


FORM OF ORDER SHEET

Court of _____

Appeal No. 1494/2024


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1.	2	3
1-	20/09/2024	<p>The appeal of Mr. Shamsur Rehman resubmitted today by Syed Dawran Shah Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 30.09.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman</p> <p> REGISTRAR</p>

The appeal of Mr. Shams ur Rehman received today i.e on 02.09.2024 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 Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 2- Check list is not attached with the appeal.
- 3- Annexures of the appeal are unattested.
- 4- Annexures A, B, D, E and G of the appeal are illegible.
- 5- According to sub-rule-4 of rule-6 of Khyber Pakhtunkhwa Service Tribunal rules 1974 respondent no.1 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.

No. 746 /Inst./2024/KPST,

Dt. 12/9 /2024.

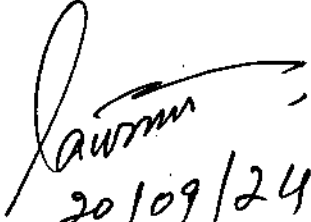

OFFICE ASSISTANT
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Syed Dawran Shah Adv.
High Court at Peshawar.

Note:

Sir,

Re. Submitted after the removal of
office objections.


20/09/24

BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR

Appeal No. 1494/2024

Shams Ur Rehman

VERSUS

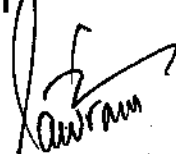
C.C.P.O Peshawar & others

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5.	Copy of Written Statement	"C"	12-12A
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APPELLANT

THROUGH


Syed Dawran Shah
Advocate High Court
Peshawar

BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR

Appeal No. _____

Shams Ur Rehman

VERSUS

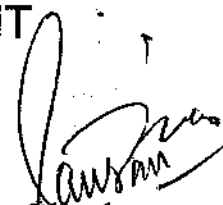
Provincial Police Officer & others

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APPELLANT

THROUGH


Syed Dawran Shah
Advocate High Court
Peshawar

BEFORE THE KPK SERVICE TRIBUNAL,
PESHAWAR

Appeal No. _____

Shams Ur Rehman S/o Lal Zaman Ex-Constable R/o
Mohallah Muhammad Ali Banda, Shagai, Sufaid Sang, Tehsil
& District Peshawar *Ex-Constable P.S. Regi Peshawar.*

APPELLANT

VERSUS

1. Capital City Police Officer, (C.C.P.O), Peshawar.
2. Superintendent Of Police, Warsak Division, Peshawar.

RESPONDENTS

APPEAL UNDER SECTION 4 OF KPK SERVICE
TRIBUNAL ACT, 1974 AGAINST IMPUGNED ORDER
DATED 10-07-2024, PASSED BY RESPONDENT NO-
03 WHEREBY THE APPELLANT HAS BEEN AWARDED
THE MAJOR PENALTY OF DISMISSAL FROM SERVICE
AND HIS DEPARTMENTAL APPEAL AGAINST THE
IMPUNGED ORDER IBID WAS REJECTED BY

①

BEFORE THE KPK SERVICE TRIBUNAL,
PESHAWAR

Appeal No. _____

Shams Ur Rehman Ex-Constable S/o Lal Zaman R/o
Mohallah Muhammad Ali Banda, Shagai, Sufaid Sang, Tehsil
& District Peshawar.

APPELLANT

VERSUS

1. Provincial Police Officer (I.G.P), Khyber
Pakhtunkhwa, Peshawar.
2. Capital City Police Officer (C.C.P.O), Peshawar.
3. Superintendent Of Police, Warsak Division, Peshawar.

RESPONDENTS

APPEAL UNDER SECTION 4 OF KPK SERVICE
TRIBUNAL ACT, 1974 AGAINST IMPUGNED ORDER
DATED 10-07-2024, PASSED BY RESPONDENT NO-
03 WHEREBY THE APPELLANT HAS BEEN AWARDED
THE MAJOR PENALTY OF DISMISSAL FROM SERVICE
AND HIS DEPARTMENTAL APPEAL AGAINST THE
IMPUGNED ORDER IBID WAS REJECTED BY

**RESPONDENT NO-02 VIDE IMPUGNED FINAL ORDER
DATED 16/08/2024 in DISREGARD OF THE RULES
AND PRINCIPLES OF NATURAL JUSTICE**

Respectfully Sheweth:

FACTS OF THE CASE

1. That the appellant was appointed as constable in the police department in the year of 2008, and during his 16/17 years of active service he has got no adverse remarks or any other charge and as such having an excellent record and spot less service.
2. That during the relevant days, appellant was on duty at DRC Industrial Estate Peshawar and a charge sheet was issued on 10/08/2024 that the Appellant remained absent from duty from PS Regi Daily Diary No: 12 dated 16/04/2024 without permission of his superiors. (Copy of Charge Sheet & DD No:12 are enclosed as Annexure "A & B")
3. That as per record, the appellant was shown transferred from DRC Industrial Estate Peshawar to PS: Regi Peshawar but the appellant was not informed through any source regarding his transfer

and when the appellant got knowledge about his transfer, he appeared at PS: Regi on 25/5/2024 which is evident from the record.

4. That Sub Divisional Police Officer Regi Sub Division Peshawar was appointed as Enquiry Officer. The enquiry officer recorded the statement of OIC DRC Industrial Estate Peshawar (where the Appellant was on duty on the relevant days) who gave written statement that the Appellant was on duty at DRC Industrial Estate Peshawar till 23/05/2024. (Copy of Written Statement is attached as Annexure "C")
5. That after recording the relevant statements and perusing the materials, the Enquiry Officer accepted the plea of the appellant and recommended the absence period (38 days) treated as duty and remaining two (2) days leave without pay. (Copy of Inquiry Report is enclosed as Annexure "D")
6. That without considering the recommendations of Enquiry Officer and record the appellant was awarded the major penalty of dismissal from

service by Respondent No.3 on 10/7/2024. (Copy of the Order dated 10/7/24 is Annexure "E")

7. That feeling aggrieved the appellant filed departmental appeal on 18/7/2024 which was also rejected on dated 16/08/2024. (Copies are enclosed as Annexure "F & G")
8. That in order to seek the justice qua his unlawful dismissal order passed by the respondent 2 & 3, the appellant now approaches this Hon'ble Court/ Tribunal for setting aside both the impugned orders and reinstatement in service on the following grounds;

GROUND:

- A. That both the orders of the respondent No. 2 & 3 are against the law, facts and violation of the procedure as provided under the law, hence the same is liable to be struck down,
- B. That so-called departmental inquiry proceeding has not been initiated in accordance with proper procedure and the entire proceeding has been completed in haphazard manner,

hence the same is having no sanctity in the eye of law.

C. That nor proper opportunity of hearing was provided to the appellant, as such the basic principle of natural justice is violated in the case of the appellant.

D. That even no one was examined in presence of the appellant nor was ever the appellant provided opportunity of personal hearing and no evidence was collected in support of the allegations.

E. That preliminary inquiry has no value and regular inquiry is mandatory in case major penalty is awarded to an employee.

F. That the ~~Respondent~~ has not given any reason for not agreeing with the recommendation of Enquiry Officer which is against the law, rules and principles of justice.

G. That being a regular employee the appellant has served the department honestly and whole heartedly for sufficient time, and perform his

duties candidly and unequivocally thus the appellant cannot be dismissed from his service with a stroke of pen as done by the respondent No. 2 & 3.

H. That the conduct of the respondent No. 2 & 3 clearly suggests that appellant has highly been discriminated which is not permissible under the constitution of Islamic Republic of Pakistan 1973.

I. That it is very much clear from the record that the appellant was not informed about his transfer from his place of duty to the PS: Regi and the appellant was regularly performing his duty at his place of posting to the satisfaction of his superiors, thus the same cannot be treated a ground for termination of the services of the appellant.

J. That it is clear from the record that the appellant regularly performs his duty and did not remain absent from duty, hence the dismissal order is illegal, against the record and facts of the case.

BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR

Appeal No. _____

Shams Ur Rehman

VERSUS

Capital City Police Officer & others

AFFIDAVIT

I, Shams Ur Rehman Ex-Constable S/o Lal Zaman R/o Mohallah Muhammad Ali Banda, Shagai, Sufaid Sang, Tehsil & District Peshawar, do hereby declare on oath that the contents of this appeal is true and correct to the best of my knowledge and nothing has been concealed there in.

Deponent *Shams Ur Rehman*
CNIC :- 17301-3378480-3
CELL NO: 0305-5050234

Identified By *Syed Dawran Shah*

Syed Dawran Shah
Advocate, High Court,
Peshawar.

2/2/24



BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR

Appeal No. _____

Shams Ur Rehman

VERSUS

C.C.P.O Peshawar & others

ADDRESSES OF PARTIES

ADDRESS OF APPELLANT:

Shams Ur Rehman Ex-Constable S/o Lal Zaman
R/o Mohallah Muhammad Ali Banda, Shagai,
Sufaid Sang, Tehsil & District Peshawar.

ADDRESSES OF RESPONDENTS

1. Capital City Police Officer, (C.C.P.O), Peshawar.
2. Superintendent Of Police, Warsak Division, Peshawar

Shams ur Rehman
APPELLANT

THROUGH

Syed Dawran Shah
Syed Dawran Shah
Advocate High Court
Peshawar

9

BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR

Appeal No. _____

Shams Ur Rehman

VERSUS

Provincial Police Officer & others

ADDRESSES OF PARTIES

ADDRESS OF APPELLANT:


Shams Ur Rehman Ex-Constable S/o Lal Zaman
R/o Mohallah Muhammad Ali Banda, Shagai,
Sufaid Sang, Tehsil & District Peshawar.

ADDRESSES OF RESPONDENTS

1. Provincial Police Officer (I.G.P), Khyber
Pakhtunkhwa, Peshawar.
2. Capital City Police Officer (C.C.P.O), Peshawar.
3. Superintendent Of Police, Warsak Division, Peshawar


APPELLANT

THROUGH


Syed Dawran Shah
Advocate High Court
Peshawar

Annexure
"A"

(10)

OFFICE OF THE
SENIOR SUPERINTENDENT OF POLICE,
WARSAK, CCP, PESHAWAR
Email: spwarsakdivision@gmail.com

NO 687/E PA

DATE 10/05/2024

CHARGE SHEET

I, the undersigned, Jawad Ishaq (PSP), Superintendent of Police, Warsak Division, Peshawar, as
an authority hereby charge you PC Shams Rehman No. 4217, of PS Regi as follows:-

That while you posted at Police Station Regi, you absented himself vide DD No. 12,
dated 16.04.2024, to to fill date from lawful duty without permission of his seniors.

All these shows his lack of interest in his legitimate duties.

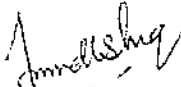
This amounts to gross misconduct, negligence and malafide on your part for which you
are liable for punishment as defined in Police Disciplinary Rules, 1975.

In view of the above, you appeared to be guilty of misconduct under Police
Disciplinary Rules, 1975 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 seven days of the
receipt of this charge sheet to the Inquiry Officer Committee.

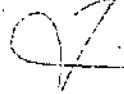
You are invited to decide to be heard in person.

A copy of the allegation is enclosed.


Superintendent of Police,
Warsak Division CCP, Peshawar.

Steno

Call the PC



NSP/Regi

14-05-2024

(Better copy)

10-A

OFFICE OF THE
DEPUTY SUPERINTENDENT OF POLICE,
REGI SUB-DIVISION PESHWAR.

No.59/E . Dated 26/06/2024.

To The Superintendent of Police,
Warsak Disivion Peshawar.

Subject: DISCIPLINARY ACTION AGAINST CONSTABLE SHAMS-UR-REHMAN NO.4217 OF PS REGI.

MEMO:

Please refer to your office Endorsement No. 68/E/PA SP warsak Dated 10-05-2024 on the subject cited above.

The instant enquiry was initiated against Constable Shams-ur-Rehman No. 4217 on the directions of SP Warsak vide his letter No. 68/E/PA dated 10-05-2024 on the charge that while he was posted at PS Regi, that he was absented himself with effect from 16-04-2024 to 25-05-2024 total (40 days) vide DD No. 06. dated 25-05-2024 to without leave or permission. The undersigned was appointed as Enquiry Officer to srutinize the conduct of the under Enquiry official.

The under Enquiry official was summoned and he appeared before the undersigned. He gave a written statement in his support that he was transferred from DRC Industrial Estate to PS Regi vide QB No. 680, dated 11.03.2024 but he was on duty at DRC industrial Estate. The said Constable stated that he didn't know about it when the on receiving the information about his transferred he appeared at PS Regi on 25-05-2024. The OIC DRC Industrial Estate has also given written statement that the said Constable was on duty with him till 23-05-2024. (statement attached).

Conclusion:

After the view of above and the statements of the under Enquiry official DRC Industrial Estate that he was on duty with OIC DRC Industrial Estate. The under Enquiry official in which he stated that his absence duration was the result not attendance in PS Regi. It is therefore, the undersigned recommended that the absence period (38 days) of Constable Shams-Ur-Rehman No. 4217 mentioned above may be stated as duty and remaining 2 days leave. Without pay, please.

Report is submitted please.

Imtiaz Alam Khan

Sub divisional Police Officer

Regi Sub Division. Peshawar.

Attested
Kawran

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Signature

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(12)

Amesure "C"

27-05-2024

№ 653

میں نے اس کے بارے میں سب سے پہلے

تعمیراتی کمیشن کو مطلع کیا تھا۔

23/05/24 اور 13/05/24 کے اجلاس

میں اس کے بارے میں بحث ہوئی۔

اس کے نتیجے میں اس کے بارے میں

تعمیراتی کمیشن نے فیصلہ کیا ہے

کہ اس کے بارے میں مزید

بحث کی ضرورت نہیں ہے۔

اس کے

(Better copy)

(Better copy) (13-A)

OFFICE OF THE
DEPUTY SUPERINTENDENT OF POLICE,
REGI SUB-DIVISION PESHWAR.

No.59/E . Dated 26/06/2024.

To The Superintendent of Police,
Warsak Disivion Peshawar.

Subject: DISCIPLINARY ACTION AGAINST CONSTABLE SHAMS-UR-REHMAN NO.4217 OF PS REGI.

MEMO:

Please refer to your office Endorsement No. 68/E/PA SP warsak Dated 10-05-2024 on the subject cited above.

The instant enquiry was initiated against Constable Shams-ur-Rehman No. 4217 on the directions of SP Warsak vide his letter No. 68/E/PA dated 10-05-2024 on the charge that while he was posted at PS Regi, that he was absented himself with effect from 16-04-2024 to 25-05-2024 total (40 days) vide DD No. 06. dated 25-05-2024 to without leave or permission. The undersigned was appointed as Enquiry Officer to srutinize the conduct of the under Enquiry official.

The under Enquiry official was summoned and he appeared before the undersigned. He gave a written statement in his support that he was transferred from DRC Industrial Estate to PS Regi vide QB No. 680, dated 11.03.2024 but he was on duty at DRC Industrial Estate. The said Constable stated that he didn't know about it when the on receiving the information about his transferred he appeared at PS Regi on 25-05-2024. The OIC DRC Industrial Estate has also given written statement that the said Constable was on duty with him till 23-05-2024. (statement attached).

Conclusion:

After the view of above and the statements of the under Enquiry official DRC Industrial Estate that he was on duty with OIC DRC Industrial Estate. The under Enquiry official in which he stated that his absence duration was the result not attendance In PS Regi. It is therefore, the undersigned recommended that the absence period (38 days) of Constable Shams-Ur-Rehman No. 4217 mentioned above may be stated as duty and remaining 2 days leave. Without pay, please.

Report is submitted please.

Imtiaz Alam Khan

Sub divisional Police Officer

Regi Sub Division. Peshawar.

Attested
Kawran

... information and necessary action in
... Department of Police, Peshawar
... of Police Department, Peshawar
... of Police Department, Peshawar
... of Police Department, Peshawar
... of Police Department, Peshawar

17/15

ALL HAKIMIAH JAWAD ISHAQI
Supervisor of Police Wazir
Peshawar

... with immediate effect
... decided to impose Major Penalty of Dismissal from Service on
... (History & Disciplinary) Index 1975. I recommended and
... to be reinstated to his regular position. The same in course of
... and with the sanction of Major Penalty
... did not agree with the recommendation of Major Penalty
... to defend his name.
... the alleged offence reported before it. ...
... and ...
... of alleged offence may be ...
... with him till 23.05.2017. Hence, recommended that the ...
... who support the name of alleged official and ...
... accordingly. ...
... the alleged offence ...
... transfer to ...
... from ...
... which results ...
... and ...
... without ...
... on the grounds that he ...
... while ...

17/15

...
...
...

Amesure 14

(Better copy)

14-A

OFFICE OF

SUPERINTENDENT OF POLICE WARSAK, CCP, PESHAWAR

Email: Spwarsak Subdivision@gmail.com.

NO. 1780.

P/A

DATE: 09/07/2024

ORDER:

This order will dispose off the Department Inquiry against Constable Shams-ur-Rehman No. 4217, while posted at PS Regi, which was initiated vide this office PA, dated 10.05.2024 on the grounds, that he absented himself for the period of (40 days) from lawful duty vide DD No.12, dated 16.04.2024 without permission of his seniors.

Under Police Rules 1975 (amended 2014) Charge Sheet along with Statement of allegation were issued against him and SDPO Regi Peshawar was appointed as Enquiry Officer completion of Inquiry. EO submitted his findings, which reveals that the has been transferred from DRC Industrial Estate to PS Regi, vide OB NO. 680. Dated 11.03.2024, but he did not inform regarding his transfer in meantime, hence, he performed his duties at DRC Industrial Estate, Later on. 25.05.2024. the alleged official received information regarding his transfer wherein he made compliance accordingly. To this effect report from OIC DRC Industrial Estate has also been obtained who support the stance of alleged official and stated that the official concerned was on duty with him till 23.05.2024. Hence, recommended that the absence period i.e. (38 days) of alleged official may be counted on his duty period, while remaining (2) days leave may be treated as leave without pay.

Subsequently, on 28.06.2024, the alleged official appeared before the during appearance he did not offer plausible reason to defend his stance.

4. I being competent authority did not agree with the recommendation of Enquiry Officer, hence, keeping in view the absence and lethargic attitude of Constable Shams-ur-Rehman No.4217, need to be Reprimand/punishment. Therefore, in exercise of powers vested in me under the Khyber Pakhtunkhwa (Efficiency & Disciplinary) Rules 1975, I Muhammad Jawad Ishaq, (PSP), SP Warsak, has decided to impose Major penalty of "Dismissal from Service" on on the Accused official with immediate effect Order announced.

Order announced.

MUHAMMAD JAWAD ISHAQ (PSP)

Superintendent of Police Warsak,

Division Peshawar.

OB No. 1715 dated 10/07/2024

Copy of above is forwarded for information and necessary action to:

1. The Capital City Police Officer, Peshawar.
2. The Senior Superintendent of Police Department CCP Peshawar.
3. CCP Peshawar.
4. SDPO Warsak,
5. Pay Officer CCP, Peshawar
6. CRC & QASI CCP, Peshawar.
7. Along with Inquiry file for record.
8. All concerned.

Approved
[Signature]

Handwritten notes: "A" and "16"



OFFICE OF THE
CITY POLICE OFFICER,
PESHAWAR
No. 102109893 No. 091/212597

ORDER

This order will dispose of the departmental appeal preferred by Shams-ur-Rehman No. 4217, who was awarded major punishment of "dismissal from service" under KP PR-1972 (amended 2013) by SP Wazir, Peshawar vide OB No. 1715 dated 10.07.2024.

1- Brief facts leading to the instant appeal are that a defaulter Constable while posted at PS Regt, Peshawar was proceeded against departmentally by the charges of absence from lawful duty w.e.f 16.04.2024 to 25.05.2024 (40 days) without prior permission of the competent authority.

2- He was issued Charge Sheet and Summary of Offences by the Station House Officer, Peshawar. The SPO Regt, Peshawar was appointed as Enquiry Officer to scrutinize the conduct of the accused official. The Enquiry Officer after conducting departmental enquiry submitted his findings in which it was recommended that his absence of 38 days may be treated as leave while the remaining 02 days as leave without pay. However, the competent authority i.e. SP Wazir, Peshawar did not agree with the recommendations of Enquiry Officer and awarded him major punishment of dismissal from service.

3- He was heard in person in Orderly Room. During personal hearing, he was given an opportunity to prove his innocence. However, he failed to submit any plausible explanation in his defence. Therefore, his appeal for setting aside the punishment awarded to him by SP Wazir, Peshawar vide OB No. 1715, dated 10.07.2024 is hereby rejected/ruled.

"Order is announced"

CAPITAL CITY POLICE OFFICER,
PESHAWAR

No. 102109893-102109893 P.A. CCP, dated Peshawar the 16/08/2024

Copies for information and necessary action to the:-

- 1. SP Wazir, Peshawar
- 2. SPO Regt, Peshawar
- 3. PO, CRG, CASI & CMC alongwith complete file attached.
- 4. Official concerned.

(Better copy)

16-A

OFFICE OF THE
CAPITAL CITY POLICE OFFICER, PESHAWAR.

Phone No. 091-9210989 Fax. No. 091-9212597.

ORDER.

- 1- This order will dispose of the departmental appeal preferred by Ex Constable Shams-Ur-Rehman No. 4217, who was awarded the major punishment of dismissal from service under KP PR-1975 (amended 2014) by SP Warsak, Peshawar vide OB No. 1715, dated 10-07-2024.
- 2- Brief facts leading to the instant appeal are that the defaulter Constable while posted at PS Regi, Peshawar was proceeded against departmentally on the charges of his willful absence from lawful duty w.e.f. 16.04.2024 to 25.05.2024. (40 days) without prior permission of leave of the competent authority.
- 3- He was issued Charge Sheet and Summary of Allegations by SP/Warsak, Peshawar. He SDPO Regi, Peshawar was appointed as Enquiry Officer to scrutinize the conduct of the accused official. The Enquiry Officer after conducting departmental enquiry submitted his findings in which it was recommended that his absence of 38 days may be treated as duty while the remaining 02 days as leave without pay. However, the competent authorities i.e. SP Warsak, Peshawar did not agree with the recommendations of Enquiry Officer and awarded him major punishment of dismissed from service.
- 4- He was heard in person in Orderly Room During personal hearing, he was given an opportunity to prove his innocence. However, he failed to submit any plausible explanations in his defense. Therefore, his appeal for setting aside the punishment awarded to him by SP/Warsak, Peshawar vide OB No. 1715, dated 10.07.2024 is hereby rejected/filed.
"Order is announced"

CAPITAL CITY POLICE OFFICER
PESHAWAR.

No. 4968-69 /PA/CCP. dated Peshawar the 16/08/2024.

Copies for information and necessary action to the:-

1. SP/HQrs, Peshawar.
2. AD/IT CCP Peshawar.
3. PO, CRC, OASI & FMC alongwith competent Fuji Misal.
4. Official concerned.

17/8/24
Approved

(17)

11:50 بجے 25/5/2024 کو سید علی عیوب خان صاحب نے
 16/5/2024 کو سید علی عیوب خان صاحب کو
 ڈی آر کے ساتھ ساتھ سید علی عیوب خان صاحب سے
 سید علی عیوب خان صاحب سے سید علی عیوب خان صاحب سے
 سید علی عیوب خان صاحب سے سید علی عیوب خان صاحب سے
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پولیس مانیٹرنگ سسٹم

شمار	پولیس سٹیشن	آڈیو رپورٹ نمبر / رجسٹر سلسلہ وار نمبر	نام اطلاع	تاریخ و وقت
پشاور	حیات آباد	2 / 13	عبدالواحد MASI	23-05-2024 13:30
لوہیت	واپسی			

خاتمہ رپورٹ

اس وقت کنسٹیبل محسن ارحمان کو 4217 DRC انڈسٹریل اسٹیٹ سے بمباری کے بعد سامان سرکاری و نجی بصورت تباہی کا ریکارڈ کر کے ہدایات مناسب دی گئی۔

 <p>Lawyer 2023/23</p>	<p>پشاور بار ایسوسی ایشن، خیبر پختونخوا</p>
<p>ایڈوکیٹ: سید عورین شاہ</p>	<p>PESHAWAR BAR ASSOCIATION</p>
<p>بار کونسل ایسوسی ایشن نمبر: BC-10-7799</p>	 
<p>رابطہ نمبر: 03005985384</p>	

بعدالت جناب: خدیجہ کھٹو کچھوہ سروس کمرہ ہونٹل لکھنواہ

<p>منجانب: ایبلز زری</p>	<p>دعویٰ:</p>
<p>شمس الرحمان</p>	<p>علت نمبر:</p>
<p>بنام</p>	<p>مورخہ:</p>
<p>دیوار نشن پولیس آفسر شاہ</p>	<p>جرم:</p>
<p></p>	<p>تھانہ:</p>

بالتحریر آگے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ آن مقام لکھنواہ کیلئے سید عورین شاہ کیلئے کو وکیل مقرر کر کے اترار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کمال اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل گرانہ و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المرقوم: 1/20

المقام لکھنواہ

Apprentice
Lawyer

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PAKISTAN National Identity Card
ISLAMIC REPUBLIC OF PAKISTAN

Name
Shams Ur Rehman

Father Name
Lal Zaman

Gender: M Country of Issue: Pakistan

Identity Number 17301-3378480-37	Date of Birth 01.01.1989
Date of Issue 24.03.2020	Date of Expiry 24.03.2030

Holder's Signature

گمشدہ کارڈ ملنے پر تقریبی ایئر بکس میں ڈال دیں

17301-3378480-3

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