




Form- A

## FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No.- 895 /2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	08/06/2022	<p>The appeal of Mr. Khaled Khan resubmitted today by Mr. Asif Ali Shah Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR</p>
2-	15.6.22	<p>This case is entrusted to Single Bench at Peshawar for preliminary hearing to be put there on <u>27.6.22</u>. Notices be issued to appellant and his counsel for the date fixed.</p> <p> CHAIRMAN</p>
	27.06.2022	<p>Learned Member (Executive), is on leave. Therefore, the case is adjourned to 12.08.2022 for the same as before.</p> <p> READER</p>

*for noted  
counsel  
16-6-22*

The appeal of Mr. Khalid Khan son of Saddam Khan process server District Revenue Office District Mohmand received today i.e. on 30.05.2022 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Memorandum of appeal may be got signed by the appellant.
- 2- Copy of order dated 25.01.2022 mentioned in the heading of the appeal is not attached with the appeal which may be placed on it.

No. 1201 /S.T,

Dt. 31/5 /2022

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Asif Ali Shah Adv. Pesh.

*Respected Sir,*

*All objections are hereby removed, this appeal may kindly be filed entered.*

*Asif Ali*  
*06-06-2022*

**BEFORE THE SERVICE TRIBUNAL K.P.K.**  
**PESHAWAR.**

Service Appeal No. 295 /2022

SCANNED  
KPST  
Peshawar

Khalid Khan.....Appellant

Versus

Govt. of K.P.K.& Others..... Respondents

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APPELLANT  
Through

Asif Ali Shah, ASC  
&

Syed Bilal Bacha  
Advocate High Court,

Dated:01.06.2022

Chamber#3-A, Haroon Mansion Khyber Bazaar, Peshawar.  
Contact Mobile: 0333-9006806, 0301-8333888

(1)

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL, PESHAWAR.**

APPEAL No. \_\_\_\_\_/2022

**Khalid Khan** S/O Saddam Khan, Process server  
District Revenue Office, District Mahmand.

..... Appellant

**Versus**

1. **The Government of Khyber Pakhtunkhwa,** through Secretary Board of Revenue Government of Khyber Pakhtunkhwa, Civil Secretariat Peshawar.
2. **The Senior Member Board of Revenue,** of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
3. **Commissioner** Peshawar Division, Peshawar.
4. **Deputy Commissioner,** Mohmand District Mohmand.
5. **Maqsood Khan** (Survey Helper Finance Department, District Mohmand.
6. **Waqar-ul-Hassan,** Naib Qasid, Additional Deputy Commissioner, District Mohmand.

..... Respondents

**APPEAL UNDER SECTION-4 OF THE KHYBER  
PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974  
AGAINST THE IMPUGNED PROMOTION  
ORDERS DATED: 26-01-2022 AND THE NOT  
DECIDING THE APPEAL OF THE APPELLANT IN  
STATUTORY PERIOD OF 90 DAYS**

**Prayer:**

IT IS, THEREFORE, HUMBL Y PRAYED THAT  
ON ACCEPTANCE OF THIS APPEAL THE  
IMPUGNED SENIORITY LIST DATED:

2

31.12.2021 AND IMPUGNED ORDER OF RESPONDENT NO.3 DATED: 25.01.2022 WHEREBY THE RESPONDENTS NO.5 & 6 HAS BEEN PROMOTED AGAINST THE SENIORITY, LAW & RULES, MAY KINDLY BE SET ASIDE AND THE RESPONDENTS MAY KINDLY BE DIRECTED TO FOLLOW THE SENIORITY AS PER LAW & RULES IN ITS TRUE LETTER AND SPIRIT AND CONVENE DPC MEETING FOR PROMOTION OF APPELLANT FROM DATE OF HIS ELIGIBILITY AND TO ISSUE THE PROMOTION ORDER OF THE APPELLANT WITH ALL BACK BENEFITS.

FURTHER ALL ACTS DONE FOR CONSIDERING THE INELIGIBLE / BLUE EYED FOR PROMOTION MAY KINDLY BE DECLARED AGAINST THE POLICY, VOID ABINITIO BEING AGAINST THE FUNDAMENTAL RIGHTS GRANTED UNDER THE CONSTITUTION OF ISLAMIC REPUBLIC OF PAKISTAN.

**RESPECTFULLY SUBMITTED:**

The appellatant most humbly beg to submit as under:

1. **That** the Appellant is a law-abiding citizen of Pakistan and also hails from a respectable family. He is a civil servant who was appointed as a process server BPS-2 vide Notification dated 10-08-2009. **(Copy of appointment order is Annex-A)**
2. **That** the Appellant remained posted at the same post in the office of Deputy Commissioner office, Mohmand, and till date he is serving.
3. **That** from the office of the respondent No.4 seniority lists dated:08.11.2021 were issued and in Class-IV category the appellatant is the most senior literate class-IV employee. **(Seniority list is attached as annexure-B)**
4. **That** all of sudden the respondent No.4 issued another seniority list dated: 31.12.2021 and some other junior employees / blue eyed has been placed senior in the seniority list and on the bases of that impugned seniority list the junior employees were promoted to next higher post i.e Junior Clerk vide impugned

C

promotion order dated: 5.01.2022 and the appellant has been intentionally ignored and by this way his fundamental / constitutional rights has been infringed. **(Copy of seniority list dated:31.12.2022 & impugned Promotion Order dated:26.01.2022 are attached as annexure-C & D)**

5. **That** being aggrieved and dissatisfied from the impugned acts & inactions of the respondent No.4 the appellant filed a department appeal before worthy Respondent No.3 on 11.02.2022 but the respondent No.3 did not consider / decide the appeal / representation of the appellant and the statutory period has been elapsed. **(Copy of Departmental appeal is attached as annexure-E)**
6. That aggrieved of the said impugned seniority and promotion order dated:26.01.2022, the appellant has no alternate remedy but to approach this Honorable Tribunal amongst others on the following grounds:

**Grounds:**

- a. **Because** the seniority list & promotion order is based in malafide and is inherently illegal, unlawful and without jurisdiction on the score of the ill-will involved in the orders and is thus liable to be set-aside.
- b. **Because** the Appellant have excellent service record which clearly shows that the Appellant has been performed his service regularly and during the said period his moral character was too excellent, hence, pushing to bottom in seniority list and not considering in DPC for the promotion by the Respondents is a great discrimination and against the rules and regulation.
- c. **Because** the Appellant is the most senior in his colleagues and according to rules and procedures he is entitle for promotion, but the acts of respondents not considering in the DPC meeting dated:26.01.2022 and considering the Respondent No.5 & 6 for promotion being lacks length of service and qualification in specific fields like Appellant, are illegal and unlawful, which has fallen the Appellant as well as his family in a great mental crises, so needs interference of this Hon'ble Tribunal and the impugned promotion order merits reversal.

- d. **Because** this conduct of the Respondents has not only enhanced the agonies of the Appellant, but it is also an example of misconduct, inefficiency, negligence, and mismanagement on the part of the Respondents No. 1 to 5 which needs to be judicially handled and curbed, in order to save the poor masses and provide them an opportunity to lead their lives freely and with the enjoyment of all of their fundamental rights, which are provided for them in the Constitution of Islamic Republic of Pakistan 1973.
- e. **Because** unless and until the proper Orders / direction of appellant's promotion are not issued, serious miscarriage of justice would be caused to the Appellant and the appellant would be suffered by the Orders of the Respondents which are fanciful, suffering from patent perversity and material irregularity, needs correction from this Hon'ble Court.
- f. **Because** the Respondents erroneously exercised their discretion against judicial principle and not considered the Appellant for promotion against the post and considered the Respondent No.5&6 for promotion against the norms of justice.
- g. **Because** the actions on part of the respondents seriously are in the negation of the Constitution of the Islamic Republic of Pakistan, 1973 and the Civil Servants Act.
- h. **Because** before taking the impugned action, no due process of law has been adopted by the Respondents.
- i. **Because** the Fundamental Rights of the Appellant have been violated in relation to Article 4, 8, 9, 18 & 25 of the Constitution of the Islamic Republic of Pakistan, 1973. The said rights flow out of the Constitution the terms and conditions of service of the Appellant and this Honorable Court being the custodian of the Fundamental Rights of citizens of Pakistan, as well as the protection afforded by the Constitution of Islamic Republic of Pakistan 1973, is why the Appellant seeks the redress of their grievances and to end the ordeal the Appellant is going through due to the illegal, unlawful and unjust acts and inaction of the Respondents.
- j. **Because** the actions and inactions of the Respondents proclaim their own mala fide.
- k. **Because** the Appellant has got the fundamental right of being treated in accordance with law but the treatment meted out to the Appellant is on consideration other than legal and he has been deprived of his rights duly guaranteed to him by the constitution of Pakistan.

- (7)
- l. **Because** the Respondents cannot be allowed under the law to pass any illegal order.
  - m. **Because** the appellant has not been treated in accordance with law, hence his rights secured and guaranteed under the Law are badly violated.
  - n. **Because** the Appellant crave for leave to add further grounds at the time of his oral arguments before this Hon'ble Tribunal highlighting further contraventions of the provisions of the Constitution & Laws which adversely affected the Appellant.

**IT IS, THEREFORE, PRAYED THAT IN VIEW OF THE ABOVE SUBMISSIONS THE INSTANT APPEAL MAY GRACIOUSLY BE ACCEPTED AS PRAYED FOR HEREIN ABOVE.**

Dated:01.06.2022

**VERIFICATION:**

It is verified that (as per information given me by my client) all the contents of the instant appeal are true and correct and nothing has been concealed intentionally from this Hon'ble Tribunal.

Advocate

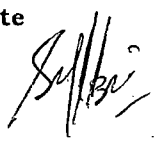
**Note:**

That no such like petition / Appeal on this subject matter has earlier been filed before this Hon'ble Tribunal.

Advocate

APPELLANT  
Through

Asif Ali Shah, ASC  
&  
Syed Bilal Bacha  
Advocate High Court,





3

**BEFORE THE SERVICE TRIBUNAL K.P.K.**  
**PESHAWAR.**

Service Appeal No. \_\_\_\_\_/2022

Khalid Khan.....Appellant

Versus

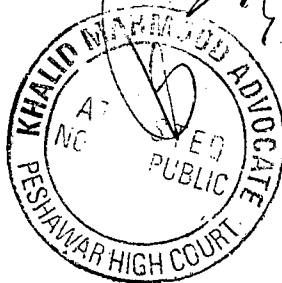
Govt. of K.P.K.& Others..... Respondents

**Affidavit**

It is hereby solemnly affirm and declare on oath that all the contents of the instant appeal are true and correct to the best of my Knowledge and belief and nothing has been concealed intentionally from this Honourable Court.

*Khalid Khan*

**Deponent**



CNIC: 21407-6121896-9  
Cell: 0301-8008115

(7)

**BEFORE THE SERVICE TRIBUNAL K.F.K.**  
**PESHAWAR.**

Service Appeal No. \_\_\_\_\_/2022

Khalid Khan.....Appellant

Versus

Govt. of K.P.K.& Others..... Respondents

**ADDRESSES OF THE PARTIES**

**APPELLANT:**

**Khalid Khan** S/O Saddam Khan, Process server  
District Revenue Office, District Mahmand.

**RESPONDENTS:**

1. **The Government of Khyber Pakhtunkhwa**, through Secretary Board of Revenue Government of Khyber Pakhtunkhwa, Civil Secretariat Peshawar.
2. **The Senior Member Board of Revenue**, of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
3. **Commissioner** Peshawar Division, Peshawar.
4. **Deputy Commissioner**, Mohmand District Mohmand.
5. **Maqsood Khan** (Survey Helper Finance Department, District Mohmand.
6. **Waqar-ul-Hassan**, Naib Qasid, Additional Deputy Commissioner, District Mohmand.

APPELLANT  
Through

Asif Ali Shah, ASC  
&

Syed Bilal Bacha  
Advocate High Court,

Dated:01.06.2022

(4) *Amir A*

OFFICE OF THE POLITICAL AGENT MOHMAND AT GHALLANAI

ORDER

Mr. Khalid Khan s/o. Sadam Khan is hereby appointed as process server BPS-2 with usual allowances as admissible under the rules, subject to the production of Age and medical fitness certificate by the Agency Surgeon Mohmand Agency against the vacancy caused due to retirement of Sadam Khan process server w.e. 01/08/2009.

The appointment is purely made on temporary basis and liable to termination at any time without any notice. However, in case he wishes to resign he shall have to give one month prior notice forfeit one month pay in lieu thereof.

*[Signature]*  
Political Agent Mohmand  
Ghallanai

No. 3054/51 Acct.

Dated Ghallanai the 10/08/2009

Copy to -

- 1) The Assistant Political Agent (Lower Mohmand) at Ekkaghund.
- 2) The Assistant Political Agent (Upper Mohmand) at Ghallanai.
- 3) The Assistant Political Agent Baizar.
- 4) The Agency Account Office Mohmand at Ghallanai.
- 5) Agency Surgeon Mohmand Agency at Ghallanai.
- 6) Official concerned.

*[Signature]*  
Political Agent Mohmand  
Ghallanai

Naib Qasid

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Annexure-B

**SRINATED SENIORITY LIST OF CLASS-IV OF THE OFFICE OF DEPUTY COMMISSIONER MOHMAND TRIBAL DISTRICT (AS IT STOOD IN OCTOBER, 2021)**

Name of Official	Father Name	CNIC	DOMICILE/ DOB	Designation (Post held (BPS))	Educational Qualification	Date of Appointment	Date of Passing Metric Exam:	Place of Posting	I have No objection over the seniority list
Rashid Khan	Hashim Khan	21306-0307148	Mohmand/ 1971	Mali (BPS-1)	Nil	01.11.1987	Nil	DC House	
Muhammad Gul	Hanesh Khan	0013960207143	Mohmand/ 01.07.1963	Naib Qasid (BPS-4)	Nil	01.02.1990	Nil	Main Office	
Mudal Muhammad	Sher Muhammad	0014293098585	Mohmand/ 01.01.1967	Khakrob (BPS-04)	Nil	01.01.1992	Nil	Tehsil Prang Ghar	
Rekham Gul	Rehmat Gul	2140292267269	Mohmand/ 01.01.1968	Naib Qasid (BPS-04)	Nil	14.05.2002	Nil	DC Office	8
Adnan Khan	Usman Khan	14286176011	Mohmand/ 1986	Naib Qasid (BPS-04)	Nil	01.01.2005	Nil	DC Main Office	
Haji Muhammad	Sher Muhammad	21407-5814982-5	Mohmand/ 01.01.1980	Naib Qasid (BPS-04)	Nil	30.04.2007	Nil	Tehsil Prang Ghar	
Khatib Gul	Sanobar Khan	2140661908791	Mohmand/	Chowkidar (BPS-03)	Nil	01.10.2007	Nil	DC Office	

Attested  
Attested

10

Naib Qasid

			01.01.1975						
9	Ajmir Khan	Zalam Khan	2140639908403	Mohmand/ 01.01.1982	Belishti BPS-03	Nil	01.10.2007	Nil	DC House
	Naseeb Khan	Zait Ullah	2140712293249	Mohmand/	Khakrob (BPS-03)	Nil	01.10.2007	Nil	AC Upper Office
10	Muhammad Roz	Amroz Khan	21402-1450528-9	Mohmand/ 01.01.1977	Naib Qasid (BPS-03)	Nil	22.12.2008	Nil	DC Office
11	Muhammad Imran	Shah Room Becha	21407-7744772-5	Mohmand/ 13-03-1990	Naib Qasid (BPS-03)	Matric	22-12-2008	2020	DC Office
12	Khalid Khan	Sadam Khan	21407-6121896-9	Mohmand/ 20.4.1994	Process Server (BPS-3)	Matric	10.8.2009	2012	AC Lower Mohmand Office
13	Waheed Gul	Khanzad Gul	21407-3984748-5	Mohmand/ 09.09.1983	Belushti (BPS-03)	Matric	01.10.2009	1999	AC Lower Mohmand Office
14	Waqar-ul-Ikhsan	Saida Gul	17301-5777460-7	Mohmand/ 18.11.1973	Naib Qasid (BPS-03)	Matric	08.12.2009	1991	DC Office / PC Branch
15	Farooq Khan	Sawab Gul	1710140041759	Mohmand/ 08.06.1988	Naib Qasid (BPS-03)	Nil	01.01.2011	Nil	AC Upper Office
16	Hijran	Qandhari	2140279696351	Mohmand/	Mali (BPS-03)	Nil	01.03.2011	Nil	DC House
17	Javid Khan	Said Karim	2140606673159	Mohmand/ 1992	Naib Qasid (BPS-03)	Nil	01.06.2011	Nil	AC Baizai Office

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*attested*  
**ATTES/ED**  
*[Signature]*

22

	Yasir Khan	Aftab Gul	1710103790795	Shabqadar/	Khakrob (BPS-03)	Nil	01.02.2013	Nil	AC Lower Office
19	Salman Khan	Isa Khan	2140693848147	Mohmand/ 07.08.1995	Naib Qasid (BPS-03)	F.A	29.03.2017	2020	DC Office
20	Amir Sohail	Zairat Shah	2140257427775	Mohmand/ 08.04.2001	Naib Qasid (BPS-03)	Matric	16.01.2019	2020	DC Main Office

*[Signature]*  
Deputy Commissioner  
Mohmand Tribal District

28/11/21

*[Handwritten signature]*  
**ATTESTED**

**FINAL SENIORITY LIST OF CLASS-IV STAFF OF THE OFFICE OF DEPUTY COMMISSIONER MOHMAND TRIBAL DISTRICT  
(AS IT STOOD ON 31/12/2021).**

12

*Annexure-C*

S. No	Name of Official	Father Name	Designation of Post Held (BPS)	CNIC No.	Educational Qualification	Date of 1 <sup>st</sup> Entry into Service	Date of Passing SSC	Domicile / Date of Both	Place of Posting	I have no objection over the seniority list
1	Fazal Qadir		Naib Qasid BPS-05		Nil	01.12.1985		Bajaur/ 1964	Employee of FATA-DC (ADC F&P Office)	
2	Rosham Khan	Hashim Khan	Mali (BPS 04)	21406-0397348-7	Nil	01.11.1987	Nil	Mohmand / 1971	DC House	
3	Muhammad Gul	Hamesh Khan	Naib Qasid (BPS-04)	0013960207143	Nil	01.02.1990	Nil	Mohmand / 01.07.1963	Main Office	
4	Abdul Mohammad	Sher Mohammad	Khakrob (BPS-04)	00414293098585	Nil	01.03.1992	Nil	Mohmand/ 01.01.1967	Tehsil Prang Ghar	
5	Rekham Gul	Rehmat Gul	Naib Qasid (BPS-04)	21402-9226726-9	Nil	14.05.2002	Nil	Mohmand/ 01.01.1968	DC Office	
6	Adnan Khan	Usman Khan	Naib Qasid (BPS-04)	14286176011	Nil	01.01.2005	Nil	Mohmand/ 1986	DC Office	
7	Haji Mohammad	Sher Mohammad	Naib Qasid (BPS-04)	21407.5814982-5	Nil	30.04.2007	Nil	Mohmand/ 01.01.1980	Tehsil Prang Ghar	
8	Khitab Gul	Sanobar Khan	Chaukidar BPS-03	21406.6190879.1	Nil	01.10.2007	Nil	Mohmand/ 01.01.1975	DC Office	

*Attested*  
**ATTESTED**

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13

X ⇒  
Promoted →  
Finance

X

Promoted

9	Ajmir Khan	Zalam Khan	(Beheshti (BPS-03)	21406.3990840.3	Nil	01.10.2007	Nil	Mohmand/ 01.01.1980	DC House
10	Nasib Khan	Zaitullah Khan	Khakrob (BPS-03)	21407.1229324.9	Nil	01.10.2007	Nil	Mohmand/ Nil	AC UM office
11	Mohammad Roz	Amroz Khan	Naib Qasid (BPS-03)	21402.1450528.9	Nil	22.12.2008	Nil	Mohmand/ 01.01.1977	DC Office
12	Mohammad Imran	Shah Rom Bacha	Naib Qasid (BPS-03)	21407.7744772.5	SSC	22.12.2008	2020	Mohmand/ 13.03.1990	DC Office
13	Maqsood Khan	Mahid Armin	Survey Helper BPS 03	17301-1420135-1	FA+DIT	18.05.2009	1990	Mohmand/ 08.02.1974	ADC F&P Office
14	Gul Taj Khan	Astar Jan	Survey Helper BPS 03	21406.2565820.7	Middle	18.05.2009	—	Mohmand/ 01.01.1976	ADC F&P Office
15	Abdullah Khan	Dilawar	Naib Qasid BPS 03	21406-0246937-3	SSC	18.05.2009	1998	Mohmand/ 1979	ADC F&P Office
16	Ibrarullah	Mahid Ashraf	Naib Qasid BPS 03	17301-1627133-1	SSC	18.05.2009	1999	Mohmand/ 01.04.1982	ADC F&P Office
17	Khalid Khan	Sadam Khan	Process Server BPS 03	21407.6121896.9	SSC	10.08.2009	2012	Mohmand/ 20.04.1994	AC Lower Office
18	Waheed Gul	Khanzad Gul	Beheshti (BPS-03)	21407.3984748.5	SSC	01.10.2009	1999	Mohmand/ 09.09.1983	AC Lower Office
19	Waqar ul Hasan	Saida Gul	Naib Qasid (BPS-03)	17301.5777460.7	SSC	08.12.2009	1991	Mohmand/ 18.11.1973	DC Office
20	Shahid Khan	Ajmir	Naib Qasid BPS 03	17101-2303866-3	Middle	20.08.2010	—	Mohmand/ 1980	ADC F&P Office
21	Sardar Gul	Inam Gul	Survey Helper BPS 03	21407-0211106-3	SSC	24.08.2010	2003	Mohmand/ 18.08.1987	ADC F&P Office
22	Faroq Khan	Sawab Gul	Naib Qasid (BPS-03)	17101.4004175.9	Nil	01.01.2011	Nil	08.06.1988	AC UM office
23	Hijran	Qandari	Mali (BPS-03)	21402.7969635.1	Nil	2011	Nil	Mohmand	DC House

ATTESTED

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(14)

24	Javid Khan	Said Karim	Naib Qasid (BPS-03)	21406.0667315.9	Nil	01.06.2011	Nil	Mohmand/ 1992	AC Baizai Office
25	Yasir Khan	Aftab Gul	Khakrob (BPS-03)	17101.0379079.5	Nil	01.02.2013	Nil	Shabqadar	AC Lower Office
26	Salman Khan	Issa Khan	Naib Qasid (BPS-03)	21406.9384814.7	FA	29.03.2017	2020	Mohmand/ 07.08.1985	DC Office
27	Abu Qiyas		Naib Qasid BPS-03		Middle	31.03.2017	—	Mohmand/ 01.01.1996	ADC F&P Office
28	Mohammad Israr		Chaukidar BPS-03		Nil	05.04.2018	—	Mohmand/ 07.03.1989	ADC F&P Office
29	Amir Suhail	Ziarat Shah	Naib Qasid (BPS-03)	21402.5742777.5	SSC	19.01.2019	2020	Mohmand/ 08.04.2001	DC Office
30	Sharafat Hayat	Hayatullah	Mali (BPS-03)	17301-8483852- 1	B.A		1998	Mohmand	PMRU Office
31	Kashif Khan	Fazal Subhan			—		—	Mohmand	DC House

*addressed*  
*by*

**TESTED**

*Jam*  
Deputy Commissioner,  
Mohmand Tribal District



(5)

Amex-

DEPUTY COMMISSIONER  
MOHMAND TRIBAL DISTRICT

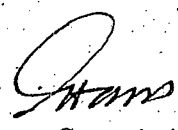
Phone No. 0924-290001 Fax No. 0924-290075 Email: [pamohmand@gmail.com](mailto:pamohmand@gmail.com)

No. 509-12/Acctt:  
Dated 26/01/2022

**ORDER.**

As recommended by Departmental Promotion Committee in its meeting held at Ghallanai on 25/01/2022, the following Class-IV (BPS-04) (9900-440-23100) are hereby promoted to the post of Junior Clerks (BPS-11) (12570-880-38970) with immediate effect in the best interest of public:-

3. Mr. Maqsood Khan.
4. Mr. Waqar ul Hassan.

  
Deputy Commissioner  
Mohmand Tribal District

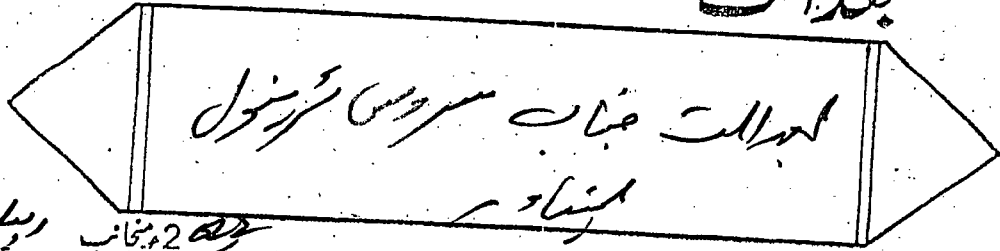
Copy to:-

6. Commissioner Peshawar Division Peshawar.
7. Additional Deputy Commissioners (G/F&P) Mohmand Tribal District.
8. Assistant Commissioners Mohmand Tribal District.
9. District Accounts Officer Mohmand Tribal District.
10. Official concerned.

*advised*  
*Syff*  
**RECEIVED**



بعدالت



محمد 2، پنجاب، راولپنڈی  
خالد خان بنام حکومت پاکستان

موزخہ  
مقدمہ  
دعوی  
جرم

Ustad Khan

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی و کل کاروائی متعلقہ  
آن مقام مستعمل کیلئے آصف علی شاہ کے لئے

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز  
دیکل صاحب کو راضی نامہ کرنے و تقریر ثالثتہ فیصلہ بر حلف دینے جواب دہی اور اقبال دعوی اور  
بصورت ڈگری کرنے اجراء اور صولی چیک و روپیہ ارضی دعوی 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 یا اپنے بجائے تقرر کا اختیار  
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ  
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانہ 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 20 \_\_\_\_\_ ماہ \_\_\_\_\_ ع 20 \_\_\_\_\_

advocate  
of all  
\*  
کے لئے منظور ہے۔

Signature

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