


FORM OF ORDER SHEET

Court of _____

Appeal No. _____

2286/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	04/11/2024	<p>The appeal of Mx Muhammad Nacem refiled today by registered post through Muhammad Arshad Khan Tanoli Advocate. It is fixed for preliminary hearing before touring Single Bench at A.Abad on 26.11.2024. Counsel for the appellant has been informed telephonically.</p> <p>By order of the Chairman</p> <p> REGISTRAR</p>

[Submit Appeal](#)[View File](#)[File status](#)[Logout](#)[view record](#)

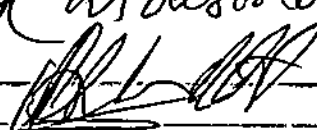
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Appliation Id: 95**CNIC: 1310109147461****Appelant: Muhammad Naeem Constable Belt No.1802 Platoon 39 SSU Versus Regional Police Officer Hazara Range Abbottabad etc****Department Police****Type Appeal****Submitted on: 12-10-2024 12:16:11pm**

Discription: SERVICE APPEAL UNDER SECTION 4 OF KP SERVICE TRIBUNAL ACT, 1974 FOR SETTING ASIDE IMPUGNED ORDER DATED 26/05/2023 MAY BE SET-ASIDE AND RESPONDENTS MAY BE DIRECTED TO RESTORE TWO ANNUAL INCREMENTS AND ARREARS THEREOF BE PAID ACCORDINGLY.

Objections:
Pending[View PDF](#)


*Sir, - case is re-submitted
duly rectified as desired*


Appliation Id: 96**CNIC: 1310109147461****Appelant: Samavia Bibi Ex-Lady Constable Belt No. 2301 District Police Mansehra Versus Inspector General of Police Khyber Pakhtunkhwa, Peshawar etc.****Department Police****Type Appeal****Submitted on: 12-10-2024 12:58:37pm**

Discription: SERVICE APPEAL UNDER SECTION 4 OF KP SERVICE TRIBUNAL ACT, 1974 FOR SETTING ASIDE IMPUGNED WITHDRAWL ORDER DATED 16/05/2024 AND RESPONDENTS' DEPARTMENT BE DIRECTED TO RE-INSTATE THE APPELLANT IN SERVICE WITH ALL BACK BENEFITS. ANY OTHER RELIEF WHICH THIS HONOURABLE TRIBUNAL DEEM APPROPRIATE IN THE CIRCUMSTANCES OF CASE MAY ALSO GRANTED TO THE APPELLANT.

Objections:
Pending[View PDF](#)

30/10/24

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Appliation Id: 95**CNIC:** 1310109147461**Appelant:** Muhammad Naeem Constable Belt No.1802 Platoon 39 SSU Versus Regional Police Officer Hazara Range Abbottabad etc**Department** Police**Type** Appeal**Submitted on:** 12-10-2024 12:16:11pm

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Objections:

Appeal of Muhammad Naeem is returned to the counsel for the appellant for removing the deficiencies. 1- Address of the appellant is incomplete be completed according to rule-6 of Khyber Pakhtunkhwa Service Tribunal rules 1974. 2- The authorities whose orders are challenged has not been arrayed in the list of respondents. 3- Copy of departmental appeal is not attached with the appeal be placed on it. 4- Annexure-E of the appeal is illegible. 5- Three copies/sets of the appeal along with annexures i.e. complete in all respect for Tribunal and one for each respondent be submitted with the appeal. No. _____/Inst./2024/KPST Dt. _____/2024. REGISTRAR SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR. M.Arshad Khan Tanoli Adv. Supreme Court at A.Abad.

View PDF

objection no. 2 not removed

Appliation Id: 96**CNIC:** 1310109147461

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File Status

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No records found for "

Appilation Id: 95

CNIC: 1310109147461

Appelant: Muhammad Naeem Constable Belt No.1802 Platoon 39 SSU Versus Regional Police Officer Hazara Range Abbottabad etc

Department Police

Type Appeal

Submitted on: 12-10-2024 12:16:11pm

Discription: SERVICE APPEAL UNDER SECTION 4 OF KP SERVICE TRIBUNAL ACT, 1974 FOR SETTING ASIDE IMPUGNED ORDER DATED 26/05/2023 MAY BE SET-ASIDE AND RESPONDENTS MAY BE DIRECTED TO RESTORE TWO ANNUAL INCREMENTS AND ARREARS THEREOF BE PAID ACCORDINGLY.

Objections:

Pending

[View PDF](#)

BEFORE THE HONOURABLE SERVICE TRIBUNAL,
KHYBER PAKHTUNKHWA, PESHAWAR

Service appeal No. 2286 /2024

Muhammad Naeem Constable Belt No. 1802, Platoon 39 SSU, Police Line Upper Kohistan.

...APPELLANT

VERSUS

Regional Police Officer Hazara Range Abbottabad & another.

...RESPONDENTS

SERVICE APPEAL

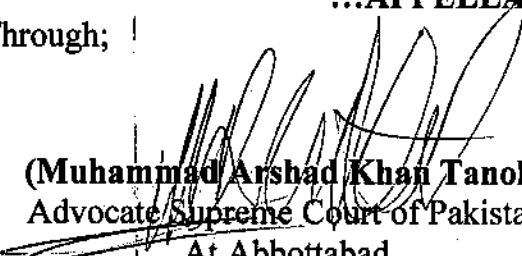
INDEX

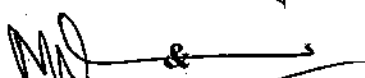
S.#	Description	Page No.	Annexure
1.	Service appeal along with affidavit	1 to 7	
2.	In this regard charge sheet and stated of allegations	8-9	"A"
3.	Reply of statement of allegation & charge sheet	10-11	"B"
4.	Copy of impugned order dated 26/05/2023	12	"C"
5.	Copy of appeal and rejection order dated 12/09/2024	13-14	"D" & "E"
6.	Copy of rejection of appeal of the appellant	15-17	"F"
7.	Wakalatnama	18	

Through;

Dated: 31/10 /2024

Naeem
...APPELLANT


(Muhammad Arshad Khan Tanoli)
Advocate Supreme Court of Pakistan
At Abbottabad


(Muhammad Ibrahim Khan)
Advocate High Court, Abbottabad

BEFORE THE HONOURABLE SERVICE TRIBUNAL,
KHYBER PAKHTUNKHWA, PESHAWAR

Service appeal No. 2286 /2024

Muhammad Naeem Constable Belt No. 1802 Platoon 39 SSU, Police Line Upper Kohistan.

...APPELLANT

VERSUS

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 17581

Dated 04-11-24

1. Regional Police Officer Hazara Range Abbottabad.
2. District Police Officer Upper Kohistan.
3. SP Admin and Minority SSU (CPEC), KP, Peshawar.
4. Additional Inspector General of Police Headquarters KP, Peshawar.

...RESPONDENTS

SERVICE APPEAL UNDER SECTION 4 OF
KP SERVICE TRIBUNAL ACT, 1974.

Filed to-day

Registrar

4/11/24.

PRAYER ON ACCEPTANCE OF INSTANT
SERVICE APPEAL THE IMPUGNED ORDER
DATED 26/05/2023 MAY BE SET-ASIDE AND
RESPONDENTS MAY BE DIRECTED TO
RESTORE TWO ANNUAL INCREMENTS AND
ARREARS THEREOF BE PAID
ACCORDINGLY.

Respectfully Sheweth;

The facts forming the back grounds of instant service appeal are arrayed as under;-

1. That the appellant was serving as constable in CEPEC project.
2. That the respondents' department as per allegation that the appellant staged a protest during movement of Chinese escort alongwith other SSU Constables and demanded for buddy ship system. In this regard charge sheet and stated of allegations is annexed as Annexure "A".
3. That the appellant replied to the statement of allegation & charge sheet and denied the allegations of the protest and buddy ship system. But infacct, on the direction of the department, the appellant as well as some other counter part constables floated a proposal of their timely preparation of Breakfast, Lunch & Dinner because two person/cooks were unable to prepare the Breakfast, Lunch of Dinner of more than 70

constables. Reply of statement of allegation & charge sheet is annexed as Annexure "B".

4. That the appellant was awarded punishment of forfeiture of two annual increments with cumulative effect and last warning to be careful in future as well vide impugned dated 26/05/2023. Copy of impugned order dated 26/05/2023 is annexed as Annexure "C".

5. That the appellant filed departmental appeal which was rejected by the competent authority on 14/09/2023. Copy of appeal and rejection order dated 12/09/2024 are annexed as Annexure "D" & "E".

6. That a board was meeting held on 08/08/2024 and rejected the appeal of the applicant on 12/09/2024. Copy of rejection of appeal of the appellant is annexed as Annexure "F". Hence, the service appeal of the appellant is filed inter-alia on the following grounds.

GROUNDS:-

- a) That the appellant is a constable and never staged a protest and demanded buddy ship system. The fact of the same can be gather from the reply submitted by the appellant to the quarter concerned.
- b) That the respondents department without conducting proper inquiry and evaluating the replies of the appellant, awarded impugned punishment of forfeiture of two annual increments with accumulative effect and last warning as well. Hence, the impugned order dated 26/05/2023 and rejection letter of appellant are liable to be set-aside.
- c) That the appellant is a low paid poor constable and hardly earn his livelihood for his dependant and the stoppage of two annual increments and final warning is harsh, pungent and the same is liable to be set-aside on this score.

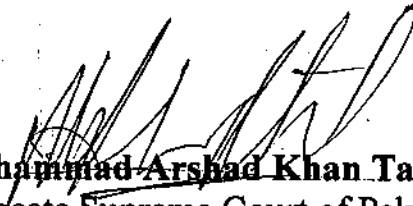
- d) That it is a settled principle of law that no one can be punished twice in the same offence. It is further submitted, that as mentioned above, the appellant has been awarded two punishments due to no fault on his part.
- e) That the respondents have led the appellant to the place which is utterly known to the principal good governance, of jurispendence fair play and natural justice.
- f) That the matter relates to terms & conditions of service. Hence, this Honourable Tribunal has jurisdiction to entertain the instated service appeal.
- g) That instant service appeal is well in time.
- h) That other point shall be urge at time of arguments with permission of this Honourable Tribunal.

It is humbly prayed that on acceptance of instant service appeal the impugned order dated 26/05/2023 may be set-aside and respondents may be directed to restore two annual increments and arrears thereof be paid accordingly.

Naseem
...APPELLANT

Through;

Dated: _____/2024


(Muhammad Arshad Khan Tanoli)
Advocate Supreme Court of Pakistan
At Abbottabad

&


(Muhammad Ibrahim Khan)
Advocate High Court, Abbottabad

VERIFICATION:-

Verified on oath that the contents of foregoing service appeal are true and correct to the best of our knowledge and belief and nothing has been concealed therein from this Honourable Tribunal.

Naseem
...APPELLANT

BEFORE THE HONOURABLE SERVICE TRIBUNAL,
KHYBER PAKHTUNKHWA, PESHAWAR

Service appeal No. _____/2024

Muhammad Naeem Constable Belt No. 1802 Platoon 39 SSU, Police Line
Upper Kohistan.

...APPELLANT

VERSUS

Regional Police Officer Hazara Range Abbottabad & another.

...RESPONDENTS

SERVICE APPEAL

AFFIDAVIT

I, Muhammad Naeem Constable Belt No. 1802 Platoon 39 SSU, Police Line Upper Kohistan, do hereby solemnly affirm and declare that the contents of forgoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Tribunal.



Naeem
DEPONENT

31/10/2024

Annex - A

P-8

CHARGE SHEET

I, Superintendent of Police, Admin & Minority Wing, Special Security Unit (CPEC), Peshawar, as competent authority, hereby charge that Constable Muhammad Naeem No. 1892 of SSU (CPEC), with the following irregularities.

"That you Constable Muhammad Naeem No. 1892 while posted at BHPP staged a protest during movement of Chinese escort along with other SSU Constables & denied to perform your lawful duty and demanded for Buddy Ship system, received vide DD report No. 21, dated 20.02.2023 from DSP Security BHPP. Being part of the Disciplined Force, this act of yours is against the Police Rules & shows gross misconduct on your part".

You are, therefore, required to submit your written defence within seven days of the receipt of this charge sheet to the Enquiry Officer committee, as the case may be.

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

Intimate whether you desire to be heard in person.
A statement of allegation is enclosed.

Allohi

U

Muhammad Arshad Khan Janjani
Advocate Supreme Court of Pakistan
Office # 33 Jinnah Plaza Adjacent to
District Bar Abbottabad

(FAZAL HANIF)

SP Admin & Minority SSU (CPEC),
Khyber Pakhtunkhwa Peshawar.

le
29-03-2023

P-9

Disciplinary Action


I, Superintendent of Police, Admin & Minority, Special Security Unit (CPEC) Peshawar as a competent authority, am of the opinion that Constable Muhammad Naeem No. 1892 of SSU (CPEC), has rendered him-self liable to be proceeded against under the provision of Police Disciplinary Rules-1975.


STATEMENT OF ALLEGATION

"That Constable Muhammad Naeem No. 1892 while posted at BHPP staged a protest during movement of Chinese escort alongwith other SSU Constables & denied to perform his lawful duty and demanded for Buddy Ship system, received vide DD report No. 21, dated 20.02.2023 from DSP Security BHPP. Being part of the Disciplined Force, this act of his is against the Police Rules & shows gross misconduct on his part".

For the purpose of scrutinizing the conduct of said accused with reference to the above allegations an enquiry is ordered and Mr. Tamiz Uddin DSP DI Khan Region is appointed as enquiry officer.

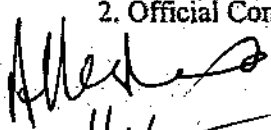
1. The Enquiry Officer shall, in accordance with the provisions of the Ordinance, provide reasonable opportunity of hearing to the accused officer, record his finding within 15 days of the receipt to this order, make recommendations as to punishment or other appropriate action against the accused.
2. The accused shall join the proceeding on the date time and place fixed by the Enquiry Officer.


 (FAZL HANIF)
 SP Admin & Minority SSU (CPEC).
 Khyber Pakhtunkhwa Peshawar.


09-03-2023

No. 671 /EC, dated Peshawar the 10/03/2023.

1. Enquiry Officer is directed to finalize the aforementioned departmental proceeding within stipulated period under the provision of Police Rules-1975.
2. Official Concerned.


 Muhammad Arshad Khan
 Advocate Supreme Court of Pakistan
 Office # 33, Jinnah Plaza, adjacent to
 District Bar, Abbottabad

Muhammad Arshad Khan Jangli
Advocate Supreme Court of Pakistan
Office # 33, Jinnah Plaza, Adjacent to
District Office, Abbottabad

D. KHAN (KPI)
SSP

Arshad

میں نے اپنے ایک دوست کو بتایا کہ وہ ایک عورت کے ساتھ
بے رحمی سے زیادتی کر رہا ہے۔ اس عورت کو اس کے
خوگوار اور بے رحمی سے زیادتی کرنے سے روکنا ہے۔
اس عورت کو اس کے خوگوار اور بے رحمی سے زیادتی
کرنے سے روکنا ہے۔ اس عورت کو اس کے خوگوار اور
بے رحمی سے زیادتی کرنے سے روکنا ہے۔ اس عورت کو
اس کے خوگوار اور بے رحمی سے زیادتی کرنے سے
روکنا ہے۔ اس عورت کو اس کے خوگوار اور بے رحمی
سے زیادتی کرنے سے روکنا ہے۔ اس عورت کو اس کے
خوگوار اور بے رحمی سے زیادتی کرنے سے روکنا ہے۔

33
30
181

Arshad

میں نے اپنے ایک دوست کو بتایا کہ وہ ایک عورت کے ساتھ
بے رحمی سے زیادتی کر رہا ہے۔ اس عورت کو اس کے
خوگوار اور بے رحمی سے زیادتی کرنے سے روکنا ہے۔

11



**OFFICE OF THE COMMANDANT
SPECIAL SECURITY UNIT (SSU)
KHYBER PAKHTUNKHWA POLICE**

CENTRAL POLICE OFFICES, S.A.O ROAD, PESHAWAR, CANIT (PH: 091-924050)

dated Peshawar the 26/05/2023

No. 1966 - 70 / EC.

ORDER

This order will dispose the formal departmental enquiry against Constable Muhammad Naem: No. 1892 of Special Security Unit (CPEC), District Abbottabad.

Brief facts of the case are that Constable Muhammad Naem No. 1892 while posted at

Balakot Hydro Power Project staged a protest during movement of Chinese escort along with other SSU constables & denied to perform his lawful duty and demanded for buddy shift system. received vide DD report No. 21, dated 20.03.2023.

In this regard, he was transferred to District DI Khan & proper departmental proceeding was initiated against him. He was issued charge sheet & summary of allegations vide this office Endr: No. 671/EC, dated 10.03.2023 and Mr. Tamiz Uddin DSP DI Khan Region was nominated as enquiry officer to conduct inquiry into the matter and submit his findings report. After completion of all codal formalities, EO submitted his findings report, wherein he reported that the Constable received charge sheet and submitted reply. He was inquired thoroughly & given enough opportunity to prove himself innocent of the above charges leveled against him but he badly failed.

Thus, the EO recommended him for suitable punishment.

Accepting in view all the above facts and recommendation of enquiry officer, as well as material available on record, the above named constable was found guilty of the charges leveled against him in the charge sheet/statement of allegations. Therefore, he is hereby awarded minor punishment of "forfeiture of two annual increment with cumulative effect & last warning to be careful in future" with immediate effect.

Copy of the above is forwarded for information to the:

1. PA to Commandant SSU (CPEC), Khyber Pakhtunkhwa Peshawar.
2. Reader to Deputy Commandant SSU (CPEC), Khyber Pakhtunkhwa Peshawar.
3. Accountant, SRC & OASI SSU (CPEC) HQs.

Muhammad Asghar Khan
Deputy Superintendent of Police
Office # 53 Jinnah
District - Abbottabad

[Signature]

Dated 26/05/2023

OB No. 636

(FAZAL HANIF)
SP Admin & Minority SSU (CPEC),
Khyber Pakhtunkhwa, Peshawar.

[Signature]

Annex - c

شاہد محمد
1399ھ میں اپنی اولاد کے لئے

تاریخ 1892ھ

Muhammad Asad Khan
Advocate Supreme Court
Office: 112, Plaza
Durrani, Abbottabad

محمد اسد خان

الغرض

میں نے اپنے اولاد کے لئے اپنی جائیداد میں سے

کچھ حصہ علیحدگی کر کے اپنے اولاد کے لئے وقف کیا ہے

جو اس وقت تک اپنے اولاد کے لئے وقف ہے

میں نے اپنے اولاد کے لئے اپنی جائیداد میں سے

کچھ حصہ علیحدگی کر کے اپنے اولاد کے لئے وقف کیا ہے

جو اس وقت تک اپنے اولاد کے لئے وقف ہے

میں نے اپنے اولاد کے لئے اپنی جائیداد میں سے

کچھ حصہ علیحدگی کر کے اپنے اولاد کے لئے وقف کیا ہے

الغرض

میں نے اپنے اولاد کے لئے اپنی جائیداد میں سے

2-13

Annex - D

(SONIA SIKHROZ KHAN)
 PSP
 AIGT: Establishment,
 For Inspector General of Police,
 Khyber Pakhtunkhwa, Peshawar.

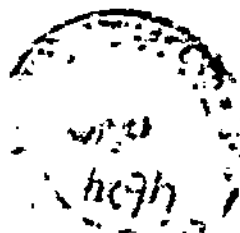
EC for MS
 13/04/2024

- Copy of the above is forwarded to the:
1. Commandant Special Security Unit (CSSU) Service Record (original Service Roll) of the above named HC received vide your office Memo No. 5151/MC dated 30.10.2023 is returned herewith for your office record.
 2. SP Admn SSU CPIC
 3. AIG Legal Khyber Pakhtunkhwa, Peshawar.
 4. PA to Addl IGP/IOs: Khyber Pakhtunkhwa, Peshawar.
 5. PA to DIG/IOs: Khyber Pakhtunkhwa, Peshawar.

No. S 2329-33 24, dated Peshawar, the 12-09-2024
 Additional Inspector General of Police,
 Khyber Pakhtunkhwa, Peshawar.
 AWAL KHAN, PSP
 Sd/-

rejected
 The Board sees no ground & reasons for acceptance of his petition therefore, his petition is hereby proved. During hearing, petitioner failed to advance any plausible explanation in rebuttal of the charges. Perusal of the enquiry papers reveals that the allegations leveled against the petitioner have been proven. The petitioner denied the allegations leveled against him.
 Meeting of Appellate Board was held on 08.08.2024 wherein petitioner was heard in person. The Appellate Authority i.e. Commandant SSU (CPIC) rejected his instant appeal vide order dated 14.09.2023.
 The Appellate Authority i.e. Commandant SSU (CPIC) rejected his instant appeal vide order dated 14.09.2023.
 Appellant was awarded minor punishment of stoppage of two annual increments with consultative effect by SP Admn SSU (CPIC) vide Order (Inst. No. 1966-27/MC, dated 26.05.2023 on the allegations that he while posted at Helwan Hydro Power Project District Mardan staged a protest during movement of Chinese escort along with other SSU Constable & denied to perform his lawful duties & demanded for buddy shift system.
 This order is hereby put to dispose of Revision Petition under Rule 11-A of Khyber Pakhtunkhwa Police Rules 1975 (amended 2014) submitted by FC Muhammad Naem No. 1892. The Applicant was awarded minor punishment of stoppage of two annual increments with consultative effect by SP Admn SSU (CPIC) vide Order (Inst. No. 1966-27/MC, dated 26.05.2023 on the allegations that he while posted at Helwan Hydro Power Project District Mardan staged a protest during movement of Chinese escort along with other SSU Constable & denied to perform his lawful duties & demanded for buddy shift system.
 The Appellate Authority i.e. Commandant SSU (CPIC) rejected his instant appeal vide order dated 14.09.2023.

OBJECT OF THE
 INSPECTOR GENERAL OF POLICE
 KHYBER PAKHTUNKHWA
 PESHAWAR
 P-14
 Khmer-B





OFFICE OF THE COMMANDANT
SPECIAL SECURITY UNIT (SSU)
KHYBER PAKHTUNKHWA POLICE

CENTRAL POLICE OFFICES, S.A.Q ROAD, PESHAWAR CANTT (PH: 091-9211056)

No. 4497-4500/EC.

dated Peshawar the 14/09/2023.

ORDER

Annex-f

This order will dispose of the formal departmental appeal preferred by constable Muhammad Naeem No. 1892 of Special Security Unit (CPEC) against the order of SP Admin SSU (CPEC), wherein he was awarded minor punishment of "forfeiture of two annual increments with cumulative effect" on the allegations that he while posted at Balakot Hydro Power Project District Mansehra staged a protest during movement of Chinese escort alongwith other SSU Constable & denied to perform his lawful duty and demanded for buddy shift system.

In this regard, he was transferred to District DI Khan & proper departmental inquiry was carried out. He was issued/served with charge sheet and summary of allegation. During the course of inquiry, the enquiry officer reported that the accused constable received charge sheet & submitted reply. He was inquired thoroughly & given ample opportunity to prove himself innocent of the above charges leveled against him but he badly failed. Thus, the enquiry officer recommended him for suitable punishment.

In the light of recommendation of enquiry officers and other material available on the record, he was awarded minor punishment of "forfeiture of two annual increments with cumulative effect" vide order No. 1966-70/EC, dated 26.05.2023.

Feeling aggrieved against the impugned orders of SP Admin & Minority SSU (CPEC), Khyber Pakhtunkhwa, Peshawar, the applicant preferred the instant appeal. The applicant was summoned and heard in person in Orderly Room held on 28.08.2023.

During the course of personal hearing, the applicant failed to prove himself innocent of the charges leveled against him. Furthermore, from perusal of enquiry file it has been found that the allegations were fully established against him by the Enquiry Officer during the course of enquiry. There doesn't seem any infirmity in the order passed by the competent authority, therefore, no ground exist to interfere in same.

Based on findings narrated above, I, Commandant SSU (CPEC), Khyber Pakhtunkhwa, Peshawar, being the competent authority, has found no substance in the appeal, therefore, the same is rejected and filed being meritless.

Order announced.

Mohammad Afzar Ali
(MOHAMMAD AFZAR ALI)^{SP}
COMMANDANT,
Special Security Unit (CPEC),
Khyber Pakhtunkhwa, Peshawar.

22/09/23

Copy of the above is forwarded for information to the:

1. SP Admin & Minority SSU (CPEC), Khyber Pakhtunkhwa Peshawar.
2. PA to Commandant SSU (CPEC), Khyber Pakhtunkhwa Peshawar.
3. Reader to Dy: Commandant SSU (CPEC), Khyber Pakhtunkhwa Peshawar.
4. Constable Muhammad Naeem No. 1892.

Muhammad Arshad Khan
Muhammad Arshad Khan, Iano.
Advocate Supreme Court of Pakistan
Office: 33, Jinnah Road, adjacent to
Distt Bar Abbottabad.

P-1A

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1396 2110 2135
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1890 1894 1905 1905 1925 2075
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فردی تنظیم و تصدیق کیا گیا
کیونکہ اس کی حالت میں یہ تھا کہ اس کو وہ اوصاف کے نام سے منسوب کیا گیا تھا

جواب عالی

تسلیم ملائین اعلیٰ

MHA-SRU-BRPP-MIA
20-02-073

GHULAM ALI
DSP
Hydro Power Project
Balakot
DSP - BRPP - MIA
20-02-073

Allee

Mulla Muhammad Arshad Khan (Advocate)
Advocate Supreme Court of Pakistan
Office # 33 Jinnah Road, Islamabad
Distt. Bar Abbonabad

بعدالت Senior Tribunal KPE Peshawar

عنوان: R.P. Office نام M. Naem

منجانب: Appellant

نوعیت مقدمہ: Service Appeal

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دی کل کاروائی متعلقہ آں مقام

Unamman Arshad Khanilano
Advocate Supreme Court of Pakistan

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ اس مقدمہ کی کل کاروائی کا کامل اختیار ہوگا نیز وکیل

صاحب موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری

کرانے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت

ضرورت مقدمہ مذکور کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی

بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا

ساختہ پر داختم مجھ کو منظور و قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے

مستحق وکیل صاحب ہوں گے۔ نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہوا

حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں

کوئی جزو بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراد

استجارت نالش بصیغہ مفلسی کے دائرہ کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کیا تاکہ سند رہے۔

المرقوم:

بمقام:

