FORM OF ORDER SHEET

Court of _____

Appeal No. 829/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	11/06/2024	The appeal of Mr. Siraj Ud Din re-filed today by registered post through Mr. Pir Ghulam Khan Marwat Advocate. It is fixed for preliminary hearing before touring Single Bench at D.I.Khan on 20.08. 2024. Counsel for the appellant has been informed telephonically. By the order of Chairman REGISTRAR

BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA, PESHAWAR, CAMP AT DIKHAN.

Service Appeal No. 829 /2024

Siraj Ud Din ....appellant

Versus

Govt. of KPk etc

SERVICE APPEAL

REFERENCE DIRECTION BY THE HONOURABLE TRIBUNAL VIDE LETTER NO. 78 DATED 29/05/2024.

Respectfully sheweth:-

That appeal cited above has been re-submitted after doing all the needful from serial No. 1 upto serial No. 8. Humbly requested that to struck out the respondent No. 4 under Order-1, Rule -10(2) of CPC. Please.

Submitted pl.

Your Humble Petitioner

Siraj Ud Din
Through Counsel

Dated 5/06/2024

Pir Ghulam Khan Marwat
Advocate High Court,
Dera Ismail Khan.

AFFIDAVIT

I, **Siraj Ud Din** S/o Atta Ullah, the appellant himself, do hereby solemnly affirm declared on oath that contents of the above **reply** are true and correct to the best of my knowledge and nothing has been concealed from this Honourable Tribunal.

OATH COMMISSIONER No. Attested Dist. Bar, D.I.Khan

DEPONENT

The appeal of Mr. Siraj ud Din received today i.e on 27.05.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

1- According to sub-rule-4 of rule-6 of Khyber Pakhtunkhwa Service Tribunal rules 1974 respondent no.4 is un-necessary/improper party, 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.
2- Affidavit is not attested by the Oath Commissioner.
3- Appeal has not been page marked according to the Index.
4- Appeal has not been flagged/marked with annexures marks.
5- Annexures/documents attached with the appeal are unattested.
6- Annexures of the appeal are not in sequence.
7- Index of the appeal is incomplete.
8- All the annexures attached with the appeal are illegible be replaced by legible/better one.

No. 78 /Inst;/2024/KPST,

Dt. 29/05/2024.

REGISTRAR 29/5/24
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Peer Ghulam Adv.
High Court D.I.Khan.

BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA, PESHAWAR, CAMP AT DIKHAN.

Service Appeal No. 829 /2024

Siraj Ud Din ....appellant

Versus

Govt. of KPk etc

SERVICE APPEAL

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Attested by

Dated 17/05/2024

Your Humble Petitioner

Siraj Ud Din
Through Counsels

Pir Ghulam Khan Marwat
Advocate High Court,
Dera Ismail Khan &

Hamayun Khan
Advocate High Court,
Dera Ismail Khan &

Muhammad Hassan
Advocate, DIKhan.

(1) (1)

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR (CAMP COURT D.I.KHAN)

Service Appeal No. 829 /2024

SIRAJ UD DIN Ex-Constable Police No. 2240, South Waziristan S/o Atta Ullah Khan R/o Khaisora, Tehsil Tiarza District South Waziristan (SWTD)

..... Appellant

Versus

1. Govt. of Khyber Pakhtunkhwa through Inspector General of Police, Civil Secretariat Peshawar.
2. Deputy Inspector General Police Dera Ismail Khan Division, Dera Ismail Khan.
3. District Police Officer, District South Waziristan.

Attested by

Attested by

..... Respondents

SERVICE APPEAL U/S 4 OF SERVICES TRIBUNAL ACT 1974 WITH THE PRAYER TO SET ASIDE IMPUNGED ORDER NO.551-555/SWTD DATED 02/11/2023 OB NO.1255 DATED 02-11/2023 AND TO REINSTIATE THE APPELLANT WITH BACK BANIFITS.

WHEREBY THE APPELLANT WAS DISMISSED FROM SERVICE BY RESPONDENT NO. 3 WHICH IS AGAINST THE LAW, RULES, AGAINST NATURAL JUSTICE AND ARBITRARY, LIABLE TO BE SET ASIDE.

Respectfully Sheweth:-

The appellant submits as under,

Brief Facts:

1. That the appellant has been serving as Khasadar in SWTD Tehsil Tiarza and inducted in Police department as a constable in regular police in at District South Waziristan.

1/1

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR (CAMP COURT D.I.KHAN)

Service Appeal No. 829 /2024

SIRAJ UD DIN Ex-Constable Police No. 2240, South Waziristan S/o Atta Ullah Khan R/o Khaisora, Tehsil Tiarza District South Waziristan (SWTD)

..... **Appellant**

Versus

1. Govt. of Khyber Pakhtunkhwa through Inspector General of Police, Civil Secretariat Peshawar.
2. Deputy Inspector General Police Dera Ismail Khan Division, Dera Ismail Khan.
3. District Police Officer, District South Waziristan.
4. D.S.P Sarwakai District South Waziristan.

..... **Respondents**

SERVICE APPEAL U/S 4 OF SERVICES TRIBUNAL ACT 1974 WITH THE PRAYER TO SET ASIDE IMPUNGED ORDER NO.551-555/SWTD DATED 02/11/2023 OB NO.1255 DATED 02-11/2023 AND TO REINSTIATE THE APPELLANT WITH BACK BANIFITS.

WHEREBY THE APPELLANT WAS DISMISSED FROM SERVICE BY RESPONDENT NO. 3 WHICH IS AGAINST THE LAW, RULES, AGAINST NATURAL JUSTICE AND ARBITRARY, LIABLE TO BE SET ASIDE.

Respectfully Sheweth:-

The appellant submits as under,

Brief Facts:

1. That the appellant has been serving as Khasadar in SWTD Tehsil Tiarza and inducted in Police department as a constable in regular police in at District South Waziristan.

2. That having successfully undergone the required training for recruitment, the appellant was posted as Constable at South Waziristan Tribal District. The appellant always striven hard to discharge satisfactory duties and performed all tasks assigned with due diligence and dedication. The service record of the appellant is unblemished, clean and devoid of any adverse remarks since nothing of the sort has ever been conveyed to the appellant in this respect.

3. That the appellant has served at different stations as Constable i.e. Police Lines South Waziristan situated at District Tank, District Bar South Waziristan at Tank and lastly at Police Lines South Waziristan situated at Sararogha SWTD. Copies of duties performed are annexed as **Annexure A, B & C**.

Attested by

4. That, thereafter, on 02/11/2023, the appellant had been dismissed without any reason, in the absence of the appellant without hearing, issuing statement of allegation and showing cause. Copy as annexed as **Annexure-D**.

5. That, thereafter, the appellant preferred departmental appeal to the appellant authority i.e. DIG on 23/11/2023. Copy as annexed as **Annexure-E.**

6. That the departmental appeal was dismissed on 25/4/2024. Copy Annexed-E.

7. That the appellant preferred another appeal to Provincial Police Officer KPK U/S 11 A, but of no avail. Copy as annexed as **Annexure-F**.

8. That, now, the appellant has no option other than to knock at the door of this Honourable Service Tribunal KPK for redressal of the grievance with the grounds below:-

GROUNDS

a. That the impugned dismissal order is malafide and is against Article 10 A constitution of Islamic Republic of Pakistan 1973.

b. That the appellant has been deprived of vested rights in the violations of all rules and regulations as defined in ESTA CODE.

c. That the appellant has dismissed without showing cause/statement of allegation and giving of proper opportunity of hearing.

d. That the instant dismissal is unlawful, malafide & infringement upon the rights of appellant.

e. That the appellant may very graciously be allowed to raise further grounds at the time of arguments.

It is, therefore, prayed very humbly to set aside the impugned order cited above and to re-insatiate the appellant with all back benefits.

Dated: 17/5/2024

Attested by

Your Humble Appellant
Siraj ud Din

Through Counsels,

Pir Ghulam
Advocate High Court
Dera Ismail Khan

Hamayun Khan
Advocate High Court
Dera Ismail Khan

Muhammad Hassan
Advocate
Dera Ismail Khan

(4)

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR (CAMP COURT D.I.KHAN)

Service Appeal No. _____ /2024

Siraj ud Din

Versus

Govt. of Khyber Pakhtunkhwa and others

SERVICE APPEAL

AFFIDAVIT

I, **Siraj ud Din Ex-Constable Police Constable** S/o **S/o Atta Ullah Khan R/o Khaisora, Tehsil Tiarza District South Waziristan (SWTD)**, do hereby solemnly affirm and declare on oath that contents of above Service Appeal are true & correct to the best of my knowledge and that nothing has been concealed from this Honourable Court.

Dated: 17/5/2024

DEPONENT

VERIFICATION

It is verified that all the *parawise* contents of the service appeal are true and correct, and no such service appeal has earlier been filed on the subject matter before this Hon'ble Court.

Humble Appellant

4/6/2024

(5) (A)

OFFICE OF THE
DISTRICT POLICE OFFICER,
SOUTH WAZIRISTAN TRIBAL DISTRICT.

No. 606 / OHC SWTD the dated: 18 / 05 / 2022

OFFICE ORDER

The following transfers / postings of Lower Subordinates are hereby ordered with immediate effect.

Rank Name	Belt No	From	To
B1 Attiq Ur Rehman	1199	District Bar SWTD at Tank	Police Line SWTD at Tank
FC Siraj Ud Din	2240	Police Line SWTD at Tank	District Bar SWTD at Tank

District Police Officer,
South Waziristan Tribal District.
18/5/22

Attested by

(A)

Better Copy

(6)

OFFICE OF THE
DISTRICT POLICE OFFICER,
SOUTH WAZIRISTAN TRIBLE DISTRICT
0963-510999, 0963-510325

No. 606 /OHC SWTD the dated 18/05/2022

OFFICE ORDER

The following transfers / postings of lower Subordinates are hereby ordered with immediate effect:

Rank Name	Belt #	From	To
B1 Attiq ur Rehman	1119	District Bar SWTD at Tank	Police Line SWTD at Tak
FC Siraj ud Din	2240	Police Line SWTD at Tank	District Bar SWTD at Tank

Attested by

Sd/
District Police Officer
South Waziristan Tribal District

(7) (B)

یونس الدین

SWTD ضلع

تھانہ محمد زئی

مدعی مسماۃ [illegible] بصورت شادی - محمد گلزار ولد [illegible] بعمر 24 $\frac{5}{22}$ وقت 08:10 کو مقدمہ
سراج الدین 2240 کو بصورت شادی حسب الحکم افسران بالا رنگ بازی
نمبر 606 بعمر 18 $\frac{5}{22}$ کو کے ساتھ فرار کا ہے مجھے کہ یونس الدین
SWTD خلاف نامزد ملزم نے دستر کیا ہے SWTD کو روانہ کر کے ہدایت مناسب ہو

مدعی مقدمہ

MM Line SWTD
24-5-22

Attested by

(13)

8

Better Copy

پولیس لائن　　نقلمد روزنامچہ　　ضلع SWTD

مد نمبر 7 روانگی/بصورت تبادلہ محمد کامران IO مورخہ 24/5/2022 وقت 08:10 بجے کنسٹیبل سراج الدین 2240 کو بصورت تبادلہ حسب الحکم افسران بالا انگریزی لیٹر نمبر 606 مورخہ 18/5/2022 کو مع سامان سرکاری ونجی پولیس لائن SWTD بمقام ٹانک سے ڈسٹرکٹ بار SWTD کو روانہ کر کے ہدایت مناسب ہوگی۔

جناب عالی نقل بمطابق اصل ہے۔

دستخط انگریزی

MM-LINE SWTD

24/5/2022

Attested By

(9)

Attested by
Humayun Khan

عالم میر 402

عالم میر 402

Better Copy

	عالم شیر ALO	غیر متعلقہ تحریر
	عالم شیر ALO	مورخہ 15/8/2023 وقت 11:00 بجے اس وقت کانسٹیبل سراج الدین 2240 کو حسب الحکم افسران بالا بحوالہ لیٹر مد نمبر 402/7-8-23 بصورت تبادلہ بمع سامان لائن ہذا سے SWTD اپر روانہ کر کے ہدایت مناسب ہوئی
	عالم شیر ALO	غیر متعلقہ تحریر

OFFICE OF THE
DISTRICT POLICE OFFICER
SOUTH WAZIRISTAN UPPER

ORDER

My this order will dispose of departmental proceedings initiated against the **FC No. Siraj Ud Din No. 2240** on the score of allegations that as per report he have been failed to appear physically before the scrutiny Committee and have been declared as ghost employee.

He was proper charge sheeted and DSP/HQRS was nominated as enquiry officer to conduct the proper enquiry. As per report of the enquiry officer the delinquent Official neither received the charge sheet nor appeared before the enquiry officer.

Now, therefore, In light of the findings/recommendations of the Enquiry Officer and available record on file agains-t the delinquent officer, **I Malik Habib, District Police Officer, South Waziristan Upper** being Competent Authority under the Police Rules 1975 with amendment 2014, hereby awarded the "**Major punishment of dismissal from the Service**" with immediate effect.

OB No. 1255

Dated: 02-11-2023

District Police Officer
South Waziristan Upper

No. 551-555 /SWTD

Dated 2/11/2023

Copy of above is submitted to:-

11. The Regional Police Officer, DI Khan Region for favour of information.
12. Acett:, Reader, Pay Officer, SRC and OHC for information and further necessary action.

District Police Officer
South Waziristan Upper

12 (D)

OFFICE OF THE
DISTRICT POLICE OFFICER
SOUTH WAZIRISTAN UPPER

Better Copy

ORDER

My this order will dispose of departmental proceedings initiated against the FC No. Siraj Ud Din No. 2240 on the score of allegations that as per report he have been failed to appear physically before the scrutiny Committee and have been declared as ghost employee.

He was proper charge sheeted and DSP/HQRS was nominated as enquiry officer to conduct the proper enquiry. As per report of the enquiry officer the delinquent Official neither received the charge sheet nor appeared before the enquiry officer.

Now, therefore, In light of the findings/recommendations of the Enquiry Officer and available record on file against the delinquent officer, I **Malik Habib, District Police Officer, South Waziristan Upper** being Competent Authority under the Police Rules 1975 with amendment 2014, hereby awarded the "**Major punishment of dismissal from the Service**" with immediate effect.

OB No. 1255

Dated: 02-11-2023

District Police Officer
South Waziristan Upper

No. 551-555 /SWTD

Dated 4 / 11 /2023.

Copy of above is submitted to:-

11. The Regional Police Officer, DI Khan Region for favour of information.
12. Acctt:, Reader, Pay Officer, SRC and OHC for information and further necessary action.

Attested by

District Police Officer
South Waziristan Upper

(13) E

بحضور جناب ریجنل پولیس آفیسر صاحب ڈی آئی خان ڈویژن ڈی آئی خان

درخواست بمراد بحالی نوکری بہ وجوہات ذیل :-

Attested by

جناب عالی :-

گزارش کی جاتی ہے کہ سائل سراج الدین ولد عطاء اللہ خان قوم محسود سکنہ ضلع وزیر تحصیل تیارزہ ضلع ٹانک ملازم نمبر 2240 بطور کانسٹیبل محکمہ پولیس ضلع ٹانک ایریا میں کام کر رہا ہوں اور لائن پولیس ضلع ٹانک ایریا میں اپنی ڈیوٹی سرانجام دے رہا ہوں۔ مورخہ 01/11/2023 کو اپنی Salary وصول کر چکا ہوں اور باقاعدہ حاضری رجسٹر میں حاضریاں درج شدہ ہیں۔ من سائل پر بے بنیاد و من گھڑت الزامات گھوسٹ ملازم لگائے گئے ہیں۔ حالانکہ سائل نہ گھوسٹ ملازم ہوں اور نہ ہی گھوسٹ کام کئے ہیں۔ قبل ازیں من سائل کے خلاف رنکوائری مقرر کی گئی تھی تاہم اس وقت من سائل ایمرجنسی ڈیوٹی پر تھا اور رنکوائری پر یکطرفہ کارروائی عمل میں لائی گئی۔

لہذا آپ جناب سے مؤدبانہ التماس کی جاتی ہے کہ سائل کو اپنی ڈیوٹی پر بحال کیا جائے۔ سائل آئندہ کبھی بھی آفسران بالا کو شکایت کا موقع نہیں دے گا۔ مورخہ: 23/11/2023

سراج الدین ولد عطاء اللہ سکنہ ضلع وزیر تحصیل تیارزہ ضلع ٹانک ملازم نمبر 2240

(14)_(F)

OFFICE OF THE
REGIONAL POLICE OFFICER
DERA ISMAIL KHAN
REGION
☎ 0966-9280291 Fax 9280290

No. [illegible] dated D.I.Khan the 25/04/2024

ORDER

1. This order disposes off departmental appeal filed by Ex-Constable Siraj Ud Din No. 2240 of District Police SW Upper, against the order of Major Punishment of (Dismissal from Service), passed by the DPO SW Upper, vide his office OB No. 1255 dated 02.11.2023 on the following allegations:

"[illegible] from his duties since long and failed to appear [illegible] could have been identified as ghost employee."

2. DPO SW Upper served the appellant with the charge sheet. Enquiry into the matter was got [illegible] through Mr. Noor Khan DSP Circle Sarwakai who in his finding, report in which he [illegible] charge sheet not appear before him, inquiry officer stated that he found [illegible] against him and recommended for further orders.

[illegible] Major Punishment of "Dismissal from service" by the DPO SW [illegible] 02.11.2023.

[illegible] on 25.4.2024, in orderly room by undersigned and his service record & [illegible] officer is also perused. He was given ample opportunity of due process and [illegible] the charges under which DPO South Upper has awarded him Major [illegible] "Dismissal from service". His written as well as verbal response is found to be [illegible]

[illegible] NASIR MEHMOOD SATTI, PSP, Regional Police Officer [illegible] of the powers conferred upon me under Rule-11, clause-4 (c), of the Police Rules 1975, Amended 2014, do not intend to take a lenient view, therefore *REJECT* his [illegible] appeal being meritless and upholds the order of Major Punishment of (Dismissal from Service) [illegible] DPO SW Upper vide his OB No. 1255 dated 02.11.2023, with immediate [illegible]

[illegible]

(NASIR MEHMOOD SATTI)PSP
Regional Police Officer
Dera Ismail Khan
25/4

No. [illegible] /PS,
[illegible] above is sent to the DPO SW Upper with reference to his office letter No. [illegible] (Flight Service Roll & Fauji Missal).

SRC
For inspection

Attested by

(NASIR MEHMOOD SATTI)PSP
Regional Police Officer
Dera Ismail Khan
25/4

District [illegible]
So [illegible]

(14)(8)

OFFICE OF THE
REGIONAL POLICE OFFICER
DERA ISMAIL KHAN
REGION
✆ 0966-9280291, Fax # 9280290

No. 2671 /ES dated D.I.Khan the 25 /04/2024

ORDER

1. This order disposes off departmental appeal filed by **Ex-Constable Siraj Ud Din No. 2240** of District Police SW Upper, against the order of Major Punishment of (Dismissal from Service), passed by the DPO SW Upper, vide his office OB No. 1255 dated 02.11.2023 on the following allegations:

i. As per report he has found absent from lawful duties since long and failed to appear physically before the scrutiny committee and have been identified as ghost employee."

ii. DPO SW Upper served the appellant with the charge sheet. Enquiry into the matter was got conducted into through Mr. Noor Khan DSP Circle Sarwakai who in his finding, report in which he stated that neither receive the charge sheet nor appear before him, inquiry officer stated that he found guilty of the charges levelled against him and recommended for further orders.

3. Hence he was awarded Major Punishment of "Dismissal from service" by the DPO SW Upper vide his office OB No. 1255 dated 02.11.2023.

4. Heard in person on 25.04.2024, in orderly room by undersigned and his service record & finding of the inquiry officer is also perused. He was given ample opportunity of due process and natural justice against the charges under which DPO South Upper has awarded him Major Punishment "Dismissal from service". His written as well as verbal response is found to be unsatisfactory.

5. Keeping in view the above, I, **NASIR MEHMOOD SATTI, PSP**, Regional Police Officer, Dera Ismail Khan, in exercise of the powers conferred upon me under Rule-11, clause-4 (a), of the Police Rules 1975, Amended 2014, do not intend to take a lenient view, therefore ***REJECT*** his appeal being meritless and uphold the order of Major Punishment of (Dismissal from Service), passed by District Police Officer SW Upper vide his OB No. 1255 dated 02.11.2023, with immediate effect.

6. Order Announced.

(NASIR MEHMOOD SATTI)PSP
Regional Police Officer
Dera Ismail Khan
25/4

No. 2672 /ES.

Copy of above is sent to the DPO SW Upper with reference to his office letter No. 28/ES dated 04.01.2024. (Encl: Service Roll & Fauji Missal).

SRC
For n/action

(NASIR MEHMOOD SATTI)PSP
Regional Police Officer
Dera Ismail Khan
25/4

District Police Officer
South Waziristan Upper

(15) (G)

بخدمت جناب انسپکٹر جنرل پولیس پشاور

درخواست بحال فرمائے جانے
بر سروس بلحاظ سابقہ مراعات
بوجہ ذیل درخواست 11-A
Under Police Service Rules

جناب عالی! سائل حسب ذیل عرض رساں ہے:

1. یہ کہ سائل خاصہ دار پوسٹ پر باقاعدہ محکمہ پولیس میں Induct کیا گیا اور سائل کو بیلٹ نمبر 2240 Allot کیا گیا۔

2. یہ کہ سائل سال 2018 سے تا 02 11/2023 تک باقاعدہ ڈیوٹی سرانجام دیتا رہا اور باقاعدہ تنخواہ لیتا رہا (فوٹو سٹیٹ لف ہے)۔

3. یہ کہ تاریخ 02 11/2023 کو سائل بذریعہ آرڈر نمبر OB N: 1255 تاریخ 02 11/2023 بغیر کسی وجہ بغیر چارج شیٹ اور شنوائی کے برخاست کیا گیا جو کہ آرٹیکل 10A رائٹس پاکستان 1973 کے اور انصاف کے تقاضوں کے سراسر خلاف ہے۔

4. یہ کہ سائل نے DIG صاحب کو اپیل کی لیکن انہوں نے بلحاظ سے کام لیتے ہوئے اس پر کوئی توجہ نہیں دی۔ لہٰذا استدعا ہے کہ سائل کو نوکری بلحاظ سابقہ مراعات بحال کر کے مشکور و ممنون فرمائیں۔

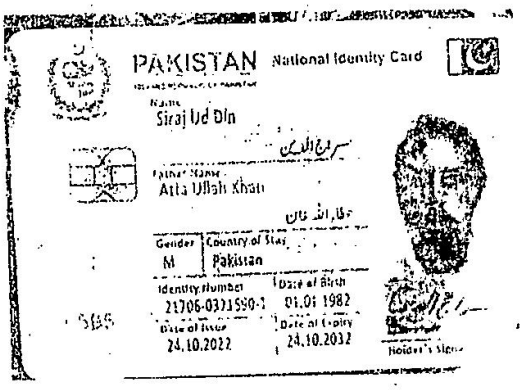
Dated: 10/05/2024

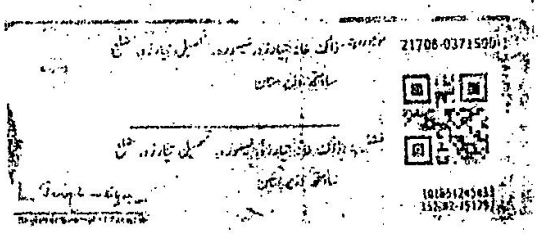
سراج الدین ولد عطاء اللہ قوم محسود سکنہ جنوبی وزیرستان
حال تحصیل تیارہ SWD بیلٹ نمبر 2240

Attested by
Hanif Khan

(16) (H)

Attested by
Hamayun Khan





گمشدہ کارڈ ملنے پر قریبی لیٹر بکس میں ڈال دیں

Khyber Pakhtunkhwa
Bar Council
B.C.No. 18-11199

RS/-100

وکالت نامہ

ANNEX: I
Page-13

DISTRICT BAR DERA ISMAIL KHAN

DBA

1954

بعدالت جناب Before The Service Tribunal Khyber Pakhtunkhwa Peshawar (D.I.Khan Camp)

منجانب

Siraj-ud-din بنام Govt. KPK Etc

دعویٰ یا جرم

تفصیل دعویٰ یا جرم Service Appeal

باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف پیروی واسطے وجواہدی برائے پیشی یا تصفیہ مقدمہ بمقام پشاور کیمپ کورٹ D.I.K
حسن خان / محمد یونس / عبدالمجید لاگری / عبدالحمید ایڈووکیٹ / غلام محمد خان
Advocates
کو حسب ذیل شرائط پر وکیل مقرر کیا ہے، کہ میں ہر پیشی پر خود بذریعہ مختیار خاص روبرو عدالت حاضر ہوتا رہوں گا۔ اور ہر پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دیکر حاضر عدالت کروں گے، اگر پیشی پر مظہر حاضر نہ ہوا۔ اور مقدمہ میری غیر حاضری کی وجہ سے کسی طرح پر میرے برخلاف ہوگیا۔ تو صاحب موصوف اسکے کسی طرح ذمہ دار نہ ہوں گا۔ نیز وکیل صاحب موصوف صدر مقام کچہری کے علاوہ کسی جگہ یا کچہری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل پیروی کرنے کے ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام کچہری کے علاوہ کسی جگہ یا کچہری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل پیروی کرنے کے ذمہ دار نہ ہوں گے۔ اور مقدمہ کچہری کے علاوہ اور جگہ سماعت ہونے یا بروز تعطیل یا کچہری کے اوقات آگے پیچھے پیش ہونے پر مظہر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا مختار نہ واپس کرنے کے بھی موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پرداختہ صاحب موصوف مثل کردہ ذات خود منظور وقبول ہوگا۔ اور صاحب موصوف کو عرضی دعویٰ یا درخواست اجرائے ڈگری ونظر ثانی اپیل نگرانی وہر قسم درخواست پر دستخط تصدیق کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کرانے اور ہر قسم کا روپیہ وصول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اور اُس پر ثالثی یا راضی نامہ وفیصلہ بر حلف کرنے، اقبال دعویٰ کا بھی اختیار ہوگا۔ اور بصورت مقرر ہونے تاریخ پیشی مقدمہ مذکورہ بیرون از کچہری صدر پیروی مقدمہ مذکورہ نظر ثانی واپیل ونگرانی وبرآمدی مقدمہ یا منسوخی ڈگری یک طرفہ یا درخواست حکم امتناع یا قرقی یا گرفتاری قبل از فیصلہ اجرائے ڈگری بھی صاحب موصوف کو بشرط ادائیگی علیحدہ محنتانہ پیروی کا اختیار ہوگا اور تمام ساختہ پرداختہ صاحب موصوف مثل کردہ ذات خود منظور وقبول ہوگا۔ اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ مذکورہ یا اسکے کسی کی کاروائی یا بصورت درخواست نظر ثانی اپیل یا نگرانی یا دیگر معاملہ مقدمہ مذکورہ کسی دوسرے وکیل یا بیرسٹر کو اپنے بجائے یا اپنے ہمراہ مقرر کریں۔ اور ایسے مشیر قانون کو بھی ہر امر میں وہی ویسے اختیارات حاصل ہوں گے، جیسے صاحب موصوف کو حاصل ہیں، اور دوران مقدمہ میں جو کچھ ہرجانہ التواء پڑیگا، وہ صاحب موصوف کا حق ہوگا۔ مگر صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا۔ تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی پیروی نہ کریں اور ایسی صورت میں میرا مطالبہ کسی قسم کا صاحب موصوف کے برخلاف ہوگا۔

لہٰذا وکالت نامہ لکھدیا ہے۔ تاکہ سند رہے

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