


FORM OF ORDER SHEET

Court of _____

Appeal No. 831/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	11/06/2024	<p>The appeal of Mst. Sania Bibi presented today by Mr. Muhammad Aslam Tanoli Advocate. It is fixed for preliminary hearing before touring Single Bench at A.Abad on 27.07. 2024. Parcha Peshi given to counsel for the appellant.</p> <p>By the order of Chairman  REGISTRAR</p>

**BEFORE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR**

Appeal No: 831/2024

Sania Bibi, Ex-Lady Constable No. 835, District Police Haripur R/O
Village Namli Maira, Tehsil & District Abbottabad.....(Appellant)

VERSUS

1. District Police Officer, Haripur.
2. Regional Police Officer, Hazara Region, Abbottabad.

.....(Respondents)

SERVICE APPEAL

INDEX

S/No.	Description of documents.	Annexure	Page No.
1.	Memo of appeal & condonation application.		01-11
2.	Salary Slip for Dec 2023	"A"	12
3.	medical certificates, Charge Sheet and its reply	"B,C&D"	13-14 15-16 17-18
4.	Clearance Certificate, Daily Dairy and result sheet of recruit course	"E,F&G"	19 20 21-22
5.	Charge Sheet and its reply	"H&I"	23-24 25-26
6.	Application dated 27-12-2023	"J"	27
6.	Dismissal order dated 29-12-2023 & Application 13-05-24.	"K&L"	28 29
7.	Departmental appeal & its rejection order 25-05-2024	"M&N"	30-34 35-36
8.	Wakalatnama		

Sania Bibi
APPELLANT

THROUGH

M. Aslam Tanoli
(MUHAMMAD ASLAM TANOLI)
ADVOCATE HIGH COURT
ABBOTTABAD

Dated: 11-06-2024

①

**BEFORE HONOURABLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Appeal No..... 831 / 2024

Sania Bibi, Ex-Lady Constable No. 835, District Police Haripur R/O
Village Namli Maira, Tehsil & District Abbottabad.....(Appellant)

VERSUS

1. District Police Officer, Haripur.
2. Regional Police Officer, Hazara Region, Abbottabad.

.....(Respondents)

**SERVICE APPEAL UNDER SECTION-4 OF KPK SERVICE TRIBUNAL ACT
1974 AGAINST ORDER DATED 29-12-2023 PASSED BY THE DISTRICT
POLICE OFFICER HARIPUR WHEREBY APPELLANT HAS BEEN DISMISSED
FROM SERVICE AND ORDER DATED 25-05-2024 OF THE REGIONAL
POLICE OFFICER HAZARA REGION ABBOTTABAD WHEREBY
APPELLANT'S DEPARTMENTAL APPEAL HAS BEEN REJECTED/FILED.**

**PRAYER: ON ACCEPTANCE OF INSTANT SERVICE APPEAL BOTH THE
ORDERS DATED 29-12-2023 AND 25-05-2024 OF THE RESPONDENTS
MAY GRACIOUSLY BE SET ASIDE AND APPELLANT BE REINSTATED IN
HER SERVICE FROM THE DATE OF DISMISSAL WITH ALL
CONSEQUENTIAL SERVICE BACK BENEFITS.**

Respectfully Sheweth:

1. That appellant was inducted in police department as Lady Constable on 09-12-2016 in District Police Haripur. Right from the first day her appointment, the appellant was deputed to serve the disabled (confined to bed) SISTER of the then DPO Haripur (Nadeem Shahzadd Bukhari) at his residence at Islamabad. (Copy of Salary Slip for Dec 2023 showing date of appointment is attached as "A").

2

2. That appellant served the disabled sister of the very DPO at his residence at Islamabad till October, 2022. During this period from December 2016 to October 2022 appellant always tried her best to be backed to her District Haripur to serve as Lady Constable but in vain. In Oct, 2022 she came back on the pretext of illness of her mother and reported for duty here in Police Lines at Haripur but she was not taken on duty rather forced to go back and serve the disabled sister of very DPO at his residence at Islamabad. For the reason she was being marked absent despite her 24 hours presence in Police Lines and performing duties. In October 2022 when appellant fell ill for about 04 days she was marked absent and charge sheeted despite her submitting medical certificate and reply to the charge sheet. **(Copies of medical certificates, Charge Sheet and its reply are attached as B, C & D).**

3. That after issuing above cited baseless charge sheet and receipt of its reply the District Police Officer Haripur vide his order dated 20-01-2023 dismissed the appellant from service without any cause and reason due to pressure from (Nadeem Shahzad Bukhari SP). Appellant preferred a departmental appeal dated 30-01-2023 against her dismissal and she was re-instated in service by the Regional Police Officer Hazara Region Abbottabad vide 27-03-2023. Appellant joined and started duties at Police Lines Haripur.

3

4. That attitude of the Nadeem Shahzad Bukhari SP was/is still inimical towards the appellant and since then he has been trying to oust the appellant from service. That throughout her entire service the appellant was never allowed or deputed to acquire her basic recruit course/training at PTC Hangu. That on the General Instructions of Provincial Police Officer KPK Peshawar the appellant was deputed for basic recruit course at PTC Hangu vide DPO Haripur order dated 03-05-2023 but just after 02 days on 05-05-2023 the SP Training Hangu was approached by the DPO Haripur to drop the appellant from training and send her back to Haripur. On this appellant immediately approached the Commandant (DIG Training) PTC Hangu who was kind enough and instructed the appellant to continue and complete her basic recruit course/ training. The appellant completed her training at PTC Hangu and reported back for duties at Police Line Haripur on 05-12-2023. **(Copies of Clearance Certificate, Daily Dairy and result sheet of recruit course from PTC Hangu are attached as "E, F & G").**

5. That despite appellant's undergoing and completing her basic recruit course/training at PTC Hangu she was marked absent at her parents District Haripur. On her return from PTC Hangu and reporting for duty at Police Lines Haripur, she was issued a Charge Sheet dated 06-12-2023 for absence from duty which was duly replied explaining all facts and denying the allegations being false and fabricated.

(4)

(Copies of Charge Sheet and its reply are attached as "H & I").

6. That since her return from Islamabad appellant was not allowed rather stopped to enter the police lines Haripur and DPO's Office at Haripur, for no just cause and reason but on one or the other pretext. Even the appellant had been dealt with inimical attitude and discriminatory treatment, and penalized for personal grudge without any fault on her part though she has been performing her duties with devotion and honesty. **(Copy of Application Dated 27-12-2023 is attached as Annexure "J")**.
7. That no proper departmental inquiry was conducted. Inquiry report, if any, was not given to her. She was not called by Inquiry Officer. Even the appellant was not provided the opportunity of personal hearing despite her repeated requests and she was awarded major punishment of dismissal from service in serious violation of law, departmental rules & regulations, facts and principle of natural justice. Even copy of dismissal order was not issued to her despite appellant's time and again requests and personal approaches. On 03-01-2024 the appellant had to make departmental appeal before RPO Hazara Region without a copy of dismissal order.
8. That on 29-12-2023 when appellant submitted reply to the show cause notice, at about 1700 hours the Monitor (Noreen Blbi) of lady constables Police Lines Haripur telephonically informed the appellant that

5

DPO Haripur had dismissed her from service and appellant could obtain dismissal order from DPO office on 01-01-2024 (30-31/12/2023 being Saturday and Sunday). On 01-01-2024 when appellant visited DPO' Office at Haripur for obtaining dismissal order she was not allowed to enter the premises and her application was received at the Gate of Office. But still she was not given copy of the order and deferred on the pretext to come the next day. Copy of order was delivered after 25-05-2024 & that too by the RPO Office Abbottabad alongwith appeal rejection order on her written request with a copy to the PPO KPK Peshawar. **(Copies of dismissal order dated 29-12-2023 and application is attached as Annexure-"K&L")**.

9. That appellant aggrieved of dismissal order dated 29-12-2023 filed a departmental appeal dated 03-01-2024 without having copy of dismissal order before the Regional Police Officer, Hazara Region, Abbottabad which was rejected vide order dated 25-05-2023. **(Copies of departmental appeal & its rejection order 25-05-2024 are attached as Annexure "M & N")**.

10. That proper departmental inquiry was not conducted. Appellant was also not provided with inquiry report. Even appellant was not afforded with the opportunity of cross examination and personal hearing before awarding major punishment of dismissal from service and she was condemned

6

unheard. Hence instant service appeal, inter alia, on the following grounds.

GROUNDS:-

- A) That impugned orders dated 29-12-2023, 25-05-2024 of the respondents are illegal, unlawful against the facts, departmental rules, regulations and principle of natural justice hence liable to be set aside.
- B) That proper departmental inquiry was not conducted. Inquiry report, if any, was not given to appellant. Even the appellant was not provided with the opportunity personal hearing and was awarded major punishment of dismissal from service in serious violation of law, departmental rules & regulations, facts and principle of natural justice.
- C) That respondents have not treated the appellant in accordance with law, departmental rules, regulations and policy on the subject applicable to the terms and conditions of his service and have acted in violation of Article-4 of the constitution of Islamic Republic of Pakistan 1973 and unlawfully issued the impugned orders which are unjust, unfair hence not sustainable in the eyes of law.
- D) That appellate authority has also failed to abide by the law and even did not take into consideration the grounds taken in the memo of appeal and has rejected the departmental appeal. Thus act of respondent is contrary to the law as laid down in the KPK Police Rules 1934 read with section 24-A of

7

General Clauses Act 1897 and Article-10 of the Constitution of Islamic Republic of Pakistan 1973.

- E) That the allegations leveled against appellant in dismissal as well as appellate orders are incorrect. Nothing adverse could be brought on record against the appellant during departmental inquiry to connect him with the guilt as attributed to him. The only charge against appellant was her absence which is totally wrong and her basic recruit training at PTC Hangu is sufficient proof of her presence on duties which negates the absence allegations. She is innocent and there is nothing wrong on her part.
- F) That the then DPO Haripur Nadeem Shahzad Bukhari was so influential and powerful officer that none of the DPO Haripur and even RPO Hazara Region Abbottabad from 2016 to 2022 could release and bring the appellant from his house at Islamabad to appellant's District Haripur. But when appellant proceeded to her Basic Recruit Course at Hangu the DPO Haripur tried to drop her from the said legal and mandatory task. However it was the Commandant PTC Hangu who was king enough and asked appellant to continue course till its completion.
- G) That instant service appeal is well within time and this honorable Service Tribunal has got every jurisdiction to entertain and adjudicate upon the lis.

8

PRAYER:

It is, therefore, humbly prayed that on acceptance of instant service appeal all the three orders dated 29-12-2023 and 25-05-2024 of the respondents may graciously be set aside and appellant be re-instated in service from the date of dismissal with all consequential service back benefits. Any other relief which in the circumstances of the case this honorable Tribunal deems fit may also be granted.

Sana Bibi
Appellant

Through

M Aslam
(Muhammad Aslam Tanoli)
Advocate High Court
At Abbottabad

Dated: 11-06-2024

VERIFICATION

It is verified that contents of instant service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Tribunal.

Dated: 11-06-2024

Sana Bibi
Appellant

(9)

BEFORE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Sania Bibi, Ex-Lady Constable No. 835, District Police Haripur R/O
Village Namli Maira, Tehsil & District Abbottabad.....(**Appellant**)

VERSUS

1. District Police Officer, Haripur.
2. Regional Police Officer, Hazara Region, Abbottabad.
3. Provincial Police Officer Khyber Pakhtunkhwa Peshawar
.....(**Respondents**)

SERVICE APPEAL

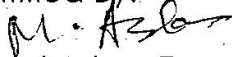
AFFIDAVIT

I, Sania Bibi, appellant do hereby solemnly declare and affirm on
oath that contents of instant service appeal are true and correct
to the best of my knowledge and belief and nothing has been
suppressed from this Honorable Tribunal.

Dated: 11-06-2024


Deponent/Appellant

Identified By:


(Muhammad Aslam Tanoli)
Advocate High Court
ABBOTTABAD

Dated: 11-06-2024


Appellant

11.6.2024

10

BEFORE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Sania Bibi, Ex-Lady Constable No. 835, District Police Haripur R/O
Village Namli Maira, Tehsil & District Abbottabad.....(Appellant)

VERSUS

1. District Police Officer, Haripur.
2. Regional Police Officer, Hazara Region, Abbottabad.
3. Provincial Police Officer Khyber Pakhtunkhwa Peshawar
.....(Respondents)

SERVICE APPEAL

CERTIFICATE

It is certified that no such appeal on the subject prior to this one
has ever been filed in this Honorable Service Tribunal or any other
court.

Dated: 11-06-2024


Appellant

11

**BEFORE HONOURABLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Sania Bibi, Ex-Lady Constable No. 835, District Police Haripur R/O Village Namli
Maira, Tehsil & District Abbottabad.....(Appellant)

VERSUS

1. District Police Officer, Haripur.
2. Regional Police Officer, Hazara Region, Abbottabad.
3. Provincial Police Officer Khyber Pakhtunkhwa Peshawar
.....(Respondents)

**APPLICATION FOR CONDONATION OF DELAY IN FILING INSTANT SERVICE
APPEAL BEFORE THIS HONOURABLE SERVICE TRIBUNAL.**

Respectfully Sheweth:

1. That applicant/appellant has filed today a Service Appeal which may be considered as part and parcel of this application, against order dated 29-12-2023, and 25-05-2024 passed by respondents, whereby appellant has been awarded penalty of "dismissal from service" and her departmental appeal has been rejected without jurisdiction and abiding by procedure.
2. That as the orders of departmental authorities have been passed in violation and derogation of the statutory provision of law, departmental rules and regulation governing the terms and condition of appellant's service and fact of the case, therefore, causing a recurring cause of action to the applicant/appellant can be challenged and questioned irrespective of a time frame.
3. That though appellant's was dismissed from service on 29-12-2023 but copy of order was delivered after 25-05-2024 & that too by the RPO Office Abbottabad alongwith appeal rejection order on her written request. The appellant has rigorously been pursuing her case. Therefore, the delay if any, in filing instant service appeal is because of forgoing reasons.
4. That instant application is being filed as an abundant caution for condonation of delay, if any. The impugned orders are liable to be set aside in the interest of justice.

It is, therefore, respectfully prayed that on acceptance of the instant application the delay, if any, in filing the titled appeal may graciously be condoned.

Through

Sania Bibi
Applicant/Appellant

M. Aslam
(Muhammad Aslam Tanoli)
Advocate High Court
At Abbottabad

Dated: 11-06-2024

Sania Bibi

It is verified that contents of instant service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Tribunal.

Dated: 11-06-2024

Sania Bibi
Applicant/Appellant

12

Annex-A

Government of Khyber Pakhtunkhwa
District Accounts Office Haripur
Monthly Salary Statement (December-2023)



Personal Information of Miss SANIA BIBI d/w/s of SARDAR MUHAMMAD RAFIQUE

Personnel Number: 00822428 CNIC: 1310134900830 NTN:
Date of Birth: 04/04/1990 Entry into Govt. Service: 09.12.2016 Length of Service: 07 Years 00 Months 024 Days

Employment Category: Active Temporary

Designation: CONSTABLE 80002071-GOVERNMENT OF KHYBER PAKH

DDO Code: HR4009-DPO (POLICE PROPER) HARIPUR

Payroll Section: 002

GPF Section: 001

Cash Center:

GPF A/C No:

Interest Applied: Yes

GPF Balance: 59,702.00

Vendor Number:

Pay and Allowances:

Pay scale: BPS For - 2022

Pay Scale Type: Civil BPS: 07

Pay Stage: 4

Wage type	Amount	Wage type	Amount
0001 Basic Pay	19,950.00	1001 House Rent Allowance 45%	2,384.00
1210 Convey Allowance 2005	1,932.00	1300 Medical Allowance	1,500.00
1547 Ration Allowance	1,000.00	1567 Washing Allowance	150.00
1616 Constabulary R Allowance	300.00	1902 Special Incentive Allowance	775.00
2108 Fixed Daily Allowance	2,730.00	2314 Risk Allow Police - 2021	7,400.00
2347 Adhoc Rel All 15% 22(PS17)	1,832.00	2378 Adhoc Relief All 2023 35%	6,664.00

Deductions - General

Wage type	Amount	Wage type	Amount
3007 GPF Subscription	-1,500.00	3530 Police welfare Fund BS-1 to 18	-399.00
3534 R. Ben & Death Comp Fresh	-450.00		0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance

Deductions - Income Tax

Payable: 0.00 Recovered till December-2023: 0.00 Exempted: 0.00 Recoverable: 0.00

Gross Pay (Rs.): 44,617.00 Deductions: (Rs.): -2,349.00 Net Pay: (Rs.): 44,268.00

Payee Name: SANIA BIBI

Account Number: 4139024827

Bank Details: NATIONAL BANK OF PAKISTAN, 230337 MAIN BRANCH HARIPUR MAIN BRANCH HARIPUR, HARIPUR

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address: NAMLI MAIRA

City: ABBOTTABAD

Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Temp. Address:

City:

Email:

Attested
Sania Bibi

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Missed
Sund Bk

MISSING
2011

Best rest for 3 days
AD

State Ambulance Co. ORS
1-6-11
100-5-11
1/2 mtr + 1/2 hr
1/2 mtr + 1/2 hr
1/2 mtr + 1/2 hr
1/2 mtr + 1/2 hr

FACE VALUE RUPEES RS. 10/-
DISEASE
DATE 6-10-22
YEARLY NO 4016
NAME Sam
DHQ HOSPITAL HARIPUR
Rs. 10/-
OUTPATIENTS DEPARTMENT

13

Annex - B

~~Samir Babu~~
M. K. C.

~~ADMISSION~~

Bed Rest for 3 days

ADL

oral

tab. paracetamol

tab. amoxicillin (2x1)

tab. spiramycin (2x1)

tab. entonox (2x1)

tab. aspirin

Acute G.V.

acute bronchitis

vacc.

1. fever - 100.4 F

DISEASE

DATE

YEARLY NO

NAME

9-10-22

4947

Samir

OUTPATIENT DEPARTMENT

DHQ HOSPITAL HARIPUR

Rs. 10/-

FACE VALUE RUPEES RS. 10/-

14

15

Annex - C

CHARGE SHEET

I, Imran Shahid, (PSP) District Police Officer, Haripur as the competent authority, hereby charge you JFC Sania No. 835 as enclosed statement of allegations:

- (1) You appear to be guilty of misconduct under Khyber Pakhtunkhwa Police Efficiency and Discipline Rules 1975 (amended 2014) and have rendered yourself liable to all or any of the penalties specified in the said Rules.
- (2) You are, therefore, required to submit your written defense within 07 days of the receipt of this charge sheet and statement of allegation to the Enquiry Officer as the case may be.
- (3) Your written defense, if any, should reach the Enquiry Officer within the specified period, failing which it will be presumed that you have no defense to put in and, in that case, ex-parte action will follow against you.
- (4) Intimate whether you desire to be heard in person or otherwise.
- (5) A statement of allegations is enclosed.

Imran Shahid, (PSP)
District Police Officer
Haripur

Attested
SANIA BIBI

DISCIPLINARY ACTION

I, Imran Shahid, (PSP), District Police Officer, Haripur as the competent authority is of the opinion that you LFC Sania No.835 have rendered yourself liable to be proceeded against you as you have committed the following acts/omissions within the meanings of Khyber Pakhtunkhwa Police Efficiency and Discipline Rules 1975 (amended 2014).

STATEMENT OF ALLEGATION

"It has been reported vide DD No.13 dated 06.10.2022 (Police Lines Haripur) that you while posted at police lines, Haripur absented from lawful duties without any leave or permission from the competent authority, which shows lack of interest in disposal of official duties. This tantamounts to gross misconduct on your part in terms of KPK Police E and D Rules 1975" (amended 2014), hence charge sheeted."

- (2) For the purpose of scrutinizing the conduct of the said accused officer with reference to the above allegations, the following Enquiry officer is appointed to probe the charges.

Mr. Muhammad Ayaz (Addl. SP/Haripur)

- (3) The Enquiry Officer shall in accordance with the provisions of these Rules provide a reasonable opportunity of hearing to the accused, record findings, and make within 25 days of the receipt of this order, a recommendation as to punishment or the appropriate action against the accused.
- (4) The accused and a well-conversant representative of the department shall attend the proceedings on the date, time and place fixed by the Enquiry Officer.

9 — —
Imran Shahid, (PSP)
District Police Officer
Haripur

No: 420-21/HC dated Haripur the 07/10/2022.

Copy of above is submitted to:-

- 1) Enquiry Officer for initiating proceedings against the said accused under Khyber Pakhtunkhwa Police Efficiency and Discipline Rules 1975 (amended 2014).
- 2) LFC Sania No.835 with the direction to submit his defense within 7 days of the receipt of this statement of allegations and also to appear before the Enquiry Officer on the date, time, and place fixed for the purpose of departmental proceedings.

9 — —
District Police Officer
Haripur

Almas
Sania BPS

Handwritten signature at the top of the page.

Handwritten number '10' at the top right.

Main body of handwritten text, appearing to be a list or series of notes, possibly related to a medical or scientific study. The text is dense and difficult to decipher due to the cursive style and some blurring.

Handwritten text 'HEVA' on the right margin.

Handwritten text at the bottom of the main body, possibly a date or reference.

Handwritten text 'Appendix-I' at the bottom left.

Handwritten number '17' inside a circle at the bottom center.

28

1-18/08/2018 - 18/08/2018 - 18/08/2018

2-01/09/2018 - 01/09/2018 - 01/09/2018

14/08

18/08/2018 - 18/08/2018 - 18/08/2018

18/08/2018

Mohd

Santa Bibi

Approved
 5/21/2003

Year

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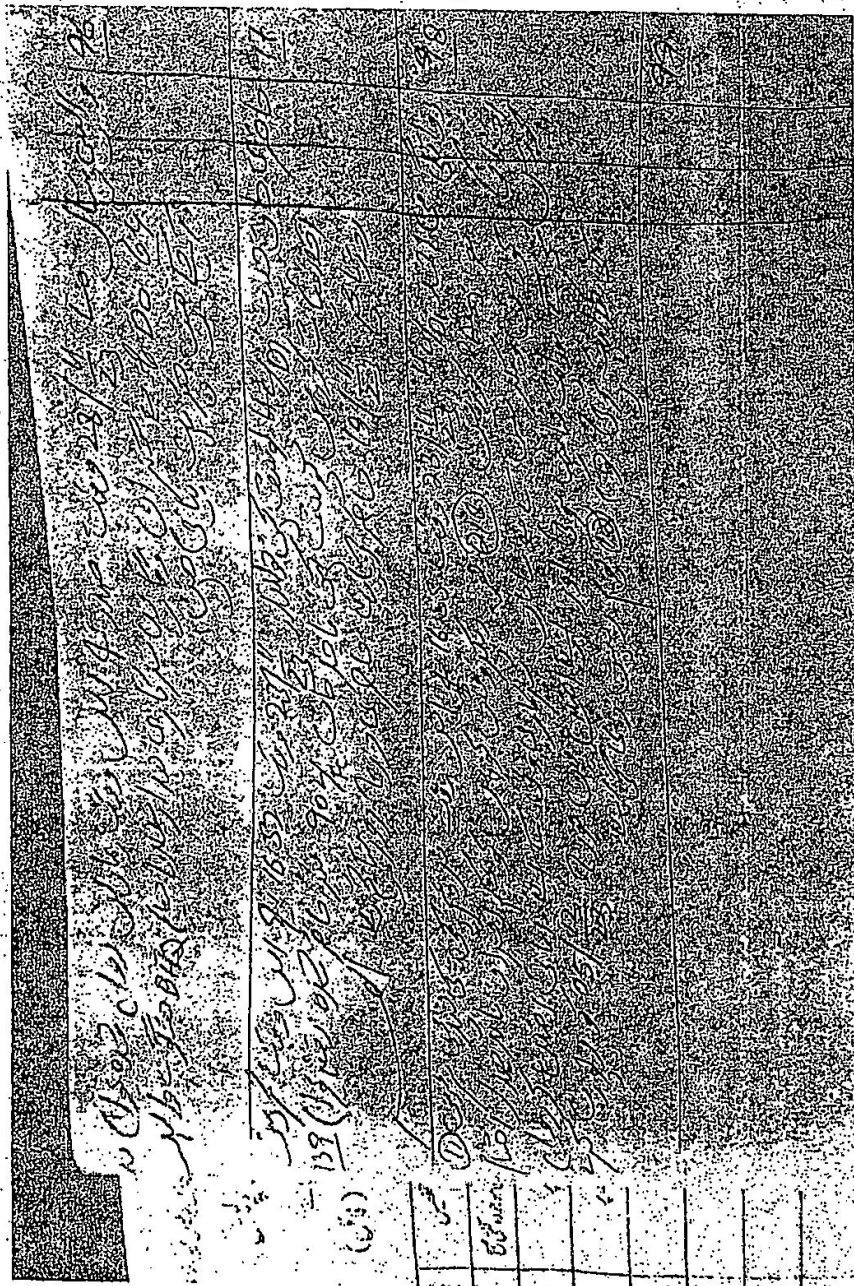
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5/21/2003

Annex-E

19

~~SECRET~~
Approved



ANNEX-F

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21

Annex-9



OFFICE THE COMMANDANT, POLICE TRAINING COLLEGE, HANGU.

Ph. # 0925-621886

Fax # 0925-620886

**FOR PUBLICATION IN KHYBER PAKHTUNKHWA POLICE GAZETTE PART-II ORDERS BY THE
COMMANDANT POLICE TRAINING COLLEGE HANGU.**

NOTIFICATION

Dated: 02.04.2024

No. 371 /S/RESULT: Result of the following Ladies Recruits, of your Distt/Units, who appeared in the final examinations of Recruit Course, held at PTC Hangu for the term ending 05.11.2023, are hereby announced against their Order of Merit. The Original Performance Reports/History sheets, of the Passed Candidates shall be issued and sent separately.

Result of Ladies Recruits at PTC Hangu, Term Ending 05.11.2023

S#	Comp#	Name	Belt #	District/Unit	Merit No
1	R-28283	Alishba Sajid	1723	Abbottabad	1
2	R-28284	Aqsa Shaheen	1728	Abbottabad	2
3	R-28250	Ammara Murad	1721	Abbottabad	3
4	R-28150	Nimra Mushtaq	1780	Manselra	4
5	R-28303	Sidra Bibi	1584	Manselra	5
6	R-28272	Sadaf Naz	1662	Manselra	6
7	R-28198	Sara Baidar	3127	CCP Peshr:	7
8	R-28326	Zainab	1959	Abbottabad	8
9	R-28161	Farhat Shaheen	1841	Abbottabad	9
10	R-28225	Javeria	1758	Abbottabad	10
11	R-28249	Qurat Ul Ain	1764	Abbottabad	11
12	R-28327	Ayeza	1727	Abbottabad	12
13	R-28244	Amina Saeed	1668	Manselra	13
14	R-28316	Naila	88	CCP Peshr:	14
15	R-28240	Ayesha Bibi	1600	Manselra	15
16	R-28252	Mishal Khalid	1983	Abbottabad	16
17	R-28153	Mairaj	2066	Manselra	17
18	R-28257	Sara Qadeem	700	Charsadda	18
19	R-28228	Fatima Sarif	1923	Abbottabad	19
20	R-28213	Laraib Bibi	2182	Manselra	20
21	R-28164	Amina Farooq	1735	Abbottabad	21
22	R-28188	Saira BiBi	1713	Manselra	22
23	R-28163	Laiba Gulistan	2041	Abbottabad	23

Attended
Sana Bibi

22

Result of Failed Ladies Recruit's, Term Ending 05.11.2023

S#	Comp#	Name	Belt #	District/Unit	Failed Sub:
194	R-28182	Rukhsana	12200	Manselra	Paper-II
195	R-28162	Fakeeza	2001	Abbottabad	Paper-II
196	R-28278	Sunshra	3863	NWTD	Paper-I
197	R-28274	Bisma	2410	Manselra	Paper-I
198	R-28176	Saira Zahoor	1749	Manselra	Paper-I
199	R-28206	Saba	4088	Khyber	Paper-I, Paper-II
200	R-28293	Shahana	4269	SWTD	Paper-I, Paper-II
201	R-28261	Shmza	4087	Khyber	Paper-I, Paper-II & Eng
202	R-28282	Ayesha	942	Chitradila	Paper-I, Paper-II
203	R-28289	Nazo	3707	Mohmand	Paper-I, Paper-II
204	R-28260	Nusrat	4085	Khyber	Paper-I, Paper-II
205	R-28253	Khatun	2271	CCP Pesh:	Paper-I, Paper-II
206	R-28168	Shmza	2143	Manselra	Paper-I, Paper-II
207	R-28287	Nadia Bibi	2528	Lakki Marwat	Paper-I, Paper-II
208	R-28286	Nafeesa	4375	SWTD	Paper-I, Paper-II
209	R-28288	Iqra	4086	Khyber	Paper-I, Paper-II
210	R-28156	Shabana	4249	SWTD	Paper-I, Paper-II
211	R-28344	Maryam	1726	Parachinar	Paper-I, Paper-II
212	R-28230	Samia Bibi	835	Harijpur	Paper-I, Paper-II
213	R-28174	Rehana Bibi	3274	Swat	Paper-I, Paper-II
214	R-28167	Sheeba	1196	FRP HQ Pesh:	Paper-I, Paper-II
215	R-28232	Khandifa Zeb	3382	Swat	Paper-I, Paper-II
216	R-28320	Sunmya	2128	Orakzai	Paper-I, Paper-II & Eng
217	R-28263	Shabeena	264	Nowshera	Paper-I, Paper-II & Eng
218	R-28233	Ajman Ameen	1487	Swabi	Paper-I, Paper-II

Attested
Samia Bibi

Handwritten signature and initials, possibly "Sawar B. B." and "H. H."

Muhammad Omer Khan, (PSP)
District Police Officer,
Haripur

1. Muhammad Omer Khan, (PSP) District Police Officer, Haripur as the competent authority, hereby charge you LFC Saulta No. 835 as enclosed statement of reasons.

You appear to be guilty of misconduct under Khyber Pakhtunkhwa Police Efficiency and Discipline Rules 1975 (amended 2014) and have rendered yourself liable to all or any of the penalties specified in the said Rules.

You are, therefore, required to submit your written defense within 07 days of the receipt of this charge sheet and statement of allegation to the Enquiry Officer as the case may be.

Your written defense, if any, should reach the Enquiry Officer within the specified period, failing which it will be presumed that you have no defense to put in and, in that case, ex-parte action will follow against you.

Intimate whether you desire to be heard in person or otherwise.

A statement of allegations is enclosed.

CHARGESHEET

23

Amir - H

DISCIPLINARY ACTION

Muhammad Omer Khan, (PSP) District Police Officer, Haripur as the competent authority is of the opinion that you LEC Sania No.835 while undergoing recruit course at (PTC Hangu) have rendered yourself liable to be proceeded against you as you have committed the following acts/omissions within the meanings of Khyber Pakhtunkhwa Police Efficiency and Discipline Rules 1975 (amended 2014).

STATEMENT OF ALLEGATION

It has been reported vide DD No.17 dated 19.05.2023 (Police Lines, Haripur) that you were dropped from the basic recruit course according to DIG Training office letter No.2791/Trg. dated 05.05.2023. However, you have been found absent from legitimate official duties w.e.f. from 19.05.2023 to date without any leave or permission from the competent authority. Your willful absence demonstrates a lack of interest in discharge of official duties. This constitutes to gross misconduct on your part in terms of the KPK Police Efficiency & Disciplinary Rules 1975 (amended 2014), hence charge sheet.

(2) For the purpose of scrutinizing the conduct of the said accused officer with reference to the above allegations, the following Enquiry officer is appointed to probe the charges.

Mr. Iftikhar Ahmed (PSP/Sadar)

(3) The Enquiry Officer shall in accordance with the provisions of these Rules provide a reasonable opportunity of hearing to the accused, record findings, and make within 15 days of the receipt of this order, a recommendation as to punishment or the appropriate action against the accused.

(4) The accused and a well-conversant representative of the department shall attend the proceedings on the date, time and place fixed by the Enquiry Officer.

Muhammad Omer Khan, (PSP) District Police Officer, Haripur

No. 717-20/PS dated Haripur the 06/12/2023.

Copy of above is submitted to:

- 1) Enquiry Officer for initiating proceedings against the said accused under Khyber Pakhtunkhwa Police Efficiency and Discipline Rules 1975 (amended 2014).
2) LEC Sania No.835 with the direction to submit his defense within 7 days of the receipt of this statement of allegations and also to appear before the Enquiry Officer on the date, time and place fixed for the purpose of departmental proceedings.

Muhammad Omer Khan, District Police Officer, Haripur

Signature of LEC Sania No.835

~~Handwritten signature~~

Handwritten notes in Urdu, including:

- 1- ...
- 2- ...
- 3- ...

06-12-23

Handwritten text at the bottom of the page.

۶۔ میرٹھورہم $\frac{12}{23}$ کو منحدت کو گھٹا کر $\frac{12}{23}$ کے لئے
 چھٹی ڈی جی۔ جبکہ $\frac{12}{23}$ کو منحدت سے گھٹا کر $\frac{12}{23}$ کے لئے
 کا کا اور $\frac{12}{23}$ سے $\frac{12}{23}$ اور اس طرح $\frac{12}{23}$ کو $\frac{12}{23}$ کے لئے
 عہدہ تو میں نامٹ ڈی جی کا کم ہوا۔ جو منحدت کو گھٹا کر $\frac{12}{23}$ کے لئے
 اور $\frac{12}{23}$ کو منحدت کو گھٹا کر $\frac{12}{23}$ کے لئے۔

۵۔ یہ کہ اگر میں منحدت کو گھٹا کر $\frac{12}{23}$ کے لئے
 سے اس نام ڈی جی ہوں۔ لیکن میں $\frac{12}{23}$ کے لئے
 قلمی سے اس نام کو گھٹا کر $\frac{12}{23}$ کے لئے
 ہے۔ اور منحدت کو گھٹا کر $\frac{12}{23}$ کے لئے
 منحدت میں منحدت کو گھٹا کر $\frac{12}{23}$ کے لئے
 بارے حقیقت سے اس نام کو گھٹا کر $\frac{12}{23}$ کے لئے۔

۴۔ یہ کہ میں منحدت کو گھٹا کر $\frac{12}{23}$ کے لئے
 نے اس نام کو گھٹا کر $\frac{12}{23}$ کے لئے
 کے لئے منحدت کو گھٹا کر $\frac{12}{23}$ کے لئے
 منحدت میں منحدت کو گھٹا کر $\frac{12}{23}$ کے لئے
 سے اس نام کو گھٹا کر $\frac{12}{23}$ کے لئے۔

۷۔ یہ کہ میں منحدت کو گھٹا کر $\frac{12}{23}$ کے لئے
 اس نام کو گھٹا کر $\frac{12}{23}$ کے لئے۔

استعمال سے منحدت کو گھٹا کر $\frac{12}{23}$ کے لئے
 ذیل کے نام کو گھٹا کر $\frac{12}{23}$ کے لئے
 ۰۹/۱۲/۹۳

Attest
 Sd/-

~~Amir~~
Alto

MI-POICE TIME
Haripur
27-12-2023

2023 27 12 2023

835 23 12 2023

التم

نہایت سے زیادہ اہمیت رکھتا ہے۔
نہایت سے زیادہ اہمیت رکھتا ہے۔

بانی

بانی (DPO) صاحب پر کئی کئی بار

بانی پر کئی کئی بار

بانی

Amir

(27)

(28)

Annex - K



DISTRICT POLICE OFFICER
HARIPUR

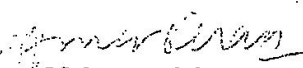
ORDER

LFC Sania No.835, while undergoing recruit course at PTC Hangu, it was reported vide DD No.17 dated 19.05.2023 (Police Lines, Haripur) that she was dropped from the "Basic Recruit Course" according to DIG Training office letter No.2791/Trg: dated 05.05.2023. However, she has been found absent from legitimate official duties w.e.f. from 19.05.2023 to 14.12.2023 (209 days) without obtaining any leave or permission from the competent authority. The willful absence demonstrated her lack of interests in discharge of official duties. Furthermore, it has also reported vide DD No. 25 dated 18.12.2023 (Police Lines, Haripur) that the lady's barrack was inspected by RI Police Lines, during the inspection, lady constables complained that she was recording their videos without their permission or consent, she was directed not to indulge in such activities tarnishing the soft image of police and unrest among the females police officials. The acts & omissions of the lady constable Sania No.835 were gross misconduct on her part in terms of the KPK Police Efficiency & Disciplinary Rules 1975 (amended 2014)".

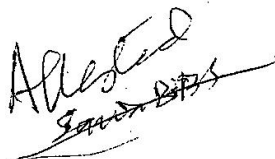
To probe the allegations of misconduct Mr. Iftikhar Ahmed (SDPO/Saddar, Haripur) was appointed as Enquiry Officer vide this office memo: No.719-20/PS dated 06.12.2023. In the meanwhile, delinquent made her arrival at Police Lines, Haripur vide DD No.23 dated 14.12.2023 and absented herself again from official duties vide DD No.30 dated 15.12.2023. Consequently, she was served with a SCN vide issue No.739/PS dated 18.12.2023. The inquiry officer conducted proper departmental inquiry and submitted his findings, vide his office Memo No.483 dated 19.12.2022, wherein, the charges of misconduct against the accused official were proved. It is worth mentioning that delinquent LFC was previously awarded major penalty of dismissal from service vide DD No.38 dated 20.01.2023 but she did not bother to mind her ways and committing repeated misconduct. The Inquiry Officer recommended her for "Major Punishment".

Having perused the relevant record and evidence the charges of misconduct against LFC Sania No.835 stands proved. Therefore, I, Muhammad Omer Khan, (PSP), District Police Officer, Haripur being competent authority under the Khyber Pakhtunkhwa, Police Efficiency & Discipline Rule 1975 (amended 2014), am fully satisfied that LFC Sania No.835, has committed gross misconduct. Therefore, she is awarded Major Punishment of "Dismissal from Service" with immediate effect.

OB No: 1105
Dated 29-12-2023


Muhammad Omer Khan, PSP
District Police Officer,
Haripur

NO. 110/PPK,
dated 5.11.2024, sister of very DPO at his residence at Islamabad as


Sania No.835

29

Annex-L

To

The Regional Police Officer,
Hazara Region,
Abbottabad.

Subject:- REQUEST FOR PROVISION OF DISMISSAL AS WELL AS APPELLATE ORDERS.

Respected Sir,

With most reverence and humble submission it is stated:-

1. That appellant was dismissed from service on 29-12-2023 by the DPO Haripur but dismissal order was not issued to her despite her enthusiastic efforts she made by visiting DPO Office Haripur and submitting written applications for order. Even appellant was often not allowed to see DPO Haripur in person for explaining her grievance. Appellant was verbally informed by her (Monitor) Lady Constable Police Lines Haripur that appellant had been dismissed from service by DPO Haripur on 29-12-2023.
2. That in compulsion appellant without having any Dismissal Order from DPO Haripur had to file a Departmental Appeal before the Region Police Officer, Hazara Region, Abbottabad on 03-01-2024. Since Statutory period of deciding appeal i.e. 90 days has passed away on 03-04-2024 and similarly further 30 days for filing service appeal before the Hon'able KPK Service Tribunal Peshawar have also completed on 03-05-2024 but no appellate or dismissal order has yet been provided.
3. That appellant was telephonically called by Falza Tanveer ASP Abbottabad that her inquiry was under process. Appellant appeared before ASP Abbottabad in inquiry but as per information of RPO Office appellant's inquiry has not yet been finalized thus appellate order has not been given to her. As per Section-4 of KPK Service Tribunal Act 1974 initial and appellate orders of which a civil servant is aggrieved are mandatory requirement for filing service appeal. Non-issuing of initial as well appellate order on the part of departmental authorities seem just to deprive the appellant from filing service appeal otherwise it is legal bounded responsibility of the departmental authorities to provide the appellant these order well in time.

It is, therefore, earnestly requested that dismissal as well as appellate order may graciously be provided to appellant for seeking her remedy before the Hon'able KPK Service Tribunal Peshawar.

Yours Obedient Servant

Sania Bibi
(SANIA BIBI)

D/O Sardar Muhammad Rafique
Ex-Lady Constable No.835
District Police Haripur

Address:

Village: Namli Maira
Tehsil & Distt: Abbottabad
Mobile No.0348-1551077

Dated: 13-05-2024

Copy for information and necessary Action:-

1. Honourable PPO/IGP KPK Peshawar.
2. The District police Officer, Haripur

Sania Bibi
Sania Bibi

(30)

Annex - M

BEFORE THE REGIONAL POLICE OFFICER HAZARA REGION
ABBOTTABAD

(Departmental Appeal by LFC Sania Bibi No.835, District Police Haripur)

DEPARTMENTAL APPEAL AGAINST "DISMISSAL FROM SERVICE" OF
WHICH ORDER IS NOT BEING PROVIDED BY DISTRICT POLICE
OFFICER HARIPUR.

PRAYER: ON ACCEPTANCE OF INSTANT DEPARTMENTAL APPEAL THE
APPELLANT'S DISMISSAL ORDER (DATE NOT KNOWN) ISSUED BY DPO
HARIPUR MAY KINDLY BE SET ASIDE AND APPELLANT BE RE-INSTATED
IN SERVICE FROM THE DATE OF DISMISSAL WITH ALL
CONSEQUENTIAL SERVICE BACK BENEFITS.

Respected Sir,

With most veneration the following few lines are laid down before your highness for your kind consideration and favorable orders:-

1. That appellant was inducted in police department as Lady Constable on 09-12-2016 in District Police Haripur. Right from her appointment, the appellant was deputed to serve the disabled (confined to bed) SISTER of the then DPO Haripur at his residence at Islamabad. (Copy of Salary Slip for Dec 2023 showing date of appointment is attached as "A").
2. That appellant served the disabled sister of the very DPO at his residence at Islamabad till October, 2022. During this entire period from December 2016 to - 10/2022 appellant always tried her best to be backed to her District Haripur and serve as Lady Constable but was never allowed. In Oct, 2022 she came back and reported for duty here in Police Lines at Haripur but she was not being taken on duty rather forced to go back and serve the disabled sister of very DPO at his residence at Islamabad as

*Applicant
Sania Bibi*

previous. For the reason she was being marked absent despite her 24 hours presence in Police Lines and performing duties. In October 2022 when appellant fell ill for about 04 days she was marked absent and charge sheeted despite her submitting medical certificates which was replied. **(Copies of medical certificates, Charge Sheet and its reply are attached as B, C & D).**

3. That after issuing above cited baseless charge sheet the District Police Officer Haripur vide his order dated 20-01-2023 dismissed the appellant from service without any cause and reason due to instigation of the then DPO Haripur, Appellant preferred departmental appeal dated 30-01-2023 against her dismissal and she was re-instated in service by the Regional Police Officer Hazara Region Abbottabad vide 27-03-2023. Appellant joined and started duties.

4. That attitude of the then DPO Haripur was/is still inimical towards the appellant and since then he has been trying to oust the appellant from service. That throughout her entire service the appellant was never allowed or deputed to acquire her basic recruit course/training at PTC Hangu. That on the General Instructions of Provincial Police Officer KPK Peshawar the appellant was deputed for basic recruit course at PTC Hangu vide DPO Haripur order dated 03-05-2023 but just after 02 days on 05-05-2023 the SP Training Hangu was approached by the DPO Haripur to oust the appellant from training and send her back to her District Haripur. The appellant

*Attested
Sd/- BPP*

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approached the Commandant (DG Training) PTC Hungu who was kind enough and instructed the appellant to keep continued and complete basic recruit course/ training. The appellant completed her training at PTC Hungu and reported back for duties at Police Line Haripur on 05-12-2023. **(Copies of Clearance Certificate and Daily Dairy from PTC Hungu are attached as "E & F").**

5. That despite appellant's undergoing and completing her basic recruit course/training at PTC Hungu she was being marked absent at her District Haripur. On her return from PTC Hungu and reporting for duty at Police Lines Haripur, she was issued a Charge Sheet dated 06-12-2023 for absence from duty which was duly replied explaining all facts and denying the allegations being false and fabricated. **(Copies of Charge Sheet and its reply are attached as "G & H").**

6. That since her return from the house at Islamabad of the then DPO Haripur appellant has not been allowed to enter the police lines Haripur and DPO's Office at Haripur, for no just cause and reason, on one or the other pretext.

7. That since her return from the residence at Islamabad of the then DPO Haripur, the appellant has been dealt with inimical attitude and discriminatory treatment, and being penalized for personal grudge without any fault on her part though she has been performing her duties with devotion and honesty.

Abdullah
Sawab BB

8. That no proper departmental inquiry was conducted. Inquiry report, if any, was not given to her. She was not called by Inquiry Officer. Even the appellant was not provided the opportunity of personal hearing despite her repeated requests and she was awarded major punishment of dismissal from service in serious violation of law, departmental rules & regulations, facts and principle of natural justice. Even copy of dismissal order despite appellant's time and again personal approaches is being not given.
9. That on 29-12-2023 after submitted reply to the show cause notice, at about 1700 hours the Monitor (Noreen Blbi) of lady constables Police Lines Haripur telephonically informed the appellant that DPO Haripur has dismissed the appellant from service and appellant could obtain dismissal order from DPO office on 01-01-2024 (30-31/12/2023 being Saturday and Sunday). On 01-01-2024 when appellant visited DPO Haripur Office for obtaining dismissal order she was not allowed to enter the premises and application was received from her at the Gate of Office. But she was not given copy of the order and deferred on the pretext to come the next day.
10. That appellant is not allowed to appear before the DPO Haripur for personal hearing. In this regard appellant has submitted different applications. **(Copy of application is attached as "I")**.
11. That appellant is totally innocent and had discharged her official duties with devotion and honesty but still she was awarded with major

Attested
Sara Blbi

34

punishment of dismissal from service without any cause or justification just on the basis personal grudge and enmity and instigation of the then DPO Haripur. There is nothing wrong on the part of appellant.

12. That if the appellant is provided with a chance of personal hearing, she will really prove herself as innocent by explaining all facts and circumstances of the matter.

In view of the aforementioned facts it is earnestly requested that dismissal order (copy of order not provided) of the District Police Officer, Haripur, may kindly be set aside and appellant be re-instated in service from the date of dismissal with all consequential service back benefits. Appellant shall pray for your good health and long life. Thanking you sir in anticipation.

Yours Obedient Servant

Sania Bibi
(SANIA BIBI)

D/O Sardar Muhammad Rafique
Lady Constable No.835
District Police Haripur.

Address:

Village: Namli Maira
Tehsil & Distt: Annpattanad
Mobile No.0348-1551077

Dated: 03-01-2024

*Accepted
Sania Bibi*

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Annex-N



OFFICE OF THE REGIONAL POLICE OFFICER
HAZARA REGION, ABBOTTABAD

☎ 0992-9310021-22

☎ 0992-9310023

✉ r.rpohazara@gmail.com

NO: 2778 /PA DATED: 25/12/2024

ORDER

This order will dispose of departmental appeal under Rule 11-A of Khyber Pakhtunkawa Police Rules, 1975 submitted by Ex-LFC Sania Bibi No. 835 of District Haripur against the order of punishment i.e. dismissal from service awarded by DPO, Haripur vide OB No.1105 dated 29-12-2023.

“Brief facts leading to the punishment are that the appellant while undergoing recruit course at PTC Hangu, it was reported vide DD No. 17 dated 19-05-2023 Police Lines, Haripur that she was dropped from basic recruit course vide DIG Training's letter No. 2791/Trg dated 05-05-2023, however she has been found absent official duty from 19-05-2023 to 14-12-2023 (209 days) without any leave or permission.”


The appellant was issued charge sheet along with summary of allegations and DSP, Saddar was deputed to conduct departmental enquiry. The EO held the appellant responsible of misconduct and recommend for major punishment. He was called in OR, heard in person by the competent authority, however he failed to advance any cogent reason in her defense. Consequently, DPO Haripur awarded her major punishment of dismissal from service. Hence, the appellant submitted this present appeal. The appellant appeared before RPO Hazara on 27-03-2024 and contended that she is innocent and was awarded punishment unjustly. Consequently, in order to give her another opportunity of defense his case was sent to ASP Cantt, Abbottabad for denovo enquiry. The EO held that her previous punishment of i.e. dismissal from service may be sustained.

After receiving the enquiry report of ASP Cantt, the appellant was again called in OR and provided with reasonable opportunity to defend the allegation of misconduct. However, she failed to advance any reasonable justification in her defense.

Attested
Sania Bibi

36

Foregoing in view, the punishment awarded by DPO Haripur seems reasonable. Hence, in exercise of the powers conferred upon the undersigned under Rule 11-4 (a) of Khyber Pakhtunkawa Police Rules, 1975 instant appeal is hereby *rejected/*filed with immediate effect.


TAHIR AYUB KHAN (PSP)
Regional Police Officer
Hazara Region, Abbottabad

No. 2779 /PA, dated Abbottabad the 25-5-2024.

Cc.

District Police Officer, Haripur for information and necessary action with reference to his office Memo No. 1084 dated 12-03-2024. Service Roll and Fuji Missal containing inquiry file and denovo enquiry file of (07 pages) is returned herewith for record.

Attested
Sana Bibi

وکالت نامہ

بہالت جناب خیر بختون خواہ سروس ٹریڈنگ پشاور

منجانب Samia Bibi ایمینٹ

تثنیہ Samia Bibi etc KPK PP0/1/PP

دعویٰ یا جرم سروس ٹریڈنگ باعث تحریر آنکہ

مندرجہ بالا عنوان میں اپنی طرف سے بیروی و جوابدہی مقام پشاور ایسٹ آباد

محمد سلیم تنولی ایڈووکیٹ بدیں شرط وکیل مقرر کیا۔ کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوتا ہوں گا۔ اور بوقت پکارے جانے وکیل صاحب موصوف کو اطلاع دے کر حاضر کروں گا۔ اگر کسی

پیشی پر مظہر حاضر نہ ہوا۔ اور حاضری کی وجہ سے کسی وجہ پر مقدمہ میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ

ہوئے۔ نیز وکیل صاحب موصوف صدر مقام پشوری کے علاوہ کسی اور جگہ یا پشوری کے مقرر اوقات سے پہلے یا بروز

تعطیل بیروی کرنے کے مجاز نہ ہونگے۔ اگر مقدمہ مقام پشوری کے کسی اور جگہ سماعت ہونے یا بروز پشوری کے اوقات

کے آگیا یا پیچھے ہونے پر مظہر کو کوئی نقصان پہنچے تو ذمہ دار یا اس کے رابطے کسی معاوضہ ادا کرنے مختار نامہ واپس کرنے کے

بھی صاحب موصوف ذمہ دار نہ ہونگے۔ مجھے کل ساختہ پرواخت صاحب مثل کردہ ذات خود منظور و قبول ہوگا اور صاحب

موصوف کو عرضی دعویٰ اور درخواست اجراءے ڈگری و نظر ثانی اپیل نگرانی دائر کرنے نیز ہر قسم کی درخواست پر دستخط تصدیق

کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کے اجراء کرنے اور ہر قسم کاروبار وصول کرنے اور رسید دینے اور داخل کرنے

کا ہر قسم کا بیان دینے اور پرواٹاشی و راضی نامہ و فیصلہ برخلاف کرنے اقبال دعویٰ کا اختیار ہوگا۔ اور بصورت اپیل و

برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم اثباتی یا ڈگری قبل از فیصلہ اجراءے ڈگری بھی صاحب موصوف کو

بشرط ادائیگی علیحدہ بیروی مختار نامہ کریکا مجاز ہوگا۔ اور بصورت ضرورت اپیل یا اپیل کے واسطے کسی دوسرے وکیل یا پریسٹر

کو بجائے اپنے ہمراہ مقرر کریں اور ایسے مشیر قانونی کو بھی اس امر میں وہی اختیارات حاصل ہونگے جیسے صاحب

موصوف کو۔ پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا۔ تو صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی بیروی نہ

کریں اور ایسی حالت میں میرا مطالبہ صاحب موصوف کے برخلاف نہیں ہوگا۔ لہذا مختار نامہ لکھ دیا ہے کہ سند رہے مضمون

مختار نامہ من لیا ہے اور اچھی طرح سمجھ لیا اور منظور ہے۔

مورخہ: 11-06-2024

العبد العبد العبد

Accepted by

M. Adam
Adv

Samia Bibi