


FORM OF ORDER SHEET

Court of _____

Appeal No. 1761/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	07/10/2024	<p>The appeal of Mr. Ameer Sultan resubmitted today by Mr. Qamar Zaman Khattak Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 09.10.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman</p> <p> REGISTRAR</p>

The appeal of Mr. Ameer Sultan received today i.e on 02.10.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Appeal has not been flagged/marked with annexures marks.
- 2- Memorandum of appeal has not been signed by the appellant.
- 3- Annexures of the appeal are unattested.

No. 862 /Inst./2024/KPST,

Dt. 02/10 /2024.

Ana Tillet
ADDITIONAL REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Qamar Zaman Khattak Adv.
High Court at Peshawar.

Sir,

All objections being removed, kindly be fixed before this Hon'ble Tribunal please.

07/10
2024
* *[Signature]*
Thanks
Qamar Zaman Khattak
Adv.

**BEFORE THE LEARNED KHYBER PAKHTUNKHWA SERVICES
TRIBUNAL, PESHAWAR**

Service Appeal No. 176L/2024

Ameer Sultan

.....APPELLANT

VERSUS

Inspector General of Police & others


.....RESPONDENTS

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Appellant

Through


QAMAR ZAMAN KHATTAK
LLM UK
Advocate Supreme Court of Pakistan
Cell: 0348-0105985

①

**BEFORE THE LEARNED KHYBER PAKHTUNKHWA SERVICES
TRIBUNAL, PESHAWAR**

Service Appeal No. 1761/2024

Ameer Sultan S/o Muhammad Hassan
R/o Laghri Rajab Khel, Tehsil Tahkhte Nasrati District
Karrak, Ex-Sub-Inspector at Police Station Latambar
District Karrak.

.....APPELLANT

VERSUS

1. Inspector General of Police Khyber Pakhtunkhwa, at
Khyber Road, Peshawar.
2. Regional Police Officer at Kohat Region, Kohat
3. District Police Officer Karrak.

.....RESPONDENTS

**SERVICE APPEAL UNDER SECTION 4 OF THE KP
SERVICE TRIBUNAL ACT 1974 AGAINST THE
IMPUGNED ORDERS/FINDINGS OF RESPONDENT
NO. 2&3 RESPECTIVELY DATED 04.04.2024 &
10.06.2024 PASSED IN SUBSEQUENT MANNER, BY
INITIALIZING THE INITIAL IMPUGNED ORDER DATED
04.04.2024, ARRIVED IN CONCLUSION OF THE
DEPARTMENTAL PROCEEDINGS INITIATIVES AND
THE OTHER ONE DATED 10.06.2024 ARRIVED IN
DECLINE OF THE APPEAL OF THE APPELLANT,
HENCE BOTH THE IMPUGNED ORDERS ARE
REQUIRED TO BE DECLARE AS ILLEGAL,
UNLAWFUL, UNPRECEDENTED, RESULT OF
CONFRONTED FACTS AVAILABLE IN THE CASE,
THEREFORE HAS NO LEGAL EFFECT.**

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PRAYER:

ON ACCEPTANCE OF PRESENT SERVICE APPEAL, BOTH THE IMPUGNED ORDERS/FINDINGS OF RESPONDENT NO. 2&3 RESPECTIVELY DATED 04.04.2024 & 10.06.2024 PASSED IN SUBSEQUENT MANNER MAY KINDLY BE SET ASIDE AND THE PUNISHMENT REGARDING FORFEITURE OF TWO YEARS APPROVED SERVICE OF THE APPELLANT MAY ALSO PLEASE BE ORDERED TO REVERSE AND FURTHER ORDER MAY KINDLY PLEASE BE PASSED BY DIRECTING TO THE RESPONDENT TO CONSIDER - THE STATUS OF THE APPELLANT. WITHOUT ADDITION OF FORFEITURE TWO YEARS APPROVED SERVICE OF THE APPELLANT WHILE CONSIDERING PENSION MATTER OF THE APPELLANT BEING RETIRED EMPLOYEE AS SUB-INSPECTOR INSTEAD OF INSPECTOR.

Respected Sheweth:-

BRIEF FACTS:-

The appellant through counsel respectfully submits as under:-

1. That the appellant served over and above comparatively more life in the service of the respondent department & lastly hold inspector rank as substantive rank and got his recently retirement on superannuation on 25.05.2024 while performing 41 years of his service throughout.
2. It is interesting to mention here for the deeper worth consideration of this learned tribunal that appellant got retired from his service on 25.05.2024 however the proceedings

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against the appellant started just before the same and initial final impugned order pronounced on 04.04.2024, in response of the allegation regarding Arms & Ammunition Narcotics and Arrest of POs performance unsatisfactory. (COPY OF THE INITIAL IMPUGNED ORDER OF RESPONDENT NO. 3 DATED 04.04.2024 IS ATTACHED AS ANNEXURE A).

3. It is further important to mention that appellant hold status of Inspector Rank but duly the course of department impeachment in the wrong affixation of liability upon the appellant, the Inspector rank of the appellant reduced to Sub-Inspector as the penalty, affixed by respondent No.3, further by respondent No.2 respectively, against which appellant also preferred his appeal to this Hon'ble Court Forum separately by impugned the above impugned separate orders/findings of respondent No. 2&3, which impugned orders are not the subject matter of this application and cannot be, because the same above impugned orders have passed on different allegation, on different times however the subject impugned orders are passed on different allegations.
4. That the appeal against the initial impugned order of respondent No.3, dated 04.04.2024 is preferred on the part of the appellant to respondent No.2, which appeal was decline vide further impugned order dated 10.06.2024.(COPIES OF THE CONTENTS OF APPEAL ALONGWITH ORDER PASSED BY RESPONDENT NO.2 ARE ATTACHED AS ANNEXURE B&C).
5. That Charge Sheet dated 11.03.2024 was also served which was duly replied and defence by the appellant, while recording his statement. (COPY OF THE CHARGE SHEET IS ATTACHED AS ANNEXURE D).

④

6. Seriously aggrieved with the both impugned orders/findings of respondent No. 2&3 respectively dated 04.04.2024 & 10.06.2024, appellant also invoke further cognizance under departmental resolved, within the meaning of rule 11-A of Police Rules 1975, by filing of Revision Petition against the above impugned order, which revision filed before the respondent No.1. (COPY OF THE REVISION PETITION IS ATTACHED AS ANNEXURE E).
7. That since no reply whatsoever is expressed by the respondent No.1 on the Revision Petition of the appellant, therefore it is presumed that the very second impugned order of the respondent No.2, dated 10.06.2024 is intact, against which when appellant is seriously aggrieved, as not satisfied at all, then this appeal is hereby preferred, which grounds are inter alia as follows:

GROUND:

- A. That both the impugned orders/findings of respondent NO. 2&3 respectively dated 04.04.2024 & 10.06.2024 are illegal, unlawful, and unprecedented; result of miscalculation of the facts & circumstances in the case, unsustainable, unwarranted by the applied laws therefore has no legal value in the eye of law, hence require appellate intervention of this learned tribunal.
- B. That appellant has been discriminated and his rights secured under the constitution of Islamic republic of Pakistan 1973 has been violated.
- C. It is notable to mention here that appellant served the respondent department over & above 41 years consistently with

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unblemished attitude & conduct but at the age of the retirement affected on 25.05.2024, the fabricated case made out by the respondent against the appellant, which initial impugned order date 04.04.2024 itself attract the malafide intention on the part of the respondent department while treated to the appellant, hence these action or in-action of the respondent department when categorically based upon discrimination & exploitation, then this Hon'ble Tribunal has competency under the subject law to intercept such illegalities.

- D. That era of the service of appellant itself negate the contention raised by the respondent in the Statement of allegation and it is no wear mentioned about any professional misconduct or discrepancy, which amount to be illegal & unprofessional against which the penalty can be imposed are affixed upon the appellant, therefore the findings of the respondent NO. 2&3 respectively are based upon presumption only as there is no concrete evidence is available to strengthen the allegation of the respondent.
- E. The two years forfeiture of punishment in the approve service to the appellant is not the minor in nature at all specially at the end of any services of any officials however in the preamble of this appeal as well as in the separately phrase main pray, it has disclosed that appellant has been retired from his service by agitating these allegations and now before this learned tribunal.
- F. That the negligence of the appellant is wrongly being set by the respondent, and the inquiry officer did not comply with the necessary requirements and without taking stance of the appellant, expressed its verdict, which sustain by the respondents in their subsequent impugned orders.

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- G. That the acts and omissions of respondents are illegal; unlawful void-ab-initio and in effective upon the rights of appellant.
- H. That the acts of respondents are in violation of article, 25,27 and other provisions of constitution of Islamic republic of Pakistan, hence needs to be declared illegal, void, wrong, of no legal effect and ineffective upon the rights of petitioner.
- I. That other grounds will be raised at the time of arguments with the permission of this Hon.ble court.

Prayer:

It is therefore most humbly prayed that the on acceptance of present service appeal, both the impugned orders/findings of respondent no. 2&3 respectively dated 04.04.2024 & 10.06.2024 passed in subsequent manner may kindly be set aside and the punishment regarding forfeiture of two years approved service of the appellant may also please be ordered to reverse and further order may kindly please be passed by directing to the respondent to consider the status of the appellant without addition of forfeiture two years approved service of the appellant while considering pension matter of the appellant being retired employee as sub-inspector instead of inspector.

Through

Appellant


* QAMAR ZAMAN KHATTAK
LLM UK
Advocate Supreme Court of Pakistan
Cell: 0348-0105985

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**BEFORE THE LEARNED KHYBER PAKHTUNKHWA SERVICES
TRIBUNAL, PESHAWAR**

Service Appeal No. _____/2024

Ameer Sultan

.....APPELLANT

VERSUS

Inspector General of Police & others

.....RESPONDENTS

AFFIDAVIT

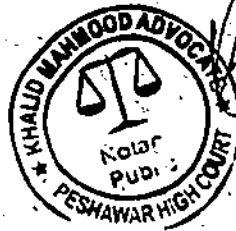
I, Ameer Sultan S/o Muhammad Hassan R/o Laghri Rajab Khel, Tehsil Tahkhte Nasrati District Karrak, Ex Sub-Inspector at Police Station Latambar District Karrak, do hereby solemnly affirm and declare on oath that the contents of the instant **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Tribunal.

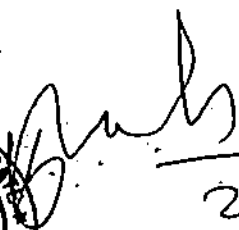
Identified by


Deponent


* QAMAR ZAMAN KHATTAK
LLM UK
Advocate Supreme Court of Pakistan

CNIC: 14203-2058407-5
Cell: 0346-9264553




2/10/24

②

**BEFORE THE LEARNED KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL, PESHAWAR**

Ameer Sultan

.....APPELLANT

VERSUS

Inspector General of Police & others

.....RESPONDENTS

**APPLICATION FOR CONDONATION
OF DELAY**


Respectfully Sheweth:

1. That the above noted case is pending before this Hon'ble Court which is fixed for today i.e. 02-10-2024.
2. That the ambiguity so far create as per detail mentioned in the Para No.6 of the facts of appeal, according to which revision under the applied police rules 1975 when preferred and when not answered by the respondent, the certainly delay is accrued, therefore the appeal is not filed within a time hence seeks condonation.

It is, therefore, most humbly prayed that on acceptance of this application, the delay whatever is accrued in filing of instant appeal, may very kindly please be condoned in the best interest of administration of justice.

Applicant/Appellant


Through


QAMAR ZAMAN KHATTAK
LLM UK
Advocate
Supreme Court of Pakistan
Cell: 0348-0105985

AFFIDAVIT

As per instructions of my client the contents of the **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

ADVOCATE



(A)

(9)

ORDER

This order will terminate off the departmental enquiry initiated against Si Ameer Sultan, SHO PS Latambar:

It has been noticed with grave concern that from the perusal of comparative recovery statement for the month of February 2023 & 2024 regarding arms & ammunition, firecrackers and arrest of POs his performance was found very poor and below the level although necessary instructions/directions have been issued to put up result oriented achievements but he failed to do so. This is quite adverse on his part and shows his lethargic conduct, lack of interest, inefficiency, negligence and non professionalism in the discharge of official obligations. Such act on his part is against service discipline and also amounts to gross misconduct.

He was served with charge sheet and statement of allegations under Police Disciplinary Rules 1975 (as amended in 2014) vide his office No. 42/Enq. dated 11.03.2024. Mr. Nazir Hussain DSP/Hqrs. Karak was appointed as Enquiry Officer to conduct enquiry into the matter. After completion of enquiry, the Enquiry Officer submitted his finding vide his office No. 68/11Q/PA dated 02.04.2024 whereas the allegation leveled against him is proved.

Keeping in view of above and having gone through available record, the undersigned came to the conclusion that Si Ameer Sultan is found guilty of the charges, therefore, I, Muhammad Waqas Khan (PSP) District Police Officer, Karak, in exercise of the powers conferred upon me, he is hereby awarded a minor punishment of forfeiture of two (02) years approved service.

OB No. 163

Dated 04.04 /2024

DISTRICT POLICE OFFICER,
KARAK

The Regional Police Officer,
Kohal Region, Kohal

THROUGH: **PROPER CHANNEL**

SUBJECT: **DEPARTMENTAL APPEAL**

Respected Sir,

Appellant very humbly submits representation against the order of
learned District Police Officer, Kohal issued under OP No. 163 dated 04.04.2024
vide which penalty of forfeiture of two (02) years approved service was imposed on
appellant.

FACTS

1. That appellant is posted as Station House Officer (SHO) Police Station
Tamber District Police Officer Kohal learned District Police Officer Kohal issued
charge sheet to appellant alleging therein that the perusal of crimes
statement for month of February, 2024 shows poor progress in
recovery of narcotics, Arms, Ammunition and arrest of 10 as against
the corresponding period of the year 2023

2. That appellant submitted reply that recovery of Arms was plus while
there was a big deficiency in recovery of narcotics and arrest of POs. It
was further contended that actually Police was engaged in General
Election 2024 duties, which led to the alleged deficiency in recovery of
narcotics and arrest of POs.

3. That an ex-parte inquiry was conducted in the alleged charges through
DSP HQ and the enquiry officer without checking the ground realities,
submitted findings wherein the charge was reported proved and
learned DPO passed the impugned order. Hence this departmental
appeal on the following grounds,

GROUND:

1. That the impugned order has been passed against facts and evidence
on record. Recovery of Arms was plus and the short deficiency in
recovery of narcotics and arrest of POs has wrongly been based for
passing the impugned order. Furthermore, the General Election 2024
security duties of nicetings and movements of the candidates who
affected Police duties.


(10)

(B)



- b) That main and prime duties of Police is maintenance of peace and order in the areas of jurisdiction. Appellant has been able to maintain peace and order in the jurisdiction of Police Station Latamber. No occurrence and incident creating Law and order situation was reported during the period under review in areas of Police Station Latamber.
 - c) That the entire inquiry proceedings were carried out at the back of appellant. No one was examined as witness in the presence of appellant. Inquiry officer conducted ex-parte proceedings. Appellant was not associated in the proceedings. The impugned order has been based on defective inquiry proceeding therefore the order is void and worth set aside.
 - d) That non achieving of the target of the progress of previous year does not fall within the ambit of misconduct. Therefore appellant has been punished for commission of no wrong, hence the impugned order has been passed against the Law & Rules governing disciplinary actions.
 - e) That appellant is on the verge of pension, therefore the impugned order will affect the pension benefits.
- It is therefore requested that the impugned order may please be set aside.

Enclosure: Copy of order.

Yours Obediently

 Ameer Sultan
 SI/SIO PS Latamber
 District Karak

"C"

12

ORDER

2393...
14/6/24

This order will dispose of the departmental appeal preferred by Sub Inspector Ameer Sultan No.K/76 of Operation Staff Karak against the order of District Police Officer, Karak whereby he was awarded minor punishment of forfeiture of two years approved service by District Police Officer, Karak vide OB No.163, dated 04.04.2024.

Brief fact of the case that Sub Inspector Amir Sultan while posted SHO P.S Latamber, was proceeded departmentally on the allegations that from the perusal of comparative recovery statement for the month of February, 2023 & 2024 regarding arms & ammunitions, narcotics and arrest of POs, his performance was found very poor and below the target although necessary directions had been issued to put up result oriented achievements but he failed to do so. This is quite adverse on his part and shows his lethargic conduct, lack of interest, inefficiency, negligence and non professionalism in the discharge of official obligations.

District Police Officer, Karak initiated proper departmental enquiry proceedings against him and Sub Divisional Police Officer Headquarters, Karak was appointed as Enquiry Officer. The Enquiry Officer, after fulfillment of codal formalities, submitted his findings wherein the appellant was found guilty of the charges leveled against him.

Keeping in view of the recommendations of the Enquiry Officer and circumstances of the case, the delinquent officer was awarded minor punishment of forfeiture of two years approved service vide OB No. 163, dated 04.04.2024.

Feeling aggrieved from the order of District Police Officer, Karak, the appellant preferred the instant appeal. He was summoned and heard in person in Orderly Room held in the office of the undersigned on 29.05.2024. During personal hearing the appellant did not advance any plausible explanation in his defense.

Foregoing in view, I, Sher Akbar, PSP, S.St, Regional Police Officer, Kohat, being the appellate authority, am of considered opinion that the punishment of forfeiture of two years approved service awarded by District Police Officer, Karak is justified and, therefore, warrants no interference. Hence appeal of Sub Inspector Ameer Sultan is hereby rejected, being devoid of substance and merit.

Order Announced
29.05.2024


Regional Police Officer,
Kohat Region

No. 4970 /EC, Dated Kohat the 10/6/2024

Copy forwarded to District Police Officer, Karak for information and necessary action w/r to his office Memo: No.655/EC, dated 06.05.2024. Service Record and Enquiry File are returned herewith.

District Police Officer, Karak

DSP HQ's Karak

No. 421 / (Enq)

Dated 11 / 03 / 2024

CHARGE SHEET

I, MUHAMMAD WAQAS KHAN (PSP), District Police Officer, Karak as a competent authority, hereby charge you Inspector Ameer Sultan, SHO PS Latamber follow:-

"It has been noticed with grave concern that from the perusal of comparative recovery statement for the month of February-2023 & 2024 regarding arms & ammunitions, narcotics and arrest of POs your performance was found very poor and below the target although necessary instructions/directions have been issued to put up result oriented achievements but you failed to do so. This is quite adverse on your part and shows your lethargic conduct, lack of interest, inefficiency, negligence and non professionalism in the discharge of official obligations. Such act on your part is against service discipline and also amounts to gross misconduct."

1. This act on your part is against the service discipline and amounts to gross misconduct. By the reason of your commission/omission, constitute miss-conduct under Police disciplinary Rule-1975. (amendment Notification No. 3859/Legal, dated 27.08.2014). Govt. of Khyber Pakhtunkhwa, Police Department, you have rendered your-self liable to all or any of the penalties specified in Police Rule-1975 ibid.

2. You are, therefore, required to submit your written defense within 07-days of the receipt of this charge sheet to the Enquiry Officer DSP HQ's Karak is hereby appointed for the purpose of conducting enquiry.

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

3. Intimate whether you desire to be heard in person.

4. A statement of allegation is enclosed.


District Police Officer, Karak

(14)

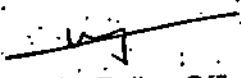
DISCIPLINARY ACTION

I, MUHAMMAD WAQAS KHAN (PSP), District Police Officer, Karak as a competent authority, is of the opinion that Inspector Ameer Sultan, SHO PS Latamber has rendered himself liable to be proceeded against on committing the following act/commission within the meaning of Police Disciplinary Rule-1975 (as amendment in 2014) vide Notification No. 3859/Legal, dated 27.08.2014) Govt. of Khyber Pakhtunkhwa, Police Department:

STATEMENT OF ALLEGATIONS

It has been noticed with grave concern that from the perusal of comparative recovery statement for the month of February-2023 & 2024 regarding arms & ammunitions, narcotics and arrest of POs his performance was found very poor and below the target although necessary instructions/directions have been issued to put up result oriented achievements but he failed to do so. This is quite adverse on his part and shows his lethargic conduct, lack of interest, inefficiency, negligence and non professionalism in the discharge of official obligations. Such act on his part is against service discipline and also amounts to gross misconduct."

1. The Enquiry Officer in accordance with provision of the Police Disciplinary Rules-1975 (amendment 2014 vide Notification No. 3859/Legal, dated 27.08.2014) Govt. of Khyber Pakhtunkhwa, Police Department may provide reasonable opportunity of hearing to the accused official, record his finding and make within 10-days of the receipt of this order, recommendation as to punishment or other appropriate action against the accused.
2. The accused official shall join the proceeding on the date, time and place fixed by the enquiry officer.


District Police Officer, Karak

A copy of the above is forwarded to:-

1. The Enquiry Officer for initiating proceedings against the accused under the provisions of Police Disciplinary Rules, 1975 (as amended in 2014).
2. Inspector Ameer Sultan, SHO PS Latamber. The concerned officer with the directions to appear before the Enquiry Officer, on the date, time and place fixed by the Officer, for the purpose of the enquiry proceedings.

"E"

(75)

To,

The Inspector General of Police,
Khyber Pakhtunkhwa Peshawar

Subject: REVISION PETITION UNDER RULE-II OF POLICE RULES- 1974

Respected Sir,

Petitioner very humbly submits revision petition against the order of learned District Police Officer, Karak issued under OB No. 103 dated 04.04.2024 vide which penalty of forfeiture of two (02) years approved service was imposed on petitioner and order of Regional Police Officer dated 10.06.2024 vide which petitioner departmental appeal was rejected.

FACTS

1. That petitioner was posted as Station House Officer (SHO) Police Station Latamber District Karak. Learned District Police Officer Karak issued charge sheet to petitioner alleging therein that the perusal of crimes statement for month of February, 2024 shows poor progress in recovery of narcotics, Arms, Ammunition and arrest of Pos as against the corresponding period of the year 2023
2. That petitioner submitted reply that recovery of Arms was plus while there was a bit deficiency in recovery of narcotics and arrest of POs. it was further contended that actually Police was engaged in General Election 2024 duties, which led to the alleged deficiency in recovery of narcotics and arrest of POs.
3. That an ex-parte inquiry was conducted in the alleged charges through DSP HQ and the inquiry officer without checking the ground realities, submitted findings wherein the charge was reported proved and learned DPO passed the impugned order. The departmental appeal was rejected by Regional Police Officer hence this revision petition on the following grounds.

GROUND:

- a) That the impugned order has been passed against facts and evidence on record. Recovery of Arms was plus and the short deficiency in recovery of narcotics and arrest of POs has wrongly been based for passing the impugned orders. Furthermore, the General Election 2024 security duties of meetings and movements of the candidates also affected Police duties.

District Police Officer, Karak

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- b) That main and prime duties of Police is maintenance of peace and order in the areas of jurisdiction. Petitioner has been able to maintain peace and order in the jurisdiction of Police Station Latamber. No occurrence and incident creating Law and order situation was reported during the period under review in areas of Police Station Latamber.
- c) That the entire Inquiry proceedings were carried out at the back of appellant. No one was examined as witness in the presence of appellant. Inquiry officer conducted ex-parte proceedings. Petitioner was not associated in the proceedings. The impugned order have been based on defective inquiry proceeding therefore the order are void and worth set aside.
- d) That non achieving of the target of the progress of previous year does not fall within the ambit of misconduct. Therefore petitioner has been punished for commision of no wrong, hence the impugned order has been passed against the Law & Rules governing disciplinary actions.
- e) That petitioner has retired from service on 25.05.2024 and the impugned orders will affected pension benefits.
- It is therefore requested that the impugned orders may please be set aside.

Enclosure: Copy of orders.

Yours Obediently



Ameer Sultan

Retired SI District Karak

55529	پشاور بار ایسوسی ایشن، خیبر پختونخوا
ایڈویکیٹ: <u>قمر زمان</u>	PESHAWAR BAR ASSOCIATION
بار کونسل ایسوسی ایشن نمبر: <u>BC-10-9973</u>	
رابطہ نمبر: <u>03420108985</u>	

بعدالت جناب: سروس ریٹینوئل عنیدہ کنوینشنی ایہ لیسٹاؤر

مخانب: <u>ایہ لیسٹاؤر</u>	دعوئی: <u>سروس ایہیل</u>
<u>امید سلطان</u>	علت نمبر: <u>X</u>
<u>بنام</u>	مورخہ: <u>ر</u>
<u>السیدہ عنیدہ کنوینشنی ایہ لیسٹاؤر</u>	جم: <u>X</u>
	تھانہ: <u>X</u>

بابت تحریر آئکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی وجواب دہی کاروائی متعلقہ آن مقام لسٹاؤر کیلے ہم سروس کو وکیل مقرر کر کے اقرار 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 ایہیل کی برآمدگی اور منسوخی، نیز دائر کرنے ایہیل نگرانی 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 بر داخست منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا و کوئی تازج 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: واہ شد العبد

Accepted

Accepted

امید سلطان (ایہ لیسٹاؤر)