

23.02.2015

None present on behalf of the appellant. Called time & again but no body appeared on behalf of the appellant. Moreover, Security and process fee has also not been deposited by the appellant within the prescribed period despite clear directions of the Court. As such, the appeal is dismissed due to non-deposit of security and process fee. File be consigned to the record.

ANNOUNCED
23.02.2015



MEMBER
Camp Court D.I.Khan

30-9-2014. No one is present on behalf appellant.
Notices could not be issued to respondents
due to non-deposit of security & process fee by
the appellant despite repeated directions.
Case to come up for further proceedings
on 29-12-2014 at Camp Court, D.I.K.

Le Sul
Registrar
Camp Court, D.I.K.

29-12-14

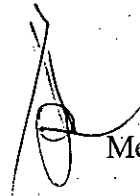
No one is present on behalf of appellant.
Case adjourned to 23-2015 for further proceedings
at Camp Court, D.I.Khan.

Le Sul
Registrar
Camp Court, D.I.K.

Appeal No. 1582/2013
Mr. Muhammad Fairuz


13.03.2014

Counsel for the appellant sent an application for early hearing of the instant appeal through post. Application allowed. Notices be issued to the appellant/counsel for the appellant for preliminary hearing on 24.03.2014 at camp court D.I. Khan instead of 04.04.2014.


Member


6. 24-3-2014.

Counsel for the appellant present and heard. The counsel for the appellant argued that appellant has not been treated in accordance with Law. His reversion order is against Law, facts and violative to E & D. rules, 2011. He was reverted from BPS-2 to BPS-1 on 2-7-2013 against which he filed Departmental appeal on 5-7-2013 but with no reply till lapse of statutory period of 60 days. Hence this appeal on 26-9-2013. Points raised at the bar need consideration. Admit ^{90 to all first legal speeches} process fee and security within 10 days. Thereafter notices be issued to respondents for written reply on 27-5-2014 at camp court, D.I. Khan.


Member
Camp Court, D.I. Khan.

7. 27-5-2014.

No one is present on behalf of appellant. Notices were not issued to respondents due to non-deposit of security and process fee. Notice be issued to the appellant for deposit of process fee and security within 10 days after receipt of notice positively. Case adjourned to 30-9-14 for written reply at Camp Court, D.I. Khan. Notices be issued to the respondents ~~for~~ date fixed when security & process fee is deposited by the appellant.


Member
Camp Court D.I. Khan.

3.

24.01.2014

No one is present on behalf of the appellant. Notice be issued to the appellant/counsel for the appellant for preliminary hearing on 25.02.2014.

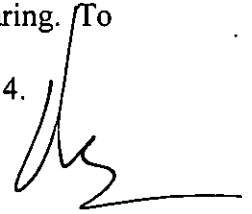


Member

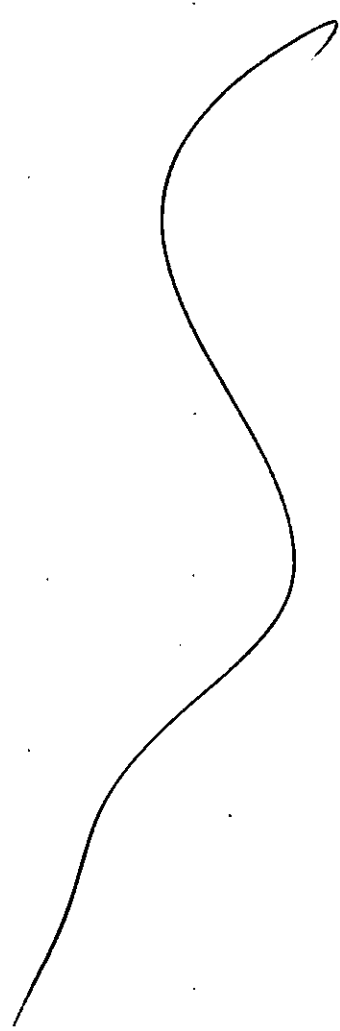
4.

25.02.2014

No one is present on behalf of the appellant despite notices were issued to them. Another fresh notice be issued to the appellant/counsel for the appellant for preliminary hearing. To come up for preliminary hearing, positively, on 04.04.2014.



Member





Form- A

FORM OF ORDER SHEET

Court of _____

Case No. 1582/2013


S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	04/12/2013	<p>The appeal of Mr. Muhammad Haroon Kundi resubmitted today by Mr. Muhammad Idrees Khan Advocate may be entered in the Institution register and put up to the Worthy Chairman for preliminary hearing.</p> <p> REGISTRAR</p>
2	10-12-2013	<p>This case is entrusted to Primary Bench for preliminary hearing to be put up there on <u>24-1-2014</u>.</p> <p> CHAIRMAN</p>

This is an appeal filed by Mr. Muhammad Haroon Kundi today on 26/09/2013 against the impugned order dated 02.07.2013 against which he preferred a departmental appeal on 5.07.2013 which is premature as laid down in an authority reported as 2005-SCMR-890.

As such the instant appeal is returned in original to the appellant/counsel. The appellant would be at liberty to resubmit fresh appeal after maturity of cause of action.

No. 1354/ST,

Dt. 27/9 /2013


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

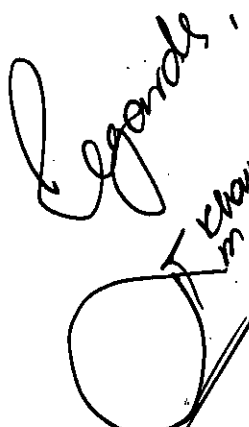
Mr. Muhammad Idrees Khan Adv.
High Court D.I. Khan

Dear Sir!

Submitted as on 14th /13
after the expiry of 90
days, along with 8 extra
copies of appeal and
amendments.

16216
04-12-13

Note:- Impugned order is passed
under Contd D Rules, hence
Limitation period is 60 days.


M. Khan

14.10.2013
ATK

BEFORE THE SERVICES TRIBUNAL KHYBER PAKHTUNKHWA
PESHAWAR

S.T.A no. 1582 of 2013

Mohammad Haroon Kundi Versus Govt of Kpk etc

INDEX

S.No	Particulars of the Documents	Annexure	Pages
1	Memo of grounds of appeal		1-4
2	Copy of suspension orders no. 8574-79/12/PF	I	5
3	Copy of explanation letter dated. 25.02.2013	II	6-7
4	Copy of letter no. 1574-79/3/13/PF dated. 25.03.2013	III	8-9
	Copy of the letter no. 2745-48/5/13/PF, dated. 20.05.2013	IV	10
5	Copy of office order no. 3652-57/7/13/PF dated 02.07.2013	V	11
6	Copy of letter dated. 21.07.2013 no. 2420-22/6/PF	VI	12
7	Copy of departmental appeal alongwith Dak receipts	VII, VIII	13-14
8	Vakalatnama		15

Appellant


Mohammad Haroon Kundi
Through Counsel


Mohammad Idrees Khan
Advocate High Court.

14.10.13

BEFORE THE SERVICES TRIBUNAL KHYBER PAKHTUNKHWA
PESHAWAR

S.T.A no. 1582 of 2013

~~1407~~
~~2.6/9/13~~

Mohammad Haroon Kundi S/o Sameen Jan Ward Attendant (Sweeper presently), Mufi
Mehmood Memorial Teaching Hospital Dera Ismail Khan.

Versus

1. Govt of Kpk through secretary health Peshawar
2. Director General Health services KPK Peshawar.
3. Chief executive health services Dist Dera Ismail Khan.
4. Mr. Shah Jahan Baloch, Medical Superintendent, MMM Teaching Hospital Dera Ismail Khan.
5. Dr. Arifullah, Enquiry officer MMM teaching Hospital D I Khan.
6. District Accounts Officer Dera Ismail Khan.

Service appeal U/S 4 of Khyber Pakhtunkhwa Services Tribunal Act, against the order of the respondent no. 04 bearing no. 3652-57/7/13/PF dated. 02.07.2013 vide which the appellant is permanently reverted/demoted from BPS 02 ward attendant to BPS 01 sweeper, while 116 days alleged absence from duty have been converted to extra ordinary leave without pay.

1907
26/9/13
Prayer:

On acceptance of instant appeal, order of respondent no. 04 bearing no. 3652-57/7/13/PF dated. 02.07.2013 may graciously be set aside declaring the same as null and void and the appellant be restored on his previous position as ward attendant BPS 02 with all back benefits and further directing the respondent no. 04 not to initiate any unlawful proceedings as above in the future.

Re-submitted to ~~409~~
and filed.
4/12/13
Respectfully Sheweth,

1. That on 10.12.2012 vide letter bearing no. 8574-79/12/PF respondent no. 04 suspended the services of the appellant with immediate effect on consequence upon initiation of investigation proceedings by local police in case FIR no. 758 and 1031, lodged against the appellant on 14.08.2012 and 05.11.2012 respectively and eventually the salary of the appellant was stopped causing him monetary loss

- in violation of the rule 5 of E&D rules. Copy of suspension letter is enclosed and marked as annexure I.
2. That all of a sudden on 25.02.2013, respondent no. 04 issued explanation letter (Reminder I) for explanation for absence from duties as per detailed in the letter ibid starting from the month of August 2012 till the period of suspension. Copy of the explanation letter is annexed and marked as annexure II.
 3. That again on 25.03.2013 vide letter bearing no. 1574-79/3/13/PF, appellant was served yet with another letter for explanation for absence from duties starting from Jan, 2013 and floating in descending order till Nov, 2012. It is pertinent to mention here that the respondent no. 04 himself suspended the services of the appellant and the proceedings cited above were initiated during said period. Copy of the letter dated. 25.03.2013 is enclosed as annexure III.
 4. That after two months on 20.05.2013 appellant again served with a punishment order bearing no. 2745-48/5/13/PF, upon consequence of alleged absentees from the duty without issuing any show cause notice or awarding an opportunity for personal hearing and his alleged 116 days absence was converted in extra ordinary leave without pay. Copy of the letter ibid is enclosed and annexed as annexure IV.
 5. That again on 02.07.2013 appellant was served with another impugned office order bearing no. 3652-57/7/13/PF vide which the appellant was permanently reverted/demoted as sweeper BPS 01 from ward attendant BPS 02, w.e.f 01.07.2013 and his alleged 116 days absence from duty was converted to leave without pay. Copy of the letter dated. 02.07.2013 is enclosed as annexure V.
 6. That once again on 21.07.2013 vide letter bearing no. 2420-22/6/PF services already suspended were reinstated as ward attendant by respondent no. 04. Copy of letter ibid is enclosed as annexure VI.
 7. That being aggrieved from the order of the office of respondent no. 04 appellant approached respondents no. 1, 2 and 3 through departmental appeal/ representation dated. 05.07. 2013 whose response is yet not received. Copy of the departmental appeal alongwith Dak receipts dated. 05.07. 2013 are enclosed and marked as annexures VII and VIII.

That appellant being aggrieved from the above cited attitude of the respondent authorities now preferred instant appeal before this Honorable Tribunal inter alia on following grounds,

Grounds:

1. That the orders of respondent no. 04 are against law, facts, violative to E & D rules, issued with ulterior motives to deprive the appellant from his legal rights guaranteed to him under the law.

2. That services of the appellant were suspended since 10.12.2012 and were reinstated on 21.07.2013, but respondent authorities had initiated unlawful proceedings against the appellant during the period of suspension which are liable to be set aside and respondent no. 04 is accountable for his act *ibid*.
3. That neither the appellant is convicted by any court of law nor charged or fined, but respondent no. 04 presumed the appellant as convicted offender, initiated proceedings against the appellant for unseen charges against the appellant with malafide intentions.
4. That neither any showcause notice was issued to the appellant nor has any proper opportunity of personal hearing been awarded to the appellant before passing the impugned order which is unlawful and against the mandatory provisions of Rule 5 of E & D rules and are liable to be set aside on this score alone.
5. That during the period suspension appellant was neither directed to report to any senior officer but only his services were suspended from immediate effect, but respondent no. 04 beside the orders of suspension passed by him served the appellant with impugned order converting the alleged absence of the appellant into leave without pay beside the fact that the appellant remained present on his duties which clearly reveals malafide intentions of the respondent no. 04 toward the appellant.
6. That appellant was served with major punishment of reversion/demotion to lower rank without any cause and reason just on the basis of presumptions and surmises, suffering and directing the appellant with irreparable loss.
7. That appellant is neither convicted in any case by any competent court of law nor punished with fine ever, but respondent no. 04 presuming himself as a Judicial Officer and declaring his office as a court of competent jurisdiction, declaring the appellant as convicted offender, supposing the appellant as defamer to the institution, sentencing him with permanent demotion vide impugned order dated. 02.07.2013, which is in fact against law and respondent no. 04 is accountable to his acts.
8. That appellant counsel may be allowed to raise additional grounds during the course of arguments.

In wake of the submissions made above, it is humbly prayed that instant appeal of the appellant may graciously be accepted as prayed for in the heading of the appeal.

Appellant

Mohammad Haroon Kundi
Through Counsel

Mohammad Idrees Khan
Advocate High Court

Sep 24, 2013

**BEFORE THE SERVICES TRIBUNAL KHYBER PAKHTUNKHWA
PESHAWAR**

S.T.A no. _____ of 2013

Mohammad Haroon Kundi Versus Govt of Kpk etc

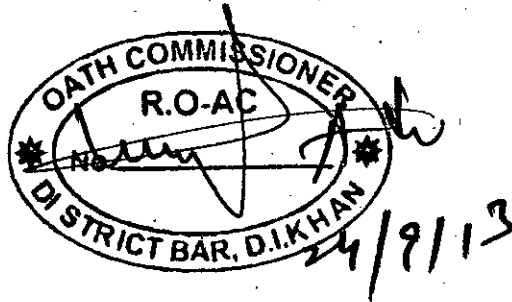
AFFIDAVIT

I, Mohammad Haroon Kundi, do solemnly affirm and declare on oath that the contents of the appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable court.

Sep 24, 2013



Deponent.





I
5

0966-747067
0966-747151-53
0966-747154

Office of the
Medical Superintendent
Mufti Mehmood Memorial Teaching Hospital
Dera Ismail Khan

Office Order:-

Reference office letter No. 14403/Inv: dated 06-12-2012, from the office of District Police Officer (Investigation) DIKhan, the service of Mr. Muhammad Haroon Kundi (Ward Attendant) Mufti Mehmood Memorial Teaching Hospital DIKhan are hereby suspended with immediate effect, due to his arrest under section PPC 489-F, 489-F/420, registered under F.I.R No. 758 dated 14-08-2012 & vide No. 1031 dated 05-11-2012.

Medical Superintendent
Mufti Mehmood Memorial Teaching Hospital
Dera Ismail Khan

No. 8574-79/12/2012 /FF Dated DIKhan the 10/12/2012

Copy forwarded to the:

1. Director General Health Services Khyber Pakhtunkhwa Peshawar.
2. Chief Executive/Principal Gomal Medical College DIKhan.
3. District Police Officer (Investigation) for information with reference to above.
4. DMS Admn MMM Teaching Hospital DIKhan for enquiry and report with in one week to proceed further in the matter.
5. DMS H/R MMM Teaching Hospital DIKhan.
6. Official concerned.

(For information please).

Medical Superintendent
Mufti Mehmood Memorial Teaching Hospital
Dera Ismail Khan

Attested.
10/12/12
Mxc

**Registered Letter
Reminder-I**

II

6



0966-747057
0966-747151-53
0966-747154

Office of the
Medical Superintendent
Mufti Mahmood Memorial Teaching Hospital
Dera Ismail Khan

No. 1072/02/2013 /PF

Dated: 25/02/2013

To

✓ Mr. Haroon Kundi (Ward Attendant),
Medical Unit, MMM Teaching Hospital
Dera Ismail Khan

Subject: **Explanation/Absent from Duties.**

Memo:

- Reference following letter number's, you were absent from duties & not approved before the enquiry officer.

S.No	Letter number & Date	Service Record	Remarks
1 ✓	No.5255/09/12/E-10 Dated 06-09-2012	11 Days Absent Remain absent for 10 days in the Month of August 2012. (7,9,10,11 & from 25 to 31 August 2012)	✓ Not submitted any reply for Explanation.
2 ✓	No. 7959/11/12/E-10 Dated 14-11-2012	Absent for 02 days in the Month of October 2012	✓
3 ✓	No. 8649/12/12/PF Dated 12-12-2012	11 Days Absent (5,6 & from 22 to 30 November)	✓
4 ✓	No. 327/01/13 Dated 15-01-2013	Remain absent for the month of December 2012	✓
5 ✓	No. 448/01/13/PF Dated 21-01-2013	Charge Sheeted for; • Misconduct. • Non Performance of Duties. • Defaming the Institution.	✓
6 ✓	No. 789/02/13/E-10 Dated 11-02-2013	Remain absent for the month of January 2013	✓
7 ✓	No. 8574-79/12/12/PF Dated 10-12-2012	Suspended from Services vide DPO letter No. 14408/Inq: dated 06-12-2012, under FIR No/758 dated 14-08-12 & FIR No. 1031 dated 05-11-2012.	* Remain arrested with Police due to fraudulent activities. * Enquiry performed vide No. 1031 dated 05-11-12

attested
[Signature]

No	Letter number & Date	Service Record	Remarks
8	No. 7609/10/12/PF Dated 30-10-2012	Explanation for forgery & illegal activities.	Enquiry performed & warning issued, vide No. 8025/11/12/PF Dated 17-11-12.
9	No. 2689/12/2012/PF Dated 27-12-2012	Enquiry initiated against him for issuances of bogus cheque & FIR.	Not appeared before the enquiry officer.
10.	---	Enquiry initiated for absent from duties.	In process

Keeping in view the above fact, you are once again directed to explain the reason of your absence & appear before the enquiry officer, with in one week to proceed further in the matter.

In case of non compliance, your services will be considered for termination, under E&D Rules 2011.

[Signature]
 Medical Superintendent
 Mufti Mehmood Memorial Teaching Hospital
 Dera Ismail Khan

No. _____ /PF

Copy forwarded to the :

1. Director General Health Services, Khyber Pakhtunkhwa Peshawar for information please.
2. Chief Executive/Principal Gomal Medical College Dikhan.
3. Dr. Muhammad Arif Ullah DMS (Admn) along with Dr. Shaukat Siyal (Medical Officer) are requested for detail enquiry & report with in one week to proceed further in the matter.

(For information and n/action please)

Medical Superintendent
 Mufti Mehmood Memorial Teaching Hospital
 Dera Ismail Khan

Affidavit
[Signature]
 A.H.C

Registered Remainder III
0966-747067
0966-747151-53
0966-747154



Office of the
Medical Superintendent
Mufti Mehmood Memorial Teaching Hospital
Dera Ismail Khan

No. 1574/3/13/PF

Dated: 25/03/2013

To

✓ The Mr. Haroon Kundi
Ward Attendant
MMM Teaching Hospital
Dera Ismail Khan.

Subject: Explanation/Absent from duties.
Memo:

As per enquiry report submitted by enquiry officer's you are absent from duties since 22-11-2012 till date.

The following explanation letter's were issued by this office with out any response.

S.No	Letter No and Date	Absent Period	Absent days	Remarks
1	No. 789/9/13/E-10 dated 11-02-2012	Absent for the month of January	31 days	Not Submitted any reply <u>1072</u>
2	No. 255/9/12/E-10 dated 06-09-2012	11 days	7,9,10,11 & 25 to 31 August 2012	
3	No. 7609/10/12/PF dated 30-10-2012	Previous Period	One Month 11 days	Explanation/Enquiry order after compliant
4	No. 7609/10/12/PF dated 30-10-2012	Explanation for forgery & illegal activities	-	Enquiry performed
5	No. 7959/11/12/E-10 dated 14-11-2012 No. 8025/11/12/PF dated 17-11-12	Absent for 02 days in the Month of October	-	Warning issued
6	No. 8574-79/12/12/PF dated 10-12-2012 with reference to DPO letter No. 14408/ inquiry date 6-12-2012		Remain in jail	Suspended from service due to FIR No. 758 dated 14-8-12 & No. 1031 dated 5-11-12. *Remain arrested with police due the fraudulent activities.
7	No. 8644/12/12/PF dated 12-12-2012	11 days absent	5,6 & 22 to 30 November	Not submitted any reply of explanation.
8	No. 2389/12/2012/PF dated 27-12-2012	Enquiry initiated against him for issuances of bogus cheque & FIR.		Not appeared before the enquiry officer.

Alleged
[Signature]
20

9

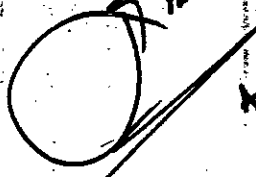
No. 327/01/13 dated 21-01-2013	Remain absent for the month of December 2012	31 days	Not submitted any reply.
No. 448/01/13/PF dated 21-01-2013	Charge Sheeted for: <ul style="list-style-type: none">• Misconduct.• Non Performance of Duties.• Defaming the Institution.		Vide FIR with section PPC 489-F/420 and due to absent from duties
No. 1072/02/2013 dated 25-2-2013	7 Months	Combine explanation	Not submitted any reply
Diary NO.500 dated 20-03-2013	Enquiry initiated for absent from duties.		Not appeared. Recommended for Termination

You have not submitted any proper reply to any of the above said Explanation.

Moreover you were not appeared before the enquiry committee, inspite of repeated letter's.

You are hereby served with this final letter to explain the reason of this unlawful activity, absent from duties and misbehaving attitude with in 03 days; otherwise your services will be terminated as per recommendation submitted by the Enquiry committee, under E&D Rules 2011.


Medical Superintendent
Mufti Mehmood Memorial Teaching Hospital
Dera Ismail Khan

Asst. Secy
to Secy

A.H.C

0966-747067
0966-747151-53
0966-747154



Office of the
Medical Superintendent
Mehmood Memorial Teaching Hospital
Dera Ismail Khan

No. _____

Dated: 20/05/2013

IV


9

10

OFFICE ORDER:

As recommended by enquiry officer's Mr Harron Kundi Ward Attendant Mufti Mehmood Memorial Teaching Hospital DIKhan is served with the following "Minor Punishment" due to his prolong absence from duties.


1. 116 days absent period will be considered as leave without pay, shall be deposited to Govt: treasury or deducted from monthly pay.
2. He will be served with final warning to be issued. In future if he found absent from duties, termination order from service will be issued without being further corresponding's.
3. He will submit a surety bond for "be regular in duty", dully signed by two witness on stamp paper.
4. Proper entries be made in his service book.

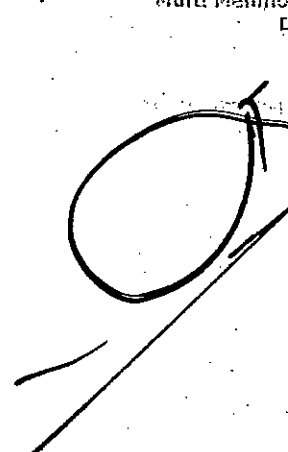

Medical Superintendent
Mufti Mehmood Memorial Teaching Hospital
Dera Ismail Khan

No. 2745-48/5/13/PF Dated DIKhan the 17/05/2013

Copy forwarded to the:

1. DMS HR MMM Teaching Hospital, DIKhan.
2. District Accounts Officer DIKhan.
3. Accountant MMM Teaching Hospital DIKhan.
4. Official concern


Medical Superintendent
Mufti Mehmood Memorial Teaching Hospital
Dera Ismail Khan


A-11C



0966-747067
0966-747151-55
0966-747154



U
①①

Office of the
Medical Superintendent
Mufti Mehmood Memorial Teaching Hospital
Dera Ismail Khan

OFFICE ORDER:

In pursuance of the report of enquiry officer, the following charges against Mr. Haroon Kundi (Ward Attendant) are proved.

- (i) Non performance of duties.
- (ii) Misconduct/Disobedience.
- (iii) Defaming the Institution due to his criminal activities.

However taking lenient view, he is reverted permanently one step down from BPS-02 to BPS-01 w.e.f 01/07/2013. He is re-designated as sweeper w.e.f 01/07/2013. His salary for earlier absence period of 116 days has already been converted into extra ordinary leave without pay.

He will submit a surety bond on stamp paper, duly signed by two witness & verified by Oath Commissioner that he will perform his duties regularly & not indulged himself in illegal/criminal activities in futures. He is also warned to be careful in future & avoid illegal/criminal activities, otherwise his services will be terminated without going into further proceedings.

Medical Superintendent
Mufti Mehmood Memorial Teaching Hospital
Dera Ismail Khan

No. 3652-57/7/13 / PF Dated: DIKhan the 02/07/2013

Copy forwarded to the:

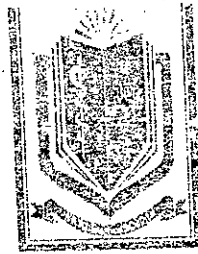
- 1. DMS H/R MMM Teaching Hospital DIKhan.
- 2. District Account Officer, DIKhan.
- 3. Accounts Officer MMM, Teaching Hospital DIKhan.
- 4. Accountant MMM Teaching Hospital DIKhan.
- 5. Official Concerned for information.
- 6. Incharge Supervisor, MMM Teaching Hospital DIKhan.

(For information & compliance)

Handwritten signatures and dates:
 [Large signature]
 [Signature]
 [Signature]
 02/07/13
 Medical Superintendent
 Mufti Mehmood Memorial Teaching Hospital
 Dera Ismail Khan



0966-747067
0966-747151-53
0966-747154



Office of the
Medical Superintendent
Mehmood Memorial Teaching Hospital
Dera Ismail Khan

VI

(12)

OFFICE ORDER:

Consequence upon Suspension under FIR No-329 dated 27-05-2013, in respect of Mr. Haroon Kundi S/O Samin Jan Ward Attendant.

After getting Bail, he has submitted his arrival on 20-06-2013.

His service are re-instated with effect from 20-06-2013.

Medical Superintendent
Mufti Mehmood Memorial Teaching Hospital
Dera Ismail Khan

No. 3420-22/06/13/PF Dated

DIKhan the 21/07/2013

Copy forwarded to the:

1. District Accounts Officer DIKhan.
2. Accountant MMM Teaching Hospital DIKhan.
3. Official concern.

(For information)

Medical Superintendent
Mufti Mehmood Memorial Teaching Hospital
Dera Ismail Khan

attested.
F. Ismail

To:

1. District Officer Health/Chief Executive Officer
Health D.I.Khan

VII

13

2. The Director General,
Health Services,
K.P.K. Peshawar.

3. The Secretary Health,
Govt of K.P.K. Peshawar.

Subject: Departmental Appeal/Representation
against order bearing No.3652-57/7/13/
PF dated.2.7.2013 issued by Medical
Superintendent Mufti Mahmood Memorial
Teaching Hospital D.I.Khan.

Respected Sir,

Kindly reference office order No.3652-57/
//13/PF dated.2.7.2013 issued by Medical Superintendent
M.M.M Teaching Hospital D.I.Khan vide which 116 days
Extra ordinary leave sanctioned in favour of the applicant
with a one step demotion Basic pay scale O2 to BPS -1
as Sweeper. (Copy of the Office order is enclosed)

In this connection I may wish to inform
your honour that I have illegally and unlawfully tortured
There is no any dent and stigma on the service record of
the Applicant.

The Applicant has served the Department
to entire satisfaction of his superiors .No any show
cause notice , enquiry have been conducted against the
Applicant. Beside this Applicant have not been heard
in person.

It is therefore humbly prayed that the
above referred office order may kindly be recalled
cancelled and obliterated.

Your Most Obedient.

Haroon Kundi (Ward Attendant)
Mufti Mahmood Memorial and teaching
Hospital D.I.Khan.

Haroon Kundi
7/13/13
Haroon Kundi

No. 1360

For Insurance Notice see reverse. Stamps affixed except in case of uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgment is due.

(14)

(14)

Received a registered letter addressed to

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

Insured for Rs. (in figures) Weight Ps. (in words) Name and address of sender

If insured.

No. 1361

For Insurance Notice see reverse. Stamps affixed except in case of uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgment is due.

98 Ps.

Received a registered letter addressed to

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

Insured for Rs. (in figures) Weight Ps. (in words) Name and address of sender

If insured.

No. 1362

For Insurance Notice see reverse. Stamps affixed except in case of uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgment is due.

Rs.

Received a registered letter addressed to

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

Insured for Rs. (in figures) Weight Ps. (in words) Name and address of sender

If insured.

Handwritten signature and initials, including "A.H.C." and a large circular mark.

وکالت نامہ

کورت فیس	قیمت ایک روپیہ
----------	-------------------

بعدالت جناب **ہدایت سرگزی اریہونل** - **پلہ پختونخواہ** - **لنڈن**

منجانب **اسد اللہ**

بنام **سرگزی**

دعوی یا جرم **محمد یاسین سرگزی اریہونل**

تفصیل دعوی یا جرم

باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے واسطے پیروی و طرفداری برائے پیشی یا تصفیہ مقدمہ بمقام **ڈیپٹی سیکریٹری** **محمد یاسین سرگزی اریہونل**

کو حسب ذیل شرائط پر وکیل مقرر کیا ہے، کہ میں ہر قسمی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوتا ہوں گا۔ اور ہر وقت پکارے جانے مقدمہ وکیل صاحب موصوف کا اطلاع دیکر حاضر عدالت کروں گا، اگر پیشی پر منظر حاضر نہ ہوں اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور پر میرے برخلاف ہو گیا۔ تو صاحب موصوف اسکے کسی طرح ذمہ دار نہ ہوں گے، نیز وکیل صاحب موصوف صدر مقام پکھری کے علاوہ کسی جگہ یا پکھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل پیروی کرنے کے ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام پکھری کے علاوہ کسی جگہ یا پکھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل پیروی کرنے کے ذمہ دار نہ ہوں گے۔ اور مقدمہ صدر پکھری کے علاوہ اور جگہ سماعت ہونے یا بروز تعطیل یا پکھری کے اوقات سے پہلے یا پیچھے پیش ہونے پر منظر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا جبران واپس کرنے کے بھی موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پرداخت صاحب موصوف مثل کروہ ذات خود منظور قبول ہوگا۔ اور صاحب موصوف کو عرضی دعویٰ یا جواب دعویٰ یا درخواست اجراء ڈگری و نظر ثانی اپیل و گمرانی و جرم درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کرانے اور جرم کاروبار وصول کرنے اور رسید دینے اور داخل کرنے اور جرم کے بیان دینے اور اس پر ٹاشی یا راشی نامہ و فیصلہ بر حلف کرنے، اقبال دعویٰ کا بھی اختیار ہوگا۔ اور بصورت مقرر ہونے تاریخ پیشی مقدمہ مذکورہ پیر دن از پکھری صدر پیروی مقدمہ مذکورہ نظر ثانی اپیل و گمرانی و برآمدگی مقدمہ یا منسوقی ڈگری کی طرف یا درخواست حکم اختتامی یا قرتی یا گرفتاری قبل از فیصلہ اجراء ڈگری بھی صاحب موصوف کو بشرط ادائیگی علیحدہ عتقاد پیروی کا اختیار ہوگا اور تمام ساختہ پرداخت صاحب موصوف مثل کروہ ذات خود منظور قبول ہوگا۔ اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ مذکورہ یا اسکے کسی جزو کی کاروائی یا بصورت درخواست نظر ثانی اپیل یا گمرانی یا دیگر معاملہ مقدمہ مذکورہ کسی دوسرے وکیل یا پیر منکر اپنے ہجائے یا اپنے ہمراہ مقرر کریں۔ اور ایسے مشیر قانون کو بھی ہر امر میں وہی اور ویسے اختیارات حاصل ہوں گے، جیسے صاحب موصوف کو حاصل ہیں، اور دوران مقدمہ میں جو کچھ ہر جانہ التواء پڑے گا وہ صاحب موصوف کا حق ہوگا۔ مگر صاحب موصوف کو پوری فیس و خرچہ پیشی سے پہلے ادا نہ کروں گا۔ تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی پیروی نہ کریں اور ایسی صورت میں پیر کوئی مصلحت یا کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔

مورخہ **24** مارچ **2013**

مضمون وکالت نامہ سن لیا ہے۔ اور اچھی طرح سمجھا گیا ہے۔ اور منظور ہے۔

العبد العبد العبد

سید

Accepted

Signature

Chau

Adv. H.C.