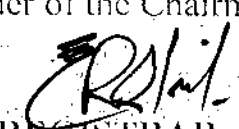


FORM OF ORDER SHEET

Court of _____

Appeal No. _____

2149/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge \
1	2	3
1-	25/10/2024	<p>The appeal of Mr. Nawab Ali resubmitted today by Mr. Kifayatullah Shahab Khel Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 01.11.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman</p> <p> REGISTRAR</p>

The appeal of Mr. Nawab Ali received today i.e on 24.10.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Memorandum of appeal is not signed by the appellant. ✓
- 2- Copy of DMC in respect of appellant mentioned in para-3 of the memo is not attached with the appeal be placed on it. ✓
- 3- Copy of promotion order mentioned in para-6 of the memo of appeal is not attached with the appeal be placed on it. ✓
- 4- The authority to whom the departmental appeal was made has not been made a necessary party.
- 5- Copy of rejection order departmentals is not attached with the appeal be placed on it.

No. Q38 /Inst./2024/KPST,

Dt. 24/10 /2024.

Amalilloh
ADDITIONAL REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Kifayatullah Adv.
High Court Peshawar.

PTO

BEFORE THE COURT OF WORTHY CHAIRMAN
SERVICES TRIBUNAL, PESHAWAR

Appeal No. 2149 /2024

Nawab Ali.....Appellant

V E R S U S

IG Prison and others.....Respondents

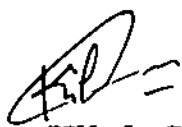
I N D E X

S.No.	Description of Documents	Annex	Pages
1.	Memo of appeal along with affidavit	*	1-6
2.	Copy of DMC	A	7
3.	Copy of judgment dated 14/02/2024	B	8-14
4.	Copy of Application	B/1	15
5.	Copy of impugned order dated 09/07/2024	C	16
6.	Copy of order dated 07/10/2024	D	17
7.	Wakalatnama	*	18


Appellant

Through :

Date: 24/10/2024


Kifayat Ullah Shahabkhel
Advocate, High Court,
Peshawar
Cell# 0300-5844181

1

BEFORE THE COURT OF WORTHY CHAIRMAN
SERVICES TRIBUNAL, PESHAWAR

Appeal No. 2149 /2024

Nawab Ali S/o Shamsheer Khan R/o Sangu Peshawar
presently serving as Chief Head Warden Central Jail,
Peshawar.....**Appellant**

V E R S U S

1. Inspector General of Prison Khyber Pakhtunkhwa,
Peshawar.
2. Assistant Director Regional Prison Office,
Peshawar,
3. Secretary Home and Tribal Affairs, Govt. of Khyber
Pakhtunkhwa, Civil Secretariat, Peshawar

.....**Respondents**

APPEAL UNDER SECTION 4 OF KP
SERVICES TRIBUNAL ACT 1974
AGAINST THE IMPUGNED ORDER
DATED 09/07/2024 ISSUED BY THE
RESPONDENT NO.2 WHEREBY THE
PROMOTION OF THE APPELLANT TO
BPS-16 WAS DEFERRED, HENCE THE
IMPUGNED ORDER MAY Y KINDLY BE
DECLARE UNLAWFUL AND VOID-AB-
INITIO

Prayer in Appeal:

On acceptance of this service appeal, the
impugned order dated 07/09/2024 issued by the

2

respondent No.2 may kindly be set aside and the appellant may kindly be promoted to BPS-16 as per his service record/ career.

Respectfully Sheweth:

1. That the appellant was appointed in Preston Department after fulfillment all the codal and legal formalities and serving from last 27 years.
2. That the appellant was promoted to the up post step by step upon the recommendations of the competent authority and best service carrier.
3. That the appellant was appeared and as in examination for the post of Assistant Superintendent Jail in the said examination and qualified the said examination in the year 2022 which he qualified the said exam and obtained 273 Marks. **(Copy of DMC is attached as Annexure-A)**
4. That during the said period, the appellant was charged in criminal case in which the appellant was acquitted by the competent court.

3

5. That after the criminal case, the respondents compulsory retired from the service against which the appellant was approached this Hon'ble Tribunal wherein the appellant was reinstated on service vide order dated 14/02/2024. **(Copy of judgment dated 14/02/2024 is attached as Annexure-B)**
6. That the appellant serving the department from last 27 years with full zeal and zest but during this period, the appellant was not promoted to BPS-16 i.e. Assistant Superintend of Jail due to the above mentioned reasons.
7. That appellant aggrieved from the above mentioned act of the respondent file an application for promotion which was referred to the respondent No. 2 who dismissed the application of the appellant vide impugned order dated 09/07/2024. **(Copy of impugned order dated 09/07/2024 is attached as Annexure-C)**
8. That the appellant feeling aggrieved from the impugned order dated 09/07/2024 of the

(4)

respondent No.2, hence approaches this Hon'ble Tribunal inter alia on the following grounds:

GROUND S:

- A. That the impugned actions and inactions of the respondents are illegal, unlawful, without lawful authority and jurisdiction, liable to be struck down.
- B. That the impugned act of deferring the appellant from promotion is illegal and un-Constitutional. Hence the same acts are liable to be declared as such.
- C. That the appellant have been treated in violation of the Constitutional spirit.
- D. That the appellant has been discriminated and he is being treated against the law, rules and regulations, thus, deprived of equal protection of law, which is mandated by Article 24/25 of the Constitution of Islamic Republic of Pakistan, 1973.
- E. That due to the fault and negligence of the respondent, the appellant was not joined the training.

5

- F. That being successful in the written examination, the appellant is entitled for promotion/ upgradation and refusal on the part of the respondents is illegal, unlawful and against the rules/regulations of the department.
- G. That any other grounds will be raised at the time of arguments with prior permission of this Hon'ble Tribunal.

It is, therefore, most humbly prayed that on acceptance of this service appeal, the impugned order dated 09/07/2024 issued by the respondent No.2 may kindly be set aside and the appellant may kindly be promoted to BPS-16 as per his service record/ career.

OR

Any other relief may deemed fit in the circumstances of the law may also be granted in favour of the appellant against respondent.


Appellant

Through


Kifayat Ullah Shahabkhel
Advocate, High Court,
Peshawar

Date: 24/10/2024

(8)

BEFORE THE COURT OF WORTHY CHAIRMAN
SERVICES TRIBUNAL, PESHAWAR

Appeal No. _____/2024

Nawab Ali.....**Appellant**

V E R S U S

IG Prison and others.....**Respondents**

AFFIDAVIT

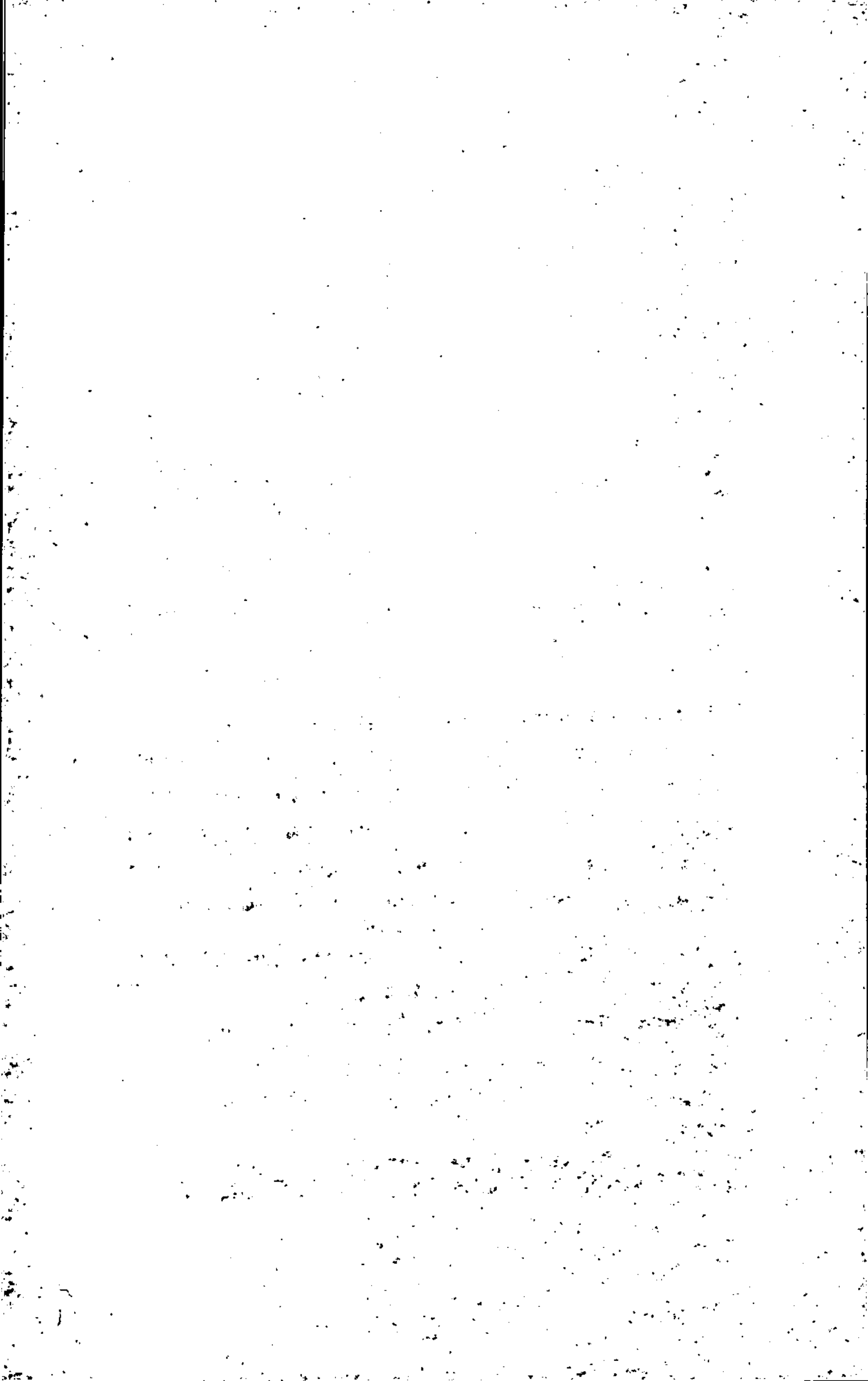
I, Nawab Ali S/o Shamsheer Khan R/o Sangu Peshawar presently serving as Chief Head Warden Central Jail, Peshawar, do hereby solemnly affirm and declare on oath that the contents of accompanying **Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable court.

Identified by:

Nawab Ali
DEPONENT

Kifayat Ullah Shahabkhel
Kifayat Ullah Shahabkhel
Advocate, High Court,
Peshawar.





(7)



Appendix-C

Government of Khyber Pakhtunkhwa,
Home & Tribal Affairs Department.

RESULT SHEET OF THE DEPARTMENTAL EXAMINATION FOR THE POST OF ASSISTANT SUPERINTENDENT JAIL (CLASS-II) HELD DURING THE YEAR 2022

Sl No	Name of Candidates	Designation	Prison Manual Paper-I	Prison Manual Paper-II	General Knowledge and Current Affairs	General	Drill and Musketry	Obtained Marks/Marks Obtained out of 500	Percentage (%)	Remarks
			Marks Obtained out of 100	Marks Obtained out of 100	Marks Obtained out of 100	Marks Obtained out of 100	Marks Obtained out of 100			
1.	Hamid Ali Shah	ASI	71	73	55	44	50	293/500	58.6	Pass
2.	Usman Ali	ASI	89	83	56	54	65	347/500	69.4	Pass
3.	AbidUllah	ASI	86	66	48	53	50	303/500	60.6	Pass
4.	Bilal Ahmad	ASI	76	87	61	54	65	343/500	68.6	Pass
5.	Hamid Jalal	ASI	75	80	66	53	55	329/500	65.8	Pass
6.	Naveed Iqbal	ASI	96	92	60	58	65	371/500	74.2	Pass
7.	Najeem Ahmad	ASI	74	84	66	65	55	344/500	68.8	Pass
8.	Ahmad Ullah Khan	ASI	71	87	68	58	55	339/500	67.8	Pass
9.	Miss Hina Shahreen	ASI	78	86	64	55	55	338/500	67.6	Pass
10.	Saeed Raza	Senior Clerk	74	62	64	48	Exempted	248/400	62	Pass
11.	Abdul Haseeb	Senior Clerk	75	87	61	55	Exempted	278/400	69.5	Pass
12.	Nasir Khan	Senior Clerk	69	76	58	52	Exempted	255/400	63.75	Pass
13.	Muhammad Ali	Senior Clerk	69	88	62	58	Exempted	277/400	69.25	Pass
14.	Muhammad Jan	Senior Clerk	94	87	66	67	Exempted	314/400	78.5	Pass
15.	Naveed Hanger	Senior Clerk	87	90	68	60	Exempted	305/400	76.25	Pass
16.	Imad Hussain	Chief Head Warden	50	52	40	40	45	227/500	45.4	Pass
17.	Abdul Zahid	Chief Head Warden	57	64	40	40	55	256/500	51.2	Pass
18.	Nawaz Ali	Chief Head Warden	60	62	52	44	55	273/500	54.6	Pass

[Signature]
 ASSISTANT SUPERINTENDENT JAIL

Annex "A" 8

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**



Service Appeal No. 220/2023

BEFORE: MRS. RASHIDA BANO ... MEMBER (J)
MISS FAREEHA PAUL ... MEMBER (E)

Nawab Ali S/O Shamsheer Khan, R/O Bara Road Sangu Peshawar,
presently Chief Head Warder BPS- 11 Central Jail, Peshawar.
..... (Appellant)

Versus

1. Inspector General of Prisons Khyber Pakhtunkhwa, Peshawar.
2. Home Secretary Khyber Pakhtunkhwa, Peshawar.
.....(Respondents)

Mr. Kifayatullah Shahabkhel, ... For appellant
Advocate

Mr. Asif Masood Ali Shah, ... For respondents
Deputy District Attorney

Date of Institution..... 13.01.2023
Date of Hearing..... 14.02.2024
Date of Decision..... 14.02.2024

JUDGEMENT

FAREEHA PAUL, MEMBER (E): Through this single judgment, we intend to dispose of instant service appeal as well as connected service appeal No. 221/2023 titled "Ali Akbar Versus IG Prison, Khyber Pakhtunkhwa Peshawar etc.", service appeal No. 222/2023, titled "Nisar Ali Versus IG Prisons Khyber Pakhtunkhwa Peshawar etc." and service appeal No. 273/2023, titled "Rooh Ullah Versus Government of Khyber Pakhtunkhwa through Secretary Home, Civil Secretariat, Peshawar etc.", as in all the appeals, common questions of law and facts are involved.

ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

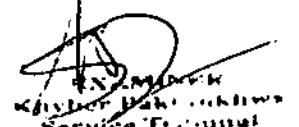
(8) (9)

2. The service appeal in hand has been instituted under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 against the order dated 29.09.2022, whereby the appellant was compulsory retired from service. It has been prayed that on acceptance of the appeal, the impugned order 29.09.2022 might be set aside and he might be reinstated into service with back benefits.

3. Brief facts of the case, as given in the memorandum of appeal, are that the appellant, while serving as Warder BPS-11 in the Central Prison, Peshawar, was deputed for the security of MPA Mr. Faisal Zaman, against whom there was allegation of murder, at Room No. 11 MPA Hostel Peshawar, which was declared Sub Jail. The prisoner escaped from the sub jail on 22.04.2022. As a result of that incident, the appellant was compulsory retired from service vide order dated 29.09.2022. Feeling aggrieved from the said order, he approached the Secretary to Government of Khyber Pakhtunkhwa, Home Department, through his departmental appeal but the same was not decided within the stipulated period; hence the instant service appeal.

4. Respondents were put on notice who submitted their joint written reply/comments on the appeal. We heard the learned counsel for the appellant as well as the learned Deputy District Attorney for the respondents and perused the case file with connected documents in detail.

5. Learned counsel for the appellant, after presenting the case in detail, argued that on the relevant day, the appellant performed duty


ATTESTED

 Khyber Pakhtunkhwa
 Service Tribunal
 Peshawar

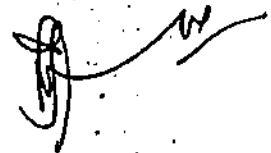


(8) (10)

from 8.00 A.M to 1.00 PM, whereas the incident of escape took place at about 04.31 P.M, the time on which he was not on duty. He further argued that there was no instruction from the high ups regarding the access of the driver and personal security guard of MPA Faisal Zaman to his room, the sub jail and they frequently visited him. He further argued that he was guarding the front side of the room whereas it had a door and a balcony at its back side and the security of the back side of the room was not in the domain of the appellant. There were no orders from the authority to have access of the security staff of prison inside the room of the MPA. He further argued that the said MPA, secretly and with the connivance of his driver and personal security guard, escaped from the sub jail through back door. Learned counsel argued that according to the Khyber Pakhtunkhwa Prison Rules 2018, the appellant was bound for the internal security only and the police, as per law, had the authority for external security and transfer of the said MPA from the sub jail to the Provincial Assembly or the court of law. According to him, the moment the escape of the MPA was noted, the matter was timely reported to other officials present in the MPA hostel. CCTV footage was seen whereby it was clearly noted that the MPA Faisal Zaman escaped with his personal security guard and his driver due to the negligence of the security on the main gate of MPA hostel. He requested that the appeal might be accepted as prayed for.

6. Learned Deputy District Attorney, while rebutting the arguments of learned counsel for the appellant, argued that Government of Khyber

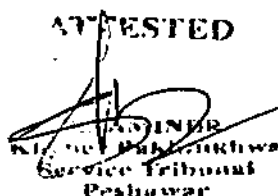
ATTESTED

 EXAMINER
 Khyber Pakhtunkhwa
 Service Tribunal
 Peshawar

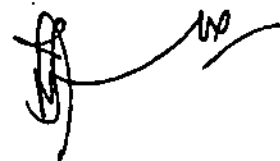


(11)

Pakhtunkhwa vide Home and Tribal Affairs Department declared Sub Jail at MPA Hostel Room No.11, Block-D, for confinement of the accused Faisal Zaman MPA, where he was shifted on 31.03.2022. For the purpose of duty, one Assistant Superintendent Jail Nisar Ali Khan Incharge Sub Jail, alongwith one Chief Head Warder namely Mr. Nawab Ali and 03 other warders namely Kashif, Rooh Ullah and Ali Akbar were deployed to perform further duty at the Sub Jail. He contended that due to the gross negligence and inefficiency in the performance of their duties on 22.04.2022, at about 04:31 PM, the accused MPA Faisal Zaman escaped from Sub Jail. The learned DDA argued that the appellant was on duty at the time of escape and he was required to monitor every act of the accused strictly and to have vigilant eye on his activities, but he failed to perform his assigned duties as per norms of the Khyber Pakhtunkhwa Prison Rules, 2018. According to him, the appellant also failed to inform the police staff timely for its prevention. He requested that the appeal might be dismissed.

7. From the arguments and record presented before us, it transpires that the appellants were deputed by the Superintendent Central Prison, Peshawar to perform duties at Room No. 11 of the MPA Hostel at Peshawar, which was declared as sub-jail for detention of an MPA, Mr Faisal Zaman, who was an under trial prisoner. On 22.04.2022, the prisoner escaped, as a result of which an inquiry was conducted and five officials of the Prison Department were proceeded against and penalties were imposed vide an order dated 29.09.2022 as follows:-

ATTESTED

 JUDGE
 Khyber Pakhtunkhwa
 Service Tribunal
 Peshawar



(19)

S#	Name of officer/officials	Penalty awarded
1.	Mr. Nisar Ali, Assistant Superintendent Jail (BPS-16)	Compulsory retirement from service with immediate effect
2.	Mr. Nawab Ali, Chief Head Warder (BPS-11)	Compulsory retirement from service with immediate effect
3.	Muhammad Kashif S/O Fazal Mir, Warder (BPS-07)	Reduction to lower stages in time pay scale for a period of 03 years without cumulative effect.
4.	Roohullah S/O Shakirullah, Warder (BPS-07)	Reduction to lower stages in time pay scale for a period of 03 years without cumulative effect.
5.	Ali Akbar S/O Bakht Muhammad Khan Warder (BPS-07)	Removal from service with immediate effect

8. Out of the above five officials, service appeal of four officials namely Nawab Ali, Ali Akbar, Nisar Ali and Rooh Ullah are before us. After going through the record in all the appeals and the documents presented by the respondents, it appears that five officials of the Prison Department were deputed to perform duty at the sub-jail but no specific job description and duty rota was there in order to determine the nature of duty to be performed by every official, along with the time and duty hours. This point has been highlighted by the learned Judicial Magistrate-IV Peshawar also in his judgment dated 30.01.2023 wherein he has raised the point as follows:-

".....here the point of consideration is that whether the accused facing trial being public servants were deputed to

ATTESTED *hold the custody of absconding accused or otherwise, thus, after deep scrutiny of the record, this court holds that*

JAGHMOOR
Peshawar
District Court
Peshawar

[Handwritten signature]

19

there is nothing available on file in written form which may show that the accused facing trial being public servants were deputed to hold the lawful custody of absconding co-accused at the time of his escape. No order etc regarding the deployment of accused facing trial issued by Superintendent Jail or any competent authority is there on record-----."

The inquiry officer, in his report, has identified numerous loopholes in the security of facility that was declared as sub-jail. The question is whether it was the responsibility of the officials of the Prison Department deputed there or it was a task to have been looked into by the provincial government before declaring Room No. 11 of the MPA Hostel as sub-jail? Moreover as far as the security of the prison is concerned there are more than one tier/cordon and ultimately at the outermost level, there is the Police. The Inquiry Officer, in his report has identified that there was District Police Squad under the charge of Sub-Inspector Haroon deployed for providing the security to the sub-jail. He has also identified that there were no CCTV cameras in the corridors, rooms and around the building of the MPA Hostel to fully monitor the movement of the prisoner. Negligence of police deployed for security has also been highlighted by him. In the light of all the shortcomings identified by the Inquiry Officer in his report, one fails to understand that how the competent authority held the appellants responsible for escape of the Prisoner?

ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

مذکورہ جناح سے یہ ہم سکریٹری ضمیمہ دستخط خواہتا ہوں۔

لغات علی ولد سمنیر خان سکنہ سنو حال جیل ملتان

سنٹرل جیل ملتان ... سنٹرل / اسپلٹ

درخواست / اپیل برخلاف اسٹپ رائٹ ٹریڈ یونٹ و انسٹیٹیوٹ

جیل خانہ جات سے غیر رجسٹرڈ خواہ مورخہ 24/7/24 کو

داررہی -

جناب عالی!

سنٹرل جیل ملتان سے 15/7/24

11 سے کہ سنٹرل جیل درخواست بابت سے موافقت دار کی کہی جو کہ اصول حکم نامہ

174/2 کو غرضانہ کی ہے۔

12 یہ کہ اسپلٹ کے بنیاد FIR میں معلومات کیا گیا تھا جو کہ عدالت

صغورہ سے پیش کرنے کے احکامات کہی تھا در فرمائیں ہے اور ساتھ

سنٹرل کو داسی اپنی کفر کی ہے۔ بحال ہو چکا ہے۔ جو کہ سروس ٹیم

مورخہ 24/2/2024 حکم صادر فرمایا ہے۔

13 یہ کہ اسپلٹ نے باقاعدہ طور پر اسٹپ سے اٹھنا نہ کیا جیل کا

امکان نہیں دیا گیا ہے کہ شکوکے سے تعلق سے اس کی رجسٹر

ہیں ہوئی اور اسے سنٹرل 24/10/24 کو ریٹائرڈ ہو رہا ہے

ٹریننگ کی دورانہ کہی حکم نہیں ہو رہی رہی وصف سنٹرل

سروسس کا حقدار ہے۔ لہذا استدعا ہے کہ سنٹرل کو یہ موافقت کرائی جائے۔

اسپلٹ لکوات علیک وصف داررہی

مورخہ 24/7/24



09/17/24

KHYBER PAKHTUNKHWA PESHAWAR

091-9210334, 9210406 091-9213445

No. 21150-22-27990-1-ME

Dated. 09-07-2024

To,

Annex-'C' 16

The Superintendent,
Circle Headquarters Prison Peshawar

Subject: APPLICATION IN RESPECT OF CHIEF HEAD WARDER NAWAB ALI S/O SHAMSHER KHAN, PRESENTLY ATTACHED TO CENTRAL PRISON BANNU

Memo;

I am directed to refer to the subject and to forward herewith a copy of Superintendent Central Prison Bannu letter No. 3263WE dated 01-07-2024 alongwith an application (self-explanatory) in respect of subject cited Chief Head Warder attached to Central Prison Bannu for information and with the request to send his nomination, if he is senior most and in the line of promotion as and when requisition for promotion course of Chief Head Warder to Assistant Superintendent Jail is forwarded by this office / Prison Staff Training Academy Haripur please.


ASSISTANT DIRECTOR
INSPECTORATE GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR

Endst: No. _____ /-

Copy of the above is forwarded to the:

1. Superintendent Central Prison Bannu for information w/r to above please.
2. PS to I.G, Prisons Khyber Pakhtunkhwa Peshawar.

ASSISTANT DIRECTOR
INSPECTORATE GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR

P.B
M/A
~~X~~
Suppl
09/17/24

(17)



OFFICE OF THE
DEPUTY INSPECTOR GENERAL
REGIONAL PRISON OFFICE
PESHAWAR
No: 262/WE Dt: 07/10/2024
djg.rpo.peshawar@gmail.com

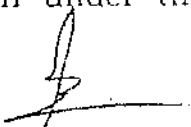
To,
The Inspector General of Prisons,
Khyber Pakhtunkhwa, Peshawar.

Subject: **APPLICATION SUBMITTED BY CHIEF HEAD WARDER NAWAB ALI.**

Dear Sir,

I am directed to forward herewith a copy of Superintendent Central Prison Peshawar letter No. 12936/WE dated 18-09-2024 alongwith an application submitted by Nawab Ali, Chief Head Warder (BPS-11) wherein he stated that he will be retired on attaining the age of superannuation on 25-10-2024. He has also stated that he is the most senior amongst Chief Head Warders, possess the required length of service and already cleared the departmental examination for the post of Assistant Superintendent Jail (BPS-16) but due to non-completion of promotion training course he was not considered for promotion. Therefore, he has requested that he may be appointed on acting charge basis to the post of Assistant Superintendent Jail (BPS-16).

Submitted for information and further necessary action under the rules in force.


ASSISTANT DIRECTOR
REGIONAL PRISON OFFICE


ATTESTED

50	62597	پشاور بار ایسوسی ایشن، خیبر پختونخواہ
ایڈوکیٹ:	بار کونسل ایسوسی ایشن نمبر: 107835	PESHAWAR BAR ASSOCIATION
رابطہ نمبر: 0300-5844181		QR Code

18

بعدالت جناب: *Servise Eubana / سروس ایبانا*

مخاطب: مسائل / مسائل	دعویٰ:
	علت نمبر:
IG prison جواب علی بنام	موضوع:
KPK	جرم:
	تھانہ:

بابت تحریر آتھ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ آن مقام لپ خاور کیلئے کفایت اللہ شہاب خیل اللہ اللہ کی طرف سے اپنی طرف سے کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی 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 نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کارروائی 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

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مقام پشاور

Accepted by
Kifayatullah

لواب علی ولم *مستند* سند *مستند* سند *مستند* سند