do hereby solemnly affirm and declare that all the contents of the **instant appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Hon'ble Court.

DEPONENT

Identified by:


Roeeda Khan
Advocate High Court
Peshawar.



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BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

In Re S.A No. _____/2019

Abdul Sami

VERSUS

Directorate General Population Welfare Department and
Others

ADDRESSES OF PARTIES

PETITIONER.


Abdul Sami Accountant BPS-16, District
Population Welfare Officer, Swat.

ADDRESSES OF RESPONDENTS

1. Directorate General Population Welfare
Department.
2. District Population Welfare Office Mardan.
3. Secretary Government of Khyber Pakhtunkhwa
Population Welfare Department.


APPELLANT

Through


Roeeeda Khan
Advocate, High Court
Peshawar.

Dated: 30/04/2019

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BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

In Re S.A No. _____/2019

Abdul Sami

VERSUS

Directorate General Population Welfare Department and
Others

APPLICATION FOR CONDONATION OF DELAY
{IF ANAY}

RESPECTFULLY SHEWETH,

Petitioner submits as under:

1. That the above mentioned appeal is filing before this Hon'ble Tribunal in which no date is fixed for hearing so far.
2. That the appellant submitted departmental appeal within 30 days of the communication of the promotion order dated 08/11/2017.
3. That it is a well settled principle of law and according to the judgment of Supreme Court as well as judgment of this Hon'ble Tribunal rely upon 2002 PLS (CS) Page 1388 and

9

judgment passed in service appeal No: 760/2011 Sanaullah Khan Versus Police Department decided on 15/03/2019 but in matter of promotion seniority pay pension no limitation run against that.

Grounds:

- A. That the impugned orders are void order and no limitation run against the void orders.
- B. That there are number of precedents of the Supreme Court of Pakistan which provides that the cases shall be decided on merits rather than technicalities.

It is, therefore, requested that the limitation period (if any) may kindly be condone in the interest of justice.

Dated: 30/05/2018


APPELLANT

Through



Roeeda Khan

Advocate, High Court.
Peshawar.

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BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

In Re S.A No. _____/2019

Abdul Sami

VERSUS

Directorate General Population Welfare Department and
Others

AFFIDAVIT

I, Abdul Sami Accountant BPS-16, District Population Welfare Officer, Swat, do hereby solemnly affirm and declare on oath that contents of the Condonation application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble court.


Appellant

Identified by:

Advocate, High Court Peshawar.

(11)

Annexure - A
Am "A" pls. Attention Secy for 3

File

(11)

Directorate General
Population Welfare Department
Post Box.No.235

F.No.4(35)/95-2000/Admn.Vol-IV Peshawar, the 31st August,2000.
Subject: APPOINTMENT AS ACCOUNT ASSISTANT (BPS-11)

Reference their applications on the subject noted above.
The following candidates are hereby offered appointment on temporary basis, as Account Assistant (BPS-11), in NWFP, Population Welfare Department on the following terms and conditions.

S/No.	Name of Candidates	District of Domicile	Place of Posting
1.	Waqar Khan S/O Mohammad Afzal	Peshawar	Directorate General, Population Welfare Office, Peshawar.
2.	Abdul Sami S/O Abdul Qayyum	Chitral	Reproductive Health Services Centre-A Chitral.
3.	Mohammad Kashif Khan S/O Mohammad Hashim Khan	Peshawar.	Reproductive Health Services Centre-A, Nowshehra.
4.	Jehanzeb Pervaiz S/O Mohammad Pervaiz	Peshawar	Reproductive Health Services Centre-A, Swat.
5.	Mohammad Aman Ullah S/O Jar Ullah	FATA	Divisional Directorate Population Welfare, Kohat.
6.	Mohammad Khalid Usman S/O Sakhawat Shah	Mardan	Reproductive Health Services Centre-A Mardan.
7.	Waheed Khan S/O Mureed Abbass	Bannu	Reproductive Health Services Centre-A, Bannu.
8.	Azmat Ullah S/O Taseer Ghulam	Bannu	Reproductive Health Services Centre-A, Abbottabad.
9.	Shuja-ul-Mulk S/O Mohammad Shafiq	FR-Kohat	Reproductive Health Services Centre-A, Kohat.
10.	Amin Khan S/O Saif-ur-Rehman	Peshawar.	Divisional Directorate Population Welfare Deptt: Peshawar.
11.	Wazir Mohammad S/O Mohammad Ali	Mardan	Reproductive Health Services Centre-A, Swabi.
12.	Zahir-ud-Din S/o Mohammad Shafi	Peshawar.	Reproductive Health Services Centre-A, Haripur.
13.	Mohammad Tauseef Khan S/O Haq Nawaz.	Mansehra	Divisional Directorate Population Welfare Deptt: A.Abad.
14.	Naeem Khan S/O Gul Qadar Khan.	Karak	Reproductive Health Services Centre-A, DIKhan.
15.	Abdul Salam S/O Mohammad Ishaque.	Peshawar	Reproductive Health Services Centre-A, Hayatabad Medical Complex Peshawar.
16.	Shahid Murad S/O Murad Khan	Peshawar.	Reproductive Health Services Centre-A, Khyber Teaching Hospital Peshawar.

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7073
4/9/2000

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- i) They will be paid the salary of BPS-11, i.e. pays scale Rs. 1725-116-3465 plus other allowance as sanctioned by the Government from time to time.
- ii) They can be posted any where in Pakistan as the competent authority may decide.
- iii) In case of resignation from service they will be bound to give one month notice to the Government prior to the date of relinquishing charge. In case one month's notice is not served an amount equivalent to one month salary will be deposited by the concerned.
- iv) He/She will not be entitled to any TA/DA to join duty.
- v) He/She will be on probation for a period of one year. If no order is issued on the expiry of the first year of probation period, it shall be deemed to have been extended for a further period of one year.
- vi) Their appointment will be subject to Medical Certificate of fitness. Government/ Competent Authority will be competent to vary or add conditions without any notice. The decision of the competent authority will be final and not challengeable before any court of law. Similarly the interpretation of these conditions by the competent authority will be final.

In case they accept the offer of appointment on these terms and conditions they should report for duty to the District Population Welfare Officer mentioned against their name and produce original certificate in connection with their age, qualification, domicile etc.

The offer is valid for 15 days from the date of its receipt and will automatically lapse if no reply is received within due date or you fail to report for duty by this date i.e. 15 days after issue of the offer.

The appointment is subject to verification of your character and antecedents by police authorities.

Sd/-
Director General

Mr./Miss./Mrs. Nahanna Amanullah s/o Jamillah

Bilal Fridge and Electrical Store near Bazar
Hanger

Copy forwarded to:-

1. Addl. Accountant General, P.R. Sub Office Peshawar.
2. PS to Secretary, PW & WDD, Govt. of NWFP, Peshawar.
3. All Divisional Directors, PWD, in NWFP.
4. All DPWOs, in NWFP for information & necessary action.
5. All District Accounts Officer/Agency Account officer, in NWFP.
6. Section Officer(Admn-V), Ministry of Population Welfare, Islamabad, for information w/r to his letter No. 5(4)/2000/Admn-V dated 30.8.2000.

(Amir Jan Khan)
Director(A&C)

*** A.W ***

Amir R^s

(12-1)

(2)

Annexure-4

MERIT LIST OF THIRTY EIGHT SUCCESSFUL CANDIDATES SELECTED FOR APPOINTMENT (PRINCIPAL & ALTERNATE) OBTAINING FIFTY TO SEVENTY SIX MARKS OUT OF HUNDRED MARKS

No.	Name of Candidate	Qualification	Date of Birth	Domestic District	Roll No.	Marks Obtained	Merit Position	Remarks
341	Mr. Waseel Khan X	B.Com	15-12-1973	Peshawar	20	76	1	
275	Mr. Abdul Sami	B.Com	20-5-1977	Chitral	6	74	2	
400	Mr. M. Kasim Kh. S.	M.A.	21-7-1977	Nowshera	1	77	3	
370	Mr. Jofirzehl Fawaz X	B.Com	26-11-1976	Peshawar	210	71	4	
199	Mr. Amirullah	B.E.S.B.Sc.	14-1968	Kohat/AITA	17	70	5	
342	Mr. Muhammad Khalid Usman	M.Si.	13-4-1974	Mardan	63	69	6	
101	Mr. Walshed Khan (Merely from Roll)	B.A. LLB	18-4-1974	Berula	47	68	7	
102	Mr. Armatullah Khan	B.Com.	10-4-1978	Barau	64	67	8	
103	Mr. Saqib ul Mark Ahndi	B.Com.	01-02-1976	Kohat	10	66	9	
77	Mr. Arin Khan	B.Com.	01-02-1976	Peshawar	185	65	10	
307	Mr. Waqar Muhammad	B.Com.	01-06-1977	Peshawar	54	64	11	
337	Mr. Zaheer-ud-Din	B.Sc.	10-02-1978	Peshawar	107	63	12	
273	Mr. Muhammad Tauseef Khan	B.Com.	03-02-1971	Marshehra	2	62	13	
105	Mr. Nazam Khan	B.Com.	02-01-1973	Karak	16	61.5	14	
343	Mr. Abdul Salam	M.Com.	04-01-1972	Peshawar	97	61	15	
106	Mr. Shahid Khairud	B.Com.	08-03-1978	Peshawar	114	60.5	16	
107	Mr. Irfan Ali	B.Com.	02-01-1971	Feroz	15	60	17	
398	Mr. Saifur Raza	B.A.	01-05-1972	Mardan	59	59	18	
399	Mr. Hironullah	B.Com.	18-06-1978	D.I. Khan	28/24	58.5	19	
401	Mr. Akhbar Ahmad	B.A.	17-05-1972	Peshawar	58	58	20	
402	Mr. Inqbar Ahmad	M.Sc.	01-01-1972	Gannu	50	57	21	
408	Mr. Saadur Ali	M.A.	13-04-1978	Suani	4	56.5	22	
308	Mr. Khasimur Abdul Rehman	B.Com.	01-06-1977	Peshawar	180	56	23	
96	Mr. Asim Dyer Yousef	B.Com.	04-01-1974	Mardan	30	55.5	24	
242	Mr. Muhammad Yousef Khan	B.A.		D.I. Khan	7	55	25	

Senior Position

Amir R^s

(12-1)

Amir R^s



GOVERNMENT OF KHYBER PAKHTUNKHWA,
POPULATION WELFARE DEPARTMENT
02nd Floor, Abdul Wali Khan Multiplex, Civil Secretariat, Peshawar

Dated Peshawar the 08th November, 2017

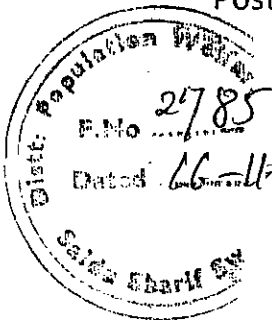
NOTIFICATION

No. SOE (PWD) 4-42/2015-16/DPC:- On the recommendations of the Departmental Promotion Committee and with approval of the Competent Authority, the following ADPWOs, Statistical Investigator & M&E Officers and Accountant (BS-16) are promoted against the posts of Assistant Directors / TPWO / DDPWOs (Non-Tech) / Instructors (Non-Tech) / Accounts Officer / Deputy Demographers (BS-17) on regular basis, whereas Mr. Adnan Saeed, ADPWO at S. No. 11 on acting charge basis, with immediate effect:-

S. No.	Name	Promoted to the post
1	Shah Zeb, ADPWO (BS-16)	AD / TPWO / DDPWO / Instructor (Non-Tech) / Accounts Officer / Dy. Demographer (BS-17) on regular basis.
2	Shahab Ahmad, ADPWO (BS-16)	-do-
3	Zia-ul-Haq, ADPWO (BS-16)	-do-
4	Afsar Khan, Statistical Investigator (BS-16)	-do-
5	Muhammad Tariq, M&E Officer (BS-16)	-do-
6	Abdul Salam, Accountant (BS-16)	-do-
7	Amin Khan, Accountant (BS-16)	-do-
8	Muhammad Kashif Khan, Accountant (BS-16)	-do-
9	Shahid Murad, Accountant (BS-16)	-do-
10	Saleem Ullah Khan, Accountant (BS-16)	-do-
11	Adnan Saeed, ADPWO (BS-16)	AD / TPWO / DDPWO / Instructor (Non-Tech) / Accounts Officer / Dy. Demographer (BS-17) on acting charge basis

The officers at S. No. 1 to 10 above will remain on probation for a period of one year in terms of Rule-15 of Civil Servants (Appointment, Promotion & Transfer) Rules, 1989 extendable for another year.

Posting / transfer orders will be issued later on.



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D/AA
Good wishes to
Acu


SECRETARY
GOVT. OF KHYBER PAKHTUNKHWA
POPULATION WELFARE DEPARTMENT

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5/11/17

Endst: No. SOE(PWD)4-42/2015-16/DPC/2314-2323 Dated Peshawar the 08th Nov: 2017

Copy for information & necessary action to the: -

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director General Population Welfare Department, Peshawar.
3. All District Population Welfare Officers in Khyber Pakhtunkhwa.
4. All District Accounts Officers in Khyber Pakhtunkhwa.
5. PSO to Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
6. PS to Secretary, Establishment Department, Khyber Pakhtunkhwa, Peshawar.
7. PS to Secretary, Population Welfare Department, Khyber Pakhtunkhwa, Peshawar.
8. PA to Advisor to the CM for PWD, Khyber Pakhtunkhwa, Peshawar.
9. Officers concerned.
10. Master file.


SECTION OFFICER (ESTT)
Phone No. 091-9223623

(14) (D)

resnawar.

Through:
Subject: -

Proper Channel:
REQUEST FOR RECTIFICATION OF VOILATED SENIORITY.

Dear Sir.

Reference Provisional seniority list of Accountant issued by your office for appeal/rectification. In this connection your kind attention is invited to the above noted subject with the following submissions: -

1. That I was appointed in the year 2000 by the then DSC as per appointment order enclosed at (Flag-A).
According to the merit list I was placed at serial No. 2 amongst 16- numbers. selected Account Assistant with 74 marks and at serial No.2 of the merit list (Flag-B).
2. That according to the worn-out and obsolete tradition our seniority was determined even in the existence of the merit list which is altogether a gross violation of APT rules, 17 under title of seniority may be read as under: -
 - a) In case of persons appointment by initial recruitment, accordance with the order of merit assigned by the commission (or as the case may be, the departmental selection committee) provided that persons selected for appointment to post in an earliest selection shall rank senior to the person selected in a later selection, and
 - b) In the case of civil servants appointed otherwise, with reference to the date of their continuous regular appointment in the post; provided that civil servants selected for promotion to a higher post in one batch shall, on their promotion to the higher post, retain their enter se seniority as in the lower post.

The above miss-calculation of the department inflicted me long lasting future and mental loss which can't be compromised upon. However, before knocking at the door of the court I humbly request before your good self to observe that "I Abdul Sami Accountant (BPS-16) has now become junior to my junior meaning thereby that as per attached merit list".

The following juniors of my cadres/same batch have been promoted to BPS-17 out of turn: -

1. Mr. Waheed Khan BPS-17
2. Mr. Abdul Salam BPS-17
3. Mr. Ameen Khan BPS-17
4. Mr. M. Kashif Khan BPS-17
5. Mr. Shahid Murad BPS-17

Keeping in view the above. I file this 5th number appeal once for all to rectify the seniority on the basis of merit please.

Enclosed:

1. Offer of appointment (Annexure-A).
2. Merit list. (Annexure-B).
3. List of the promoted Junior Accountants (Annexure-C).
4. Previous (04-Nos) appeals previously regretted without cogent reasons. (Annexure-D).

(Handwritten signature)

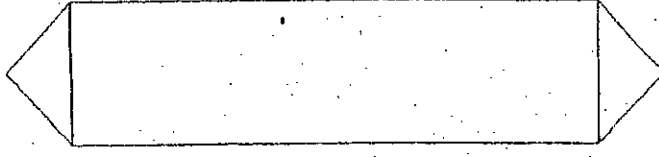
Your's faithfully.

(Handwritten signature)
21/12/2018

(ABDUL SAMI)
Accountant (BPS-16)

District Population Welfare Officer.

بعدالتجانب
عبدالصغیر بنام



امین
الوکیل
محمد

2019ء منجانب

عبدالصغیر بنام

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 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 دینے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ عرضی 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 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 پابندیوں
گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ مندر ہے۔

Stam
Abdul Sami

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العبد العبد
مقام کے لئے منظور ہے۔