

FORM OF ORDER SHEET

Case No.

Appeal No.

362/2024

S.No.

Date of order  
proceedings

Order or other proceedings with signature of judge

3

11/03/2024

The appeal of Mr. Muhammad Idrees resubmitted today by Hira Babar Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 13.03.2024. Parcha Peshi is given to counsel for the appellant.

By the order of Chairman



REGISTRAR

**IN THE COURT OF SERVICE TRIBUNAL PESHAWAR**

**M IDREES**

**VERSUS**

**POLICE DEPTT BANNU**

**APPLICATION TO FILE APPEAL IN KP SERVICE TRIBUNAL  
PESHAWAR BENCH PESHAWAR**

**RESPECTFULLY SHEWETH,**

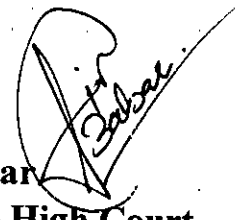
1. That the above titled case has been submitted and filed in KP Service Tribunal Peshawar.
2. That the cases submitted in Peshawar are directed to be sent to their specific stations and this titled case might also get sent to Banru Bench.
3. That being a female lawyer it's not possible for me to travel all the way to Bannu.

*It is therefore most humbly prayed that on acceptance of this application the case mentioned above may kindly be filed in Main Bench Peshawar.*

Through

Appellant

**Hira Babar**  
**Advocate High Court**  
**Peshawar**




1. The copy of the documents received today i.e. on 19.02.2024 is incomplete. The copy of the documents is returned to the counsel for the appellant for completion and submission within 25 days.

2. According to sub-rule-4 of rule-6 of Khyber Pakhtunkhwa Service Tribunal rules 1974 respondents no. 1, 3, & 5 are un-necessary/improper parties, in light of the above and on the written direction of the Worthy Chairman the above respondents number be deleted/struck out from the list of respondents.

- ✓ Appeal has not been flagged/marked with annexures
- ✓ Memorandum of appeal is not signed by the appellant.
- ✓ Affidavit is not attested by the Oath Commissioner.
- ⑤ Grounds of appeal is incomplete be complete according to the rule-6 of the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- ⑥ Annexures of appeal which may be replaced by legible/better one.
- 7 Copy of order of the justice mentioned in the memo of appeal is not attached with the appeal.
- ⑧ Copy of order of the justice mentioned in para-f of the grounds of appeal is not attached with the appeal be placed on it.

384  
20/02

  
20/2/24  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Hira Babar Adv.  
High Court Peshawar

Pro-Submitt  


**BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR**

Appeal No. 362/2024

Muhammad Idrees

VERSUS

Superintendent of Police Investigation Police Headquarter, Bannu & others

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APPELLANT

THROUGH

  
HIRA BABAR

Advocate High Court

Peshawar

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**BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR**

Appeal No.

362/2024

Muhammad Idrees S/o Zar Wali Shah R/o Tehsil and District Bannu Ex Constable  
No 39, District Police, Bannu.

APPELLANT

VERSUS

1. Superintendent of Police Investigation Police Headquarter, Bannu.
2. Regional Police Officer, Bannu Region, Bannu.

RESPONDENTS

**APPEAL UNDER SECTION 4 OF KPK SERVICE TRIBUNAL ACT, 1974 AGAINST IMPUGNED ORDER DATED 11-09-2023, PASSED BY RESPONDENT NO-01 WHEREBY THE APPELLANT HAS BEEN AWARDED THE MAJOR PENALTY OF DISMISSAL FROM SERVICE AND HIS DEPARTMENTAL APPEAL AGAINST THE IMPUNGED ORDER IBID WAS REJECTED BY RESPONDENT NO-04 VIDE IMPUGNED FINAL ORDER DATED 19-01-2024, DISREGARD OF THE RULES AND PRINCIPLES OF NATURAL JUSTICE**

Respectfully Sheweth:

**FACTS OF THE CASE**

1. That the appellant was appointed as constable in the police department in the year of 2007 and during his 17 years of active service he has got

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no adverse remarks or any other charge and as such having an excellent record and spot less service.

2. That the stroke of misfortune hit appellant when he was charged in false and concocted criminal FIR No 98 on dated 02-04-2023 U/S 9D CNSA, Police Station Jerma Kohat. **(copy of the FIR is annexed as annexure "A")**
3. That the allegation of the appellant was that he was involved in smuggling of heroin from Peshawar to Bannu where illegal departmental inquiry was conducted by Respondent No 02. **(Copies are enclosed as B & C).**
4. That there after the show cause notice was issued to the appellant by respondent no 03 which the appellant also replied refuting the allegations and explaining the true facts and circumstances but the respondent turned a deaf ear. **(copy of show cause notice and finding reports are enclosed as annexure D, E AND E<sup>2</sup>)**
5. That without considering the reply and record the appellant was awarded the major penalty of dismissal from service by Respondent No 01 as well. **(copy of the order is enclosed as annexure F)**
6. That feeling peeved the appellant filed departmental appeal on 09-10-2023 which was also rejected on dated 09-01-2024. **(copies are enclosed as annexure as G, H and I)**
7. That in order to seek the justice qua his unlawful dismissal order passed by the respondent 1 to 04, the appellant now approaches this Hon'ble Court/ Tribunal for setting aside both the impugned orders and reinstatement in service on the following grounds;

**GROUND:**

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- A. That both the orders of the respondent No. 1 & 4 are against the law, facts and violation of the procedure as provided under the law, hence the same is liable to be struck down,
- B. That so-called departmental inquiry proceeding has not been initiated in accordance with proper procedure, and the entire proceeding has been completed in haphazard manner, hence the same is having no sanctity in the eye of law.
- C. That nor proper opportunity of hearing was provided to the appellant, as such the basic principle of natural justice is violated in the case of the appellant.
- D. That even no one was examined in presence of the appellant nor was ever the appellant provided opportunity of personal hearing and no evidence was collected in support of the allegations.
- E. That preliminary inquiry has no value and regular inquiry is mandatory in case major penalty is awarded to an employee.
- F. That the appellant has been given relief and has granted bail by the Hon'ble Peshawar High Court Peshawar as his case is of further inquiry and this no longer required to the authorities.
- G. That being a regular employee the appellant has served the department honestly and whole heartedly for sufficient time, and perform his duties candidly and unequivocally thus the appellant cannot be dismissed from his service with a stroke of pen as done by the respondent No. 1 & 2.
- H. That the conduct of the respondent No. 1 & 2 clearly suggests that appellant has highly been discriminated which is not permissible under the constitution of Islamic Republic of Pakistan 1973.

(4)

- I. That due to absence of any prove against the appellant, the dismissal orders of the appellant shows the reason of his implication in a false and concocted case, thus the same cannot be treated a ground for termination of the services of the appellant
- J. The contents of the departmental appeal/representation may be considered as integral part of the instant appeal.
- K. That on the permission of this Hon, able court the appellant may urge other additional ground if any, at the time of arguments.

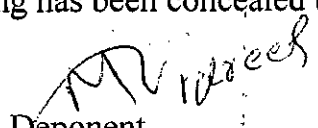
*It is therefore most humbly prayed that On acceptance of the appeal both the impugned orders of respondent No. 01 to 04 dated: 11-09-2023 & 19-01-2024, may graciously be set aside, and the appellant may graciously be reinstated in service with all back benefits etc, and any other orders deem proper may also be passed in the matter*

Dated : 19-02-2024

APPELLANT  
THROUGH  
HIRA BABAR  
Advocate High Court  
Peshawar

**AFFIDAVIT:**

I, mentioned above, do hereby declare on oath that the contents of this appeal is true and correct to the best of my knowledge and nothing has been concealed there in

  
Deponent



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**BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR**

Appeal No. \_\_\_\_\_

Muhammad Idrees

VERSUS

Superintendent of Police Investigation Police Headquarter, Bannu & others

**ADDRESSES OF PARTIES**

***PETITIONER.***

Muhammad Idrees S/o Zar Wali Shah R/o Tehsil and District Bannu Ex Constable  
No 39, District Police.

**ADDRESSES OF RESPONDENTS**

1. Superintendent of Police Investigation Police Headquarter, Bannu.
2. Regional Police Officer, Bannu Region, Bannu.

APPELLANT

THROUGH

  
HIRA BABAR

Advocate High Court

Peshawar



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SUMMARY OF ALLEGATIONS:

I. Mujeeb-Ur-Rehman, Superintendent of Police, Investigation Bannu, as competent authority, am of the opinion that FC Muhammad Idrees No. 39 (suspended), has rendered himself liable to be proceeded against as he has committed the following misconduct within the meaning of Police Rules (As amended vide Khyber Pakhtunkhwa Gazette Notification No. 27<sup>th</sup> of August, 2014):-

SUMMARY OF ALLEGATIONS:

- That the (FC Muhammad Idrees No. 39) has been charged in case FIR No. 48, dated 02.04.2023 u/s 9DCNSA PS Jarra, District Kohat in smuggling of heroin from Peshawar to Bannu.
- Such an act on you part is against service discipline and amounts to gross misconduct.
- 1. For the purpose of scrutinizing of conduct of the said accused with reference to the above allegations Mr. Farooq Khan DSP Investigation, Bannu is appointed as Enquiry Officer.
- 2. The Enquiry Officer shall provide reasonable opportunity of hearing to the accused, record statements etc and findings with the targeted days after the receipt of this order.
- 3. The accused shall join the proceedings on the date, time & place fixed by the Enquiry Officer.

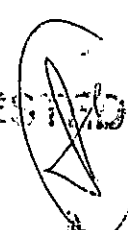
  
Superintendent of Police,  
Investigation, Bannu.

No. 254/24 dated 04/04/23

Copies to:-

1. The Enquiry Officer.
  2. The accused Officer/ Official.
- ~~LCM 7~~

ATTACHED



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C C

CHARGE SHEET:

L. Mujeeb-Ur-Rehman, Superintendent of Police, Investigation Bannu, as competent authority, hereby charge you, FC Muhammad Idress No. 39 (suspended), for the purpose of department enquiry proceedings as follows:-

- > That you have been charged in case FIR No. 98 dated 02.04.2023 w/s 9DCNSA PS Janna, District Kohat in smuggling of heroin from Peshawar to Bannu.
- > Such an act on your part is against service discipline and amounts to gross misconduct.
1. By reason of the above you appear to be guilty of misconduct under the Police Rules, 1975 (As amended vide Khyber Pakhtunkhwa gazette Notification, No. 27<sup>th</sup> of August, 2014) and have rendered yourself liable to all or any of the penalties specified in the said rules.
2. You are therefore, directed to submit your defense within 07 days of the receipt of this Charge Sheet to the enquiry officer.
3. Your written defense, if any, should reach to the Enquiry Officer within the specified period, failing which, it shall be presumed that you have no defense to put in and in that case ex-parte action shall be taken against you.
4. You are directed to intimate whether you desire to be heard in person.
5. A statement of allegation is enclosed.

Superintendent of Police  
Investigation, Bannu.

~~LAH~~

ATTESTED

(9) D 11

FINAL SHOW CAUSE NOTICE

I, Mujeeb-Ur-Rehman, Superintendent of Police Investigation, Bannu, as competent authority, under Rule 5(-) of the Khyber Pakhtunkhwa Police Rules-1975 (As amended vide Khyber Pakhtunkhwa gazette Notification No.27<sup>th</sup> of August 2014) for the following misconduct hereby serve upon you this final show cause notice.

- That you have been charged in case FIR No. 98 dated 02.04.2023 u/s 9DCNSA PS Jarra, District Kohat in smuggling of heroin from Peshawar to Bannu.
- Such an act on your part is against service discipline and amounts to gross misconduct.

That consequent upon the completion of enquiry conducted through Enquiry Officer DSP Investigation, Bannu and ongoing through the findings and recommendations of Enquiry officer, on the consising record of connected papers, I am satisfied that you have committed gross misconduct by proving allegations and you have committed the above commission and omission.

As a result, I, as competent authority, have tentatively decided to impose upon you one or more punishments including dismissal as specified in the rules.

You are, therefore, required to Show Cause, as to why the aforesaid penalty should not be imposed upon you.

If no reply to this notice is received within Seven (07) days of its delivery, it shall be presumed that you have no defence to put in and in that case an ex parte action shall be taken against you.

The copy of the findings of the Enquiry Officer is enclosed.

*[Handwritten signature]*  
30/07/23

(Mujeeb-Ur-Rehman)  
Superintendent of Police  
Investigation, Bannu.

ATTESTED



میں نے اپنا سونے کا کو بیٹھا یا۔ جب ہتھیاروں کو ہاتھ میں لیا تو وہاں پرنا کہ بندی کئے ہوئے پوتیس نے مجھے اشارہ دیکر گاڑی کو ہٹا کر پورے گاڑی کو تھیر دیا۔ پتھج کر گاڑی میں موجود کیمکس پاؤڈر کی کنسٹیبل اور پیس کے خلاف FIR درج کی جبکہ میرے خلاف تھانہ لاچی میں نمبر 101 مورخہ 02.04.2023 جرمہ 9D-CNSA تھانہ لاچی درج رجسٹر آئی۔ کنسٹیبل اور پیس کو جو FIR دیا ہے وہ بنکس غلط دیا ہے کیونکہ وہ اس کا ہرگز قصور دار نہیں ہے۔ (تمام بیانات ہمراہ لف ہے)

نالیجاہ!

ہر کہ وہ تھوڑی ہی میں ملزم ڈرائیور مدثر خان کے ساتھ سوال جواب ملے جس میں اس نے بتایا کہ الزام علیہ کنسٹیبل اور پیس نمبر 39 اور عرفان نامی شخص جو کہ بیرون ملک سے آ رہا تھا، تینوں آپس میں ایک دوسرے کو جانتے ہیں جبکہ الزام علیہ اپنے بیان میں اس سے انکار کرتے ہیں۔ وقت وقوعہ سوائے الزام علیہ کنسٹیبل اور پیس اور عرفان کے کوئی اور سواری گاڑی میں موجود نہ تھی۔ الزام علیہ نے اپنے بیان میں مشی اڈا کا ذکر کیا ہے کہ مشن ہاؤس میں سے مشی نے سٹیجوائی تھی جبکہ گاڑی بڑا بندوق مدثر ملزم مقدمہ علت نمبر 101 بالا تھانہ لاچی نہ ہی ٹیکسی ڈرائیور ہے اور نیواڈا ہاؤس سے خفیہ طور پر لٹی معلومات کے مطابق، ملزم بالا کسی بھی ٹیکسی اڈا میں کسی بھی قسم کی رجسٹریشن نہیں رکھتا۔ مزید یہ کہ الزام علیہ سے ملزم مدثر کا باہلہ پشاور میں ہوا تھا جبکہ کنسٹیبل مذکورہ نے بنوں میں رابطے کا بیانی کیا۔ دونوں کے بیان میں کافی تضاد پائی جاتی ہے اور تفتیشی افسر مقدمہ نمبر 98 مورخہ 02.04.2023 نے اپنے تحریری بیان میں کنسٹیبل اور پیس نمبر 39 کو گنہگار پایا جا کر چالان عمل دیا ہے۔ تمام بیانات اور خفیہ طور پر لٹی معلومات کے تناظر میں الزام علیہ کنسٹیبل اور پیس نمبر 39 اور ملزم مدثر خان نشیات کے کاروبار میں عرصہ سے ملوث ہے اور وقوعہ کے روز بھی پشاور ہے بنوں بیرون نہیں کر رہے تھے۔

الزام علیہ کنسٹیبل اور پیس نمبر 39 انکوائری ہذا میں قصور دار پایا جا کر Major Punishment کی سزا دینے کی جاتی ہے۔ انکوائری رپورٹ مرتب ہو کر گزارش ہے۔

ڈپٹی سپرنٹنڈنٹ آف پولیس  
انور گیشن ضلع بنوں

Handwritten signature and stamp area with text including 'S. J. B. B. B.' and other illegible markings.

ATTESTED

(12)

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ORDER.

This order will dispose the departmental enquiry conducted against Constable Muhammad Idrees Khan No.39/Inv. on the following allegations within the meaning of disciplinary rules 1975(amended vide Notification No. 3859/Legal dated 27.08.2014) Government of Khyber Pakhtunkhwa, Police Department:

- That Constable Muhammad Idrees No.39 of Investigation Staff, Bannu involved/charged in Case FIR No. 98, dated 02.04.2023 u/s 9 DCNSA PS Lachi District Kohat in smuggling of heroin from Peshawar to Bannu.
- This act on his part is against service discipline and amounts to gross misconduct.

For the purpose of scrutinizing the conduct of the accused official, Enquiry Sheet based upon summary of allegation was issued and DSP Investigation Bannu was appointed as enquiry officer. The Enquiry Officer reported in his findings report that the allegations leveled against the accused official have been proved and he is found guilty of the charge. The Enquiry Officer recommended him for award of major punishment placed on file.


After perusal of the enquiry file and recommendation of the Enquiry Officer, Final Show Cause Notice was issued to the accused Official and properly served on him on dated 24.07.2023. In response to the Final Show Cause Notice, the accused official submitted unsatisfactory reply.

On 04.09.2023, the accused official called for Orderly Room for a personal hearing. On 06.09.2023, the accused Official heard in person in Orderly Room who did not convince the undersigned for his innocence and recovery of Heroin 3655 gram from his possession.

Keeping in view the position explained above, findings report of the Enquiry Officer and available record, the record further revealed that the accused official has close relations with accused Mudasir Khan, who has been charged in Case FIR No. 101 dated 02.04.2023 9 DCNSA PS Lachi District Kohat. Therefore, I, Aqeel Hussain Superintendent of Police, Investigation, Bannu, in exercise of the power vested in me under Police Disciplinary Rules, 1975 (amended vide Notification No. 3859/Legal dated 27.08.2014) Government of Khyber Pakhtunkhwa, Police Department, accused official Constable Muhammad Idrees Khan No.39 awarded him Major Punishment of Dismissal from Police service with immediate effect.

Announced.

OB No \_\_\_\_\_

Attestation  




خدمت جناب RPO بزن ریجن بنوں  
عنوان۔ رحم اپیل بنا راضی آرڈر نمبر 244 جاریہ SP/187  
11-09-23

جناب عالی

21/11/23

سائل ذیل عرض رساں ہے۔  
1۔ یہ کہ سائل/اپیلٹ قبل ازین ناکردہ جرم میں نوالہ مقدم نے  
98 مورخہ 23/02/24 جرم 9 CNISA(D) قحان جرم نمبر 187 میں نامزد ہو کر  
عدالت عالیہ پشاور ہائی کورٹ سے ضمانت پر رہا ہوا ہے۔ جبکہ  
مقدم عنوان بالا زیر سماعت عدالت عالیہ ہے۔  
یہ کہ اندر چار بارے SP صاحب الزمٹی گیشن بنوں کے کمترین کے  
خلاف حکمانہ انکوائری شروع کر کے DSP صاحب الزمٹی گیشن بنوں  
کو انکوائری افسر مقرر کیا۔ جو صاحب ہونہو نے بیانات قلمبند  
کر کے فائنل رپورٹ میں سائل کے خلاف بنا کی ٹھوس ثبوت شواہد  
Major Punishment کی سفارشات پیش کیا۔ جو سنی یہ  
non Reading اور Miss Reading کے ہیں۔ جبکہ انکوائری افسر  
نے سائل/اپیلٹ کے پیش کردہ ثبوت۔ شواہد کو یکسر مسترد کیا ہے۔  
یہ کہ ایسی انکوائری پر سائل کو فائنل شو کاز نوٹس جاری ہو کر  
جناب SP صاحب الزمٹی گیشن بنوں نے نوالہ B عنوان الصدا سائل  
کو نوٹس سے ڈسمن کیا ہے۔

934  
11-09-23

یہ کہ سائل کا مین کیوں عدالت عالیہ میں زیر سماعت ہے۔ جبکہ  
فائنل افسر مافت نے عدالت عالیہ کے حکم کو سید سے نظر انداز  
کر کے Expert سزا دینے کا حکم کیا ہے۔ حالانکہ فاضل افسر  
مافت کو چاہیے تھا کہ وہ برطانوی رولز سائل کے Re-instal into  
سائل کے خلاف جاری انکوائری کے بابت ذیل احکام جاری کرتا۔  
Departmental Enquiry kept Pending till the  
Decision of the Court.  
(NEXT-PAGE)

ATTESTED

یہ پتہ بھی سائل کے خلاف جاری شدہ ڈیسس آرڈر خلاف روزانہ قواعد ہے۔ اور مبینہ براہ راست ہونے کی وجہ سے قابل منسوخ ہے۔

اس کے برعکس سائل / اپیلٹ کا سرویں ریکارڈ بھی شفاف ہے۔ علاوہ ازیں سائل غریب گھرانے سے تعلق رکھتا ہے۔ اور ماہانہ تنخواہ کے علاوہ دیگر ذریعہ معاش نہیں ہے۔ ہنگامی کے اس دور میں سائل / اپیلٹ انتہائی کسمپرسی کا شکار ہے۔

عاجزانہ استدعا ہے کہ سائل کے چھوٹے بال بچوں پر رحم کر کے اپیلٹ کو ترقی پر دوبارہ خیال کرنے کا شہانہ حکم صادر فرمایا جائے۔ حاجت پوری ہوگی۔

مورخ 09/10/23

سائل کے کانٹیل ڈاؤن لینز 39 رقم خود

SRE  
For information &  
compliance.

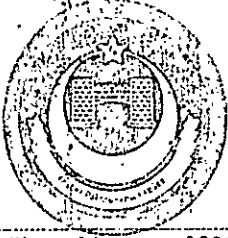
SP Mr. Bannu  
13/10/2023

No. 342/ES  
DC 10/10-23

SP Mr. Bannu  
for Comments. Der  
recht und Engin  
file for disposal  
of this appeal.

For APc-Bannu  
14/10/23

ATTACHED



OFFICE OF THE  
SUPERINTENDENT OF POLICE,  
INVESTIGATION, BANNU.

Phone No. 0928-9270178.  
No. 3333 /SRC

Dated Bannu the: 31/10/2023.

The Regional Police Officer,  
Bannu Region, Bannu.

DEPARTMENTAL APPEAL OF CONSTABLE IDREES INV: No.39

Refer to your office Endst: No.3481/EC dated 10.10.2023.

1. Incorrect the appellant was directly charged in case vide FIR No.98 dated 02.04.2023 u/s 9D-CNSA & found guilty of the charges during departmental proceeding.
2. Incorrect an imperial enquiry was conducted according to Police Rule 1975. Sufficient evidence placed on file. All opportunity including personal hearing was provided besides final Show Cause Notice to the appellant but he badly failed to rebut the allegations. After establishment the charge the major punishment was awarded.
3. Need no comments.
4. According to Police Disciplinary Rules 1975, the appellant was charge sheeted based upon statement of allegations and after proving the allegations, major punishment of dismissal was awarded to him under Sub Rule 8 (a) (b) vide this office O.B No.144, dated 11.09.2023.

Enclosed:  
Service Roll = 01  
Enquiry File =41 pages

(AQEEQ HUSSAIN)  
LL.B/PPM  
Superintendent of Police,  
Investigation, Bannu.

o/c

ATTACHED

16

"I"

This order will dispose of departmental appeal preferred by EX-Constable Muhammad Adress No. 39 of Investigation Staff Bannu, wherein, he has prayed for setting aside the order of major punishment of "Dismissal" imposed upon him by SP Investigation Bannu vide OB No. 144, dated 11.09.2023 for committing the following misconduct:

- That he was involved in case FIR No. 98, dated 02.04.2023 u/s 91D-CNSA Police Station Janna District Kohat.

Comments, service record and departmental inquiry file received from SP Investigation Bannu vide Memo: No. 3333/SRC dated 31.10.2023, wherein the SP Investigation Bannu reported that the appellant was proceeded against departmentally under Police Rules 1975, all opportunity including personal hearing was provided besides final show-cause notice to the appellant but he badly failed to rebut the allegations. After establishment the charge, the aforementioned punishment of dismissal was awarded to him by SP Investigation Bannu.

The appellant was heard in person in orderly room on 18.01.2024 but he badly failed to convince the undersigned with regard to his innocence. Hence, the order passed by SP investigation, Bannu is in consonance with law.

Therefore, I, Qasim Ali Khan, Regional Police Officer, Bannu Region Bannu, in exercise of the powers vested in me under Khyber Pakhtunkhwa Police Rules, 1975 (with amendments 2014) hereby regret the order of major punishment of dismissal passed by SP Investigation, Bannu vide his office OB No. 144, dated 11.09.2023.

Regional Police Officer,  
Bannu Region,  
Bannu

No. 367 /EC, dated Bannu the 19/01/2024

Copy to SP Investigation Bannu, for information w/r to his office Memo: No. 3333/SRC, dated 31.10.2023 along with the annexures (one Service Roll & enquiry file 11 pages)

Regional Police Officer  
Bannu Region,  
Bannu

ATTACHED

بعدالت (17)

Service Tribunals Khyber Pukhtunkhwa

24 منجانب

مورخہ 19/2/2024

محمد ادریس نام

مقدمہ سروس

دعویٰ

Police Department

جرم

باعث تحریر آنکے

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

آن مقام Peshawar کیلئے حرا یاہر ایڈووکیٹ

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 کے تقرر ثالث و فیصلہ پر حلف دیئے جواب دہی اور اقبال دعویٰ اور  
بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق  
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی  
اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا محتاج 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 مذکور با اختیارات حاصل ہوں گے  
اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ ہوں گے  
سب سے وہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔  
کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

20

ماہ

Accepted

by

محمد ادریس

المقوم

واہ العبد

العبد

کے لئے منظور ہے۔

مقام پشاور