




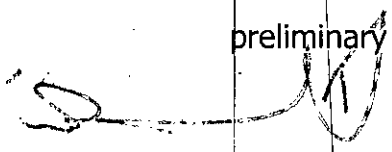
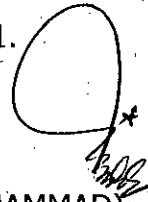
Form- A

FORM OF ORDER SHEET

Court of _____

Case No.-

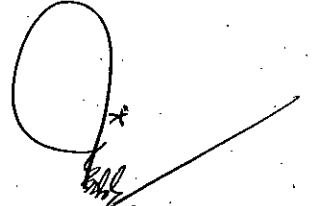
6610 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	25/06/2021	<p>The appeal of Mr. Amjid Saleem presented today by Mr. Bashir Khan Wazir Advocate, may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR.</p>
2-		<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>07/07/21</u>.</p> <p> CHAIRMAN</p>
	07.07.2021	<p>Junior to counsel for the appellant present and seeks adjournment as his senior is indisposed today. Adjourned to 30.09.2021 for preliminary hearing before S.B.</p> <p> Chairman</p>
	30.09.2021	<p>Clerk of counsel for the appellant present.</p> <p>Clerk of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is not available today. Adjourned. To come up for preliminary hearing before the S.B on 29.11.2021.</p> <p>  (MIAN MUHAMMAD) MEMBER (E)</p>

29.11.2021

None for the appellant present.

Notices be issued to the appellant and his counsel. To come up for preliminary hearing on 01.02.2022 before S.B.

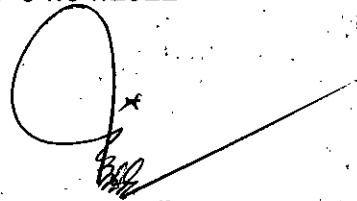


(MIAN MUHAMMAD)
MEMBER (E)

01.02.2022

Counsel for the appellant present.

Learned counsel for the appellant seeks adjournment.
Adjourned. To come up for preliminary hearing on 04.04.2022 before S.B.



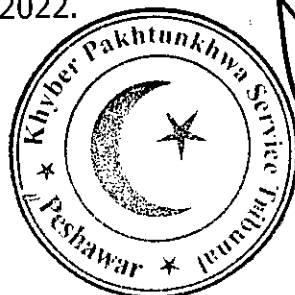
(Mian Muhammad)
Member(E)

04.04.2022

None present for the appellant.

Called several times till last hours of the court but none appeared on behalf of the appellant despite the fact that on previous date learned counsel for the appellant was present before the Court. In view of the above, the appeal is dismissed in default.

Pronounced in open court in Peshawar and given under my hand and seal of the Tribunal this 04th day of April, 2022.



(KALIM ARSHAD KHAN)
Chairman

**BEFORE THE LEARNED SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR**

Service Appeal No. _____/2021

Amjad SaleemAppellant

VERSUS

The Chief Secretary & others Respondents

I N D E X

S NO	DESCRIPTION OF DOCUMENTS	ANNEX	PAGES
1.	Service Appeal	-	
2.	Affidavit	-	
3.	Application for Suspension	-	
4.	Affidavit		
5.	Copy of the CNIC	A	11-13
6.	Copy of additional charge & adjustment on Head Clerk	B	14-15
7.	Copy of the transfer order dated 06/08/2019	"C"	16
8.	Copies of charge assumption, appeal and cancellation order	"D"	17-21
9.	Copies of the orders dated 24/02/2020 and withdrawal order dated 25/08/2020	"E"	22-23
10.	Copy of the impugned order dated 07/04/2021	"F"	24, 25
11.	Copies of appointment order of his wife and appeal	G	26-28
12.	Copy of Appeal and rejection order	H	29-33
13.	Wakalat Nama		34

Through:


Appellant

(BASHIR KHAN WAZIR)

Advocate,
High Court, Peshawar

Dated:- 18.06.2021

D

**BEFORE THE HONORABLE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA PESHAWAR**

Service Appeal No 6610 /2021

Diary No. 6658

Amjid Saleem S/o Saleem Muhammad Khan R/o 465 Street
No.6, Sector K-4 Phase-III, Hayatabad, Peshawar.

Dated 25-6-2021

.....Appellant

VERSUS

1. Govt of Khyber Pakhtunkhwa through Chief Secretary, Civil Secretariat, Khyber Pakhtunkhwa Peshawar.
2. Secretary Health, Civil Secretariat, Khyber Pakhtunkhwa Peshawar.
3. Director General Health Government of Khyber Pakhtunkhwa, Directorate Health, Peshawar.
4. District Health Officer, District North Waziristan.

.....Respondents

**SERVICE APPEAL UNDER SECTION 4 OF
KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
ACT 1974 AGAINST THE IMPUGNED ORDER
DATED 07.04.2021, WHEREBY THE
PREMATURE, AGAINST THE WEDLOCK POLICY
AND REPEATED TRANSFER ORDER HAS BEEN
ISSUED OF THE APPELLANT BY THE
RESPONDENTS**

Prayer in Appeal:

On acceptance of this Appeal, the Order dated 07.04.2021, whereby the Respondent No 3 has illegally, pre-maturely and against the Wedlock Policy issued transfer order of the Appellant vide which the Appellant has been transferred from the district cadre post DHO Office North Waziristan to District Chitral, may kindly be cancelled / set aside.

Respectfully Sheweth:-

The Appellant humbly submits as under:-

1. That the Appellant is the Law abiding citizen of Pakistan and is entitled for all the rights guaranteed by the Constitution of Islamic Republic of Pakistan, 1973. **(Copy of the CNIC is attached as Annex 'A')**.
2. That briefly stated the fact relevant for the purpose of this petition are that, Appellant being disable person by birth and he was appointed on district cadre post by the respondent no. 4 as he being the competent authority in the office of respondent no 4 on the post of Junior Clerk BPS.11 in the year of 2017, since than the Appellant was performing his duty with full devotion.

Filed to-day

25/6/2021

Registrar.

- (2)
3. That after appointment, the Appellant took over the charge against the above mentioned Sanctioned Post, the Appellant was being competent for the said post he was performing his duty with great zeal & zest and with full devotion with no complaint whatsoever, but he time and again penalized by the respondents through various means and he has been illegally transferred from one place to other.
 4. That when the Appellant was performing his duty on his respective post with good results and was giving outstanding performance, the Appellant had been shown efficiency in his duty, the respondents had issued various office orders vide which the Appellant was ordered to perform Head clerk duty in addition to his work in the said office in the interest of Public Services, as he was observed being competent and hard worker, due to which he had been assigned additional duties. **(Copy of additional charge & adjustment on Head Clerk are attached as annexure "B")**
 5. That when the Appellant was performing his duty with the satisfactory results of the respondents, meanwhile the respondents issued the transfer order, vide which he was transferred from district North Waziristan to District South Waziristan, inspite of the fact that the Appellant was appointed on district cadre post, if at all any transfer of the Appellant was necessary, his transfer could be done within the District rather than outside the district. **(Copy of the transfer order dated 06/08/2019 is attached as annexure "C")**
 6. That the Appellant while complied the said transfer order, assumed the charge of his transfer position in the office of District Health Officer South Waziristan and the respondent no 4 had issued relieving order of the Appellant, thereafter, the Appellant submitted an appeal to the competent authority on the ground of his disability and also his wife being the employee of education department and posted at District North Waziristan, the said appeal was entertain by the competent authority, while constituted a grievance committee on the appeal of Appellant after examined all the relevant rules and facts the competent authority recognized the same grounds being genuine and cancelled the said transfer order. **(Copies of charge assumption, appeal and cancellation order are attached as annexure "D")**

7. That the respondents after reached to the conclusion that the transfer of the Appellant was issued illegally and on wrong assumption, the same was withdrawn and the Appellant retransferred to his previous position to the office of respondent no 4, the Appellant assumed again the charge on his previous position and he was continuously performing his duty with great results, meanwhile on the influence of political figure he was again transferred within a period of few months, while issued a transfer order on dated 24/02/2020, the Appellant again submitted an appeal against the said order to the competent authority, which was considered after few months and cancelled the same transfer order on dated 25/08/2020. **(Copies of the orders dated 24/02/2020 and withdrawal order dated 25/08/2020 are attached as annexure "E")**
8. That after few months, the Appellant again transferred from the office of respondent no. 4 to District Chitral, while issued the impugned order vide dated 07/04/2021 and due to politically victimizing his service since his appointment, inspite of the fact that he being disable person and appointed on district cadre post the respondent no 2 having no authority to issue the impugned order, but due to the influence of some political figures the respondent no 2 has issued the impugned transfer order, which is being corm non Judice. **(Copy of the impugned order dated 07/04/2021 is attached as annexure "F")**
9. That resultantly the Appellant again submitted appeal before the competent authority on the ground of disability, District Cadre Post and under the spouse policy as the wife of the Appellant is serving as PST in Education Department on District cadre post and she is performing her duty at district North Waziristan. **(Copies of appointment order of his wife and appeal are attached as annexure "G")**
10. That the Appellant submitted Appeal before the District Health Officer as he is the immediate boss of the Appellant and being performing his duty on District Cadre Post he has preferred Appeal to the DHO, which was also regretted by the DHO. **(Copy of Appeal and rejection Order is attached as annexure H)**
11. That thereafter, the Appellant time and again visited to the office of respondents and made several requests for cancellation of his illegal transfer, but in vain.

(4)

12. That feeling aggrieved from the act of Respondents, having no other adequate and efficacious remedy, approaches this Honourable Tribunal on the following grounds inter-alia:-

GROUND:-

- A) That the Appellant is peaceful and law abiding citizen of Islamic Republic of Pakistan and is fully entitled to all the basic and fundamental rights as enshrined in the fundamental law of the state, interpreted and guaranteed by the law of the land.
- B) That the Appellant is well qualified person and having the experience of this post, the respondents with the connivance of each other issued the above mentioned impugned order which is void ab initio, because on one hand the respondents time and again endorsed the illegal transfer orders issued in past and the same had been cancelled and in spite of the fact that the instant post is lying under the purview of district Cadre post and only the respondent no 4 is being competent to transfer posting of the subject post within the District, however the respondent no 2 acceded from his power issued the impugned transfer order, which is *corm non* *judice* in the eyes of law and liable to be set aside.
- C) That as per the policy guide lines it is obligatory upon the competent authority to issue the transfer posting orders in such manners provided under the rules and policy according to which the Appellant has been transferred premature just to facilitate the incompetent person which is illegal unlawful without lawful authority.
- D) That the fundamental right of the Appellant has blatantly violated by the Respondents and the Appellant have been discriminated and has been denied his due rights under the Constitution of Islamic Republic of Pakistan, 1973.
- E) That the acts of the Respondents of not following the same criteria which has been safeguarded by the law and rules and guidelines provided by the apex courts that when the employee serving on respective post the competent authority is not allowed to transfer the employee with malafide intention or for ulterior motives,

while in the present case the respondents neither only violated the prescribed rules and regulations but also harassed the Appellant which can easily be gathered from the face of order, which is illegal, unlawful, unnatural, ab-initio, null and void in the eye of law, hence liable to be declared so.

- F) That though the transfer order of the employees is the discretion of the respondents but the apex courts has time and again held that the authority should exercise its discretion in judicious manner but in the instant case the authority failed to adhere to the dictum of laid down by the superior courts which is highly deplorable such like order cant not be allowed to remained in the field normally, this does not interfere with the orders passed by the competent authority in exigency of service after due application of mind but if the order seems to be illegal, ab initio, void, the court always intervenes at this stage hence the instant impugned office order to the extent is not only ridicules but also void, illegal and unlawful and liable to be struck down.
- G) That as per the guidelines of the apex Courts in the judgment PLD,2013 Supreme Court 195, transferred posting of the civil servant has been discussed in detail in which the principle laid down that non subservience to political executive and impartiality, although civil servant did have a duty to fall the policy guidelines and directions of the political executive yet, because of Article 5 of the constitution their foremost duty was obedience to the constitution and the law, not unthinking obedience to all directives right or wrong issued from the political executive.
- H) That as per the Article 9, 14, 18 of the constitution seeking elaboration of constitutional and legal safeguards relating to the working of civil servants, the point of maintainability is that matter of tenure appointment, posting, transfer and promotion of civil servants could not be dealt with in arbitrary manner, it could only be sustained when it was in accordance with the law, it is settled in the above mentioned judgment that decision which deviated from the accepted or rule based norm without proper justification could be tested on the touch stone of manifest public interest.
- I) That for the convenient the provincial government issued policy in respect of posting and transfer in which the minimum period of the employees on the same position has been specified, but in the instant case the

6

respondents violated the guidelines provided under the said policy, another aspect of the case is that the wife of the Appellant is serving in District north Waziristan and the basis of spouse policy he is entitled to be served on the same station, however the respondents also violated the spouse policy and issued the impugned order, which is liable to be declared null and void in the eyes of law.

- J) That the respondent No.2 violated the fundamental rights of the Appellant enshrined under the article 4 and 10 of the constitutional of Pakistan that when the ordinary tenure for the [posting had been specified in the law or rules made thereunder such tenure must be respected and could not be varied, except for compelling reasons which should be recorded in writing and were judicially reviewable transfers of civil servants by political figures which were capricious and were based on consideration not in the public interest were not legally sustainable, hence as per the above mentioned circumstances the impugned order of the respondent No. 2 is illegal, unlawful, and unwarranted in the eyes of law and liable to be declared so.
- K) That any other ground not raised here specifically may graciously be allowed to be raised at the time of arguments.

PRAYER:-

It is, therefore, most humbly prayed that, **On acceptance of this Appeal, the Order dated 07.04.2021, whereby the Respondent No 3 has illegally, pre-maturely and against the Wedlock Policy issued transfer order of the Appellant vide which the Appellant has been transferred from the district cadre post DHO Office North Waziristan to District Chitral, may kindly be cancelled / set aside.**

Any other relief, not specifically asked for may also graciously be extended in favour of the Appellant in the circumstances of the case.

Appellant

Through:


(BASHIR KHAN WAZIR)

Advocate,

High Court, Peshawar

Dated:- 18.06.2021

7

BEFORE THE LEARNED SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR

Service Appeal No. _____/2021

Amjad SaleemAppellant

VERSUS

The Chief Secretary & others Respondents

AFFIDAVIT

I, Amjid Saleem S/o Saleem Muhammad Khan R/o 465 Street No.6, Sector K-4 Phase-III, Hayatabad, Peshawar, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.


DEPONENT

8

BEFORE THE LEARNED SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR

Service Appeal No. _____/2021

Amjad SaleemAppellant

VERSUS

The Chief Secretary & others Respondents

APPLICATION FOR SUSPENSION OF
IMPUGNED ORDER DATED 07.04.2021,
WHEREBY THE RESPONDENT NO 3 HAS
ILLEGALLY, PRE-MATURELY AND
AGAINST THE WEDLOCK POLICY ISSUED
TRANSFER ORDER OF THE APPELLANT,
TILL THE FINAL DECISION OF THE
SERVICE APPEAL.

Respectfully Sheweth:

1. That the above noted Service Appeal is being filed before this hon'ble court, in which no date of hearing has yet been fixed.
2. That the Appellant has got a good prima facie case in their favour, and is sanguine about its success.
3. That the balance of convenience also lies in favour of the Appellant.
4. That if the Impugned Order dated 07.04.2021 is not suspended, the Appellant would suffer extreme irreparable loss.
5. That the facts and grounds of the Appeal may kindly be read as an integral part of this application.

9

It is, therefore, respectfully prayed that on acceptance of this application, the Impugned Order dated 07.04.2021 may kindly be suspended, till the final decision of the case.

Through:

Appellant



(BASHIR KHAN WAZIR)

Advocate,
High Court, Peshawar

Dated:- 18.06.2021

(10)

**BEFORE THE LEARNED SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR**

Service Appeal No. _____/2021

Amjad SaleemAppellant

VERSUS

The Chief Secretary & others Respondents

AFFIDAVIT

I, Amjid Saleem S/o Saleem Muhammad Khan R/o 465 Street No.6, Sector K-4 Phase-III, Hayatabad, Peshawar, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.


DEPONENT

(2)



FATA SECRETARIAT
DIRECTORATE OF SOCIAL WELFARE FATA
SOCIAL SERVICES MEDICAL CENTER MIRAN SHAH N.W.A

Reg.No.SO (Z&U)/SW/6(2)2012/395

Dated:- 06/02/2018

DISABILITY CERTIFICATE

1. Name:- AMJAD SALEEM
2. Father Name:- SALEEM MUHAMMAD KHAN
3. Married/Unmarried:- Married
4. Spouse:- KHATAM NISA BIBI
5. Date of Birth:- 01/03/1988
6. CNIC:- 21506-2013998-9.
7. Qualification:- MA
8. Nature of Disability:- Physically
9. Present Address:- Village Hamzoni Ali Khel Teh Miranshah N.W.Agency
10. Permanent Address:- Village Hamzoni Ali Khel Teh Miranshah N.W.Agency
11. Recommendations of the Board for Disability Certificate: (Attached)

Stamp: NADRA ORIGINAL SEEN
Name: _____
ERP No: _____
Signature: _____

out disability
3
[Signature]

Social Welfare Officer
Miranshah N.W. Agency

AKC
[Signature]

13

FATA SECRETARIAT
DIRECTORATE OF SOCIAL WELFARE FATA
SOCIAL SERVICES MEDICAL CENTER MIRANSHAH N.W.AGENCY
ASSESSMENT OF PERSON WITH DISABILITY (PWD)

Registration No. 395 Dated. 6/2/18
01- Name. Amjad Saleem 02- Father Name. Saleem Mohammad Khas
03- Married/Un-Married. Married 04- Spouse. Khatoon Nisa Bibi
05- CNIC No. 21566-2013998-9 06- Date of Birth. 01-03-1988
07- Qualification. MA 08- Type of Disability. Physically
09- Nature of Disability. Depravity in (R) Hyj 7H
10- Cause of Disability. DDH (Developmental Dysplasia of Hyj 7H)
11- Type of job can do. _____ 12- Source of Disability. _____
13- Applied for. _____ 14- Phone No. 03361890001
15- Present Address. Village Hamzoni Ali Khel Tehsil
Miran Shah
16- Permanent Address. _____

Recommendation of the Assessment Committee

17. Applicant is declared Disable/Not Disable. (R) Hyj 7H
18. Disability/Impairment: Depravity in (R) Hyj 7H 19. Fit/Not fit for work. _____
20. Type of Job can Advised. DDH 21. Referred to expert. _____
22. Recommendations to Social Welfare Miranshah N.W. Agency

Signature. _____
APA/Tahsildar/Naib Tahsildar
Chairman Agency Assessment Committee

Signature. _____
Agency Zakat Officer
North Waziristan Agency
Miranahab

1. Member
Signature _____
Name. Dr. Hamidullah
Medical Superintendent
AHQ Hospital Miranshah
Medical Superintendent
Agency H.Q. Hospital
Miranshah

2. Member
Signature _____
Name. Dr. Niamatullah
Medical Officer
AHQ Hospital Miranshah
Medical Officer
AHQ Hospital
Miranshah

3. Member
Signature _____
Name. _____
Social Welfare Officer
SSMC Miranshah N.W.A

Stamp: Social Services Medical Center
Miranshah N.W. Agency

Handwritten signature/initials

OFFICE OF THE DISTRICT HEALTH OFFICER
NORTH WAZIRISTAN TRIBAL DISTRICT AT MIRANSHAH

Tel: (0928) 300788 FAX: (0928) 311662

Email: agency surgeon nwa 2018@gmail.com

OFFICE ORDER:

I am directed by the competent authority to assign the duty of Head Clerk / Account Clerk to Mr. Amjad Saleem Junior Clerk BPS-11, on his good performance in the best interest of public Services with immediate effect.

Sd/xxx

District Health Officer
North Waziristan Tribal District

No. 104-71

Dated the 10/1/2020.

Copy forwarded to

1. The District Account officer NWTD.
 2. PS to Secretary Health, Khyber Pakhtunkhwa Peshawar.
 3. Director Health Services Mergea Area Peshawar vide his express approval dated 07-01-2020.
 4. Official Concerned.
- For information please.

District Health Officer
North Waziristan Tribal District

AKK
R

"B"
14

OFFICE OF THE DISTRICT HEALTH OFFICER
NORTH WAZIRISTAN TRIBAL DISTRICT AT MIRANSHAH

Tel: (0928) 300788 FAX: (0928) 311662

Email:agency Surgeonnwa2018@gmail.com

No. 3049 /PF,

Dated the 03 /09/2019

To,

The Director Health Services,
Merged Areas Peshawar.

Subject: Office Order

Dear Sir,

Kindly reference your letter No. 14470-72/DHS/Admin dated 02-09-2019 on the subject noted above. It is stated that three other Junior Clerks are working in this office but they are incapable and cannot shoulder the responsibility due to lack of relevant qualification and experiences and the undersigned cannot rely on such person at this stage. Multifarious, nature of work is facing this office due to the merger process, which needs quick and timely response.

Meanwhile, the incumbent may work as account/ Head clerk as he had good record of accomplishment of services and having ample experience and relevant qualifications to dispose-off the routine work with most zeal and zest. He is dedicated, hardworking trustworthy and a well qualified for the said job.

District Health Officer
Tribal District Miranshah

No. 3050 /PF,
Copy forwarded to the.

1. Deputy Director Admin DHS Merged Areas Peshawar.
2. District Account Officer NWTD.
3. Official concerned.

District Health Officer
Tribal District Miranshah

Handwritten initials: MR



DIRECTORATE OF HEALTH SERVICES

MERGED AREA SECRETARIAT WARSAK ROAD PESHAWAR

PH # 091-9210212 FAX # 091-9212110

16

OFFICE ORDER

The following posting / transfer of Junior Clerks (BS-11), is hereby ordered in the interest of public service with immediate effect.

S#	Name with Designation	From	To	Remarks
1	Amjid Saleem Junior Clerk	District Health Officer North Waziristan	District Health Officer South Waziristan	Vice # 2
2	Muhammad Tariq Junior Clerk	District Health Officer South Waziristan	District Health Officer North Waziristan	Vice # 1

Arrival / Departure report should be submitted to this Directorate.

--/--

Director Health Services,
Merged Areas, Peshawar.


Dated 6 / 08 / 2019

No. 12922-27 / DHS/Admin

Copy forwarded to the:-

1. Deputy Director (Admin) DHS Merged Areas.
2. District Health Officer North & South Waziristan.
3. District Accounts Officer North & South Waziristan.
4. Officials concerned.

For information and necessary action.


Director Health Services,
Merged Areas, Peshawar.

HE
R

To

The District Health Officer,
South Waziristan Tribal District.

D
17

Subject: Arrival Report.

R/Sir,

In compliance with DHS Merged Areas office order No. 17 822-27/106
dated 06/08/2019.

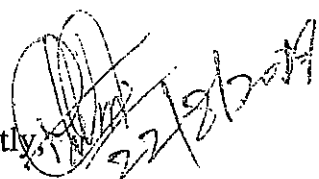
I have the honour to submit herewith my arrival report for duty as a

Junior Clerk BPS-11 today on 22/8/2019 FN.

Dated: 22/8/2019

Thanks

Yours Obediently,



Mr. Amjad Saleem
J/C B-11

DHO Office SWTD

ATTN



18

The Honorable Director,
Health Services Khyber Pakhtunkhwa Merged area.

Subject: REQUEST FOR CANCELLATION OF TRANSFER ORDER DATED 06-08-2019 ON COMPASSIONATE /DISABILITY GROUND.

Respected Sir,

That the appellant is the resident of North Waziristan working in Office of Agency Surgeon North Waziristan Tribal District. The appellant was given charge of as Accounts Clerk on 28-02-2019 by the Director Health Services merge area KP according to the appellant qualification, expertise and experiences after that just spending short time of three months. The appellant was transferred from the office of Agency Surgeon North Waziristan Tribal District to South Waziristan when the appellant was on the proceeding of Hajj pilgrim dated 06-08-2019. Copy of the transfer order at Annex-I. The appellant seeks the setting aside of the impugned transfer order dated 06-08-2019 on the following grounds;

Grounds;

- a) That the person is disable suffering from DDH disease due to which the appellant is under regular treatment and the most importantly need domestic care which is only possible at home. Copy of medicine and prescription is attached Annex-I.
- b) That the spouse of appellant is Govt servant in education department, which cannot be leave on the mercy of some other as my children is going to school and the appellant is solely guardian of family.
- c) That Applicant is rendering meritorious services having illustrious career, spreading over many years and have earned "outstanding and very good Annual Confidential/Personal Evaluation Reports (PERs)". Similarly Petitioners integrity has never been called into question by any Reporting/Assessing Officer.

It is therefore humbly requested that the impugned transfer Order No.12922-27/DHS/Admin date 06-08-2019 may kindly be cancelled on compassionate ground keeping in view of above grounds and the erstwhile posting of the appellant may kindly be restored.
The appellant will be pray for your long life and prosperity.

Your Sincerely,

[Signature]
Amjad Saleem,

Accounts Clerk office of Agency Surgeon NWT D.

Date: 26-08-2019.

*DIRECTOR
MERGED AREAS, KP
Please consider the
request as per law/
Policy. The concerned
is disabled and needs
to be given sympathetic
consideration per within
the domain of our
Policy. Thank You.*

[Signature]
27/08/2019
Minister for Health
Khyber Pakhtunkhwa

*Atte
R*

OFFICE OF THE DISTRICT HEALTH OFFICER
SOUTH WAZIRISTAN TRIBAL DISTRICT



19

OFFICE ORDER:

Mr. Amjad Saleem Junior Clerk BPS-11, recently transferred to South Waziristan vide DHS Merged Areas Peshawar letter No. 12922-27/DHS/Admn dated 06-08-2019.

Mr. Muhammad Tariq Junior Clerk BPS-11, is directed to hand over complete charge of Account Clerk with immediate effect in the best interest of public.

Sd/XXX

District Health Officer
South Waziristan Tribal District

No. 645-48 /DHO/SWTD, dated

24/08/2019.

Copy forwarded to the:

1. Director Health Services Merged Areas, Peshawar for information.
2. Deputy Commissioner, South Waziristan Tribal District.
3. District Account Officer, South Waziristan.
4. Officials concerned for strict compliance.

24/8/2019

District Health Officer
South Waziristan Tribal District



DIRECTORATE OF HEALTH SERVICES

MERGED AREA SECRETARIAT WARSAK ROAD PESHAWAR
Ph # 091-9210212 Fax # 091-9212110

OFFICE ORDER

As per recommendation of grievance committee, this Directorate office order bearing endorsement No.12922-27/DHS/admin dated 06-08-2019, regarding transfer of Mr. Amjid Saleem Junior Clerk (BS-11) from District Health Officer North Waziristan to District Health Officer South Waziristan, is hereby withdrawn on disability grounds.

--/--

Director Health Services,
Merged Areas, Peshawar.

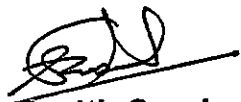
Dated 28 / 08 / 2019

No. 14349-52/DHS/Admin

Copy forwarded to the:-

1. District Health Officer North Waziristan.
2. District Health Officer South Waziristan.
3. District Accounts Officer South Waziristan & North Waziristan.
4. Officials concerned.

For information and necessary action.


Director Health Services,
Merged Areas, Peshawar.

OFFICE OF THE DISTRICT HEALTH OFFICER NORTH WAZIRISTAN TRIBAL DISTRICT AT MIRANSHAH

Tel: (0928) 300788 FAX: (0928) 311662

Email: agencyurgeonwa2018@gmail.com

NO 3020-22 /

PF: Miranshah

dated: the

29 / 8 / 2019.

Copy forwarded the:

- 1- Director Health Services Merged Areas Peshawar for information w/r to your officer letter No. cited as above please.
- 2- District Account Officer North Wazirsitan Miransah for information and necessary action.
- 3- Official concerned.


District Health Officer
Tribal District North Waziristan



OFFICE OF THE DISTRICT HEALTH OFFICER
TRIBAL DISTRICT NORTH WAZIRISTAN AT MIRANSHA

Tel: (0928) 300788 FAX: (0928) 311662
No. /Transfer/Posting

Email: agencysurgeonwa2018@gmail.com

dated:

22/8/2019

To

2-f27-

The Director Health Services
Merged Areas Peshawar.

**SUBJECT: POSTING /TRANSFER OF HEAD CLERKS, ACCOUNT
CLERKS AND STORE KEEPERS.**

Memo:

Reference your office letter No.13588/608/ DHS/Admin: dated:19/8/2019, on the subject noted above and to state that the following clerks/store keepers are hereby relieved with immediate effect please.

S#	Name & Designation	Transfer To	Remarks
1	Mr.Said Muhammad J/C	DHO South Waziristan	Relived
2	Mr.Hadyat ullah Store Keeper	MS Wana	Relived
3	Mr.Karim Shah	DHO South Waziristan	Relived
4	Mr.Amjad Saleem J/C	-do-	Relived

For your information and further necessary action as desired please.

DISTRICT HEALTH OFFICER
TRIBAL DISTRICT MIRANSHAH

AKS

DIRECTORATE OF HEALTH SERVICES

MERGED AREA SECRETARIAT WARSAK ROAD PESHAWAR

Ph # 091-9210212 Fax # 091-9212110

OFFICE ORDER

Mr. Amjid Saleem Junior Clerk (BPS-11), attached to District Health North Waziristan is hereby relieved from Head Clerk / Accounts Clerk on administrative ground and he is directed to report to Directorate of Health Services, DHS, Merged Areas Peshawar for further posting with immediate effect.

ADP
Director Health Services,

OIC *Nar*
Merged Areas, Peshawar.

Dated *24* / 02 / 2020

No. 4631-33 /DHS/Admin

Copy forwarded to the:-

3. District Health Officer, North Waziristan.
4. District Accounts Officer, North Waziristan.
5. Official Concerned.

ADP
Director Health Services,

OIC *Nar*
Merged Areas, Peshawar.



DIRECTORATE OF HEALTH SERVICES

MERGED AREA SECRETARIAT WARSAK ROAD PESHAWAR

Phone # 091-9210212 Fax # 091-921210

23

OFFICE ORDER

The office order bearing endstt: No.4631-33/DHS/Admin dated 24/02/2020 is hereby withdrawn in the best interest of public.

Sd/xxx

Director Health Services,
Merged Areas, Peshawar

No. 18925-27 /DHS/Admin

Dated 25/08 /2020

Copy forwarded to:

1. The District Health Officer, North Waziristan.
2. District Account Officer, North Waziristan.
3. Official concerned.

Deputy Director (Admn),
DHS Merged Areas, Peshawar

24

**DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUN KHWA PESHAWAR**



OFFICE ORDER

As approved by the competent authority, the services of Mr. Arif Salim Junior Clerk attached to DHO office North Waziristan, are hereby placed at the disposal of DHO Chitral Lower, for further posting under his control against the vacant post of Junior Clerk on Administrative grounds with immediate effect.

Nb: Arrival/departure reports should be submitted to this Directorate for record.

Sd/xxxxxxxx

DIRECTOR GENERAL HEALTH SERVICES, K.P, PESHAWAR.

Dated 7/4/2021

No. 2276-79/Personnel

Copy forwarded to the:

1. DHO North Waziristan. He is hereby directed to relieve the above named Junior Clerk immediately.
2. DHO Chitral Lower.
3. DAO North Waziristan/Chitral Lower.
4. Official concerned.

For information and necessary action.

DIRECTOR GENERAL HEALTH SERVICES, K.P.K PESHAWAR.

AAQ

Better Copy

**DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR**

OFFICE ORDER

As approved by the competent authority, the services of Mr. Amjid Saleem Junior Clerk attached to DHO office North Waziristan, are hereby placed at the disposal of DHO Chitral Lower, for further posting under his control against the vacant post of Junior Clerk on Administrative grounds with immediate effect

Nb: Arrival/departure reports should be submitted in this Directorate for record.

Sd/-xxxxxx
DIRECTOR GENERAL HEALTH
SERVICE, K.P.K, PESHAWAR

No. 2276-79/Personnel

Dated 7/04/2021

Copy forwarded to the:-

1. DHO North Waziristan. He is hereby directed to relieve the above named Junior Clerk immediately.
2. DHO Chitral Lower.
3. DHO Chitral Lower
4. DAO North Waziristan /Chitral Lower
5. Official concerned

For information and necessary action.

Sd/-xxxxxx
DIRECTOR GENERAL HEALTH
SERVICE, K.P.K, PESHAWAR

Att
G

OFFICE OF THE AGENCY EDUCATION OFFICER NORTH WAZIRISTAN AGENCY

APPOINTMENT ORDER

Consequent upon the recommendation of Departmental Selection committee the following untrained PTC Female Candidates are hereby appointed as PTC Teacher on temporary basis in BPS- 5 at Rs.(3340-160-S140) & BPS -6 at Rs. (3430-175-8680) Per month plus usual allowances as admissible under the rules against vacant PTC post in the schools mentioned against each their name from the date of taking over charge.

TEHSIL GIJULAM KHAN AND MIRANSHAH

S.No	Name with Father Name	Qualification	Place of posting	Remarks
1	Basnoor Zada D/O Zaley Din	F.A B-6	GGPS Gujar Khan Saidgi NWA	Vacant Post
2	Sadia D/O Awaz Khan	S.S.C B-5	GGPS Gujar Khan Saidgi NWA	Vacant Post
3	Bibi Zaina D/O Khalid Khan	S.S.C B-5	GGPS Haji Muhammad Kot Saidgi	Vacant Post
4	Khatam Nisa Bibi D/O Noora Gul	S.S.C B-5	GGPS Haji Muhammad Kot Danday Derpa Khel	Vacant Post

TERMS & CONDITIONS:

- 1 Their appointment are made on temporary basis and liable to terminated at any time with out any notice. If they wish to resign from their post, they should give one month prior notice or forfeit one month pay in lieu thereof.
- 2 They should bring their Health and Age certificate from Medical Supdt; A.H.Q Hospital Miran Shah.
- 3 If they fail to assume their charge within 15 days their order will be treated as cancelled.
- 4 They should not be handed over charge if they below 18 years and above 40 years of age.
- 5 Their academic certificates will be referred to the concerned Board/University by depositing usual fee charge for necessary verification & their salaries will not be drawn until and unless their verification are received in this office.
- 6 Their original Qualification, Date of Birth, Domicile Certificate and CNIC should be checked and photo copy be placed on record.
- 7 Their services will be terminated if they found absent for 4 days continuously from the date of taking over charge.
- 8 They will be terminated if their certificates found fake/bogus and tampered.
- 9 The appointee is entitled for all benefits except pension and gratuity.
- 10 They will have to acquire requisite training within 3 years of their appointment, failing which their appointment will stand cancelled automatically.

Agency Education Officer
North Waziristan Agency

Ends: 1166/2010 Appointment PTC/ADO NWA Dated 29/13 2010.

Copy to:

- The Director of Education (C.A.E.) NWFP Peshawar
- The Principal, Gujar Khan Saidgi NWA
- The Agency Account Officer, Miran Shah
- Head Teacher, Gujar Khan Saidgi NWA
- Head Teacher, Haji Muhammad Kot Saidgi
- Head Teacher, Danday Derpa Khel
- Accountant, PTC

Better Copy

OFFICE OF THE AGENCY EDUCATION OFFICER NORTH WAZIRISTAN AGENCY

APPOINTMENT ORDER

Consequent upon the recommendation of Departmental Selection Committee the following untrained PTC female candidates are hereby appointed as PTC Teacher on temporary basis in BPS-5 at Rs.(3340-160-8140) & BPS-6 at Rs. (3430-1758680) Per month plus usual allowances as admissible under the rules against vacant PTC post in the schools mentioned against each their name from the date of taking over charges.

TEHSIL GHULAM KHAN AND MIRANSHAH

S.No.	Name with Father Name	Qualification	Place of posting	Remarks
1	Basnoor Zada D/o Zaley Din	F.A, B-6	GGPS Gujar Khan Saidgi NWA	Vacant post
2	Saida D/o Awaz Khan	S.S.C B-5	GGPS Gujar Khan Saidgi NWA	Vacant post
3	Bibi Zaina D/o Khalid Khan	S.S.C B-5	GGPS Haji Muhammad Kot Saidgi	Vacant post
4	Khatam Nisa Bibi D/o Noora Gul	S.S.C B-5	GGPS Haji Muhammad Kot Danday Derpa Khel	Vacant post

TERMS & CONDITIONS:

1. Their appointment are made on temporary basis and liable to terminated at any time without any notice, if they wish to resign from their post, they should give one month prior notice or forfeit one month pay in lieu thereof.
2. They should bring their Health and Age certificate from Medical Supdt. A.H.Q Hospital Miranshah.
3. If they fail to assume their charge within 15 days, their order will be treated as cancelled.
4. They should not be handed over charge if they below 18 years and above 40 years of age.
5. Their academic certificates will be referred to the concerned Board/University by depositing usual fee charge for necessary verification & their salaries will be drawn until and unless their verification are received in this office.
6. Their original Qualification, Date of Birth, Domicile and CNIC should be checked and photo copy be placed on record.
7. Their services will be terminated if they found absent for 4- days continuously from the date of taking over charge.
8. They will be terminated if their certificates found fake/bogus and tampered.
9. The appointee is entitled for all benefits except pension and gratuity.
10. They will have to acquire requisite training with In 3 years of their appointment, failing which their appointment will stand cancelled automatically.

Sd/-
Agency Education Officer
North Waziristan Agency

Endst No. 1166-72 /Appointment/PTC/AEO/NWA

Dated 29/03/2010

Copy to:

1. The Director of Education, (FATA) NWFP Peshawar
2. The Political Agent NWA Miranshah
3. The Agency Accounts Officer Miranshah
4. AAEO (Female) Concerned
5. Head Teachers
6. Candidates Concerned.
7. Accountant local office

Sd/-
Agency Education Officer
North Waziristan Agency

Handwritten signature



**GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT**

Dated Peshawar, the 14th January, 2020

NOTIFICATION

No. E&A/HEALTH/2-5/2020:

Whereas to streamline the postings/transfers of Doctors, Nurses and other Health staff in Khyber Pakhtunkhwa including Newly Merged Districts to ensure transparency and meritocracy; and

Whereas to provide Doctors, Nurses and other Health staff to every Health facility of Khyber Pakhtunkhwa and Newly Merged Districts for better public service delivery; and

Whereas to formulate a proper posting/transfer policy for Doctors, Nurses and other Health staff in Khyber Pakhtunkhwa including Newly Merged Districts to arrest nepotism, favoritism or any other biases;

Now, therefore, the Competent Authority is pleased to impose ban on all kind of posting/transfer of Doctors, Nurses and other Health staff in Khyber Pakhtunkhwa including Newly Merged Districts except recommendees of Khyber Pakhtunkhwa Public Service Commission, transfers on promotion, awaiting posting (to be posted against available vacant posts in their respective cadres) and transfer on administrative grounds/on administrative posts.

**SECRETARY HEALTH
KHYBER PAKHTUNKHWA**

Endst: No. & Date Even.

Copy forwarded to the:

1. Director General Health Services, Khyber Pakhtunkhwa, Peshawar.
2. Director General Provincial Health Services Academy, Peshawar.
3. Director General Drug Control and Pharmacy Services, Peshawar.
4. Director Health Services, Merged Areas, Peshawar.
5. Chief Executive Bacha Khan Medical Complex, Swabi.
6. Chief Executive Saidu Group of Teaching Hospitals, Swat.
7. All District Health Officers, Khyber Pakhtunkhwa.
8. All Medical Superintends, Khyber Pakhtunkhwa.
9. All Project Directors, Health Department Khyber Pakhtunkhwa.
10. MD Health Foundation, Khyber Pakhtunkhwa.
11. Chief Executive Officer Khyber Pakhtunkhwa Health Care Commission.
12. Secretary Khyber Pakhtunkhwa Pharmacy Council, Peshawar.
13. Secretary Khyber Pakhtunkhwa Medical Faculty, Peshawar.
14. Chief Health Sector Reforms Unit, Khyber Pakhtunkhwa.
15. Director Independent Monitoring Unit, Khyber Pakhtunkhwa.
16. Deputy Director IT, Khyber Pakhtunkhwa.
17. All Section Officer, Health Department Khyber Pakhtunkhwa.
18. PS to Minister Health, Khyber Pakhtunkhwa.
19. PS to Secretary Health, Khyber Pakhtunkhwa.
20. P.A to Additional Secretary (Estt) Health Department, Peshawar.
21. P.A to Additional Secretary (Dev) Health Department, Peshawar.
22. P.A Chief Planning Officer, Health Department.
23. P.A to All Deputy Secretaries, Health Department, Peshawar.

Section Officer (General)

Handwritten notes:
D.No. 315
Date: 20-1-20
JAN 2020
R/b [Signature] 20/1/20

Handwritten signature: [Signature]

28

"H"

(29)

Dairy No. 13342

dt 12/4/2021

To,

The Director General Health Services,
Health Department Khyber Pakhtunkhwa, Peshawar.

Subject: -

Departmental Appeal for cancellation of impugned order No 2276-79/personal issued vide dated 07-04-2021, by the Director General Health services, KP Peshawar, whereby the services of the appellant has been transferred from the DHO Office North Waziristan to the disposal of DHO Chitral Lower.

DGHs
APK

RESPECTED SIR,

The Undersigned submit as under; -

1. That the appellant belongs to a respectable family of District North Waziristan and also a disable person declared by the Social Welfare Department, which is evident from his CNIC/physical appearance.
2. That two officials namely Mr. Saeed Ullah Junior Clerk who remained Head Clerk for the period of 2001 to 2011 and Mr. Said Muhammad Junior Clerk who had worked as Head Clerk for the period of 2011 to 2017 who has became the mafia of DHO office where new entry like me is never acceptable to them. Both of them are using political links and undue pressure upon the Govt by using *strain every nerve* just to defame the undersigned and posted me out.
3. That groups being influential on political side as well as built up pressure upon the incumbents of the said office and even not easily leaving to perform duties in the four corners of limits. The appellant was also time and again targeted by those private persons for whom the appellant refused to issue illegal and unlawful favors.
4. That as per the office record the appellant is the only person amongst the clerical staff who had been performed his duties for the best interest of office which is very much established from the past record as the former DHO's given certificates of appreciation in favor of the Appellant, but due to the involvement of influential and political figures in the DHO Office, the Appellant after his Re-Instatement transferred from District North Waziristan to District South Waziristan vide transfer order No 12922-29/DHS/ADMN dated 06-08-2019, the Appellant relieved from his position at District North Waziristan and assumed the charge soon after his transfer.
5. That the Appellant submitted an appeal to Director Health Officer with request that the Appellant being disabled person is unable to perform his duty faraway or in the other District, consequent upon the request of

Appellant the Hon'ble Health Minister constituted a committee for determination of agonies of the Apellant, the Committee made recommendations in favor of the appellant and submitted report before the Competent Authority, on recommendation of Committee the Transfer order of the Appellant was pleased to withdrawn the same on the ground of disability, thereafter the Appellant was transferred back to the DHO North Waziristan.

6. That the Appellant resumed the charge on the subject post, however after few months of his transfer order was again issued vide order No 4631-33/DHS/ADMN dated 24-02-2020, vide which the services of the Appellant was transferred to the Directorate Merged Area Peshawar, which was challenged before the August Peshawar High Court Bannu Bench in Writ Petition 271/2020 in which the transfer order was suspended by Peshawar High Court Bannu Bench on dated 26-02-2020.
7. That during the pendency of the Writ Petition and in spite of the interim relief granted by the Peshawar High Court Bannu Bench, the Competent Authority had issued another order in respect of the Appellant on the bases of misconceptions which was provided by the involved influential persons on dated 13-03-2020 by the Directorate Of Health Services, in response of the said order the Appellant submitted interim relief before the Competent Authority along with an application, after perusal of the same, the Director Health Services withdrawn the same order vide office order No 6942-67/DHS/MAS/LIT on dated 18-03-2020.
8. That during the pendency of that Writ Petition the competent authority issued another office order, on dated 25/08/2020 on the basis of which the impugned transfer order was withdrawn for the best public interest.
9. That it is pertinent to mention here that as per the above mentioned facts and circumstances the Appellant was time and again transferred to different places for a short span of period and politically victimized and now once again on the influence of political figures transfer order has been issued vide office order No 2276-79/personal on dated 07-04-2021 and the service of the Appellant has once again transferred at disposal of DHO Chitral Lower, in spite of the fact the Appellant is initially appointed on the District Cadre Post and if supposed his transfer is necessary than the Competent Authority must have to keep in view the fact of his position and to transfer his services inside the District rather than to transfer to the remote district.
10. That the posting transfer policy is very much clear, similarly the wife of the Appellant is serving in the Educational Department at District North Waziristan which cannot be leave on the mercy of some other as my children is going to school and the appellant is solely guardian of family. on this


score alone under the Spouse Policy the transfer order of the Appellant is illegal, unlawful, void ab-initio and liable to be declared so on this point alone the directions of the Superior Courts are very much clear and time and again the number of judgments are rendered by the Superior Courts that no competent authority shall violate the transfer posting policy as well as directions were made to the Departments to strictly follow the spouse policy of the incumbents in respect of transfer and posting.

- 11. That on the involvement of political figures the Appellant had time and again punished, while various transfer orders had been issued which had been cancelled time and again by the competent authority and now once again on the basis of political victimization the Appellant has been penalized while issued the instant transfer order.
- 12. That Applicant is rendering meritorious services having illustrious career, spreading over many years and have earned outstanding which is clear from appreciation certificate given by the competent authority to the U/s. Similarly Petitioners integrity has never been called into question by any Reporting/Assessing Officer.
- 13. That Superior Court judgment is very clear that it is the responsibility of Deptt to provide pleasant/congenial environment to every employee, which is free of fair from every danger, the using of political link is also in sheer violation of Govt rules, where the U/s is always victim of it.

Note: All the relevant and necessary documents are attached herewith.

It is therefore, humbly prayed that on acceptance of this departmental appeal the transfer order dated 07/04/2021 may kindly be canceled/withdrawn on the grounds of disability, premature, illegal transfer and against the spouse policy

Dated: - 08-04-2021


 Appellant 02/4/21
 Amjid Saleem
 Junior Clerk BPS-11
 DHO Office NWTD
 Contact # 03361890004

alone the directions of the Superior Courts are very much clear and time and again the number of judgments are rendered by the Superior Courts that no competent authority shall violate the transfer posting policy as well as directions were made to the Departments to strictly follow the spouse policy of the incumbents in respect of transfer and posting.

Xi That on the involvement of political figures the Appellant had time and again punished, while various transfer orders had been issued which had been cancelled time and again by the competent authority and now once again on the basis of political victimization the Appellant has been penalized while issued the instant transfer order.

Xii That Applicant is rendering meritorious services having illustrious career, spreading over many years and have earned outstanding which is clear from appreciation certificate given by the competent authority to the U/s. Similarly been called into question by any Petitioners integrity has never Reporting/Assessing Officer.

Xiii That Superior Court judgment is very clear that it is the responsibility of Deptt to provide pleasant/congenial environment to every employee, which is free of fair from every danger, the using of political link is also in sheer violation of Govt rules, where the U/s is always victim of it.

2. He has requested that on acceptance of this departmental appeal the transfer order dated 07/04/2021 may kindly be canceled/withdrawn on the grounds of disability, premature, illegal transfer and against the spouse policy.

3. It is, therefore, requested to cancel the impugned transfer order dated 07/04/2021 which enable the said official to dispense the services at the home station, please. *to*

4. *Para-3/N is submitted for approval, pls.*

Deputy Secretary (Drugs).

[Signature]
Section Officer-VI
27/04/2021

For Perusal & further orders please.

05

Adl. Secy (Dr/B)

[Signature]
27/04/2021



DIRECTORATE GENERAL HEALTH SERVICES KHYBER PAKHTUN KHWA PESHAWAR

33

E-Mail Address: nwfpdghs@yahoo.com Office Ph# 091-9210269 Exchange# 091-9210187, 9210196 Fax # 091-9210230

No. 3748 /Personnel Dated 16/6/2021

To,

Mr. Amjad Saleem
Junior Clerk.
House No. 62, Street No. 3 K-2
Phase 3 Hayatabad Peshawar.
0316185556

Subject: **DEPARTMENTAL APPEAL.**

Memo:

Reference to your appeal dated 08.04.2021 on the subject noted above and to state that your appeal has been considered by the competent authority but it is regretted be acceded too.

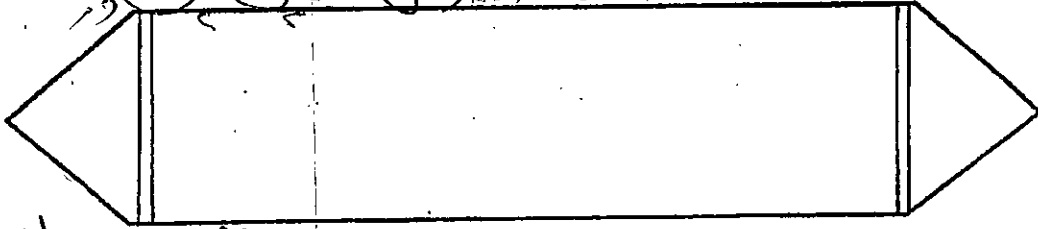
You are hereby directed to immediately report to your new place of posting.

u Saleem

ADDITIONAL DG (ADMN)
DIRECTORATE GENERAL HEALTH
SERVICES, K.P.K PESHAWAR.

15/06
16/06/2021

بعد الت سروس ڈیویژن کی پریزنٹ



2024ء پنجاب ایپل ٹرسٹ

احمد سلیم بنام حکومت

موزخہ	-----
مقدمہ	-----
دعویٰ	سروس ایپل
جرم	-----

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ آن مقام کے لیے پیش کیا گیا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور صولی چیک دروپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا ایپل کی برآمدگی اور منسوخی نیز دائر کرنے ایپل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو کسی وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ دہر جائد التوائے مقدمہ کے سبب سے وہ ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھد یا کہ سند ہے۔

المرقوم 17 _____ ماہ جون 2024

بمقام یہاں کے لئے منظور ہے۔ Accepted by _____

**BEFORE THE LEARNED SUBORDINATE
JUDICIARY SERVICE TRIBUNAL KPK,
PESHAWAR**

Appeal No. 6610/2021

Amjad SaleemAppellant

VERSUS

Govt of KPKRespondents

APPLICATION FOR ADJOURNMENT

Respectfully Sheweth:

1. That the above titled Appeals are pending adjudication before this Hon'ble Court and is fixed for 07.07.2021

2. That the counsel for Appellant is ill and suffering from severe fever and throat infection, hence would not be able to appear and assist this Hon'ble Court on the date fixed.

It is, therefore, respectfully prayed that on acceptance of this application, the titled Appeals may kindly be adjourned, convenient to this Hon'ble Court.

Applicant

Through

Dated 07.07.2021

BASHIR KHAN WAZIR
Advocate High Court
Peshawar

Through

Clerk Hassan Ahmed