





Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- _____ 61/2022 _____

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	18/01/2022	<p>The appeal of Mr. Said Khan presented today by Mr. Hasnain Abbas Muhammadzai Advocate, may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-	4-3-2022	<p>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put up there on <u>04/03/22</u>.</p> <p style="text-align: right;"> CHAIRMAN</p> <p>Due to retirement of the Honble Chairman the case is adjourned to come up for the same as before on 6-6-22</p> <p style="text-align: right;"> Reader</p>
	06.06.2022	<p>Junior to counsel for the appellant present.</p> <p>Lawyers are on general strike, therefore, case is adjourned to 27.07.2022 for preliminary hearing before S.B.</p> <p style="text-align: right;"> (Rozina Rehman) Member (J)</p>

41

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Handwritten text, possibly a date or reference number.

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KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
CHECK LIST

Case Title: Said Khan vs Govt. of KP

S#	CONTENTS	YES	NO
1	This Appeal has been presented by:		
2	Whether Counsel/Appellant/Respondent/Deponent have signed the requisite documents?	✓	
3	Whether appeal is within time?	✓	
4	Whether the enactment under which the appeal is filed mentioned?	✓	
5	Whether the enactment under which the appeal is filed is correct?	✓	
6	Whether affidavit is appended?	✓	
7	Whether affidavit is duly attested by competent Oath Commissioner?	✓	
8	Whether appeal/annexures are properly paged?	✓	
9	Whether certificate regarding filing any earlier appeal on the subject, furnished?		✓
10	Whether annexures are legible?	✓	
11	Whether annexures are attested?	✓	
12	Whether copies of annexures are readable/clear?	✓	
13	Whether copy of appeal is delivered to AG/DAG?	✓	
14	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	✓	
15	Whether numbers of referred cases given are correct?	✓	
16	Whether appeal contains cutting/overwriting?		✓
17	Whether list of books has been provided at the end of the appeal?		✓
18	Whether case relate to this court?	✓	
19	Whether requisite number of spare copies attached?	✓	
20	Whether complete spare copy is filed in separate file cover?	✓	
21	Whether addresses of parties given are complete?	✓	
22	Whether index filed?	✓	
23	Whether index is correct?	✓	
24	Whether Security and Process Fee deposited? On		✓
25	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? On		
26	Whether copies of comments/reply/rejoinder submitted? On		
27	Whether copies of comments/reply/rejoinder provided to opposite party? On		

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name: HASNAIN ABBAS

Signature: [Signature]

Dated: 18-01-2022

BEFORE KPK SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No: 61 / 2022

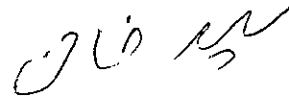
SAID KHAN

Versus

Government of KPK etc.

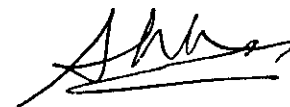
I N D E X

Description of Documents		Pg No:
<i>Memo of Service Appeal</i>		1-3
<i>Affidavit</i>		4
<i>Addresses Sheet</i>		5
<i>Annexure-A</i>	Order dated 08.07.2003 along with Seniority List.	6-7
<i>Annexure-B</i>	Last Pay Certificate etc.	8-12
<i>Annexure-C</i>	Departmental Appeal / Representation & Appellate Order dated 18.11.2021.	13-15
Wakalatnama		Nil



Appellant,

Through:



HASNAIN ABBAS MUHAMMADZAI

(Advocate, Peshawar)

213, Sunehri Masjid Road, Near
HBL Nothia Branch, Peshawar
Cantt.

BEFORE KPK SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No: _____ / 2020

SAID KHAN, (599),
Ex-Vehicle Mechanic / Head Constable,
Telecommunication Section,
Police Department, Peshawar.

..... Appellant

VERSUS

1. GOVERNMENT OF KHYBER PAKHTUNKHWA,
Through Secretary Home,
Home Department, Peshawar.
2. PROVINCIAL POLICE OFFICER / INSPECTOR GENERAL OF
POLICE,
Central Police Office, Peshawar.
3. ASSISTANT INSPECTOR GENERAL OF POLICE,
Telecommunication Khyber Pakhtunkhwa, Peshawar.

..... Respondents

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNALS ACT, 1974, AGAINST APPELLATE ORDER NO. 4304/21 DATED 18.11.2021 COMMUNICATED / HANDED OVER TO THE APPELLANT ON 22.12.2021 WHEREBY THE APPEAL OF THE APPELLANT WAS REGRETTEED BEING BADLY TIME BARRED.

Prayer: On acceptance of this Service Appeal the Impugned Order dated 18.11.2021 be set aside and Appellant's Increment withheld vide Order dated 08.07.2003 may

please be restored with all back benefits and pensionary benefits with such other relief as may deem fit in the circumstances of the case may also be granted.

Respectfully Sheweth,

Short facts, giving rise to present Service Appeal, are as under:

- 1) That, Appellant, was performing duties as Constable and vide Order dated 08.07.2003 he was awarded with a minor punishment whereby his one increment was withheld with a cumulative effect, copy of the Impugned Order dated 08.07.2003 is attached as Annexure A.
- 2) That, on the request of the Appellant, he was retired from service on 29.02.2004, copies of the Last Pay Certificate etc are attached as Annexure B.
- 3) That, despite the fact that the proceedings against the Appellant were not in accordance with law, the withheld increment of the Appellant was never restored.
- 4) That, as per law applicable, Appellant filed / submitted his Departmental Appeal / Representation against the Order dated 08.07.2003, which was decided by the Competent Authority on 18.11.2021, copy of the Departmental Appeal / Representation & Appellate Order dated 18.11.2021 is attached as Annexure C, hence this Appeal on the following amongst other grounds:

GROUNDS

1. That, not restoring the withheld increment vide Order dated 08.07.2003 is illegal, unlawful, void and ineffective.
2. That, same is against the principles of Natural Justice, also.

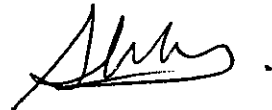
3. That, it is now an undisputed fact that the proceedings initiated against the Appellant were not in accordance with law and the provisions of Repealed Khyber Pakhtunkhwa Removal from Service (Special Powers) Ordinance 2000 were not made applicable.
4. That, the Respondents have stopped / withheld the increment vide Order dated 08.07.2003 which was never restored hence the action of the Department was against the Fundamental Rule-29.
5. That, it is well settled principle of law that cases pertaining / involving the questions relating to pay / perks etc are continuous and recurring cause of action hence the same could not be termed as time barred, in any manner.
6. That, the actions and inactions of the Department are not in accordance with law and rules hence liable to be set at naught.
7. That, the punishment as imposed upon the Appellant is not in accordance with law hence it does not run prospectively.

It is, therefore, requested that Appeal, be accepted as prayed for.



Appellant

Through:



HASNAIN ABBAS MUHAMMADZAI

(Advocate, Peshawar)

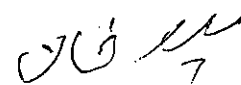
BEFORE KPK SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No: _____ / 2022

SAID KHAN Versus Government of KPK etc.

AFFIDAVIT

I, SAID KHAN, (599), Ex-Vehicle Mechanic / Head Constable, Telecommunication Section, Police Department, Peshawar, Appellant, do hereby on oath affirm and declare that the contents of the Service Appeal are true and correct to the best of my knowledge and belief and nothing has been kept secret from this Honourable Tribunal.

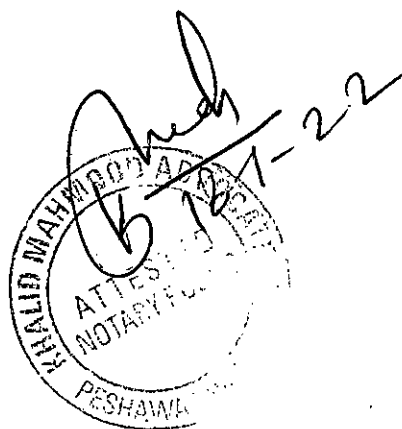


Deponent

Identified by:



HASNAIN ABBAS MUHAMMADZAI
(Advocate, Peshawar)



BEFORE KPK SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No: _____ / 2022

SAID KHAN Versus Government of KPK etc.

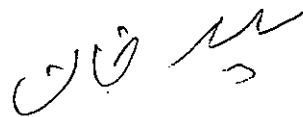
ADDRESSES OF PARTIES.

APPELLANT:

SAID KHAN, (599), Ex-Vehicle Mechanic / Head Constable,
Telecommunication Section, Police Department, Peshawar.

RESPONDENTS

1. Government of Khyber Pakhtunkhwa, Through Secretary Home, Home Department, Peshawar.
2. Provincial Police Officer / Inspector General of Police, Central Police Office, Peshawar.
3. Assistant Inspector General of Police, Telecommunication Khyber Pakhtunkhwa, Peshawar.



Appellant,

Through,



HASNAIN ABBAS MUHAMMADZAI

(Advocate, Peshawar)

(2) (6) A

Telecommunications Order.

Head Constable Said Khan NO:599 of this unit posted at HT Section H.Qrs. Peshawar had lodged 2nd complaints against ASI Tariq in the Telecomms. Department about the stealing of spare parts from the vehicles has been received from DIGP/Enquiry & Inspection Peshawar.

2. In this connection it is pointed out that the Head Constable Said Khan has already lodged a complaint against ASI Tariq of Telecomms. on which IGP, NWFP, Peshawar has directed the DIGP/Investigation to conduct proper enquiry. The enquiry carried out by the Crime Branch Peshawar. During the enquiry the complainant could not produce any solid proof to the enquiry Officer, but instead he himself was found guilty. As order by the Police Chief the departmental action against complainant should be taken and allegation charged against the Head Constable Said Khan NO:599 has been issued. On another complaint IGP, NWFP, has directed the DIGP Enquiry/Ins. Officer Team to find out the fact and verify the relevant records. The Inspector Musa Ali has appointed to conduct the enquiry against the Head Constable Said Khan. The Enquiry Officer in his finding he has recommended for transfer to out District and also recommended for awarding major punishment.

3. In this connection the AIGP/Telecomms: NWFP, has called of the complainant Head Constable No.599 and ASI Tariq to his office for personal hearing on 8.7.2003. After hearing the AIGP/Telecomms: NWFP, has directed to take a lenient step and stop one increment with a cumulative effect from Head Constable Said Khan NO:599 and he may also be transfer to Kohistan Distt: as much he draw his monthly salary from Telecomms. H.Qrs. through GI/C Control Kohistan and he will not allow to visit Peshawar for the receipt of salary.

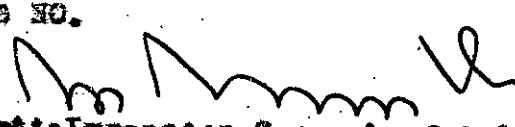
Announced on 8.7.2003.

Asstt: Inspector General of Police,
Telecommunications, NWFP, Peshawar.

NO. 6711-15 / TELC/OSI, Dated Peshawar, the 15/7 /2003.

Copies forwarded for information & necessary action to the:-

- 1) Accountant General NWFP, Peshawar. (2) SP/M. T. NWFP, Pesh.
- 3) Accountant Tele Peshawar.
- 4) SAC / TRM . (5) OSI / CB NO.


Asstt: Inspector General of Police,
Telecommunications, NWFP, Peshawar.

7 SENIORITY LIST OF J.M STAFF MT SECTION N.W.F.P PESHAWAR.

Rank/Names.	Date of Birth	Date of Appoint:	Date of Obserp:	Date of Trade Conver:	Date of Conf:as Coust:	DATE OF PROMOTION LIST			Date of Promoti: as Offg: HO	Date of Prom: as Offg: HO	Date of Promoti: to List	Date of Prom: as Offg: AS	Date of Prom: as Offg: ASI	Date of Prom: to List 'E'	Date of Prom: as Offg: SI	Date of Conf: as S.I	REMAR- KS,
						A	B	C									
SI Maiz Ullah	10.6.52	22.2.72	1.1.76	-	1.6.80	29.5.78	30.5.78	31.5.78	13.2.76	13.2.79	5.7.89	15.3.79	1.1.88	6.7.89	16.9.91	-	
ASI Farid Ullah	20.9.52	12.11.73	-	-	12.11.76	29.5.78	30.5.78	31.5.78	13.2.76	13.2.79	-	15.8.89	-	-	-	-	
ASI Nisar Abbas	5.4.52	5.4.77	-	-	5.4.80	29.5.78	30.5.78	31.5.78	1.4.79	1.4.82	-	2.12.91	-	-	-	-	
HC/549 Mohammad Tariq	8.4.56	8.4.76	-	-	8.4.79	29.5.78	30.5.78	31.5.78	1.10.81	1.9.90	-	-	-	-	-	-	
C/599 Saib Khan	21.12.57	26.12.78	-	-	26.12.81	15.2.92	18.6.92	3.8.92	-	-	-	-	-	-	-	-	
C/631 Pervez Khan	30.11.62	1.12.80	-	9.6.83	1.12.83	15.2.92	18.6.92	3.8.92	-	-	-	-	-	-	-	-	
C/844 JehanZeb	6.8.61	6.8.83	-	11.7.84	-	15.2.92	18.6.92	3.8.92	-	-	-	-	-	-	-	-	
C/886 Farhad Khan	4.6.62	4.6.80	-	6.5.86	-	15.2.92	18.6.92	3.8.92	-	-	-	-	-	-	-	-	
C/433 Murad Gul	30.6.53	12.11.71	1.9.84	1.10.88	16.2.79	15.2.92	18.6.92	3.8.92	-	-	-	-	-	-	-	-	
C/644 Nisar Ahmed	1.1.61	1.8.81	-	-	1.8.84	15.2.92	18.6.92	3.8.92	-	-	-	-	-	-	-	-	

Asstt: Inspector General of Police, 2
Tele communications, NWFP, Peshawar.

(B)
(8)

LAST PAY CERTIFICATE

1. Last Pay Certificate of EX HE 599 SAID KHAN
of the OFFICE OF THE A.C. POLICE ISLS CAMPUS NWFP
proceeding to RETIRED FROM SERVICE (A.P. N.W.F.P.)

2. He has been paid upto AND FOR 29-2-09

as the following rates:—

Particulars:

Substantive Pay:—

Officiating Pay:—

Exchange Compensation Allowance:—

Pay	6116- ¹ ✓
Hd	493- ¹
CA	170- ¹
MSD	210- ¹
RATION	681- ¹
WASHING	30- ¹
SPAA	370- ¹
CRA	300- ¹
SP2 RELIEF	621

Deductions:—

~~MEMBER OF C.A.F @ Rs 25/PA UNDER ACINO WOL 31397~~
~~MEMBER OF C.A AND B BOND IN USUAL RATES~~

3. He made over charge of the Office of HTS DUTY
on the 1/2 noon of 29-2-09

4. Recoveries are to be made from the pay of the Government servant as detailed on the reverse.

5. He has been paid leave salary as detailed below. Deductions have been made as noted on the reverse.

From _____ to _____ at Rs. _____ a month

From _____ to _____ at Rs. _____ a month

From _____ to _____ at Rs. _____ a month

6. He is entitled to draw the following 3-2004

CPA STOPPED BY COMPUTER FOR THE M/O 3/04

7. He is also entitled to joining time for _____ days.

8. The details to the Income Tax recovered from him upto the date from the beginning of the current year are noted on the reverse.

[Handwritten signature]
27/4/04

[Handwritten signature]
Asstt. Inspector General
Signature: Police Telecommunication
Designation: A. W. F. P. Peshawar

Dated at 10/3/09 19

8
Asstt Inspector General of Police,
Telecommunication N.W.P., Peshawar.

[Handwritten signature]

- offices.
- Asstt Inspector General of Police, Peshawar to all out standing desks to complete Govt in concerned from his duty on the target date and directed to report at H/Gen to:
12. Suptd of Police Kohistan NO concerned may please be relieved
 11. OR NO. 44 Peshawar
 10. OSI Peshawar.
 9. SHO Peshawar.
 8. CASI Peshawar.
 7. SA TO AIG Peshawar.
 6. Inspector B/Gen Peshawar.
 5. Suptd of Police Peshawar.
 4. Deputy Suptd of Police Peshawar.
 3. Suptd of Police Kohistan
 2. Accountant Peshawar.
 1. Accountant General N.W.P., Peshawar.

to them:-
Copies forwarded for information and necessary action

No. 283-74 / Peshawar
Copies forwarded for information and necessary action

Asstt Inspector General of Police,
Telecommunication N.W.P., Peshawar.

He may be informed accordingly.

Head Constable No. 599 said when of this unit police telecommunication posted at Deccan Kohistan District Police line Dast (Kohistan) as a unit is retired from service with effect from 29.2.04 A/N at his own request.

Telecommunication Order

[Handwritten signature]
(6)

REGISTERED OR PENSION PAYMENT ORDER ON PESHAWAR TREASURY.

S.N.O. NO. OF P.P.O.	NAME OF PENSIONER	MONTHLY PAID UP TO	AND FOR	PENSION REMARKS.
8 17086	Cand. / 1666/	30-4-1966	15-2-1966	

PENSION IS DEBITABLE TO GENERAL/N.W.F.P. GOVERNMENT

No. 120-6/T/Pension Dated Peshawar the 21-5-66

Copy of the above along with Disburser's Portion of the above Pension Payment Order is sent to the Manager, National Bank of Pakistan P.O. Branch for further necessary action.

Accountant General, N.W.F.P. Peshawar.

TREASURY OFFICER

[Handwritten signature]

PENSION ROLL DATA SHEET & PENSION SLIP

(11)

Date of issue : 01.11.2021
 PPO type: FRESH
 PPO Number: 00852246-01
 Pensioner ID: 00852246
 Pension Register No: S-80\03-04
 Pensioner's Name: SAID KHAN
 Father / Husband name: TAJ AKBAR
 Designation: CONSTABLE
 NIC No.: 1730103321277
 Grade / Scale: 07
 Department.Min: Min. Of Health
 Pensioner's Type: SELF
 Pension Type: SUPERANNUATION
 Date of Birth: 21.12.1957
 Date of appointment: 26.12.1978
 Date of retirement: 01.03.2004
 Date of Death:
 Date of commence: 01.08.2017
 Date of Restoration:
 Accounts office ID: PW
 Accounts office Name: AG KP Peshawar
 Federal / Province: Khyber Pakhtunkhwa
 Length of Qualifying Service: 25 years, 2 months, 4 days
 Old PPO Number:
 No. and Date of sanction of pension / Letter No. :
 and the date of the other Audit and Accounts officer authorising
 the Pension/Gratuity/Commutation
 Permanent Address:

Note
 Age: 47 years
 Last Drawn pay/Emoluments(Rs.): 4140.00
 Gross Pension(Rs.): 2415.00
 1/4th Surrendered Portion (Rs.):
 Commuted Portion (Rs.): 966.00
 Net Pension (Rs.): 1449.00
 Net Family Pension (Rs.): 0.00
 Amount of Commutation(Rs.): 0.00
 With Held Amount (Rs.): 0.00
 Life Time Arrears (Rs.): 0.00
 Arrears Of Pension (Rs.): 0.00
 Special Additional Pension (Rs.): 0.00
 Commutation Percentage: 40.00
 Commutation Table value: 20.36
 Recovery on A/C of
 Debitable to Govt: Khyber Pakht
 Total Net Share
 Federal: 0.00 Punjab: 0.00
 Sindh: 0.00 NWFP: 0.00
 Balochistan: 0.00 Military: 0.00
 AJK: 0.00 Autonomous: 0.00

He/She is also entitled to the following increases

Sr. No.	Period	Increase % or amount	Increase Amount	W.E.F.
1	JUL.2015	Rs. 6529.00	6529.00	01.08.2017
2	JUL.2016	10.00 %	797.80	01.08.2017
3	JUL.2017	10.00 %	877.58	01.08.2017
4	JUL.2018	10.00 %	965.34	01.07.2018
5	JUL.2019	10.00 %	1061.87	01.07.2019
6	JUL.2021	10.00 %	1168.06	01.07.2021
7	0.	Rs. 0.00	0.00	
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27				

PENSION SLIP

Month: October
 Year: 2021

Pension roll details

Wage Type	Wage Type Text
/559	Payment
0100	Monthly Pension - Self
0101	Pension Increases - Self
1599	Medical Allow - Pensioner
1600	Med. All. 2015 Pensioner

Bank Details

Bank Account Number: 0102753805
 Bank Branch: Kohat Road Branch
 Kohat Road Branch
 Payment Mode: PAYMENT THROUGH E

12

OFFICE OF THE ACCOUNTANT GENERAL NWFP, PESHAWAR.

No. Pension (Main) / 580/2013-11/431

Dated. 16.01.2003 24.4.24

To

The Officer Incharge,
Pay Roll *6 am* Section.

Subject: VERIFICATION AND PAY FIXATION OF 01.12.2001 IN RESPECT
OF MR. Said Khan EX: 14593
P.NO 32138 RETIRED ON 28-2-07

27
28/1/03

Memo:

The services Book and L.P.C in respect of the above named Ex: Official is sent here with for fixation of pay and pay stopage certificate may please be recorded on L.P.C under proper attestations.

Jawadullah
ACCOUNTS OFFICER
N.W.F.P, PESHAWAR.

عنوان: درخواست بمراد بحالی (Increment) انکریمنٹ ازان سابقہ ہیڈ کنسٹیبل سعید خان ٹیلی کمیونیکیشن پشاور۔
جناب عالی

- ۱- یہ کہ من سائل محکمہ پولیس میں MT 26.12.1978 ورکشاپ میں بطور (VM) وہیکل مکینک بھرتی ہوا تھا۔
- ۲- یہ کہ دوران سروس سائل نے نہایت ایمانداری کے ساتھ ڈیوٹی کی اور افسران بالا صاحبان کو کسی قسم کی شکایت کا موقع نہیں دیا۔
- ۳- یہ کہ من سائل ایک چھوٹے درخواست کی بناء پر 15.07.2003 کو سزا (stoppage of increment) دی گئی جو کہ سراسر انصاف کے تقاضوں کے منافی تھی۔
- ۴- یہ کہ من سائل کی کوئی تعلیم نہیں ہے یہی وجہ ہے کہ سائل کے درخواست پر جو کہ بغرض بحالی انکریمنٹ کے لیے دی تھی کوئی کارروائی کی اطلاع نہیں دی تھی۔
- ۵- یہ کہ من سائل اس دوران 29.02.2004 کو محکمہ ہذا سے ریٹائرمنٹ پر چلا گیا ہے اور اب سائل کی ماہانہ پنشن بہت کم آرہی ہے۔
- ۶- لہذا سائل بذریعہ درخواست استدعا کرتا ہے کہ چونکہ سائل کے چھوٹے بچے ہیں اور دوسرا کوئی ذریعہ معاش نہیں ہے استدعا ہے کہ سائل کو جو سزا بشکل stoppage of increment دی تھی اس کی بحالی اور ساتھ تمام back benefit کے حکامات صادر فرما کر مشکور فرمائیں۔
تمام کاغذات ہمراہ لف ہے۔

سعید خان
سعید خان سابقہ ہیڈ کنسٹیبل نمبر 599 ٹیلی کمیونیکیشن
موبائل نمبر: 0313-1901226

Inspector General of Police

OT
DI
De



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

14

No. S/ 4364 /21, dated Peshawar the 18/11 /2021.

To: The Deputy Inspector General of Police,
Telecommunication, Khyber Pakhtunkhwa,
Peshawar.

Subject: APPEAL.

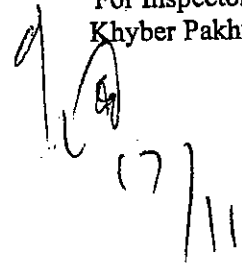
Memo:

The Competent Authority has examined and filed the revision petition submitted by Retired Head Constable Saeed Khan No. 599 of Telecommunication against the punishment of stoppage of one increment with a cumulative effect by Assistant Inspector General of Police, Telecommunication, Khyber Pakhtunkhwa, Peshawar vide order Endst: No. 6711-15/Tele/OSI, dated 15.07.2003. being badly time barred.

The applicant may please be informed accordingly.


(NOOR AFGHAN)
Registrar,

For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.


17/11

Hc/593 Gaud Khan

(15)

P. Increment @ Rs. 120/Per

Pay @ Rs. 4140/Per

W.E.F. 1.11.2002

For AIG/Tele NWFP

80

Service from 1-2-2002 to 31-12-2002
has been included from end pay bill
and has been sent in air after
40000

msdali
410 8000

Punishment

10

one increment is here by staffed
with cumulative effect

AIS NO 6711-15

0.15.7.2003

ANNOUNCED ON 8.7.2003

msdali
& AISTELE NWFP

Service verified from 1-3-2003

UP to 31-12-2003.

msdali
AIG TELE NWFP

Service verified from 1-1-2004

to 29-2-2004

R.P.O. NO. ISSUED &
SERVICE BOOK CANCELLED

msdali
AIG TELE NWFP

Retired from service with 29-2-2004

at his own request

Pay verified vide OB no 44/2004

@ Rs 4140/Per on 1.12.2003
for the purpose of Pension

msdali
AIG TELE NWFP

Accountant
Frontier District

ISSUED & CANCELLED
ON 0.0.0

ISSUED & CANCELLED
ON 0.0.0

General Inspector
Police Tele Communication
M. W. F. P. Peshawar.

[Handwritten signature]

51K - 11 - 15
Copies of Stamps by wife
of 26-12-1978 up to 29-2-2004
has been received from the
Records of this office found
correct and kept in this office.

CERTIFICATE

(16)

وکالت نامہ

حسین عباس محمد زئی ایڈووکیٹ
باز کونسل / ایسوسی ایشن نمبر BC15-6120
رابطہ نمبر 0346-535917

BEFORE KP Service Tribunal, Peshawar بعدالت

Govt. of KP etc **بٹا** Said Khan

دعویٰ یا جرم منجانب

تھانہ ایف آئی آر، عدلت نمبر مورخہ

باعث تحریر آنکہ مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے بیروی و جواب دہی وکل کاروائی متعلقہ آن بمقام **بٹا** کیلئے حسین عباس محمد زئی ایڈووکیٹ ہائی کورٹ پشاور مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحبان کو راضی نامہ کرنے و تقرر ثالث و فیصلہ برخلاف دیئے جواب دہی اقبال دعویٰ اور بصورت ڈگری کرنے اجراء در وصولی چیک در و پیہ عرضی دعویٰ اور درخواست ہر قسم کی تصدیق زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم بیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و بیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختیار قانونی کو اپنے ہمراہ یا اپنے بجا بقیتر کا اختیار ہوگا۔ اور صاحبان مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس ساختہ پرواختہ منظور و قبول ہوگا۔ دوران مقدمہ میں جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحبان پابند ہونگے۔ کہ بیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سندر ہے۔

المرقوم 18 ماہ جنوری 2022ء

بمقام **بٹا** کے لئے منظور ہے۔
 حسین عباس محمد زئی ایڈووکیٹ
 Accepted & Attested

سید فاضل