

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- _____ 1212/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	04/08/2022	<p>The appeal of Mr. Anwar UI Haq presented today by Mr. Asghar Ali Khn Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____.</p> <p style="text-align: right;">By the order of Chairman</p> <p style="text-align: right;">REGISTRAR</p>

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Case Title: گورنمنٹ ریسٹورنٹ CHECK LIST انور الحق

S#	CONTENTS	YES	NO
1	This Appeal has been presented by: <u>رسول علی خان</u>	/	
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: Asghar Adh Ullah
 Signature: Asghar Adh
 Dated: 04/08/2022

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO 1212 /2022

ANWAR UL HAQ..... (Appellant)


VERSUS

Govt of KPK through Chief Secretary Peshawar & others..... (Respondents)

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2.	Copy of the notification No.SOG(AD)/17-131/surplus pool/WM/2017-18 dated:08/03/2022	"A"	7-8
3.	Notification NO.SOE (AD)/17-131/surplus pool/WM/2017-18 dated: 29/03/2022.	"B"	9
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Dated: 04/08/2022


Appellant
ANWAR UL HAQ
Through counsel

**ASGHAR ALI KHAN DAIM KHEL ASC
BANNU.**

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO 1212 /2022

ANWAR UL HAQ S/O HAMEED ULLAH SHAH R/O SHAH BAZ AZMAT KHEL

TEHSIL AND DISTRICT BANNU..... (Appellant)

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 924

Dated 04-08-2022

VERSUS

- 1) Govt of KPK through Chief Secretary Peshawar.
- 2) Secretary agriculture KPK Peshawar.
- 3) Director General On-Form Water Management KPK Peshawar.
- 4) Accountant General KPK Peshawar.
- 5) District Director On-Form Water Management Bannu.
- 6) District Director On-Form Water Management Kohat.
- 7) Budget officer VIII Govt of KPK Finance Department Peshawar
- 8) Mr. Rizwan Ullah S/O Sher Bali khan R/O Sokarri Karim khan Bannu,
at present On-Form Water Management Bannu. (Respondents)

APPEAL:

APPEAL U/S 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT NO. 1 OF 1974. THROUGH WHICH NOTIFICATION NO. SOG (AD)/17/131/ SURPLUS POOL/WM/2017-18 DATED 08/03/2022, THE APPELLANT WAS, AT S.NO.10,ADJUSTED/POSTED WITH RESPONDENT NO.5,BUT LATER ON THROUGH THE IMPUGNED NOTIFICATION NO.SOE(AD) 17-131/ SURPLUS POOL/WM/2017-18 DATED 29/03/2022, HIS PLACE OF DUTY CHANGED TO ON-FARM WATER-MANAGEMENT AGAINST VACANT POST AT THE OFFICIAL S.NO.10 KOHAT AND AGAINST NO ACTION TAKE ON THE DEPARTMENT APPEAL OF THE APPELLANT WITH IN THE STATUTORY PERIOD OF NINETY DAYS.

PRAYER:

ON ACCEPTANCE OF THE INSTANT APPEAL THE IMPUGNED ORDER / NOTIFICATION NO.SOE (AD) 17-131 / SURPLUS POOL/WM/2017-18 DATED 29/03/2022 MAY VERY KINDLY BE SET ASIDE AND THE APPELLANT MAY BE PLEASED RETRANSFERRED TO THE OFFICE OF THE RESPONDENT NO.5 AND MAY BE PLEASED ALLOWED THE APPELLANT TO COMPLETE HIS TENURE IN OFFICE ON-FARM WATER MANAGEMENT AT BANNU AND ANY REMEDY DEEM FIT MAY ALSO BE GRANTED.

Respectfully Sheweth:

(2)

1) That the appellant was serving in On-Farm Water Management Office in the light of Notification No.SOG(AD)/17-131/ Surplus pool/WM/2017-18 dated 08-03-2022 till 28-03-2022 as a Rodman working in surplus pool o/o the Secretary Agriculture Department at place of posting, than working as Rodman o/o District Office OFWM Bannu. Against the newly created vacant post/current side post. Copy of notification mentioned above is enclosed annexure "A"

2) That the then respondent No.8 with the complicity of the respondent No.5 and others respondents the new impugned notification No.SOE(AD)/17-131/ Surplus pool/WM/2017-18 dated 29/3/2022, that is, after 20 days, issued and to the extent of appellant partially modified the departmental notification of the even No, dated 08/03/2022 and changed his place of duty as Rodman o/o to District officer On-Farm water management kohat, while Mr.Rizwan Ullah (Respondent No.8) was transferred from OFWM kakki and adjusted/posted at Bannu OFWM office in his place.

3) That the appellant submitted departmental appeal against the impugned transferred order dated 29/03/2022 but no action taken on the departmental appeal of the appellant with in the statutory period of ninety days.

4) That now appellant has no option but two indulge this honorable tribunal into the matter, inter alia, the following grounds:-

AGHA AD

GROUNDS:

1) That from the situation it indicates that the respondents had taken the law in their own hand and transgressed the powers, essentially in the matter.

2) That the law does nothing in vain and commands nothing in vain.

3) That respondents having no unfetter power to exercise Unlimited powers but will be do as per law. And the legislatures determined the boundaries of powers to exercise it within the ambit of law.

4) It is notice able that the appellant was transferred on administrative grounds. Which shows mala fide on the part of respondent and on this scored alone the impugned transferred order is liable to be set aside.

5) That the respondents also violated the transferred/policy notified by the provincial government KP read with the letter of the establishment department dated 27/02/2013 pertaining to posting/transfer the relevant para-2 of the said letter is reproduced as under for ready reference;

"Tenure, posting and transferred; when the ordinary tenure for a posting has been specified in the law or rules made there under, -such tenure must be respected and cannot be varied, except for compelling reasons, which should be recorded in writing and are judicial reviewable."

3

Moreover, transfer/Posting on administrative ground is not permissible under the law.

6) That the appellant was discriminated without any kind of complaint by written or verbally and he was penalized in shape of transfer. Further the impugned notification relating to the transfer of the appellant dated 29/03/2022 is pre mature and based on mala fide.

7) That additional grounds would be raised at the time of final submission.

It is, therefore, humbly prayed that instant appeal of the appellant may kindly be accepted and the impugned transfer order/notification No.SOE (AD) 17-131/ Surplus Pool/WM/2017-18 Dated 29/03/2022 may kindly be satisfied and appellant may be pleased retransferred to the office of the respondent No.5 and may further kindly be allowed the appellant to complete his tenure in office On-Farm Water Management Bannu.

Dated: 04/08/2022

Asghar Ali

الذاري
Appellant

ANWAR UL HAQ
Through counsel

ASGHAR ALI KHAN DAIM KHEL ASC
BANNU.

4

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO _____/2022

ANWAR UL HAQ..... (Appellant)

VERSUS

Govt of KPK through Chief Secretary Peshawar & others..... (Respondents)

AFFIDAVIT.

I Mr. ANWAR UL HAQ S/O HAMEED ULLAH SHAH R/O SHAH BAZ AZMAT KHEL TEHSIL AND DISTRICT BANNU (Appellant), do hereby solemnly affirms and declare on Oath, that the whole contents of the instant Service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable S. Tribunal Nor any part of it is false.

DEPONENT *انوار الحق*

Dated: 04/08/2022

Cell No# 0335-9363293

CNIC#11101-6438769-5

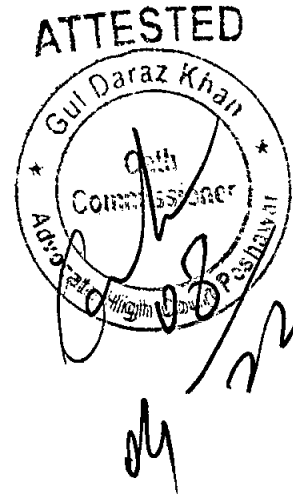
Asghar Ad

IDENTIFICATION

The Deponent Identified By

MR. ASGHAR ALI KHAN DAIM KHEL

ASC BANNU



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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO _____/2022

ANWAR UL HAQ..... (Appellant)

VERSUS

Govt of KPK through Chief Secretary Peshawar & others..... (Respondents)

CERTIFICATE

It is, certified, that no earlier such service appeal before this

Honorable service tribunal of KP Peshawar been Filled.

Dated: 04/08/2022

انوار الحق
Appellant

ANWAR UL HAQ

Through counsel

Asghar Ad

ASGHAR ALI KHAN DAIM KHEL ASC
BANNU.

6

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO _____/2022

ANWAR UL HAQ..... (Appellant)

VERSUS

Govt of KPK through Chief Secretary Peshawar & others..... (Respondents)

ADDRESS FORM

ANWAR UL HAQ S/O HAMEED ULLAH SHAH R/O SHAH BAZ AZMAT KHEL
TEHSIL AND DISTRICT BANNU..... (Appellant)

VERSUS

- 1) Govt of KPK through Chief Secretary Peshawar.
- 2) Secretary agriculture KPK Peshawar.
- 3) Director General On-Form Water Management KPK Peshawar.
- 4) Accountant General KPK Peshawar.
- 5) District Director On-Form Water Management Bannu.
- 6) District Director On-Form Water Management Kohat.
- 7) Budget officer VIII Govt of KPK Finance Department Peshawar
..... (Respondents)

Note: Addresses of the parties given above are sufficient to serve notices upon them.

Dated: 04/08/2022

انوار الحق

Appellant

ANWAR UL HAQ

Through counsel

Asghar Ali Khan

ASGHAR ALI KHAN DAIM KHEL ASC
BANNU.



(7)

**GOVERNMENT OF
KHYBER PAKHTUNKHWA
AGRICULTURE LIVESTOCK & COOPERATIVE
DEPARTMENT**

Dated Peshawar, the March 08, 2022

NOTIFICATION

ATTESTED

No. SOG(AD)/17-131/Surplus Pool/WM/2017-18: In continuation to this department notifications of even number dated 10-01-2013 and 03-07-2013 and in pursuance of the procedure for adjustment of Surplus Pool Employees, the Competent Authority is pleased to order the adjustment/posting of the following official (s) of On-Farm Water Management Department against regular/current side post with immediate effect in the interest of public service:-

S. No	Name of Official	Present place of posting	Place of posting against current side post.
1.	Asif	Rodman (Surplus Pool) o/o the Secretary Agriculture Department	Chowkidar o/o District Officer OFWM Swabi against the newly created vacant post.
2.	Haider Ali	Rodman (Surplus Pool) o/o the Secretary Agriculture Department	Naib Qasid o/o District Officer OFWM Malakand at Batkhela against the newly created vacant post.
3.	Iqtidar Ali	Rodman (Surplus Pool) o/o the Secretary Agriculture Department	Rodman o/o District Officer OFWM Malakand at Batkhela against the newly created vacant post.
4.	Bakht Jamal	Rodman (working in Surplus Pool) o/o the Secretary Agriculture Department	Rodman o/o District Officer OFWM Shangla against the newly created vacant post.
5.	Muhammad Irfan	Rodman (working in Surplus Pool) o/o the Secretary Agriculture Department	Naib Qasid o/o District Officer OFWM Shangla against the newly created vacant post.
6.	Sohail	Rodman (working in Surplus Pool) o/o the Secretary Agriculture Department	Rodman o/o District Officer OFWM Malakand against the vacant post.
7.	Raidullah	Rodman (working in Surplus Pool) o/o the Secretary Agriculture Department	Rodman o/o District Officer OFWM Swabi against the newly created vacant post.
8.	Tahir Ali	Rodman (working in Surplus Pool) o/o the Secretary Agriculture Department.	Naib Qasid o/o District Director OFWM Swabi against the newly created vacant post.
9.	Falak Sher	Naib Qasid (working in Surplus Pool) o/o the Secretary Agriculture Department.	Naib Qasid o/o District Officer OFWM Bannu against the newly created vacant post.
10.	Anwar-ur-Haq	Rodman (working in Surplus Pool) o/o the Secretary Agriculture Department.	Rodman o/o District Officer OFWM Bannu against the newly created vacant post.
11.	Ayub Rehman	Rodman (working in Surplus Pool) o/o the Secretary Agriculture Department.	Chowkidar o/o District Officer OFWM Bannu against the vacant post.
12.	Ghulam Siddique	Rodman (working in Surplus Pool) o/o the Secretary Agriculture Department.	Chowkidar o/o District Director OFWM Lakki marwat against the vacant post.
13.	Rizwanullah	Rodman (working in Surplus Pool) o/o the Secretary Agriculture Department.	Naib Qasid o/o District Director OFWM Lakki Marwat against the newly created vacant post.
14.	Shafiullah	Rodman (working in Surplus Pool) o/o the Secretary Agriculture Department.	Rodman o/o District Director OFWM Dir Khan against the newly created vacant post.
15.	Inayatullah	Rodman (working in Surplus Pool) o/o the Secretary Agriculture Department.	Rodman o/o District Director OFWM D. I. Khan against the newly created vacant post.
16.	Rehmat Ullah	Rodman (working in Surplus Pool) o/o the Secretary Agriculture Department.	Naib Qasid o/o District Director OFWM D. I. Khan against the newly created vacant post.
17.	Hanif Ullah	Rodman (working in Surplus Pool) o/o the Secretary Agriculture Department.	Rodman o/o District Officer OFWM Dir Upper against the newly created vacant post.
18.	Matti Ullah	Rodman (working in Surplus Pool) o/o the Secretary Agriculture Department.	Rodman o/o District Officer OFWM Dir Upper against the vacant post.
19.	Syed Fazal Mabood Jan	Rodman (working in Surplus Pool) o/o the Secretary Agriculture Department.	Chowkidar o/o District Officer OFWM Dir Upper against the newly created vacant post.
20.	Sajid Ullah	Chowkidar (working in Surplus Pool) o/o the Secretary Agriculture Department.	Naib Qasid o/o District Officer OFWM Dir Upper against the newly created vacant post.
21.	Hidayatullah	Rodman (working in Surplus Pool) o/o the Secretary Agriculture Department.	Naib Qasid o/o District Officer OFWM Dir Lower against the newly created vacant post.
22.	Islam Badshah	Rodman (working in Surplus Pool) o/o the Secretary Agriculture Department.	Rodman o/o District Officer OFWM Dir Lower against the vacant post.
23.	Khan Laiq	Rodman (working in Surplus Pool) o/o the Secretary Agriculture Department.	Naib Qasid o/o District Officer OFWM Dir Lower against the vacant post.

(8)

S. No	Name of Official	Present place of posting	Place of posting against current side
26	Islam Gul	Working in o/o the Director PIO PHLCEP Swabi on deputation basis	Rodman o/o District Officer OFWM Swabi against the newly created vacant post.
27	Wisal Muhammad	Working in o/o the Director PIO PHLCEP Swabi on deputation basis	Naib Qasid o/o District Officer OFWM Swabi against the newly created vacant post.
28	Naveed Gul	Chowkidar (working in Surplus Pool) o/o the Secretary Agriculture Department.	Chowkidar o/o District Officer OFWM Nowshera against the newly created vacant post.
29	Amir Khan	Naib Qasid (working in Surplus Pool) o/o the Secretary Agriculture Department.	Chowkidar o/o District Officer OFWM Nowshera against the newly created vacant post.
30	Ayaz Ali Shah	Rodman (working in Surplus Pool) o/o the Secretary Agriculture Department.	Naib Qasid o/o District Officer OFWM Nowshera against the newly created vacant post.
31	Kishwar Khan	Rodman (working in Surplus Pool) o/o the Secretary Agriculture Department.	Rodman o/o District Director OFWM Mardan against the newly created vacant post.
32	Muhammad Waheed	Rodman (working in Surplus Pool) o/o the Secretary Agriculture Department.	Rodman o/o District Director OFWM Peshawar against the newly created vacant post.
33	Kashif Khan	Sweeper (working in Surplus Pool) o/o the Secretary Agriculture Department.	Naib Qasid o/o District Director OFWM Mardan against the newly created vacant post.
34	Kashif Mehmood	Rodman (working in Surplus Pool) o/o the Secretary Agriculture Department.	Rodman o/o District Director OFWM Kohat against the newly created vacant post.
35	Asif Hussain	Naib Qasid (working in Surplus Pool) o/o the Secretary Agriculture Department.	Naib Qasid o/o District Officer OFWM Hangu against the newly created vacant post.

2. In pursuance to S#1 of the Second Schedule of Delegation of Power Rules, 2018, the Competent Authority is further pleased to order the abolishment of the above mentioned (35) posts from the Surplus Pool of the office of Secretary Agriculture under the head of account 04 Economic Affairs, 042-Agriculture Food, Irrigation, Forestry & Fisheries, 0421-Agriculture 042103-Agriculture Research and Extension Service Grant No. 18 PR-5724.

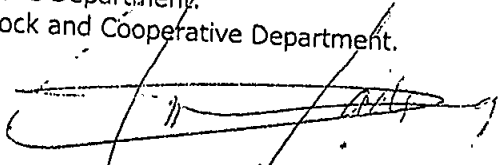
Sd/XX
SECRETARY AGRICULTURE
KHYBER PAKHTUNKHWA

Endst. of even No. & Date.

Copy for information and necessary action to:-

1. The Registrar Hon'able Peshawar High Court, Peshawar.
2. The Director General On-Farm Water Management, Khyber Pakhtunkhwa, w/r to his letter No. 35/DG/OFWM/Estt: dated: 05-01-2022 & letter No. 383/DG/OFWM/Estt: dated: 22-02-2022.
3. The Accountant General, Khyber Pakhtunkhwa, Peshawar.
4. The concerned District Director, On-Farm Water Management, Khyber Pakhtunkhwa.
5. The Budget Officer-VII, Government of Khyber Pakhtunkhwa Finance Department.
6. PS to Secretary Agriculture, Livestock and Cooperative Department.
7. P.A to Deputy Secretary (Admn) Agriculture, Livestock and Cooperative Department.
8. Accountant of the Agriculture Department.
9. Official concerned.

Attested


SECTION OFFICER (ADMN.)

**District Officer
on Farm Water Management
Bannu**



9

**GOVERNMENT OF
KHYBER PAKHTUNKHWA
AGRICULTURE LIVESTOCK & COOPERATIVE DEPARTMENT**

Dated Peshawar, the March 29, 2022

NOTIFICATION

No. SOE(AD)117-131/Surplus Pool/WM/2017-18: In partial modification of this Department Notification of even no. dated 08-03-2022 the Competent Authority is pleased to change the place of duty of the official at S#10 & S#13, which may be read as under;

S#	Name of Official	Designation	Adjusted against
10	Mr. Anwar-ul-Haq	Rodman working in surplus pool o/o the Secretary Agriculture Department.	Naib Qasid o/o the District Officer On-Farm Water Management Kohat against the vacant post.
13	Mr. Rizwanullah	Rodman working in surplus pool o/o the Secretary Agriculture Department.	Rodman o/o the District Officer On-Farm Water Management Bannu against the vacant post.

2. In pursuance to S#1 of the Second Schedule of Delegation of Power Rules, 2018, the Competent Authority is further pleased to order the abolishment of the above mentioned (35) posts from the Surplus Pool of the office of Secretary Agriculture under the head of account 04 Economic Affairs, 042-Agriculture Food, Irrigation, Forestry & Fisheries, 0421-Agriculture 042103-Agriculture Research and Extension Service Grant No. 18 PR-5724.

Sd/XX
**SECRETARY AGRICULTURE
KHYBER PAKHTUNKHWA**

Endst. of even No. & Date.

Copy for information and necessary action to:-

1. The Registrar Hon'able Peshawar High Court, Peshawar.
2. The Director General ONFWM, w.r to his letter No.570/DG/OFWM/Esstt: dated 15-03-2022.
3. The Accountant General, Khyber Pakhtunkhwa, Peshawar.
4. District Account Officers (concerned)
5. The Budget Officer VII, Finance Department, Khyber Pakhtunkhwa.
6. The concerned Districts Directors/Officers, OFWM, Khyber Pakhtunkhwa.
7. The Director, Anti-Corruption, Khyber Pakhtunkhwa, Peshawar
8. Section Officer (Establishment) Agriculture Department.
9. PS to Minister for Agriculture, Livestock & Cooperative Department.
10. PS to Secretary Agriculture Livestock & Cooperative Department.
11. PA to Deputy Secretary (Admin), Agriculture Livestock & Cooperative Department.
12. Accountant Agriculture Department.
13. Officials Concerned.

ATTESTED

SECTION OFFICER (ADMN:)



10

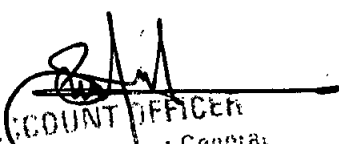
**GOVERNMENT OF
KHYBER PAKHTUNKHWA
AGRICULTURE, LIVESTOCK
& COOPERATIVES DEPARTMENT**

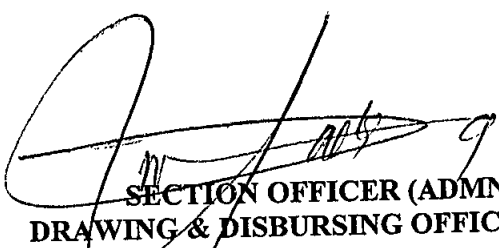
LAST PAY CERTIFICATE

PERSONAL COMPUTERIZED NO. 00360066 OF A.G. OFFICE. KPK DDO

Last pay Certificate to MR. ANWAR UL HAQ, Designation RODMAN (BPS-04) of Surplus Pool, of Agri; Livestock & Coop: Department. He has been paid up to 28.02.2022 at the following rates.

PAYMENTS				DEDUCTIONS			
S.No.	Code	Pay & Allowances	Amount	S.No.	Code	Deduction	Amount
1	0001	Basic pay	16940	1	3004	G.P. Fund	-830/-
2	1210	Conveyance Allow	1785	2	3501	Benv: Fund	-600/-
3	1001	House Rent Allow	3576	3	4004	R.B & D.C	-300/-
4	1300	Medical Allow	1500	4			
6	2148	Adhoc Allow 2013	313	5			
7	2199	Adhoc Allow 2015	208	6			
8	2211	Adhoc Allow 2016	1235	7			
9	2224	ARA,2017	1694	8			
10	2247	ARA,2018	1694	9			
11	2264	ARA,2019	1694	10			
12	2309	ARA 2021	1694				
13	2311	Dress Allowance	1000				
14	2312	Washing Allowance	1000				
15	2313	Integrated Allowance	600				
Grant Total Rs.			34933/-	Grant Total Rs.			1730/-


ACCOUNT OFFICER
Assistant Account General
U/O AG Khyber Pakhtunkhwa
2/14/3


SECTION OFFICER (ADMN:)
DRAWING & DISBURSING OFFICER
Section Officer (Admn:)
Govt. of Khyber Pakhtunkhwa
Agn., Livestock & Coop. Department


ATTESTED

مختصر طور پر ضیاء ضلعی ڈائریکٹر او۔ ایف۔ ڈبلیو۔ ایم۔ نیوں

حکمانہ اپیل

حکمانہ اپیل برائے من مرقعہ مقرر مجبور نوٹیفیکیشن SOG (AD)/17-131/surplus pool/wm/2018-19 dtd 29.3.22
تعمیر نیوں تفتیشی بیوٹی اور 20 دن سے بعد مجبور نوٹیفیکیشن SOE (AD)/17-131/surplus pool/wm/2018-19
مورخ 29.3.2022 کو نفعیہ کے معقول و ہموار سے من ایبلٹ کا ڈیوٹی نیوں سے کوٹا کر دیا گیا
اراضی کی موجودگی یا کسی اور سروس اور لٹریچر اور لٹریچر مورخ 27.2.2013 کے بین کورڈر ہے من
ایبلٹ کا ڈیوٹی تعمیر نیوں کو لایا جاوے

ضیاء کا! اپیل ذیل ہے۔

- 1- چونکہ من ایبلٹ سال 2005ء میں محمد OFWM میں میری سوزائش منبھ تعمیر نیوں سرانجام دیا گیا تھا۔
- 2- میرے سال 2017ء میں محمد نے ایبلٹ کو نوٹیفیکیشن سے نکال دیا تھا جس کے حقوق ایبلٹ نے تعمیر لیا اور عدالت عالیہ میں رٹ ڈاڑھی جو سال 2016ء میں منظور ہوئی اور محمد نے من ایبلٹ کو بحال کر دیا لیکن بعد میں محمد نے ایبلٹ کو surplus pool میں لیا۔
- 3- میرے بعد محمد نے مجبور نوٹیفیکیشن سے 2022ء کو لکھ 18-131/surplus pool/wm/2017-18 SOE (AD)/17-131 کو باقاعدہ تعمیر نیوں OFWM میں تفتیش لیا گیا۔
- 4- میرے 20 دن سے بعد من ایبلٹ کو مجبور نوٹیفیکیشن SOE (AD)/17-131/surplus pool/wm/2018-19 مورخ 29.3.2022 کو نفعیہ کے معقول و ہموار سے من ایبلٹ کا ڈیوٹی نیوں سے کوٹا کر دیا گیا اور من ایبلٹ کی جگہ مسما رضوان اللہ خان ولد مسما بیگم خان سے سوزائش تعمیر نیوں کی تفتیشی کر دیا۔
- 5- یہ جہ نفعیہ اور رٹ ر انصاف بابت مستحق تفتیشی تعمیر کوٹا میں برہنہ اور عدالت کاٹ فنانس ہے جو موجود سروس یا کسی اور لٹریچر مورخ 27.2.2013 کے بالکل صدق ہے۔

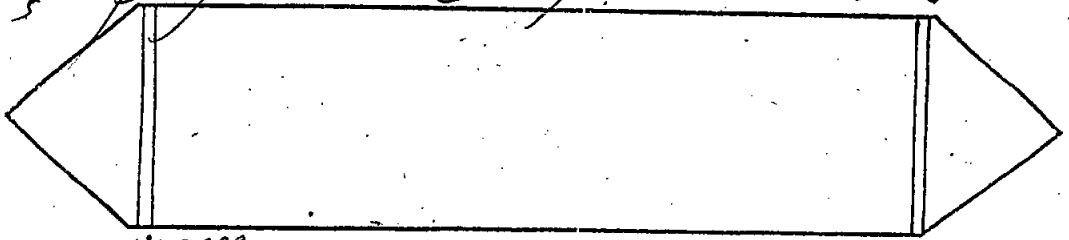
لینڈ ایجوکیشن باہر اپیل اور سروس ہے کہ اپیل معزز منظور فرما کر نوٹیفیکیشن SOE
کی ڈیوٹی از سر نفع تعمیر نیوں کے احکامات 131-17 (AD) کو منظور مستحق فرما کر من ایبلٹ
میں باوجود اسکا ~~موجود~~ ضیاء کے وہ میں دلہا کی جاوے

5.4.2022

انور الحق ولد عبد اللہ خان مسما شہناز بیگم فیملی تعمیر نیوں
انوار الحق

ATTESTED

بعدالت حسین مختون سروس پیروی کیس



Appellant

2822 مخجاب

بنام گورنمنٹ آف ایل این ڈی

الوارث

موزخہ	-----
مقدمہ	-----
دعویٰ	سروس پیروی
جرم	-----

باعث تحریر آنکھ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی اور جواب دہی وکل کاروائی متعلقہ آن مقام کیلئے حسین مختون سروس پیروی کیلئے 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 بر حلف دیئے جواب دہی اور اقبال دعویٰ اور بسورت ڈگری کرنے اجراء اور صولی چیک و روپیہ عرضی دعویٰ اور درخواست ہر قسم کی تصدیق زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی نیز دائر کرنے اپیل 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 لیا اپنے بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو ہمیں وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ دہر جائے التوائے مقدمہ کے سبب سے 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 لکھ دیا کہ سندر ہے۔

المرقوم ۶۶۶۶ ماہ اگست 2022ء

Aghee Ad
Attested and
Accepted

الوارث و مختون سروس پیروی
تقریر صلح ہون
Appellant

بمقام حسین مختون سروس پیروی کے لئے منظور ہے۔

BE # 10 - 3836
enric # 11101 - 4534457-3
cell # 0337 - 9997194