


FORM OF ORDER SHEET

Court of _____

Appeal No. 497/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	02/04/2024	<p>The appeal of Mr. Mushtaq Ahmad resubmitted today by Mr. Asif Bilal Advocate. It is fixed for preliminary hearing before touring Single Bench at D.I.Khan on 16.04.2024. Parcha Peshi given to the counsel for the appellant.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

The appeal of Mr. Mushtaq Ahmad received today i.e on 27.03.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

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

No. 702 /S.T.,

Dt. 28/3 /2024.




28/3/24

REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Asif Bilal Adv.
High Court D.I.Khan.

R/Sis,

Resubmitted after necessary
completion.



01/4/24

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

Service Appeal No. 497 /2024

Mushtaq Ahmad Versus
(Appellant)

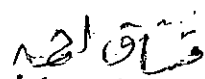
Govt of KPK etc
(Respondents)

INDEX

S. No.	Particulars of documents	Annexure	Page
1.	Grounds of Service appeal with affidavits		1-6
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Dated: 11 /03/2024

Humble Appellant:


Mushtaq Ahmad
Through Counsel


Asif Bilal
Advocate High Court

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Service Appeal No. 497 /2024

Mushtaq Ahmad, Chowkidar

Govt. Primary School No. 1 Pota District Dera Ismail Khan.

(Appellant)

VERSUS

1. Director, Elementary & Secondary Education Department,
Khyber Pakhtunkhwa, Peshawar.
2. District Education Officer (Female) Dera Ismail Khan.
3. District Accounts Officer, Dera Ismail Khan.

..... **(RESPONDENTS)**

**APPEAL UNDER SECTION 4 OF THE KPK SERVICES
TRIBUNAL ACT, 1974.**

PRAYER;

On acceptance of the instant appeal the respondents may kindly be directed to release the salaries of the appellant from the date of appointment with all back benefits.

Any other relief deemed appropriate in the given circumstances may also be granted to the appellant in the large interest of justice.

2

Note: Addresses given above shall suffice the object of service. All necessary and proper parties have been arrayed in the panel of respondents.

Respectfully Sheweth;

1. That the appellant is bona-fide resident of Dera Ismail Khan and is law abiding citizen of Pakistan. Copy of CNIC is annexed.
2. That the respondent No.3 appointed the appellant against the vacant post of Chowkidar in GPS, Potah#1, Dera Ismail Khan vide order No.842-46 dated 13.01.2023. Thereafter, the medical of the appellant was conducted and medical report was issued on 13-02-2023 and on the same date the appellant submitted arrival reports to the Head Teacher primary School Potah#1 District Dera Ismail Khan. Copies of medical report and arrival report are annexed as **Annexure-A & B.**
3. That the appellant took charge in GPS Potah#1, Dera Ismail Khan and is performing his duties regularly. Copy of charge report is enclosed as **Annexure C.**
4. That since appointment, the appellant is serving as Chowkidar in the Education Department Dera Ismail Khan as sacred and dear to be likened to worship. Appellant always performed his duties with zeal, zest and to the entire satisfaction of his high-ups.
5. That although the appellant is performing his duties regularly but the respondents are not releasing the salaries of appellant without any legal and lawful justification.
6. That feeling aggrieved by the impugned act of respondents, appellant filed a writ petition No. 440-D/2023 before the Honourable Peshawar High Court Bench Dera Ismail Khan and

4 (3)

the same was decided vide judgment dated 10/10/2023 vide which the writ petition was converted into Departmental appeal/representation and transmitted to respondent#3 for decision in accordance with law. Copies of the writ petition and order dated 10/10/2023 are annexed as **Annexure-D & E.**

7. That the respondents did not decide the departmental appeal of appellant within stipulated period, hence, the instant service appeal.
8. That feeling aggrieved by the impugned acts and omissions of respondents, the appellant does not have any other efficacious remedy but to invoke the appellate jurisdiction of this Honourable Tribunal, by way of instant appeal, on inter alia the following grounds:-

GROUNDS:-


- a) That acts and omission of the respondents by not releasing the salaries of the appellant are without any rhymes and reasons, illegal, void ab initio, without jurisdiction and against service laws.
- b) That the appellant appointed as a Chowkidar in the Education Department Dera Ismail Khan and has been performing his duties diligently and faithfully. Hence, is entitled to receive his monthly salaries in accordance with law.
- c) That despite fulfilling his obligations as an employee, appellant has not received his monthly salaries since appointment. This non-payment of salaries has caused severe financial hardship, resulting in immense distress to petitioner and his family.

8 (4)

- d) That the delayed release of salaries violates not only the legal obligations of the Education Department but also infringes upon the fundamental rights of an employee to receive timely payment for their work.
- e) That the appellant has exhausted all possible means to resolve this issue, including repeated verbal and written requests to the department. Unfortunately, these attempts have yielded no tangible results, leaving him without any recourse other than seeking the Court's intervention.
- f) That there are plethora of judgments of apex court of the country on the point that salary of civil servant cannot be stopped in the presence of appointment order and without showing any cause and issuing of any notice of stoppage of salary by passing service laws, the very act the respondents is without authority.
- g) That petitioner, being the citizen of this State, deserves to be treated in accordance with law and the discrimination meted out to him without any rhyme or reason, deserves a matching judicial response.
- h) That counsel for the appellant may please be allowed to raise additional grounds during the course of arguments.

It is therefore respectfully prayed that the instant appeal may please be accepted as prayed for.

Dated: 11/03/2024



Asif Bilal
Advocate High Court

Humble Appellant



Mushtaq Ahmad
Through Counsel

Cell# 0311 9453150

5

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

In service Appeal No. _____/2024

Mushtaq Ahmad
(Appellant)

VERSUS

Govt of KPK etc
(Respondents)

CERTIFICATE

Certified that appellant have not filed an appeal regarding the subject controversy, earlier in this august Court.


Dated 11/03/2024.


Appellant

NOTE

Appeal with annexure along-with required sets thereof are being presented in separate file covers.

Dated 11/03/2024


Appellant's counsel

6

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

In service Appeal No. _____/2024

Mushtaq Ahmad
(Appellant)

VERSUS

Govt of KPK etc
(Respondents)

AFFIDAVIT

I, **Mushtaq Ahmad**, the appellant herein, do hereby solemnly affirm on oath:-

1. That the accompanying appeal has been drafted by counsel following my instructions;
2. That all parawise contents of the appeal are true and correct to the best of my knowledge, belief and information;
3. That nothing has been deliberately concealed from this Honourable Court, nor anything contained therein are based on exaggeration or distortion of facts.

Dated 11/03/2024

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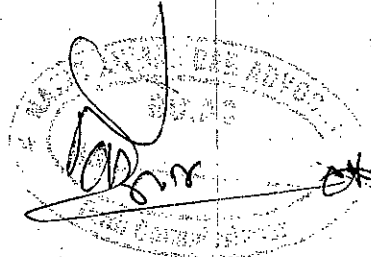
Deponent

Identified By:-

Handwritten signature

Asif Bilal

Advocate High Court
Dera Ismail Khan



ANNEX: A
Page 7

MEDICAL CERTIFICATE

Name of Official Mushtaq Ahmad

Caste or Race uttar

Father / H Name Muhammed Akram

Residence Tank Road, Patta, Tehsil 4
District DEGA Ismail Khan

Date of Birth 18-04-1999 (12101-2390543-1)

Exact height by measurement 4-5

Personal Marks of identification Nil

Signature of Official [Signature]

Signature of Head of Office Took over charge
13-02-2023

Seal of Office [Signature]

I do hereby certify that I have examined Mushtaq Ahmad a candidate for employment in the office of D.F.O (Male) D.I Khan not discover that had any disease communicable or other constitutional deflection or bodily infinity except Nil I do not consider this as disqualification for employment in the office of the D.F.O (Male) D.I Khan age according to his own statement 23 years, 09 months 4 ^{26 days} and by appearance 23 years, 09 months 4 26 days



RIGHT-HAND THUMB AND FINGER IMPRESSIONS: 13-02-2023

Hospital/Medical Director
DHQT Hospital DIKhan
Medical Director
DHQT Hospital
DIKhan

Attested
[Signature]

ANNEX: C
Page = 9

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Handwritten text: 13-02-2023

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Handwritten text: HEAD TEACHER

Handwritten text: M. G. ...

Handwritten text: A. G. ...

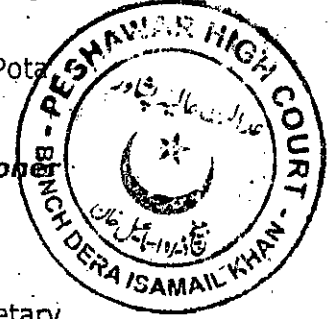
BEFORE THE HONOURABLE PESHAWAR HIGH COURT,
DERA ISMAIL KHAN BENCH.

ANNEX - D
Page = 10

Writ Petition No. _____ of 2023

Mushtaq Ahmad son of Muhammad Akram resident of Pota
District Dera Ismail Khan.

Petitioner



VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary Education, Govt. of K.P.K, Peshawar.
2. Director Education (Elementary & Secondary), Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Male), Dera Ismail Khan.
4. SDEO Male Dera Ismail Khan
5. District Account Officer, Dera Ismail Khan.

Filed today 3/2/24
Add: Registrar
18/02/24

Respondents

WRIT PETITION UNDER ARTICLE 199 OF THE
CONSTITUTION OF ISLAMIC REPUBLIC OF PAKISTAN,
1973.

Note Address given above shall suffice that object of service
and all necessary and proper parties have been arrayed as
respondents.

Prayer . On acceptance of the instant writ petition the impugned
act of respondents regarding stoppage of salaries of the
petitioner may please be declared as illegal void ab-initio unlawful
without lawful authority based on mala fide and having no legal
effect upon the rights of petitioner and the respondents may
kindly be directed to release the salaries of the petitioner from
the date of appointment with all back benefits.

Respectfully Sheweth:

ATTEST:
EXAMINOR
Peshawar High Court Bench,
Dera Ismail Khan

WP No.440-D 2023 (Grounds)

P-02

- i. That the addresses of the parties as given above are correct and sufficient for the purpose of service.
- ii. That the petitioner is bona fide and permanent resident of District Dera Ismail Khan. Copies of CNIC & Domicile of the petitioner are enclosed as **Mark-A & B** respectively.
- iii. That the respondent No. 3 appointed the petitioner against the vacant post of Chowkidar in GPS, potah No1, Dera Ismail Khan vide order No.842-46 dated 13.01.2023. Thereafter, the medical of the petitioner was conducted and medical report was issued on 13-02.2023 and on the same date the petitioner submitted arrival report to the Head Teacher primary Schol Potah No 1. **Annexure C&D**
- iv. That the petitioner resumed the charge in GPS potah no 1, D.I.Khan and is performing his duties regularly. Copy of charge report is enclosed as **Annexure C**
- v. That since appointment, the petitioner is serving Education Department as sacred and dear to be likened to worship. Petitioner always performed his duties with Zeal, zest and to the entire satisfaction of his high-ups.
- vi. That although the petitioner is performing his duties regularly but the respondents are releasing the salaries of petitioner without any legal and lawful justification. Thus being aggrieved, the petitioner approaches this Honourable Court for redressal of his grievances, having no other alternative remedy but to invoke the constitutional jurisdiction of this Honourable court, inter alia, on the following grounds:

11

Filed today 3828
Addl. Registrar
18/02/23

[Handwritten signature]

GROUND:

- 1. That the act of the respondents while they refused to initiate the process regarding release the monthly salary of the petitioner is illegal, against the natural

WP No.440-D 2023 (Grounds)

[Handwritten signature]
EXAMINOR
Peshawar High Court Bench,
Dera Ismail Khan

justice, ulterior motives, based on malafide and ineffective upon the rights of the petitioner.

P-03

12

2. That the petitioner was appointed after observing all the codal formalities and he also performing his duties with full of devotion and honestly. But the respondents are not paying the monthly salary to the petitioner; hence the act of the respondents is against the fundamental right of the petitioner protected under Article 11 of the Constitution of Islamic Republic of Pakistan, 1973.
3. That the petitioner was duly appointed by the authority after fulfilling all the codal formalities, and thereafter, he is performing his duty regularly till date. Therefore, the petitioner is entitled to receive the salary.
4. That the Constitution of Islamic Republic of Pakistan, 1973 protected the rights of every citizen and provides the equality amongst the citizen, but the respondents clearly violated the fundamental rights of the petitioner protected by the Constitution of Islamic Republic of Pakistan.
5. That the petitioner is the victim of unlawful and illegal act of the respondents and such a malafide act on the part of respondents is against the law and rules, without jurisdiction and lawful authority, against the natural justice, misuse of official powers and is the outcome of victimization known by the respondents and it has caused an immense mental torture and agony to the petitioner.
6. That the counsel for the petitioner may kindly be allowed to raise the additional grounds at the time of arguments.

Filed today 3878

Addl. Registrar

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WP No.440-D 2023 (Grounds)

[Handwritten signature]
EXAMINOR
Faisalabad High Court Bench,
Dera Ismail Khan

It is therefore, humbly prayed that may please be directed the respondents to act in accordance with law & rules and to direct the respondents to complete the process regarding releasing the monthly salary of the petitioner in the account office and to release the salary of the petitioner from the date of appointment with all back benefits or any other relief may being deem fit by this Honourable court in the interest of the petitioner.

P-04
13

INTERIM RELIEF:

It is therefore, humbly prayed that to restrain the respondents from taking any adverse action against the petitioner till the disposal of main Writ Petition.


Your humble petitioner

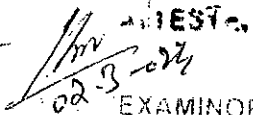
Mushtaq Ahmad
Through Attorney


Through Counsel

Dated: 16/09/2023

Asif Bilal Rodikhail
Advocate High Court.

Filed today 3828
Addl. Registrar
16/09/23

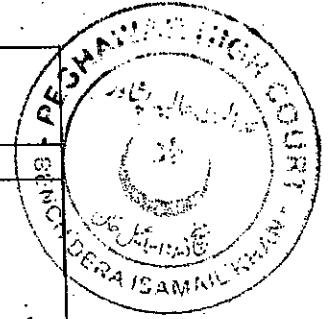

EXAMINOR
Peshawar High Court Bench
Dara Ismail Khan

PESHAWAR HIGH COURT, D.I.KHAN BENCH

ANNEX- E
Page = 14

FORM OF ORDER SHEET

Date of Order or proceedings (1)	Order or other proceedings with signature of Judge(s). (2)
10.10.2023	<p><u>W.P No. 440-D/2023 with Interim Relief.</u></p> <p>Present: Mr. Rizwanullah Khan, Advocate for the petitioner.</p> <p>Mr. Aamir Farid Saddozai, Asstt. Advocate General for the respondents.</p> <p align="center">***</p> <p><u>Dr. Khurshid Iqbal, J.-</u> At the very inception of proceedings, learned counsel for the petitioner, when confronted with the situation, that in view of the expressed bar contained in Article 212 of the Constitution, wherein, the jurisdiction of this Court under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973 has been manifestly barred in matters relating to the terms and conditions of the civil servants and the appropriate remedy lies with the respective Service Tribunal constituted in this regard under the law. Learned counsel for the petitioner frankly conceded the aforesaid stipulation but requested for converting the present petition into departmental appeal/representation and transmitting the same to the District Education Officer (Male), D.I.Khan for an appropriate order in accordance with law. Learned Assistant Advocate General has no objection to the aforesaid request.</p> <p>2. In this view of the matter, the present writ petition is converted into departmental</p>



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EXAMINOR
Peshawar High Court Bench,
Dera Ismail Khan

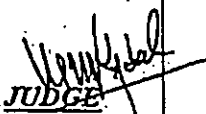
15

appeal/representation and transmits to the District Education Officer (Male), D.I.Khan for an appropriate order in accordance with law. Office is directed to send this petition alongwith its annexures in original to the District Education Officer (Male), D.I.Khan by retaining certified copies of the same for the purpose of record.

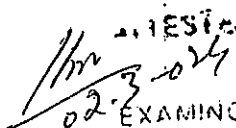
Order accordingly.

Announced
Dt: 10.10.2023


JUDGE


JUDGE

File
7/2
11/x


02.3.2024
EXAMINOR
Huzar High Court Bench,
Lahore

(D.D)

Hon'ble Mr. Justice Muhammad Fahem Wali
Hon'ble Mr. Justice Dr. Khurshid Iqbal

Hasnain/*

Sl. No. 5385

Dated: 08-9-2023

ANNEXI-F
Page = 16



**OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)
DERA ISMAIL KHAN**

To,
The District Accounts Officer,
Dera Ismail Khan.

Subject: - **RELEASE OF PAY IN RESEPT OF MR. MUHAMMAD MUSHTAQ
(CHOWKIDAR).**

Memo:

Enclosed please find herewith the original Source-1 along with other relevant documents in respect of Muhammad Mushtaq (Chowkidar) GPS No. 01 Potah is submitted for your good honor you are requested to activate the pay of aforesaid Chowkidar.

**District Education Officer
(Male) D.I.Khan**

Endst No. 16386-87

Dated: 08/9/2023

Copy for information: -

1. PA to DEO (M) Dera Ismail Khan.
2. Master file.

**District Education Officer
(Male) D.I.Khan**

Diary No. 520
02/09/23

Alleged
Rahat



**OFFICE OF THE DISTRICT EDUCATION
(MALE) DERA ISMAIL KHAN**

Tell: 09669280128 – 09669280131

Email: emisdikhan@yahoo.com

17

OFFICE ORDER

Consequent upon recommendation/approval of the Departmental Selection Committee (DSC) as contained in its minutes of the meeting held on 26-12-2022, the appointment of the following candidate is hereby ordered against the vacant post of the Class-IV in BPS-03 (Rs: 14260-580-31680) plus usual allowances as admissible under the existing policy of the Provincial Government, on the terms and conditions given below with effect from the date of their taking over charge in the interest of public service.

OPEN MERIT

S#	Name Of Candidates with Father Name	CNIC	D.O.B	Post	Station of Posting	Remarks
1	Mushtaq Ahmad S/O Muhammad Akram	12101-2390543-1	18/04/1999	Chowkidar	GPS No.1 Potah	AVP

Terms & Conditions:-

1. His services shall be considered as regular in term of Section-19 the NWFP Civil Servant Act, 1973 amended in 2013 issued vide Govt of KPK Finance Department (Regulation Wing) No SOR-III FD/12-I-/2005 dated 27-02-2013.
2. He will be governed by such rules and regulations as may be issued by the Govt. from time to time for the category to which they belong.
3. His appointment is made purely on temporary basis and liable to terminate at any time without assigning any reasons.
4. One month pay will be forfeited to Govt. in case of resignation without prior notice. The period of giving notice is one month before the date of resignation.
5. CP Fund well be deducted from their salaries in the light of section 2(2) of the Khyber Pakhtunkhwa (amendment) Act 2022.
6. His pay may not be drawn till the verification on Certificates/Degrees from the concerned Board/University/Institute.
7. He is required to join the within 30-days, falling which the appointment order will be cancelled automatically.
8. The appointment is made subject to the condition that the candidate is permanent domicile holder District DIKhan.
9. He is required to produce Health & Age Certificate from the Medical Suptd./Hospital Director DIKhan with in one week after the assumption of charge.
10. Charge Reports should be submitted to all concerned.
11. No TA/DA is allowed.

Sd/-

*District Education Officer
(Male) Dera Ismail Khan*

Dated: 13/1/2023

Endst No. 542-46 /DEO(M)

Copy forwarded for information & necessary action to the:

1. Director E&SE KPK Peshawar.
2. District Comptroller of Accounts DIKhan.
3. Principal/Headmaster/SDEO (M) Concerned.
4. Candidate Concerned.
5. Master File.

Attested

[Signature]

[Signature]
*District Education Officer
(Male) Dera Ismail Khan*

18

O.P.S.S.

ایمپلائمنٹ رجسٹریشن کارڈ

جن امیدواروں کے پاس تعارفی کارڈ (X-3) موجود نہ ہو۔
ان کو دفتر روزگار کا نامزد کردہ قبضہ کیا جائے

SERVICE
UNPAID

رجسٹریشن نمبر 6631
اکویٹیشن کوڈ نمبر 5-89-20
نام مسٹر () احمد علی لادو جی
پتہ روڈ تحصیل و ضلع

بخدمت جناب منیجر صاحب

دفتر روزگار

شناختی کارڈ نمبر 1-543-239-12101
تاریخ 07/11/2023
Manager
Employment Exchange -
Dera Ismail Khan

06/15/2023

ضروری اطلاع برائے امیدوار :-
جب آپ کو ملازمت مل جائے تو فوراً منسلک جوابی کارڈ پر دفتر روزگار
کو اطلاع کریں۔ اس کارڈ پر ڈاک کا ٹکٹ لگانے کی ضرورت نہیں۔

Attested
[Signature]

19

**KHYBER PAKHTUNKHWA
D. I. KHAN DISTRICT
CERTIFICATE OF DOMICILE**



2904

The Pakistan Citizenship Act, 1951 (Act, II of 1951)
Rules made there under (vide Rule No.23)

Son/Daughter/Wife of _____

I was born of parents who are permanently domiciled in Khyber
Pakhtunkhwa Province having belonged to it by Birth/Settled in it.

belong to Village / Mohallah _____

District _____

Signature/Thumb Impression of the Applicant _____
Name in Block Letters _____
Dated _____

_____ filled by _____

S/O, D/O, W/O _____

Domiciled in the Khyber Pakhtunkhwa

It is hereby certified that the said _____
of parents who are permanent Residents of Khyber Pakhtunkhwa Province
belonged to it by Birth / Settled in it. I have satisfied myself personally / through
relevant sources that the above declaration is true and duly certified overleaf.

Day of _____ 2017

COUNTER SIGNED BY

DEPUTY COMMISSIONER

Seal

DEPUTY COMMISSIONER
D. I. KHAN

Attested
Signature

/D.C./C.

Dated D.I.Khan the _____ / _____ / 2017

کراچی کے لیے جاری کیا گیا ہے

12101:2350543
001351050274



Ministry of Health
National Center of Pakistan

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Alleged



02.02.2018
02.02.2028
12101:2350543
18.01.1999
M
Gender: Country of Issue
Pakistan

PAKISTAN
National Identity Card
Name: Muztaz Ahmad
Ministry of Health
National Center of Pakistan

21

Moh No - 03119453150

1210-2390543-1

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Main body of handwritten text, including a signature and several lines of script.

Handwritten text line, possibly a name or title.

Lower section of handwritten text, including what appears to be a signature and some notes.

MALIK AHSAN BILAL LANGRAW
ADVOCATE SUPREME COURT
SUPREME COURT NO.5412 & KPIC B.C NO.0929

وکیل جامعہ





ASIF FALAL

Advocate

bc-11-2826

Date of issue: November 2019

Valid upto: November 2022



Secretary
KP Bar Council

وکالت نامہ

(۲۳)

کورٹ فیس

ایک روپیہ

بندالت
 مہتمم
 حشاق احمد
 گورنمنٹ لاء کورٹ
 دعوئی یا جرم
 تفصیل دعوئی یا جرم

باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف واسطے بیرونی کی جانب دہی ذرائع یا قضی یا قضیہ مقدمہ تمام حوالہ دیا گیا ہے۔

کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں پیشی پر خود یا بڑا بڑا بیرون حاضر ہوتا رہوں گا اور ہر وقت پارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا اگر پیشی پر منظر حاضر نہ ہو اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صدر مقام بکھری کے علاوہ یا بکھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل بیرونی کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ صدر بکھری کے علاوہ اور جگہ سماعت ہونے یا بروز تعطیل یا بکھری کے اوقات کے آگے یا پیچھے پیش ہونے پر منظر کوئی نقصان پہنچے تو اس کے ذمہ دار یا اسکے واسطے کسی معاوضہ کے ادا کرنے یا سخت نہ واجب کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔

نوکل ساختہ پر داختم صاحب موصوف مثل کردہ ذات خود منظور قبول ہو گا اور صاحب موصوف کو عرض دہی یا جواب دہی یا درخواست اجراء اسلئے دہی نظر ثانی یا قبول گرائی و ہر قسم درخواست ہر قسم کے بیان دینے اور پر لائی یا ماضی نامہ فیصلہ برطرف کرنے اقبال دہی کا بھی اختیار ہو گا اور بصورت مقرر ہونے تاریخ پیشی مقدمہ مرکز بیرون از بکھری صدر بیرونی مقدمہ مرکز نظر ثانی قبول و گھرائی و برآمدگی مقدمہ یا منسوخی دہی کی طرف یا درخواست ہم انتہائی یا قرضی یا گرفتاری قبول از فیصلہ اجراء دہی بھی صاحب موصوف کو بشرط ادائیگی طیمہ مقررہ دہی کا اختیار ہو گا اور تمام ساختہ پر داختم صاحب موصوف مثل کردہ از خود منظور و قبول ہو گا اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہو کہ مقدمہ مرکزہ یا اس کے کسی بیرونی کارروائی یا بصورت درخواست نظر ثانی قبول گرائی یا دیگر معاملہ و مقدمہ مذکورہ کسی دوسرے وکیل یا بیرون کو اپنے ہمایت یا اپنے ہمراہ مقرر کریں اور اپنے مشیر قانون کو بھی ہر امر میں دہی اور ذمیت اختیارات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ جملہ جو کچھ ہر جہت الزامہ بننے کا وہ صاحب موصوف کا حق ہو گا مگر صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہو گا کہ مقدمہ کی پوری نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہو گا۔

لہذا وکالت نامہ گہریا ہے تاکہ سند سے

مورخہ
 مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھا لیا ہے اور منظور ہے

حشاق احمد
 12101-2390543-1
 حشاق احمد
 03119453150

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 Accepted by
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