


FORM OF ORDER SHEET

Court of _____

Appeal No. 2453/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	13/11/2024	<p>The appeal of Mr. Zari Khan re-filed today by registered post through Mr. Hamayum Khan Advocate. It is fixed for preliminary hearing before touring Single Bench at A.Abad on 27.11.2024. Counsel for the appellatant has been informed telephonically.</p> <p>By order of the Chairman</p> <p> REGISTRAR</p>

The appeal of Mr. Zari Khan received today on 04.11 2024 by registered post, 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 the rule-6 of the Khyber Pakhtunkhwa Service Tribunal rules 1974.
2. Appeal has not been flagged/marked with annexures marks.
3. According to sub-rule-4 of rule-6 of Khyber Pakhtunkhwa Service Tribunal rules 1974 respondent nos. 1&3 are un-necessary/improper parties, in light of the rules ibid and on the written direction of the Worthy Chairman the above mentioned respondent number be deleted/struck out from the list of respondents.

No. 1026 /Inst./2024/KPST,

Dt. 04/11 /2024.

Amatillo
ADDITIONAL REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Hamayun Khan Adv.
High Court at A.Abad.

R, Sir,

- i) Address of appellant is complete and as I am the counsel the service could be procured through me, if required.
- ii) Annexure are duly written thereof.
- iii) It is submitted that Respondent no.1 is revisional authority so necessary party & respondent no.3 is the officer-in-charge and competent authority under whom the appellant worked, so is necessary party.

So, it be placed before S.B
for proceedings.

A Adv.

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR

Service Appeal No. 2453 /2024

Zari Khan son of Qaiser Khan No. 282-H presently Sub-Inspector District
 Mansehra.

...APPELLANT

VERSUS

Inspector General Police Khyber Pakhtunkhwa Peshawar & others.

...RESPONDENTS

SERVICE APPEAL

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...APPELLANT

Dated: 31 / 10 /2024

Through


 (HAMAYUN KHAN)

&

 (FAZLULLAH KHAN)

Advocates High Court, Abbottabad

1

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR

Service Appeal No. 2453 /2024

Zari Khan son of Qaiser Khan No. 282-H presently Sub-Inspector District
Mansehra.

...APPELLANT

VERSUS

1. Inspector General Police Khyber Pakhtunkhwa Peshawar.
2. Regional Police Officer Hazara Region at Abbottabad.
3. District Police Officer Abbottabad.
4. Superintendent of Police Investigation Abbottabad

...RESPONDENTS

SERVICE APPEAL UNDER SECTION 4
KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL ACT 1974, AGAINST THE
IMPUGNED ORDERS DATED 12/07/2024 OF
SUPERINTENDENT OF POLICE/
RESPONDENT NO.4 INVESTIGATION
ABBOTTABAD WHEREBY APPELLANT HAS
BEEN AWARDED PUNISHMENT OF
FORFEITURE OF 3 YEARS APPROVED
SERVICE AND ORDER DATED 30/09/2024 OF
THE REGIONAL POLICE OFFICER HAZARA
REGION AT ABBOTTABAD WHEREBY THE

DEPARTMENTAL APPEAL OF THE
APPELLANT HAS BEEN REJECTED/FILED.

PRAYER: ON ACCEPTANCE OF THE
INSTANT APPEAL, BOTH THE IMPUGNED
ORDER DATED 12/07/2024 OF THE SP
INVESTIGATION ABBOTTABAD AND
ORDER DATED 30/09/2024 OF RPO HAZARA
REGION ABBOTTABAD MAY GRACIOUSLY
BE SET-ASIDE AND RESTORED HIS
FORFEITED 3 YEARS APPROVED SERVICE
FORM THE DATED OF ITS FORFEITURE
WITH ALL CONSEQUENTIAL SERVICE
BACK BENEFITS.

Respectfully Sheweth:-

Brief facts of the instant appeal are as under:-

1. That the appellant/wife posted as OII Police Station Lora Havelian District Abbottabad was served upon with a charge sheet with the allegation that "you will posted as OII PS Lora, Abbottabad have taken illegal bribe/gratification of Rs. 45,000/- from the father of accused involved in case vide FIR No. 197 dated 16/04/2024 under Section 377 PPC read with Section 53-CPA Police Station Lora Abbottabad. Consequently you also misbehaved/abused him. All this reflects on you malafide intentions and inefficiency which come within that ambit

of gross misconduct". The aforementioned charge sheet was duly replied explaining all the facts of matter in detail and denying the allegations incorporated therein being incorrect, false and fabricated ones. Copies of the charge sheet and its reply are annexed as Annexure "A" & "B".

2. That, thereafter, appellant was issued a final show cause notice by the superintendent of Police (Investigation) Abbottabad which was also replied by denying the allegations being incorrect, baseless and fabricated ones. Copies of final show cause notice
Annexure "C" &
3. That on receipt of reply to the final show cause notice the Superintendent of Police (Investigation) Abbottabad without providing opportunity of personal hearing and proper inquiry awarded the appellant with the punishment of forfeiture of 03 years approved service vide order dated 12/07/2024. Copy of order dated 12/07/2024 is annexed as Annexure "D".
4. That appellant aggrieved of the punishment order of SP investigation Abbottabad/respondent No.4 filed a departmental appeal dated 07/08/2024 before the Regional Police Officer, Hazara Region Abbottabad which was not given any

heed and rejected/filed vide order dated 30/09/2024 and delivered on 04/10/2024. Copies of departmental appeal and its rejection order are annexed as Annexure "E" & "F".

5. That feeling from aggrieved from the above aforesaid situation, appellant seeks indulgence of this Honourable Tribunal, inter-alia, on the following amongst many other grounds through this appeal.

GROUND:-

- a. That both the impugned orders are against the law fact, have liable to be set-aside.
- b. That all proceeding were conducted with malafide intention, against the principle of natural justice.
- c. That respondents are miserably failed to proved allegation against the appellant.
- d. That at the time of passing impugned orders respondents ignored all basic principle of natural justice and equity.
- e. That, in fact the allegations as mentioned in the charge sheet, show cause notice and punishment order are incorrect and baseless. The appellant has carried out the

investigation against the accused on correct and honest footings. He collected each and every piece of evidence and made it part of the case file so that accused could be awarded exemplary punishment by the court for his heinous crime committed against a school going minor child.

- f. That accused of the case has been refused bail up to the High Court and he is still behind the bars due to the appellant's correct and honest investigation. This was the reason that Abdul Waheed father of accused filed a false and fabricated complaint against appellant that he has taken bribe of Rs. 45,000/- and also abused him. Had the appellant taken any gratification etc then he would have recorded the investigation as per wishes and in favour of the accused. That after about 06 months of the registration of FIR when father of accused came to know the results of appellant's investigation he made a false and fabricated complaint against the appellant to settle his score and take revenge from him otherwise nothing is correct in his complaint.
- g. That subsequently when Abdul Waheed complainant repent upon his wrong doing he submitted "Statement" before the SP investigation that his complaint and production of private witness was incorrect and misconception, he did not want

punishment to the appellant and even still he does not want the punishment awarded to appellant by the department. Copy of statement of the complainant is annexed as Annexure "E".

- h. That in the above mentioned case, appellant has discharged his duty with dexterity, care, caution and honesty. There is nothing wrong on his part. Hence, the allegations are totally incorrect and baseless. Hence, impugned orders are liable to be set-aside.
- i. That no proper departmental inquiry was conducted. No witness was produced before the inquiry officer to depose against the appellant in his presence nor was afforded chance of cross-examination to him. Copy of inquiry report, if any was never provided to him. Even the enquiry suffers from irregularity and illegality. On receiving reply to the show cause notice the SP Investigation Abbottabad vide order dated 12/07/2024 straightaway awarded the appellant with punishment of "Forfeiture of 03 years approved service" and that too without any reason and rhyme and without providing opportunity of personal hearing against the principles of nature justice. Hence liable to be set-aside.
- j. That in meanwhile, on 28/08/2024 appellant was transferred from Abbottabad to

Mansehra and on 03/09/2024 appellant assumed charged at District Mansehra. Hence, impugned order dated 30/09/2024 received on 04/10/2024.

- k. That the other points shall be argued at the time of arguments.

It is therefore, most humbly prayed that on acceptance of the instant appeal, both the impugned order dated 12/07/2024 of the SP Investigation Abbottabad and order dated 30/09/2024 of RPO Hazara Region Abbottabad may graciously be set-aside and restored his forfeited 3 years approved service form the dated of its forfeiture with all consequential service back benefits.


...APPELLANT

Through

Dated: 31 / 10 / 2024


(HAMAYUN KHAN)

&


(FAZLULLAH KHAN)

Advocates High Court, Abbottabad

VERIFICATION/ AFFIDAVIT:-

Verified on oath 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 Court.


...APPELLANT

ANNEXURE A⁶ 8

CHARGE SHEET

I, Mr. Tahir Iqbal, Superintendent of Police, Investigation, Abbottabad, as competent authority, hereby charge you SI Zari Khan Investigation HQs: Abbottabad, as follow: -

You appear to be guilty of misconduct under police disciplinary rules 1975 and have rendered yourself liable to all or any of the penalties specified in the said police disciplinary rules.

You are therefore, required to submit your written defense within 03 days of the receipt of this Charge Sheet to the Enquiry Officer.

Your written defense, if any, should reach the Enquiry Officer within 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.

Intimate whether you desired to be heard in person or otherwise.

Statement of allegation is enclosed.

(TAHIR IQBAL)
Superintendent of Police,
Investigation, Abbottabad.

Handwritten signature

9

DISCIPLINARY ACTION

I, Mr. Tahir Iqbal, Superintendent of Police, Investigation Abbottabad, as competent authority, of the opinion that you SI Zari Khan Investigation HQrs: Abbottabad, has rendered himself liable to be proceeded against as he committed the following acts/omissions within the meaning of Police Disciplinary Rules 1975.

STATEMENT OF ALLEGATION

You SI Zari Khan while posted as OII PS Lora, has taken illegal bribe / gratification of Rs: 45000/- from father of accused involved in case vide FIR No. 197 dated 16-04-2024 u/s 377 PPC / 53-CPA PS Lora. Consequently, you also misbehaved / abused him. All this reflects your malafide intentions and inefficiency which come within the ambient of gross misconduct.

For the purpose of scrutinizing the conduct of the said delinquent officer with reference to Mr. Muhammad Javed Inspector Inv HQrs: Abbottabad is hereby deputed to conduct Formal Departmental Enquiry against you SI Zari Khan.

The Enquiry Officer shall in accordance with the provisions of the Ordinance, provide reasonable opportunity of hearing to the delinquent, record his finding and make within (25) days of the receipt of this order, recommendation as to punishment or other appropriate action against the delinquent.

The accused and a well conversant representation of the departmental shall in the proceedings on the date, time and place fixed by the enquiry officer.

(TAHIR IQBAL)
Superintendent of Police,
Investigation, Abbottabad.

No: 322-25 /PA/dated Abbottabad 03/06/2024.
Copy of above is submitted to the:

1. Regional Police Officer, Hazara Region, Abbottabad.
2. District Police Officer, Abbottabad.
3. Mr. Muhammad Javed Inspector Investigation HQrs:, Abbottabad (Enquiry Officer) for initiating proceeding against the defaulter official under provisions of the Police Disciplinary Rules 1975.
4. SI Zari Khan Investigation HQrs: Abbottabad with the direction to submit his defense within 7 days of the receipt of this statement of allegations and also to appear before the enquiry officer on the date, time and place fixed for the purpose of departmental proceedings.

Handwritten signatures and initials

(TAHIR IQBAL)
Superintendent of Police,
Investigation, Abbottabad.

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ANNEXURE 'B'

(13) -

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322-22

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328-25

322-22

36

Attest
SM

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~~Handwritten scribble at the top of the page.~~

Attache

Handwritten text in Urdu script, appearing to be a list or detailed notes. The text is dense and covers most of the page's content area.

ANNEXURE 'C' 14.

FINAL SHOW CAUSE NOTICE

I, Mr. Tahir Iqbal, Superintendent of Police Investigation Abbottabad, being competent authority under the police disciplinary Rules 1975, issue this Final Show Cause Notice to you SI Zari Khan on the following grounds.

You SI Zari Khan while posted as OII PS Lora, has taken illegal bribe / gratification of Rs: 45000/- from father of accused involved in case vide FIR No. 197 dated 16-04-2024 u/s 377 PPC / 53-CPA PS Lora. Consequently, you also misbehaved / abused him. All this reflects your malafide intentions and inefficiency which come within the ambit of gross misconduct.

On this proper departmental Enquiry was initiated against you and the enquiry was entrusted to Inspector Investigation Headquarters Abbottabad Mr. Muhammad Javed. The enquiry officer in his enquiry report found you guilty as all the allegations leveled against you are stand proved during enquiry.

Keeping in view the above allegations on your part, you are hereby called upon to Show Cause Finally within 07 days of the receipt of this Final Show Cause Notice as to why you should not be awarded punishment under the Police disciplinary Rules 1975. If your written reply is not received within the stipulated period, it shall be presumed that you have no defense to offer. You are also at liberty to be heard in person or otherwise.

(TAHIR IQBAL)
Superintendent of Police,
Investigation, Abbottabad.

No: 335/PA/Inv.

Dated 12/06/2024.

Attested
H. Javed

Attested
H. Javed

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ANNEXURE 'D'



OFFICE OF THE SUPERINTENDENT OF POLICE, INVESTIGATION ABBOTTABAD

Phone: 0992-9310046

Fax: 0992-9310047

spinv_abbottabad@yahoo.com

No. 428/32 /Inv:

Dated Abbottabad the 12/07/2024

1. ALLEGATIONS:-

The accused officer SI Zari Khan while posted as OII PS Lora was issued Charge Sheet with the allegation that he has taken illegal gratification of Rs: 45000/- from father of accused involved in case vide FIR No. 197 dated 16-04-2024 u/s 377 PPC / 53-CPA PS Lora. Consequently, he also misbehaved / abused him. Which speaks his malafidy intentions and also earned bad image for police department in the eyes of general public. His this act comes within the ambit of misconduct.

2. FINDINGS:-

Upon this SI Zari Khan was charge sheeted and the enquiry was entrusted to Mr. Javed Khan Inspector Investigation HQrs: Abbottabad. The enquiry officer in his findings declared the said officer guilty, as the allegation leveled against him stood proved.

Consequently, he was issued with Final Show Cause Notice in order to give him another opportunity to defend himself. But again his reply was not satisfactory.

3. ORDER:-

SI Zari Khan was given the ample opportunity of hearing, but the allegations leveled against him were proved. The plea taken by the accused officer could not satisfy the undersigned. Hence, the accused officer is awarded Major Punishment of "Forfeiture of 03 years approved service" under Police Rules, 1975 with amendments 2014.

Attested
428-32

(TAHIR IQBAL)
Superintendent of Police,
Investigation, Abbottabad.

PA/Inv: dated 12/07/2024 OB No: 46 dated: 12/07/2024

Copy of above is submitted for favour of information to the:-

1. Regional Police Officer, Hazara Region, Abbottabad.
2. Deputy Inspector General of Police, Admin, Investigation, KPK Peshawar.
3. District Police Officer, Abbottabad.
4. Superintendent of Police, Traffic Warden, Abbottabad.
5. Pay Officer / SRC, Traffic Warden, Abbottabad for further necessary action.

Attested
H. J. Khan

(TAHIR IQBAL)
Superintendent of Police,
Investigation, Abbottabad.

ANNEXURE "E"

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BEFORE THE REGIONAL POLICE OFFICER HAZARA REGION
ABBOTTABAD

(Departmental Appeal by SI Zari Khan, of District Abbottabad)

DEPARTMENTAL APPEAL AGAINST ORDER DATED 12-07-2024 PASSED
BY THE SUPERINTENDENT OF POLICE (INVESTIGATION) ABBOTTABAD
WHEREBY APPELLANT HAS BEEN AWARDED PUNISHMENT OF
"FORFEITURE OF 03 YEARS APPROVED SERVICE"

PRAYER: ON ACCEPTANCE OF INSTANT DEPARTMENTAL APPEAL
ORDER DATED 12-07-2024 OF SP(INVESTIGATION) ABBOTTABAD
MAY KINDLY BE SET ASIDE AND APPELLANT BE RE-INSTATED IN HIS
FORFIETED 03 YEARS APPROVED SERVICE FROM THE DATE OF ITS
FORFEITURE I.E. 12-07-2024 WITH ALL CONSEQUENTIAL SERVICE
BACK BENEFITS.

Respected Sir,

With most reverence the following few lines are submitted for your
kind consideration and favorable order:-

1. That appellant while posted as Oll Police Station Lora Havelian (District Abbottabad) was served upon with a Charge Sheet with the allegation that "you while posted as Oll PS Lora. have taken illegal bribe/gratification of Rs.45000/- from the father of accused involved in case vide FIR No. 197 dated 16-04-2024 u/s-377 PPC/53-CPA PS Lora. Consequently you also misbehaved/abused him. All this reflects on your malafide intentions and inefficiency which come within the ambit of gross misconduct". (Copy of the Charge Sheet is attached as "A").

Attorney
H. Zari Khan
2.

That the aforementioned Charge Sheet was duly replied explaining all the facts of matter in detail and denying the allegation incorporated therein being

(20)

incorrect, false and fabricated ones. (Copy of the Reply to the Charge Sheet is attached as "B").

3. That thereafter appellant was issued a Final Show Cause Notice by the Superintendent of Police (Investigation) Abbottabad which was also replied deny the allegations being incorrect, baseless and fabricated ones. (Copies of Final Show Cause Notice and its reply are attached as "C&D").

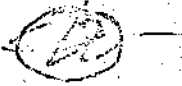
4. That on receipt of reply to the Final Show Cause Notice the Superintendent of Police (Investigation) Abbottabad without providing chance of personal hearing awarded the appellant with the punishment of forfeiture of 03 years approved service vide order dated 12-07-2024 (Copy of order dated 12-07-2024 is attached as "E").

5. That in fact the allegations are incorrect. The action taken against the appellant is that appellant has carried out the investigation against the accused on correct and honest footings. He collected each and every piece of evidence and made it part of the case file so that accused could be awarded exemplary punishment by the court for his heinous crime against a school going minor child. Investigation papers and photographs of the accused are available on the case file and even attached with this appeal which can be perused.

Attested
H. J. Khan

6.

That accused of the case has been refused bail up to the High Court and he is still behind the bars due to the appellant's correct and honest investigation.



This was the reason that accused's father Abdul Waheed filed false and fabricated complaint against appellant that he has taken bribe of 45000/- and also abused him. Had the appellant taken any gratification etc then he would have recorded the investigation as per wishes and in favour of the accused. That after about 06 months of the registration of FIR when accused's father came to know the results of appellant's investigation he made a false and fabricated complaint against the appellant to settle his score and take revenge from him otherwise nothing is correct in his complaint.

7. That subsequently when Abdul Waheed Complainant repented upon his wrong doing he submitted "statement" before the SP Investigation that his complaint and production of private witness was incorrect and misconception, he did not want punishment to the appellant and even still he does not want the punishment awarded to appellant by the department. **(Statement of the complaint is attached as "F").**

8. *That in the above mentioned case, appellant has discharged his duty with dexterity, care, caution and honesty. There is nothing wrong on his part. Hence the allegations are totally incorrect and baseless.*

*Attchd
H
SM*
9.

That Appellant throughout his entire service always performed his assigned duties with zeal, zest, devotion, dedication and honesty to the entire satisfaction of his officers and never provided a

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chance of reprimand. Appellant has meritorious service record at his credit.

10. That no proper departmental inquiry was conducted. No witness was produced before the inquiry officer to depose against the appellant in his presence nor was afforded chance of cross-examination to him. Copy of inquiry report, if any, was never provided to him. Even the enquiry suffers from irregularity and illegality. On receiving reply to the Show Cause Notice the SP(Investigation) Abbottabad vide order dated 12-07-2024 straightaway awarded the appellant with punishment of "Forfeiture of 03 years approved service" and that too without any reason and rhyme and without providing opportunity of personal hearing against the principle of natural justice. (Copy of punishment order dated 12-07-2024 is attached as "E").

11. That appellant is totally innocent and has discharged his official duties with devotion, dedication and honesty yet he has been awarded punishment of "Forfeiture of 03 years approved service" that too without any cause or justification. There is nothing wrong on the part of appellant.

Attended
H. An

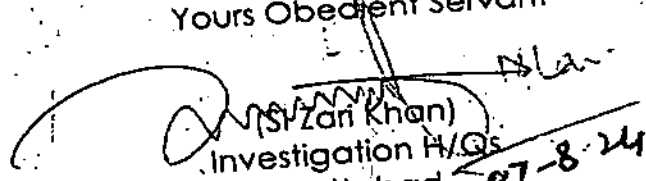
12. That if the appellant is provided with a chance of personal hearing, he will really prove himself as innocent by explaining all the facts and circumstances of the matter.

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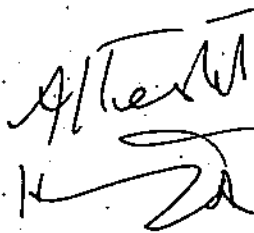
(20)

In view of the aforementioned facts it is earnestly requested that order dated 12-07-2024 of the Superintendent of Police (Investigation) Abbottabad may kindly be set aside and appellant be restored his forfeited 03 years approved service with all consequential service back benefits. Appellant shall pray for your good health and long life. Thanking you sir in anticipation.

Yours Obedient Servant


(Muzari Khan)
Investigation H/Qs
Abbottabad 07-8-24

Dated 07-08-2024



ANNEXURE 'F' 21



OFFICE OF THE REGIONAL POLICE OFFICER
HAZARA REGION, ABBOTTABAD

0992-9310021-22

0992-9310023

r.rpohazara@gmail.com

NO: 5092 / PA DATED: 30/09/2024

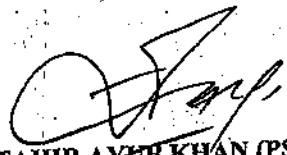
ORDER

This order will dispose of departmental appeal under Rule 11-A of Khyber Pakhtunkhwa Police Rules, 1975 submitted by SI Zari Khan of district Abbottabad against the order of punishment i.e. *forfeiture of 03 years approved service* awarded by SP Investigation, Abbottabad vide OB No. 46 dated 12-07-2024.

"Brief facts leading to the punishment are that the appellant while posted as officer incharge investigation (OII) Police Station Lora has taken illegal gratification of Rs: 45000/- from the father of accused involved in case FIR No. 197 dated 16.04.2024 u/s 377 PPC, 53-CPA PS Lora and also misbehaved/ abused him."



The appellant was issued charge sheet along with summary of allegations and Inspector, Investigation HQrs, Abbottabad was deputed to conduct departmental enquiry. The EO held the appellant responsible of misconduct. Consequently, SP Investigation, Abbottabad awarded him major punishment of forfeiture of 03 years approved service. Hence, the appellant submitted this present appeal.

After receiving his appeal, comments of SP Investigation, Abbottabad were sought and examined/perused. The undersigned called the appellant in Orderly Room and heard him in person and provided him reasonable opportunity to defend the charges leveled against him. However, he failed to advance any convincing justification in his defense. Therefore, in exercise of the powers conferred upon the undersigned under Rule 11-4. (a) of Khyber Pakhtunkhwa Police Rules, 1975 the instant appeal is hereby *rejected/filed* with immediate effect.


TAHIR AYUB KHAN (PSP)
Regional Police Officer
Hazara Region, Abbottabad

No. 5093 / PA, dated Abbottabad the 30-9-2024.

Cc. *SP Investigation Abbottabad* for information and necessary action with reference to his office Memo No. 5151 dated 02-09-2024. Service Book, Service Roll and Inquiry file containing (30 pages) of the appellant are returned herewith for office record.

Almanac

Date 19/07/2024

18/07/2024
07
13101-1804782-321

0322-552725



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355/506/367-A

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ANNEEXURE 'G'

کورٹ فیس

وکالت نامہ

BEFORE THE K P I C SERVICE TRIBUNAL بعدالت

ZARI KHAN نام / GP عنوان:

Appellant منجانب:

similar Appeal نوعیت مقدمہ:

At D باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب وہی کل کاروائی متعلقہ آن مقام

Hamayun Khan, Forullahi Khan

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا کیونکہ

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

کرانے اجراء وصولی چیک رو پیڈ 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 داخستہ مجھ کو منظور و قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے

ستحق 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 بہر اد

اسجرات ناش 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: 24/2/21

بمقام:

(Signature)