


FORM OF ORDER SHEET

Court of _____

Appeal No. _____ **2443/2024**

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	11/11/2024	<p>The appeal of Mr. Zarshad Ali resubmitted today by Mr. Khaled Khan Mohmand Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 19.11.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman  REGISTRAR</p>

The appeal of Mr. Yasir Arafat received today on 07.11 2024, is incomplete for the following reason and is being returned to the appellant's counsel 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.

No. 1040 /Inst./2024/KPST,

Dt. 7/11 /2024.

Amatullah
ADDITIONAL REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Khaled Khan Mohmand Adv.
High Court at Peshawar.

Res. Sir.

The objection raised by the Ad. Registrar are removed the case may be filed before Ad. Registrar available panel.

Khaled Khan Mohmand

Adv. Khaled Khan Mohmand.

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

S.No: 2443/2024

Service Appeal No. ___/2024

Zarshad Ali..... Appellant

VERSUS

Inspector General of Police (IGP), Khyber Pakhtunkhwa & 2 others..... Respondents

I N D E X

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Zarshad Ali
Appellant

Through

Khalid Khan Mahmand

Muaz Ashraf Khalil

Abdul Majeed Ashraf

&

Shams ur Rehman

Advocates, Peshawar

3-A, Park Avenue, Bhattani Plaza,

University Town, Peshawar

Cell No.0342-9101124 - 0336-9488778

Dated: 07.11.2024

(1)

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

S.A No:- 2443/2024

Service Appeal No. ___/2024

ZARSHAD ALI S/O ATTA MUHAMMAD

Ex-Constable, R/O Village & PO Kot Jungara, Tehsil Takht Bhai District Mardan. . . Appellant

PP. Shehzad Naka Sher Gah

VERSUS

1. Inspector General of Police (IGP), Khyber Pakhtunkhwa, Central Police Office, Peshawar.
2. Regional Police Officer/Deputy Inspector General of Police, Mardan.
3. District Police Officer (DPO), Mardan. Respondents

SERVICE APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL ACT, 1974, READ WITH ALL ENABLING PROVISIONS OF LAW, GOVERNING THE SUBJECT, AGAINST OFFICE ORDER OB NO.639, DATED: 10.05.2024 OF RESPONDENT NO.3, VIDE WHICH APPELLANT HAS BEEN AWARDED MAJOR PENALTY OF DISMISSAL FROM SERVICE, VIDE ORDER NO.2749/ES, DATED: 19.08.2024 OF RESPONDENT NO.2, VIDE WHICH DEPARTMENTAL APPEAL DATED: 22.08.2024 OF APPELLANT HAS BEEN REJECTED AND ORDER NO.3355/ES, DATED: 21.10.2024 OF RESPONDENT NO.1, VIDE WHICH BOTH THE AFOREMENTIONED ORDERS OF RESPONDENTS NO.2 & 3, WAS UPHELD.

PRAYER-IN-APPEAL:

On acceptance of instant appeal, Impugned orders dated: 10.05.2024 (of Respondent No.3), 19.08.2024 (of Respondent No.2) and 21.10.2024 (of Respondent No.1) may be set aside and appellant may be re-instated in service with all consequential benefits.

=====

Respectfully Sheweth:

1. That appellant, being qualified, was enlisted as Constable, in the Khyber Pakhtunkhwa Police Department, by the Competent Authority in the year 2011 and, since then till issuance of impugned order dated: 10.05.2024, performed duties with zeal/devotion and utmost satisfaction of superiors.
2. That Appellant has unilaterally been dismissed from service by Respondent No.3, vide Order dated: 10.05.2024, on the sole ground of absence. Moreover, the charge sheet has not properly been communicated to the appellant verbally or in written form, therefore, disciplinary action has taken place vide order dated: 14.06.2024, through which appellant directed to appear on the date and time fixed by the Inquiry Officer.
(Copy order dated: 10.05.2024 alongwith charge sheet is attached as Annexure "A")
3. That appellant preferred Departmental Appeal, against order dated: 10.05.2024, but was rejected by Respondent No.2, vide order dated: 19.08.2024, eventually he approached Respondent No.2, through Mercy Petition dated: 22.08.2024, however, met the same fate and was rejected, vide order dated: 21.10.2024.
(Copies of order dated: 19.08.2024 alongwith memo of appeal & order dated: 21.10.2024 of Respondent with memo of appeal are attached as Annexures "B & C" respectively).
4. That absence of appellant from duty is not deliberate rather occasioned inadvertently due to severe illness.
(Copy of medical report is attached as Annexure "D")
5. That appellant being aggrieved of orders dated: 10.05.2024 (of Respondent No.3), dated: 19.08.2024 (of Respondent No.2) and dated: 21.10.2024 (of Respondent No.1), approaches this Hon'ble Tribunal for re-instatement in service with all consequential benefits, inter-alia, on the following grounds:

GROUND:

- A. That impugned orders dated: 10.05.2024, 19.08.2024 & 21.10.2024 of Respondents No.3, 2 & 1 respectively, are against the law and peculiar facts of the case of appellant, hence carry no legal weight.

- B. That appellant absence is not intentional, nor deliberate rather occasioned inadvertently due to his sever illness, therefore, action of Respondent Department is illegal, unlawful and against all norms of natural justice, hence carry no legal weight.
- C. That Respondent Department has no lawful authority to punish Appellant for no wrong, rather they are duty bound to treat him in accordance with law and to provide him equal protection of law, but the Respondent Department, instead to follow the law/rules on the subject, issued the impugned orders in a clandestine and surreptitious manner, which has caused grave miscarriage of justice.
- D. That major penalty of dismissal from service has been imposed upon Appellant, mere on the basis of presumptions, that too, without adopting proper mode and manner for substantiating the alleged charges, moreover, the Appellate as well as did Appellate Authorities did not appreciate the available record of the case of Appellant in its true perspective, hence erred in jurisdiction.
- E. That Respondent No.4 was duty bound to pass appropriate order in pursuance of recommendations of the Inquiry Officer but astonishingly the impugned order has been passed in utter disregard, not only to the law/rules governing the subject, but also to the recommendations of the inquiry officer, which speaks volumes of malafide on his part.
- F. That no show cause notice has properly been served to the appellant not awarded opportunity of personal hearing, which is violation of principles of natural justice (audi alteram partem), hence the instant appeal.
- G. That any other ground, with the permission of this Hon'ble Tribunal, will be taken at the time of arguments.

It is, therefore, most humbly prayed that on acceptance of instant appeal, on acceptance of instant appeal, impugned orders dated: 10.05.2024 (of Respondent No.3), 19.08.2024 (of Respondent No.2) and 21.10.2024 (of Respondent No.1) may be set aside and appellant may be re-instated in service with all consequential benefits.

Any other relief, not specifically prayed for and deemed appropriate by this Hon'ble Tribunal in circumstances of the case, may also be granted.

Zahid Ali
Appellant

Through

Khalid Khan Mohmand

Muaz Ashraf Khalil

Abdul Majeed Ashraf

&

Shams ur Rehman
Advocates, Peshawar
3-A, Park Avenue, Bhattani Plaza,
University Town, Peshawar
Cell No.0342-9101124 - 0336-9488778

Dated: 07.11.2024

VERIFICATION:

Verified on oath that the content of the instant Service Appeal are true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Hon'ble Tribunal.



Zahid Ali
Deponent

07/11/24

3

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

Service Appeal No. ___/2024

Zarshad Ali Appellant

VERSUS

Inspector General of Police (IGP), Khyber Pakhtunkhwa & 2 others Respondents

AFFIDAVIT

I, ZARSHAD ALI S/O ATTA MUHAMMAD Ex-Constable, R/O Village & PO Kot Jungara, Tehsil Takht Bhai District Mardan, do hereby solemnly affirm declare on oath that the contents of the accompanying Service Appeal are true and correct to the best of my knowledge and belief, and that nothing has been kept concealed from this Hon'ble Tribunal.

Identified By:

Zarshad Ali
DEPONENT
CNIC #: 16102-2005596-5
Cell: 0348-5052683

Amin ur Rehman Yusufzai
Advocate, Peshawar



(4)

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

Service Appeal No. ___/2024

Zarshad Ali..... Appellant

VERSUS

Inspector General of Police (IGP), Khyber Pakhtunkhwa & 2 others..... Respondents

ADDRESSES OF THE PARTIES

APPELLANT:

ZARSHAD ALI S/O ATTA MUHAMMAD
Ex-Constable, R/O Village & PO Kot Jungara, Tehsil Takht Bhai District Mardan.

RESPONDENTS:

1. Inspector General of Police (IGP), Khyber Pakhtunkhwa, Central Police Office, Peshawar.
2. Regional Police Officer/Deputy Inspector General of Police, Mardan.
3. District Police Officer (DPO), Mardan.

Zarshad Ali
Appellant

Through

Khalid Khan Mohmand *Khalid*

Muaz Ashraf Khalil *Muaz*

Abdul Majeed Ashraf *Majeed*

&

Shams ur Rehman *Shams*
Advocates, Peshawar
3-A, Park Avenue, Bhattani Plaza,
University Town, Peshawar
Cell No.0342-9101124 - 0336-9488778

Dated: 07.11.2024



OFFICE OF THE
DISTRICT POLICE OFFICER,
MARDAN

Amred A
5

Form No. 02/12/12/10103 & Form No. 0227/02/10111

Dated 16-05-2024

2366-13 JPA

ORDER ON ENQUIRY OF CONSTABLE ZAISHAD NO. 42

This order will dispose-off a Departmental Enquiry under Police Rules-1975, initiated against Constable Zaishad No. 42, under the allegations that while posted at PP Shego Naka PS Shergarh (now under suspension Police Lines Mardan), was placed under suspension vide this office O.O. No. 1277 dated 06-06-2024, issued vide order endorsement No. 2076-75/USI dated 07-06-2024, on account of (223) days absent period from duty without any leave permission of the competent authority vide DD No 27 dated 02-03-2024 & DD No 27 dated 11-10-2023.

To ascertain facts, he was proceeded against departmentally through Inspector Sher Nawaz RI Police Lines Mardan vide this office Statement of Disciplinary Action/Charge Sheet No. 158/JPA dated 14-06-2023, who (E.O) after fulfillment of process, submitted his Finding Report in this office vide his office letter No. 66 dated 13-11-2023, holding responsible the alleged official of grave misconduct & recommended for major punishment.

Final Order

To further verify the allegations, Constable Zaishad was called for hearing in CR on 07-12-2023, 14-12-2023, 25-01-2024, 22-07-2024 & 25-04-2024 respectively but failed to comply with till-date, meaning that he is not a willing worker towards Police service therefore, awarded him major punishment of dismissal from Mardan Police & counted his absented period as leave without pay with immediate effect, in exercise of the power conferred on me under Police Rules-1975.

O.O. No. 635
Dated: 10-05-2024

(Zaboor Raheer) PSP
District Police Officer,
Mardan

Copy forwarded for information & action to:

- 1) The SP/HQrs Mardan.
- 2) The F.C. & P.O (DPO Office) Mardan.
- 3) The In-charge Lab (HRMIS) DPO Office Mardan
- 4) The OSI (DPO Office) Mardan with 7 Copies

Attested to

CLEAR COPY

OFFICE OF THE
DISTRICT POLICE OFFICER,
MARDAN

6

No. 2366-69/PA

Dated 14.05.2024

Order of enquiry of constable Zarshad No. 42

This order will dispose off a Departmental Enquiry under police Act 1975 initiated against Constable Zarshad No.42 under the allegations that while posted at PP Shego Naka PS Shergarh (now under suspension Police Lines Mardan) placed on suspension vide this Officer OB No.1277 dated 06.06.2024 issued vide order endorsement No.3076-78/OSI dated 07.06.2024 on account of (223) days absented period from duty without any leave permission of the competent authority vide DD No.27 dated 02.03.2023 as DD Bi, 21 dated 11.10.2023.

To ascertain facts, he was proceeded against departmentally through Inspector Sher Nawas RI Police Lines Mardan vide this office statement of Disciplinary Action Charge sheet No. 158/PA dated 14.06.2023 who (E.O) after fulfillment necessary process submitted his finding report to this office vide his office letter No.66 dated 13.11.2023 holding responsible the alleged official of grave misconduct and recommended for major punishment.

FINAL ORDER

To further verify the allegations. Constable Zarshad was called for hearing in OR on 07.12.2023 14.12.2023 25.01.2024 22.02.2024 and 25.04.2024 respectively but failed to comply with till date meaning that he is not a willing worker towards police therefore, awarded him major punishment of dismissal from Mardan Police and counted his absented period as leave without pay with immediate effect in exercise of the power conferred to me under Police Rules 1975.

OB No.639
Dated 10.05.2024

Zahoor Babar PSP
District Police officer
Mardan

Copy forwarded for information & n/action to.

1. The SP/HQrs Mardan.
2. The EC & PO (DPO Office) Mardan.
3. The In charge Lab (HRMIS)-DPO Office Mardan.
4. The OSI (DPO office) Mardan with sheets.

Accepted as true



OFFICE OF THE
DISTRICT POLICE OFFICER,
MARDAN

Tel No. 0937-9230109 & Fax No. 0937-9230111
Email: dpomrdn@gmail.com

7
2023

No. 158 /PA

Dated 14/6/2023

DISCIPLINARY ACTION

I, NAJEEB-UR-REHMAN BUGVI (PSP), District Police Officer Mardan, as competent authority am of the opinion that Constable Zarshad No.42, himself liable to be proceeded against, as he committed the following acts/omissions within the meaning of Police Rules 1975.

STATEMENT OF ALLEGATIONS

Whereas, Constable Zarshad No.42, while posted at PP Shego Naka PS Sher Garh (now under suspension Police Lines Mardan); remained absent from duty without any leave/permission of the competent authority vide DD No.27 dated 02-03-2023 till-date.

For the purpose of scrutinizing the conduct of the said accused official with reference to the above allegations, Insp: Sher Nawas RI Police Lines Mardan is nominated as Enquiry Officer.

The Enquiry Officer shall, in accordance with the provision of Police Rules 1975, provides reasonable opportunity of hearing to the accused Police official, record/submit his findings and make within (30) days of the receipt of this order, recommendations as to punishment or other appropriate action against the accused official.

Constable Zarshad is directed to appear before the Enquiry Officer on the date + time and place fixed by the Enquiry Officer.

(Najeeb-ur-Rehman Bugvi) PSP
District Police Officer, Mardan.

Attested to be true



2

**OFFICE OF THE
DISTRICT POLICE OFFICER,
MARDAN**

Tel No. 0937-9230109 & Fax No. 0937-9230111
Email: doomdn@gmail.com

8
2023

CHARGE SHEET

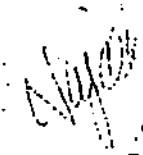
I, NAJEEB-UR-REHMAN BUGVI (PSP), District Police Officer Mardan, as competent authority, hereby charge Constable Zarshad No.42, while posted at PP Shego Naka PS Sher Garh (now under suspension Police Lines Mardan), as per attached Statement of Allegations.

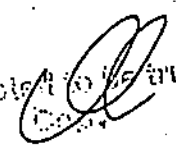
1. By reasons of above, you appear to be guilty of misconduct under Police Rules, 1975 and have rendered yourself liable to all or any of the penalties specified in Police Rules, 1975.

2. You are, therefore, required to submit your written defense within 07 days of the receipt of this Charge Sheet to the Enquiry Officer, as the case may be.

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

4. Intimate whether you desired to be heard in person.


(Najeeb-ur-Rehman Bugvi) PSP
District Police Officer, Mardan.


Accepted to be true
Constable

پاکستان کے لیے

2017/ES
22/7/24

Annex "B"

کتاب سازی (9)

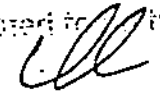
گورنمنٹ وائس روائے کالج - پانچ تہائی اسکول زون
 ضلع جہلم کا پتہ 2017ء میں آئی ایم
 637 سے 24/7/24 کو پانچ تہائی اسکول زون
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attested to be true


203104158826

(11)

ORDER.

This order will dispose-off the departmental appeal preferred by Ex-Constable Zaidad No. 42 of Mardan District Police against the order of the District Police Officer, Mardan, whereby he was awarded major punishment of dismissal from service vide OB: No. 639 dated 10/05/2024. The appellant was proceeded against departmentally on the allegations that he while posted at Police Post Shego Naka Police Station Shergarh was placed under suspension, on account of (223) days absence period from duty without any leave/permission of the competent authority vide daily diary No.27 dated 02-03-2023 to daily diary No.22 dated 11-10-2023.

Proper departmental enquiry proceedings were initiated against him. He was issued Charge Sheet alongwith Statement of Allegations and Reserve Inspector of District Mardan was nominated as Enquiry Officer. The Enquiry Officer after fulfilling nodal formalities submitted his findings to the District Police Officer, Mardan, wherein he held responsible the delinquent Officer and recommended him for major punishment.

He was also provided opportunity of self defense by summoning him to the Orderly Rooms by the District Police Officer, Mardan held on 07.12.2023, 14.12.2023, 25.1.2024, 22.02.2024 and 25.04.2024 respectively, but he failed to appear meaning that he was not a willing worker towards Police service, therefore, awarded him major punishment of dismissal from service and treated his absence period as leave without pay vide OB: No. 639 dated 10.05.2024 by the District Police Officer, Mardan.

Feeling aggrieved from the order of the District Police Officer, Mardan, the appellant preferred the instant appeal. He was summoned and heard in person in orderly room held in this office on 15.12.2024.

From the perusal of the enquiry file and service record of the appellant, it has been found that allegations leveled against the appellant have been proved beyond any shadow of doubt, as he has bitterly failed to produce any cogent reasons to justify his absence because the same is not dispute his casual and negligent attitude towards his official duties. The very conduct of appellant is unbecoming of a disciplined Police Officer. It was noticed that he is habitual absentee and prior to this the appellant had been earlier punished on various occasions on account of his misconduct. The appellant approached this forum at a belated stage by filing the

M. J. Khan
District Police Officer

CLEAR COPY

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A

ORDER


This order will dispose off the departmental appeal preferred by Ex constable Zarshad No.42 of Mardan District Police against the order of the District Police officer, Mardan, whereby he was awarded major punishment of dismissal from service vide OB No.639 dated 10.05.2024. The appellant was proceeded against departmentally on the allegations that he while posted at police Post Shago Naka Police station shergarh was placed under suspension, on account of (223) days absence period from duty without any leave/ permission of the competent authority vide Daily Diary No.27 dated 02.03.2023 to daily diary No.22 dated 11.10.2023.

Proper departmental enquiry proceedings were initiated against him. He was issued Charge Sheet alongwith Statement of allegations and Reserve Inspector of District Mardan was nominated as Enquiry Officer. The enquiry Officer after fulfilling codal formalities submitted his findings to the District Police Officer, Mardan, wherein he held responsible the delinquent officer and recommended him for major punishment.

He was also provided opportunity of self defense by summoning him in the Orderly Rooms by the District Police Officer, Mardan held on 07.12.2023, 14.12.2023, 25.01.2024, 22.2.2024 and 25.4.2024 respectively but he failed to appear meaning that he was not a willing worker towards police service, therefore, awarded him major punishment of dismissal from service, therefore awarded him major punishment of dismissal from service and treated his absence period as leave without pay vide OB No.639 dated 10.5.2024 by the District Police Officer, Mardan.

Feeling aggrieved from the Order of the District Police Officer, Mardan the appellant preferred the instant appeal. He was summoned and heard in person in order by room held in this case on 15.08.2024.

From the perusal of enquiry file and service record of the appellant, it has been found that allegations levelled against the appellant have been proved beyond any shadow of doubt. As he has bitterly failed to produce any cogent reason to justify his absence because the same clearly depicts his casual and lethargic attitude towards official duties. The very conduct of appellant is unbecoming of a disciplined police officer. It was noticed that he is habitual absentee and prior to this the appellant had been earlier punished on various occasions on account of his misconduct. The appellant approached this forum at a belated stage by filing the


Attests:  true

(11) A 1

instant appeal which is time barred by 01 month and 09 days without advancing any cogent reason regarding such delay. Moreover, he could not present any cogent justification to warrant interference in the order passed by the competent authority.

Keeping in view the above, I, Najeeb-Ur-Rehman Bugvi, PSP Regional Police Officer, Mardan, being the appellate authority, find no substance in the appeal, therefore, the same is rejected and filed, being devoid of merit as well as time barred for 01 month and 09 days.

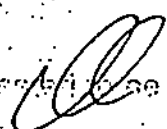
Order Announced.


(Najeeb-Ur-Rehman Bugvi) PSP
Regional Police Officer,
Mardan:

No. 27447 /ES. Dated Mardan the 19 / 02 /2024.

Copy forwarded to District Police, Mardan for information and necessary action w/r to his office Memo: No. 212/LB dated 06.08.2024. His Service Record is returned herewith.

(*****)


Attest to be true

خدمتِ خدایتان کے لئے اللہ تعالیٰ سے دعا ہے کہ
خیر و برکت سے نوازا جائے

Amred C

19

ممبرانہ سہ ماہیہ / معائنہ اسپتال میرٹھ جہاںی عکازت مجتہد
کنیشنل برقیہ ریسل DIG صاحبہ دران ریسل

میرٹھ 24.8.19 dt. No. 2749/ES

مخانتہ سہ ماہیہ شہرہ کنیشنل 42 زر شتاد دسترگت لیس دران

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Handwritten signature

0310-415 8886 - 0345 51 60 872

Handwritten signature

محبت صافی سندت نامہ دست پر خیر کلام
یو ایس غیر مختصر اخبار شمارہ

13

درخواست بابت تاقیر موافق ایمل

جناب صاحب سائل حضرت مولانا غلام محمد

۱۔ بہ سائل نے دست پر سندت نامہ / ایمل بابت مجاہد کوئی
محبت صافی - P. O. پتہ لاہور لکھنؤ
لکھنؤ سائل نے تاقیر موافق درخواست بھی
میں بھیجا۔ P. O. پتہ لاہور لکھنؤ
ڈاکٹر اکبر علی خان

۲۔ بہ سائل نے پتہ لاہور لکھنؤ میں تاقیر کوئی
صورت سے سائل نے ایمل ڈاکٹر اکبر علی خان
کو بھیجا۔ P. O. پتہ لاہور لکھنؤ
صورت سے سائل نے درخواست کوئی لکھنؤ
پتہ لاہور لکھنؤ کو بھیجا۔ P. O. پتہ لاہور لکھنؤ

Received at the time
Copy

ڈاکٹر اکبر علی خان

سائل نے ایمل پتہ لاہور لکھنؤ
۰۳۹۵۵۱۶۰۸۷۲
۳۰/۱۱/۲۰۲۴
۰۳۹۵۵۱۶۰۸۷۲

14



OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
Central Police Office, Peshawar.

No. S/ 2764 /24, dated Peshawar the 12 / 11 / 2024

To: The Regional Police Officer,
Mardan.

3355/ES
21-X-24

Subject: REVISION PETITION.

Memo: The Competent Authority has examined and filed the revision petition submitted by Ex-FC Zarshad No. 42 of district Mardan, against the punishment of dismissal from service awarded by DPO Mardan vide OB No. 639, dated 10.05.2024 being badly time barred. The applicant may please be informed accordingly.

[Handwritten Signature]
17/11/24

(AFSAR JAN)
Registrar
For Inspector General of Police,
Khyber Pakhtunkhwa Peshawar
U.P)

EC/DPO Mardan
for information and
action.

[Handwritten Signature]

DPO Mardan
19/10

Attested to be true
[Handwritten Signature]

OUT-PATIENTS DEPARTMENT
DISTRICT HEAD QUARTER
TEACHING HOSPITAL MARDAN

RS.10/.

Amend " " " "
D
15

NAME Carward ali

YEARLY NO. 511-10

DATE 20/2/23

Investigation

Adm
2 GP
DPLW
J

by Tondur
w

10

To Moul
LL

To Nafiseh
LL

To Bafiq
A

LBP
VERIFIED
15

ذات کتب و نسخ
ذات نام ایس
اربیسی

Admrd Captret
best rest w/c 20/2/23

To 23/02/23
HOSPITAL SURGEON
MARDAN

Attested to be true

OUT-PATIENTS DEPARTMENT
DISTRICT HEAD QUARTER
TEACHING HOSPITAL MARDAN

RS.10/.

16

NAME Zameer Ali

YEARLY NO 281-

DATE 24/3/23

Investigation

LBP
P.A.T
Lump
MRI

LBP not impaled

Dr. Caryl
cel

Dr. M...
on

Dr. I...
w

Dr. V...
w

VERIFIED

Handwritten text in Urdu/Arabic script, possibly a signature or official stamp.

Ad. Compliat. Home base
sent use 24/3/23 To 25/04/23

Handwritten signature and text at the bottom of the page.

OUT-PATIENTS DEPARTMENT
DISTRICT HEAD QUARTER
TEACHING HOSPITAL MARDAN

RS.10/.

17

NAME M Shad
YEARLY NO. 191-4
DATE 26/04/23

Investigation

UBP
NEET
7 map
Lumbar
Spine
Bone


by Tadar
to
Tas. Tompkins P
to Cabalms
to Mover by
car

VERIFIED

Had craphit. Have had
visit w/ wife 26/04/23
To 25/05/23

Small illegible text stamp

ORTHOPEDIC SECTION
MARDAN DISTRICT HEAD QUARTER

Attested to be true


OUT-PATIENTS DEPARTMENT
 DISTRICT HEAD QUARTER
 TEACHING HOSPITAL MARDAN

RS.10/-

(18)

NAME Zarshad
 YEARLY NO. 711
 DATE 26/05/73

Investigation

CB
CF
RTA
2

Ch. Lab

ly. Tonopla
 inf. meky
 Th. Throdex
 cup. phlygen

Send Report
 How had vas. 26/05/73
 21/1/23

ڈی. ایم. ایس.
 آر. پی. ڈی.

Signature

وکالت نامہ

بعدالت سرسلسلے سر ایبوناہ ایسٹا

نمبر شاد بک نام 137P

منجانب ایبیل زنگ دعویٰ اجرم S.A

تھانہ ایف آئی آر تاریخ

باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے واسطے بیرونی وجوہات ہی بمقام ایسٹا کے لئے

خالد خان مہمند ایڈووکیٹ ہائی کورٹ، پشاور کو بدین شرط وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص

رو برو عدالت حاضر ہوتا رہوں گا۔ اور بوقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دیکر حاضر عدالت کرونگا اگر

پیشی پر من مظهر حاضر نہ ہو اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور میرے برخلاف ہو گیا تو صاحب موصوف اس کے کسی

طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام کچہری کے کسی اور جگہ یا کچہری کے مقررہ اوقات سے پہلے یا

پچھے یا بروز تعطیل بیرونی کرنے کے ذمہ دار نہ ہوں گے۔ اگر مقدمہ علاوہ صدر مقام کچہری کے کسی اور جگہ ساعت ہونے یا بروز

تعطیل یا کچہری کے اوقات کے آگے پچھے پیش ہونے پر من مظهر کو کوئی نقصان پہنچے تو اس کے ذمہ دار ہوں گے واسطے کسی

معاوضہ کے ادا کرنے یا مختار نامہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کھل ساختہ پرداخت صاحب

موصوف مثل کردہ ذات خود منظور قبول ہوگا۔ اور صاحب موصوف کو عرضی دعویٰ و جواب دعویٰ اور درخواست اجراء ڈگری دفتر

ثانی ایبل و جگرانی ہر قسم کی درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کے اجراء کرنے اور ہر قسم کا

روپیہ وصول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اور سپرد تاشی و راضی نامہ کو فیصلہ برخلاف کرنے،

اقبال دعویٰ دینے کا بھی اختیار ہوگا۔ اور بصورت ایبل و برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم امتناعی یا قرتی یا

گرتاری قبل از اجراء ڈگری بھی موصوف کو بشرط ادا کیے شدہ مختار نامہ بیرونی کا اختیار ہوگا۔ اور بصورت ضرورت صاحب

موصوف کو بھی اختیار ہوگا یا مقدمہ مذکورہ یا اس کے کسی جزو کی کاروائی کے واسطے یا بصورت ایبل، ایبل کے واسطے کسی دوسرے

وکیل یا بیرسٹر کو بجائے اپنے یا اپنے ہمراہ مقرر کریں۔ اور ایسے مشیر قانون کو ہر امر میں وہی اور ویسے ہی اختیارات حاصل ہوں

گے۔ جیسے کہ صاحب موصوف کو حاصل ہیں اور دوران مقدمہ میں جو کچھ ہر جانہ التیاء پڑے گا۔ وہ صاحب موصوف کا حق ہوگا۔

اگر وکیل صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی

بیرونی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔ لہذا یہ مختار نامہ لکھ دیا کہ

مضمون مختار نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

ATTESTED & ACCEPTED:

Khalid Khan Mohmand
Advocate High Court
Peshawar
B.C. No. 18-1115
CNIC No. 16101-8191351-1
Mobile No. 0342-9101124

