

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 1232 /2022


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	19/08/2022	<p>The appeal of Mst. Shamshad Nazli resubmitted today by Mr. Noor Muhammad Khattak Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____. Notices be issued to appellant and her counsel for the date fixed.</p> <p style="text-align: right;">By the order of Chairman</p> <p style="text-align: right;">REGISTRAR</p>

The appeal of Miss. Shamshad Nazli Senior Scale Stenographer office of the D.G Human Rights received today i.e. on 15.08.2022 is incomplete on the following score which is returned to the counsel for the appellat for completion and resubmission within 15 days.

- 1- Annexure-C of the appeal is incomplete which may be completed.
- 2- Page no. 32 & 33 of the appeal are illegible which may be replaced by legible/better one.
- 3- Annexures are not in sequence which may be annexed serial wise as mentioned in the memo of appeal.

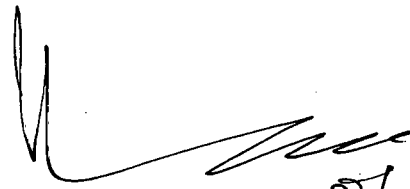
No. 2397 /S.T,

Dt. 17/8 /2022


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Noor Muhammad Khattak Adv. Pesh.

R/S.T Resubmitted after necessary
corrections and completions.


18/8/22

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

Service Appeal No. 1232 /2022

Miss Shamshad Nazli.....**Appellant**

V E R S U S

The Government of Khyber Pakhtunkhwa through Chief Secretary, & others.....**Respondents**

I N D E X

S#	Description of Documents	Annex	Pages
1.	Service Appeal		1-4
2.	Affidavit		5
3.	Application for suspension alongwith affidavit		6-8
4.	Application for condonation of delay alongwith affidavit		9-11
5.	Copies of Educational testimonials	A	12-14
6.	Copy of letter dated 15.06.2020 along with tentative seniority list	B	15-16
7.	Copy of objection petition	C	17-17A
8.	Copy of final seniority list dated 08.12.2021	D	18
9.	Copy of Order dated 31.12.2010	E	19-20
10.	Copy of Final Seniority list of different cadre staff of litigation cell of Law Department	F	21-27
11.	Copy of tentative seniority list dated 27.05.2013	G	28-29
12.	Copy of judgment dated 23.01.2012	H	30-32
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Appellant
Through


Noor Muhammad Khattak
Advocate
Supreme Court of Pakistan

Dated 15.08.2022

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

SERVICE APPEAL 1232 /2022

Miss: Shamshad Nazli, Senior Scale Stenographer (BPS-16),
Directorate General of Law & Human Rights, Law Human Rights &
Parliamentary Affairs, Khyber Pakhtunkhwa, Peshawar.

..... **APPELLANT**

VERSUS

- 1- The Government of Khyber Pakhtunkhwa through Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
- 2- The Secretary to Government of Khyber Pakhtunkhwa, Law Parliamentary Affairs and Human Rights Department, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
- 3- The Director General Law and Human Rights, Khyber Pakhtunkhwa, Peshawar.
- 4- Mr. Jamshed Khan, Assistant (BPS-16), office of the Government Pleader, re-designated as District Attorney, at Swat.

----- **RESPONDENTS**

SERVICE APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED FINAL SENIORITY LIST DATED 08-12-2021 WHEREIN THE APPELLANT BEING SENIOR TO THE PRIVATE RESPONDENT NO.4 WAS PLACED JUNIOR TO HIM AND AGAINST THE INACTION OF THE RESPONDENTS BY NOT DECIDING THE DEPARTMENTAL APPEAL WITHIN THE STATUTORY PERIOD OF NINETY DAYS.

PRAYER:

That on acceptance of the instant service appeal the impugned final seniority list dated 08-12-2021 may very kindly be set aside and the appellant may kindly be placed senior to the private respondent No.4. Any other remedy which this august service tribunal deems fit that may also be awarded in favor of the appellant.

R/SHEWETH:

Brief facts giving rise to the instant service appeal are as under:-

- 1- That the appellant is law abiding citizen of Pakistan and highly qualified person having D.Com, Master and LLb is serving as Senior Scale Stenographer (BPS-16) in the office of Solicitor Wing (Litigation

- Cell) Directorate of law & Human rights, a lower formation of Law Department. Copies of educational testimonials are attached as Annexure..... **A.**
- 2- That the appellant in the capacity of Senior Scale Stenographer has an inter-se joint seniority with Assistants (BPS-16) for promotion to the post of Superintendent (BPS-17), as such, the respondent department has issued tentative seniority of both the cadre posts i.e. Stenographers and Assistants with the direction to intimate reservation, if any, by either party up to 22-06-2020. Copy of letter dated 15-06-2020 along with tentative seniority list is attached as Annexure..... **B.**
- 3- That as per the above tentative seniority the private respondent No. 4 was made senior to the appellant despite the fact the appellant is highly qualified person and senior in age and service as well, but both these important aspects of the issue have not been kept in view.
- 4- That the appellant has abruptly conveyed her reservation over the tentative seniority list. Copy of objection petition is attached as Annexure..... **C.**
- 5- That the respondent department without caring to the objection petition of the appellant has unilaterally issued final seniority list placing the appellant junior to the private respondent No. 4. Copy of final seniority list dated 08-12-2021 is attached as Annexure..... **D.**
- 6- That it is pertinent to mention here that the private respondent No. 4 was promoted against the post of Hisba on 19-07-2007 and on abolition of post in Hisba, he was adjusted in the office of Government Pleader renamed as District Attorney Swat against the newly created vacant post and the appellant remained senior in the seniority list of the staff of District Attorney offices due to his adjustment. Copy of order dated 31-12-2010 is attached as Annexure..... **E.**
- 7- That the respondent department has issued a final seniority list of the officials of Litigation Cell of Law department on 06-04-2011 wherein name of the private respondent No. 4 was not incorporated as such the respondent No. 4 is not entitled to be reflected in the final seniority list as such he cannot be made senior than the appellant. Copy of final seniority list of different cadre staff of litigation cell of Law Department is attached as Annexure..... **F.**
- 8- That it was due to mere transfer of the appellant from the office of District Attorney Swat to the Litigation cell of the respondent department against the vacant post on 22-06-2012, the name of respondent No. 4 was included in the seniority list with the staff of Litigation cell of the respondent department malafidly. Copy of

tentative seniority list dated 27-05-2013 is attached as Annexure..... **G.**

9- That in para-7 of the judgment, it has been concluded by the Khyber Pakhtunkhwa service Tribunal that the status of respondent No.4 should remain and he could only be promoted in the Solicitor Wing and retain his inter-se seniority in that wing but the said respondent has not tendered any option to be promoted as Assistant in Litigation Cell of the respondent department. That even after pronouncement of the verdict of the Tribunal the respondent No.4 had remained in his original status and is still working as Assistant against the post on which adjusted in the office of District Attorney as such the appellant is senior to the respondent No.4. Copy of the judgment dated 23-01-2012 is attached as Annexure **H.**

10- That being aggrieved from the impugned seniority list dated 8.12.2021 the appellant filed departmental appeal before the appellate authority but no response has been received so far. Copy of departmental is attached as Annexure..... **I.**


11- That being highly aggrieved from the action and inaction of the respondents the appellant filed the instant service appeal in this Hon'ble Tribunal on the grounds interalia as under:-

GROUND:

- A- That the impugned seniority list dated 8.12.2021 issued by the respondents whereby the appellant has been placed junior to the private respondent is against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside.
- B- That the appellant has not been treated in accordance with law and rules by the respondent department on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That the action of the respondents is based on discrimination, favoritism and nepotism, hence not tenable in the eye of law.
- D- That despite the facts the appellant is senior in age and service and also high qualified person, even then the respondent department is acting in arbitrary and mala fide manner by issuing the impugned seniority list dated 8.12.2021, therefore the ibid seniority list not tenable and liable to be set aside.
- E- That by placing the private respondent No.4 senior to the appellant without any plausible reason is against section 8 of the civil servant Act, 1973 read with rule 17 of the APT rules, 1989.

- F- That the impugned seniority list dated 8.12.2021 is tantamount to disparity and discrimination under the Constitution of the Islamic Republic of Pakistan, 1973.
- G- That despite the fact the respondent department as required under the rules has given option to all the concerned staff to convey objection/reservation if any, upon tentative seniority list to which the appellant has preferred objection petition even then the respondent department has ignored and issued final seniority list which is against the law, seniority procedure and norms of natural justice.
- H- That event after pronouncement of the verdict of the Tribunal the respondent No.4 had remained in his original status and is still working as Assistant against the post and adjusted in the office of District Attorney, on this count too the appellant has prior right with preference to the private respondent No.4.
- I- That petitioner seeks permission to advance other grounds and proofs at the time of hearing.

It is therefore, most humbly prayed that the appeal may kindly be accepted as prayed for.

~~APPELLANT~~

SHAMSHAD NAZLI

THROUGH:


NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT


KAMRAN KHAN


UMAR FAROOQ


MUHAMMAD AYUB


WALEED ADNAN

&

KHANZAD GUL
ADVOCATES

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

Service Appeal No. _____/2022

Miss Shamshad Nazli.....**Appellant**

VERSUS

The Government of Khyber Pakhtunkhwa through Chief Secretary, & others.....**Respondents**

AFFIDAVIT

I, Miss Shamshad Nazli, Senior Scale Stenographer (BPS-16), Directorate General of Law & Human Rights, Law Human Rights & Parliamentary Affairs, Khyber Pakhtunkhwa, Peshawar, do hereby solemnly affirm and declare 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

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

C.M. No. _____/2022

In

Service Appeal No. _____/2022

Miss Shamshad Nazli.....**Appellant**

V E R S U S

The Government of Khyber Pakhtunkhwa through Chief
Secretary, & others.....**Respondents**

**APPLICATION FOR RESTRAINING THE
OFFICIAL RESPONDENTS FROM
PROMOTION ON THE BASIS OF
IMPUGNED SENIORITY LIST
08.12.2021, TILL THE FINAL DISPOSAL
OF THE MAIN SERVICE APPEAL.**

Respectfully Sheweth:

1. That the titled Service Appeal is being filed before this Hon'ble Tribunal in which no date of hearing is fixed.
2. That the grounds of main appeal may be considered as integral part of this application.
3. That the balance of convenience also lies in favour of the appellant.

4. That the appellant has a good prima facie case and all the three ingredients are in favour of the appellant.
5. That the applicant/appellant has challenged the final seniority list dated 08.12.2021 and the official respondents are going to conduct DPC on the basis of that seniority list whereby they are promoting the private respondent No.4 to the post of Superintendent BPS-17, if the official respondents are not restrained then the appellant/applicant would suffer an irreparable loss.
6. That any other ground if any will be raised at the time of arguments with the prior permission of this Hon'ble Tribunal.

It is, therefore, most humbly prayed that by accepting this application, the interim relief as prayed for in the instant application may kindly be passed in favour of the appellant against the respondents

Appellant

Through


Noor Muhammad Khattak
Advocate
Supreme Court of Pakistan

Dated 15.08.2022

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR

C.M. No. _____/2022

In

Service Appeal No. _____/2022

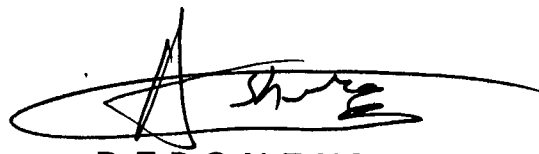
Miss Shamshad Nazli.....**Appellant**

VERSUS

The Government of Khyber Pakhtunkhwa through Chief Secretary, & others.....**Respondents**

AFFIDAVIT

I, Miss Shamshad Nazli, Senior Scale Stenographer (BPS-16), Directorate General of Law & Human Rights, Law Human Rights & Parliamentary Affairs, Khyber Pakhtunkhwa, Peshawar, do hereby solemnly affirm and declare that the contents of the accompanying **Application for suspension** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.


DEPONENT

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR

C.M. No. _____/2022

In

Service Appeal No. _____/2022

Miss Shamshad Nazli.....**Appellant**

V E R S U S

The Government of Khyber Pakhtunkhwa through Chief
Secretary, & others.....**Respondents**

APPLICATION FOR CONDONATION
OF DELAY IF ANY FILING THE
TITLED SERVICE APPEAL


Respectfully sheweth;

1. That the above titled appeal is filing today in which no date has been fixed so far.
2. That the appellant time and again ask the respondents to correct the impugned seniority list but in vain.
3. That the seniority and promotion are recurring cause of action which effect appellant.
4. That the Supreme Court also laid down the dictum that cases are to be decided on merit rather than technicalities.
2003 PLD SC 724

5. That valuable rights of the appellant is involved which may not be taken away on the basis of technicalities.

It is therefore requested that the delay in filing the instant appeal may kindly be condoned for the end of justice.

Through Appellant

Noor Muhammad Khattak
Advocate 
Supreme Court of Pakistan

Dated 15.08.2022

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR

C.M. No. _____/2022

In

Service Appeal No. _____/2022


Miss Shamshad Nazli.....**Appellant**

V E R S U S

The Government of Khyber Pakhtunkhwa through Chief Secretary, & others.....**Respondents**

A F F I D A V I T

I, Miss Shamshad Nazli, Senior Scale Stenographer (BPS-16), Directorate General of Law & Human Rights, Law Human Rights & Parliamentary Affairs, Khyber Pakhtunkhwa, Peshawar, do hereby solemnly affirm and declare that the contents of the accompanying **Application for condonation of delay** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.


DEPONENT

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

University of Peshawar (Pakistan)

Session ANNUAL 1995

SABICHAH NAZKI DAUGHTER OF MIAN MOHAMMAD SAHIB and a student

of GOVERNMENT COLLEGE OF COMMERCE, PESHAWAR having passed the

prescribed Examination held in JUNE, 1996, is this day admitted by the

University of Peshawar to the Degree of
Bachelor of Commerce

in the SECOND Division

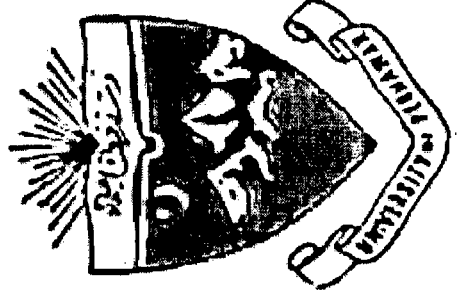
The Examination was taken as a whole/in parts

Serial No. 002541

Registered No. SE-P/Com-1422

Roll No. 1597

Result Declared on DECEMBER 8, 1996



[Signature]
Registrar

Countersigned
[Signature]
Vice-Chancellor

12

13

الجامعة الإسلامية
University of Peshawar

University of Peshawar

(Pakistan)

Session ANNUAL 1999

SHAMSHAD HAZLI

xx Son/Daughter of

MIAN MUHAMMAD SAMI

and a *student*/ private candidate of

DISTRICT PESHAWAR

having passed the prescribed examination held in

JANUARY, 2000

is this day admitted by the University of Peshawar to the Degree of

Master of Arts

In

Urdu

In

SECOND

Division

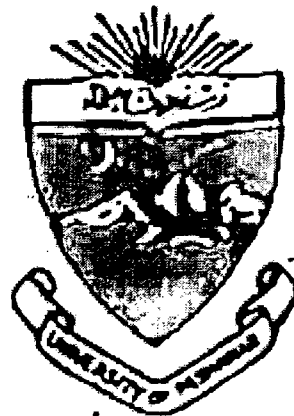
The Examination was taken as a whole /in parts/

Serial No. 0060106

Registration No. 86-PC-1422

Roll No. 26664

Result Declared on 10TH JULY, 2000



[Signature]
Registrar

Controller

[Signature]
Vice-Chancellor



5

University of Peshawar (Pakistan)

SESSION ANNUAL 2005

SHANISHAH HAZLI DAUGHTER OF MR. MUHAMMAD SAJJ

and a student of FRONTIER LAW COLLEGE PESHAWAR

having passed the prescribed examination held in MAY 2006, is this day admitted by the University of Peshawar to the Degree of

Bachelor of Laws

in the SECOND Division

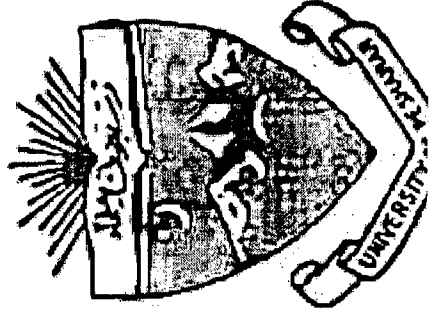
The Examination was taken as a whole / in parts

Serial No 005288/A

Registration No. 86-PCG-1422

Roll No. 3339

Result declared on OCTOBER 30, 2006



[Signature]
Registrar

Countersigned

[Signature]
Vice-Chancellor

DIRECTORATE GENERAL OF LAW & HUMAN RIGHTS
KHYBER PAKHTUNKHWA, PESHAWAR

No.GDG/SLT/AD/Seniority/2-17/2019

Dated 15/06/2020

To

All Concerned/Officials,
Solicitor Wing (Litigation Cell)
Directorate General of
Law & Human Rights

Subject: TENTATIVE SENIORITY LISTS OF OFFICIALS OF THE SOLICITOR WING (LITIGATION CELL) DIRECTORATE GENERAL OF LAW AND HUMAN RIGHTS AS STOOD ON 15.06.2020

I am directed to refer to the subject noted above and to enclose herewith copies of Tentative Seniority List of the following cadres of Solicitor Wing (Litigation) Directorate General of Law & Human Rights, reservations on the said lists, if any, may be conveyed to this Directorate on or before 22nd June, 2020 for consideration/settlement before final declaration thereof. Besides, the officials concerned would be required to provide a certificate to this Directorate General.

i	Assistant & Senior Scale Stenographer (BPS-16)
ii	Computer Operator (BPS-16)
iii	Senior Clerk (BPS-14)
iv	Junior Clerk (BPS-11)
V	Matriculate Class-IV (BPS-03)

In case objection is not received by the target date, it would be presumed that no individual has any objection to the seniority lists.

Sd/-
Assistant Solicitor
(M&E)

Endst. No. and
Copy forwarded for information to:

1. P.S to Secretary Law, Parliamentary Affairs & Human Rights, Department.
2. P.A to Director General for Law and Human Rights.

Sd/-
Assistant Solicitor
(M&E)

**DIRECTORATE GENERAL OF LAW & HUMAN RIGHTS
KHYBER PAKHTUNKHWA, PESHAWAR**

Phone: 091-9217204

Email: dlr.kpk@gmail.com

Website: www.humanrights.kp.gov.pk

Plot No. 21, Sector B-2, Phase-V, Hayatabad, Peshawar

3857-65

No: DG/SLT/AD/Seniority/2-17/2019

Dated: 15/06/2020.

Bf15

To


All concerned/officials,
Solicitor Wing (Litigation Cell)
Directorate General of
Law & Human Rights.

SUBJECT: TENTATIVE SENIORITY LISTS OF OFFICIALS OF THE SOLICITOR WING (LITIGATION CELL) DIRECTORATE GENERAL OF LAW & HUMAN RIGHTS AS STOOD ON 15.06.2020.

I am directed to refer to the subject noted above and to enclose herewith copies of Tentative Seniority Lists of the following cadres of Solicitor Wing (Litigation) Directorate General of Law & Human Rights, reservations on the said lists, if any, may be conveyed to this Directorate on or before 22nd June, 2020 for consideration/settlement before final declaration thereof. Besides, the officials concerned would be required to provide a certificate to this Directorate General.

i.	Assistant & Senior Scale Stenographer (BPS-16)
ii.	Computer Operator (BPS-16)
iii.	Senior Clerk (BPS-14)
iv.	Junior Clerk (BPS-11)
v.	Matriculate Class-IV (BPS-03)

In case objection is not received by the target date, it would be presumed that no individual has any objection to the seniority lists.


ASSISTANT SOLICITOR
(M&E)

Endst: No. and Date given,

Copy forwarded to the following:

1. P.S. to Secretary Law, Parliamentary Affairs & Human Rights, Department.
2. P.A. to Director General for Law & Human Rights.

ASSISTANT SOLICITOR
(M&E)



DIRECTORATE GENERAL
OF LAW & HUMAN RIGHTS
KHYBER PAKHTUNKHWA

TENTATIVE SENIORITY LIST OF ASSISTANT AND SENIOR SCALE STENOGRAPHER (BPS-16) OFFICE OF THE SOLICITOR WING
(LITIGATION CELL) (AS STOOD ON 16-03-2020)

S. No	Name of Official	Designation	Date of Birth	Qualification	Domicile	Date of 1 st Joining Govt: Services	Date of Promotion
1.	Mr. Jamshed Khan	Assistant	10.10.1964	M.A	Peshawar	08.10.1988	10.07.2007
2.	Mst. Shamshad Nazli	Senior Scale Stenographer	01.10.1962	B.Com, MA (Urdu) LL.B	Peshawar	01.11.1984	25.05.2012

Endst: No. DG/SLT/AD/Seniority/2-17/2019:

Copy forwarded to:-

1. Solicitor, Directorate General of Law & Human Rights.
2. PS to Secretary, Law Department.
3. Reference & Research Officer Law Department is requested to upload on Law Department Website.

DIRECTOR GENERAL
FOR LAW & HUMAN RIGHTS
KHYBER PAKHTUNKHWA

12/3/20
Endst
ASSISTANT SOLICITOR (M&E)

12/3/20
ASSISTANT SOLICITOR
(M&E)

Sol 4769

C-17

DD (A)

Jad

23/12/2021

MS (M) (E)

29/12/2021

29-12-21
Lupdi

To
The Director General,
Directorate General of Law & Human Rights,
Khyber Pakhtunkhwa.

Subject: TENTATIVE SENIORITY LIST OF THE SOLICITOR WING (LITIGATION CELL) DIRECTORATE GENERAL OF LAW & HUMAN RIGHTS AS STOOD ON 15.06.2020.

R/Sir,

With due respect, I beg to refer to letter No.GD/SLT/AD/Seniority/17/2019 dated 15.6.2020 on the subject noted above, and to state that the undersigned having objection on the Seniority List of Assistant and Senior Scale Stenographer on the following issues, facts and grounds:-

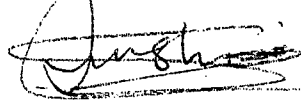
1. Vide order dated 10.7.2007 (F.A) Mr.Jamshid Khan was promoted as Assistant alongwith others employees on regular basis in the Muffassil Establishment Hisba Wing without Service rules and Seniority List. He was promoted against the post of Assistant created for the office of the Provincial Mohtehsib and District Mohtehsib in KPK the then NWFP (F.B). The Hisba Bill turndown by the apex court. The said posts were abolished by the Finance Department. After creation of seventy-five posts of various categories included Assistants in the office of District Attorney the then Government Pleader in KPK by the Finance Department vide letter No.BO-II/FD/3-2/SNE/2009-10 dated 06.07.2010 (F.C) Vide Law Department order No. SLT-19(3)2009-10/20514-21 dated 31.12.2010 (F.D) Mr.Jamshid Khan alongwith other staff were posted/transfer/adjusted in the offices of District Attorney the then Government Pleader in KPK. Parawise Comments on behalf of Respondents Government is self explanatory is attached herewith (F.E).
2. Mr. Jamshid Khan was promoted as Assistant on 10.7.2007 in the Muffassil Establishment while at that time, there was no vacant post of Assistant in Litigation Cell and only two posts of Assistant in Litigation Cell (Solicitor office) were occupied by Mr. Momin Khan and Muhammad Ismail. They were promoted as Superintendents on 13.7.2011 vide Notification No.E&A(LD)2-58/2010/10885-93(F-F) and since then the posts are vacant.

17/A

3. The Law Department issued a Seniority List of officials of Litigation Cell on 6.4.2011 and the name of Mr. Jamshid Khan was not mentioned in the said Seniority List (F.G).
4. During the period from 2007 till 2013 name of Mr. Jamshid Khan was not included in any seniority list of Litigation Cell: In 2013 Tentative Seniority List was issued by the Law Department and the name of Mr. Jamshid Khan was included and applicant filed her objection on the said Tentative Seniority List, but was turned down by the authority ignoring the facts of the case.
5. Vide Service rules for Solicitor staff the employees of Solicitor staff will be promoted to the Posts of Superintendent from among the posts holding Assistants/S.S. Stenographer.
6. Vide judgment of KPK service Tribunal is quite clear that the status of Mr. Jamshid Khan of being employee of Solicitor Wing will remain intact and he could be promoted in his own department and will retain his enter see seniority in that wing as Senior Clerk.
7. A committee was constituted by the Law Department vide Notification E&A/LD/Seniority/63-46-50 dated 24.4.2012 for looking into the matter of staff of Solicitor/Litigation Cell Law Department and Government Pleaders.
8. In meeting (Minutes Para No. 5 Sub-Para No. 8 duly highlighted) it was decided to adjust Mr. Jamshid Khan in Government Pleader Office Swat and then transferred to Litigation Cell Law Department (F.H).

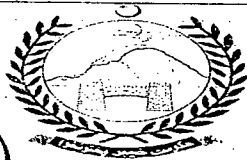
Now, it is prayed that in light of the above the Tentative Seniority List may be corrected to the extent that Mr. Jamshid may be placed in the list as Senior Clerk. The applicant is the most Senior Scale Stenographer.

Yours faithfully,



(Shamshad Nazli)
Senior Scale Stenographer
Dated: 22.06.2020

D



DIRECTORATE GENERAL OF LAW & HUMAN RIGHTS
KHYBER PAKHTUNKHWA, PESHAWAR

Phone: 091-9217204

Email: [dhr.kpk@gmail.com](mailto: dhr.kpk@gmail.com)

Website: www.humanrights.kp.gov.pk

Plot No. 21, Sector B-2, Phase-V. Hayatabad, Peshawar

Notification

Dated Peshawar, the 08/12/2021

NO. DG/SLT/Seniority/2-17/2019: *192278-81* In pursuance of Section 8 of Khyber Pakhtunkhwa Civil Servants Act, 1973 read with Rule 17 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989, the final seniority list of Assistant/Senior Scale Stenographer (BPS-16) of Solicitor Wing Litigation Cell approved by the Competent Authority it stood on 29.11.2021 is hereby notified/circulated for general information.

S. No	Name of Official	Designation	Date of Birth	Qualification	Domicile	Date of 1 st Joining Govt: Services	Date of Promotion
1.	Mr. Jamshed Khan	Assistant	10.10.1964	M.A	Peshawar	08.10.1988	10.07.2007
2.	Mst. Shamshad Nazli	Senior Scale Stenographer	01.10.1962	B.Com, MA LL.B	Peshawar	01.11.1984	25.05.2012

DIRECTOR GENERAL
FOR LAW & HUMAN RIGHTS
KHYBER PAKHTUNKHWA

Endst: No. DG/SLT/AD/Seniority/2-17/2019:

Copy forwarded to:-

1. P.A to Solicitor, Directorate General of Law & Human Rights.
2. PS to Secretary, Law Department.
3. Reference & Research Officer Law Department is requested to upload on Law Department Website.
4. Official Concerned.

[Signature]
ASSISTANT SOLICITOR (M&E)

affair concerned

20

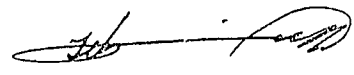
19	Mr. Sardar Ahmad, Naib Qasid.	GP Office, Tank.	GP Office, Shangla.
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Secretary to Govt. Of Khyber Pakhtunkhwa
Law, Parliamentary Affairs & Human
Rights, Department.

NO.SLT 19(3) 2009-2010/ 20574 - 27. Dated: 31/12/2010

Copy forwarded for information & necessary action to:-

- 1- The Accountant General, Khyber Pakhtunkhwa, Peshawar.
- 2- The District Account Officer concerned.
- 3- Government Pleaders/Addl: Government Pleaders in the District concerned.
- 4- PS to Secretary to Govt: of Khyber Pakhtunkhwa, Law Department.
- 5- PA to Addl: Secretary (Gen/Opinion), Law Department.
- 6- PA to Deputy Secretary (Admn)/Dy: Solicitor, Law Department.
- 7- Bill Assistant, Law Department.
- 8- Official concerned.



(TEHSINULLAH JAN)
Section Officer (Gen)



GOVERNMENT OF
KHYBER PAKHTUNKHWA
LAW, PARLIAMENTARY AFFAIRS
AND HUMAN RIGHTS DEPARTMENT

No.E&A/(LD)2-58/2010/5468-85
Dated Peshawar the 06/4/2011.

To

All the concerned Officials,
In Litigation Cell, Law, Parliamentary Affairs
& Human Rights Department.

SUBJECT:- FINAL SENIORITY LIST OF OFFICIALS IN LITIGATION CELL LAW
DEPARTMENT.

Dear Sir,


I am directed to circulate final seniority list of officials working in the
Litigation Cell of Law Department as it stood on 25-02-2011 for information.

[Handwritten signature]

[Handwritten signature]
(TAHSINULLAH JAN)
Section Officer (General),
Law Department.

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9	Ghulam Ali Chowkidar		4-2-1982	26-2-2004	1	1-7-2007	2	Direct	
10.	Mr.Muhammad Naeem NaibQasid.	F.Sc	10.10.1972	17.8.2009	1	17.8.2009	1	Direct.	
11.	Mr.Aziz Khan, NaibQasid.		7.1.1981	19.8.2009	1	19.8.2009	1	Direct.	
12.	Mr.Waqas Khan Chowkidar	Matric	24-1-1989	21.08.2009	1	21.8.2009	1	Direct	


(TAHSINULLAH JAN)
Section Officer (General)

No. EPA / (LD) / 2-58/2010/0-100
dated 06-04-2011

23

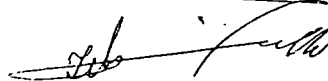
Final Seniority List of Class-IV employees of Litigation Cell, Law Department,

S.No	Name /Designation of official with qualification.	Qualificati on.	Date of birth	Date of Ist entry into Govt Service	BPS	Date of present appointme nt/S.Grade	BPS	Method of recruitment /appointment	Remarks.
1.	Mr.Anwar Ali, Naib Qasid.	-	1.8.1951	1.8.1985	1	1.7.2007	3	By Selection Grade.	
2.	Mr.Iqbal Shah Chowkidar.	-	1.8.1965	1.8.1985	1	1.7.2007	2	Direct.	
3.	Pervez Masih, Sweeper.	-	1.8.1959	1.8.1985	1	1.7.2007	2	Direct.	
4.	Mr.Iqbal Hussain, Naib Qasid.	-	19.2.1955	3.7.1988	1	1.7.2007	2	Direct.	
5.	Mr.Wali Muhammad, Naib Qasid.	-	1.1.1957	1.11.1989	1	1.7.2007	2	Direct.	
6.	Mr.Muhammad Ayub Naib Qasid.	-	1.1.1953	1.12.1994	1	1.7.2007	2	Direct.	
7.	Mr.KhialGul, Naib Qasid.	-	1.1.1958	1.12.1982 1-7-2002 (Adjusted)	1	1.7.2007	2	Surplus Pool.	
8.	Muhammad Sharif, Naib Qasid.	-	1973	5-12-1991 1-8-2002 Adjusted	1	1.7.2007	2	Surplus Pool	

876
a
No. ESA/(LD)2-58/2010/5468-85
dated 06-04-2011

Final Seniority List of Daftari of Litigation Cell, Law Department.


S.No.	Name /Designation of official.	Qualification.	Date of birth	Date of Ist entry into Govt Service	BPS	Date of present appointment	BPS	Method of recruitment/appointment	Remarks.
1.	Mr. Abdul Jalil, Daftari.		6.8.1964	1.8.1985	2	7.7.1988	5	By promotion.	


(TAHSINULLAH JAN)
Section Officer (General)

No: EBA/(LD)2-58/2010/5468-85
dated 06-04-2011

Final Seniority List of Assistants of Litigation Cell, Law Department,

S.No.	Name/ Designation of official.	Qualification.	Date of birth	Date of Ist entry into Govt Service	BPS	Date of promotion/S.Grade/ Upgradation	BPS	Date of present scale	Method of recruitment/ appointment	Remarks.
1.	Mr.Momin Khan, Assistant.	B.A.	13.1959	22.10.1985	11	SG 01.07.1987	15	01.07.1987	Selection Grade.	
2.	Mr. Muhammad Ismail, Assistant	B.A.	20.3.1965	15.12.1983	5	Prom. 15.12.2003 Pr. 15.12.2003 Up.G. 1.7.2007	07 11 14	01.07.2007	By promotion.	


(TAHSINULLAH JAN)
Section Officer (General)

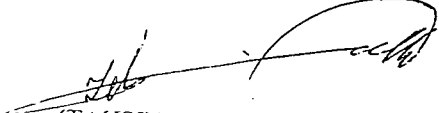
26

7

NO. EBA/(LD)2-58/2010/5468-85.
dated. 06-06-2011

Final Seniority List of Junior Scale Stenographer Litigation Cell, Law Department.

S.No.	Name /Designation of official.	Qualification.	Date of birth	Date of 1st entry into Govt Service	Date of promotion/ S. Grade	BP S	Date of Present Scale	Method of recruitment/appointment	Remarks.
1.	Mrs.Shamshad Nazli Junior Scale Stenographer.	B.Com,M.A.(Urdu),L.L.B	1.10.1962	1.11.1984	7-3-1988	12/15	3-3-97	Selection Grade	


(TAHSINULLAH JAN)
Section Officer (General)


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6

No. E.A/(LD) 2-58/2010/5468-85
dated 06-04-2011

Final Seniority List of Senior Scale Stenographer Litigation Cell, Law Department.

S.N o.	Name /Designation of official.	Qualification.	Date of birth	Date of Ist entry into Govt Service	Date of promotion/ S. Grade	BPS	Date of Present Scale	Method of recruitment/appointment	Remarks.
1.	S. Jehangir Shah, Senior Scale Stenographer.	Matric	11.9.1953	24.5.1975	2.12.1990	15 16	02-12-90	Selection Grade	


(TAHSINULLAH JAN)
Section Officer (General)



GOVERNMENT OF KHYBER PAKHTUNKHWA
LAW, PARLIAMENTARY AFFAIRS &
HUMAN RIGHTS DEPARTMENT

No. E&A/LD/2-77/Seniority list//2012/8032-51.
Dated: Peshawar 27/05/2013

To

Mrs. Shamshad Nazki
Sr. Scale Stenographer

Subject: TENTATIVE SENIORITY LIST.

I am directed to refer to the subject noted above and to enclose herewith tentative seniority list of employees of Litigation Cell, Law Department.

If you have any objection regarding the tentative seniority list, the same may be conveyed within 30 days on the receipt of this letter positively, so that necessary correction may be made. Otherwise the same will be considered as final seniority list.

Encl: as above

(Imran Khan)
Section Officer (General)

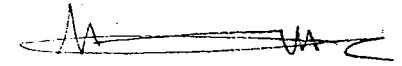
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GOVERNMENT OF KHYBER PAKHTUNKHWA
LAW, PARLIAMENTARY AFFAIRS &
HUMAN RIGHTS DEPARTMENT

TENTATIVE SENIORITY LIST OF SENIOR SCALE STENO GRAPHER OF LITIGATION CELL, LAW DEPARTMENT KHYBER PAKHTUNKHWA

1	2	3	4	5	6	7	8	9
Name /Designation of official	Academic Qualification	Date of birth	Date of 1st entry	Date of promotion/ S. Grade	BPS	Date of Present Scale	Method of recruitment/ appointment	Remarks
Mrs. Shamshad Nazli Senior Scale Stenographer	B.Com, MA (Urdu), LLB	01-10-1962	01-11-1984	25-05-2012	16		By promotion	1. She was appointed as Steno Typist in BPS-12. 2. She has been promoted as Senior Scale Stenographer on 25-05-2012



Imran Khan
Section Officer (General)

Appeal No. 636/2011

Date of Institution. .. 12.4.2011
Date of Decision .. 23.1.2012

Jamshed Khan, Assistant BPS-14, Litigation Cell,
Law Department, Civil Secretariat, Peshawar. ...

(Appellant)

VERSUS

1. Government of Khyber Pakhtunkhwa through Chief Secretary of Khyber Pakhtunkhwa, Peshawar.
 2. Secretary, Finance Department, Khyber Pakhtunkhwa, Peshawar.
 3. Secretary Law, Parliamentary Affairs and Human Rights Department, Khyber Pakhtunkhwa, Peshawar. ...
- (Respondents)

APPEAL U/S 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE ORDER DATED 31.12.2010 WHEREBY THE APPELLANT HAS BEEN TRANSFERRED/ADJUSTED AT GOVERNMENT PLEADER OFFICE SWAT AGAINST WHICH IS DEPARTMENTAL APPEAL DATED 7.1.2011 HAS NOT BEEN RESPONDED DESPITE THE LAPSE OF NINETY DAYS.

MR. IJAZ ANWAR,
Advocate

... For appellant.

MR. TAHIR IQBAL,
Addl. Government Pleader

... For respondents.

SYED MANZOOR ALI SHAH, ...
MR. NOOR ALI KHAN, ...

MEMBER
MEMBER

JUDGMENT

SYED MANZOOR ALI SHAH, MEMBER:- This appeal has been filed by Jamshed Khan, the appellant, U/S 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974, against the order dated 31.12.2010, whereby the appellant has been transferred/adjusted at Government Pleader Swat. It has been prayed that on acceptance of the appeal, the impugned order may be varied set aside and the appellant being employee of Litigation Cell of Law Department be allowed to continue his duties as such.

2. Brief facts of the case as averred in the Memo: of appeal are that the appellant was initially appointed as Junior Clerk on 6.10.1988 in the then Solicitor

750 / 11. 11.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Appeal No.636/2011

Date of Institution: 12.04.2011

Date of Decision 23.01.2012

Jamshed Khan, Assistant BPS-14, Litigation Cell.
Law Department, Civil Secretariat, Peshawar.....Appellant

Versus

1. Government of Khyber Pakhtunkhwa through Chief Secretary of Khyber Pakhtunkhwa, Peshawar
2. Secretary, Finance Department, Khyber Pakhtunkhwa, Peshawar
3. Secretary law, parliamentary Affairs and Human Rights Department, Khyber Pakhtunkhwa, Peshawar

(Respondent)

**APPEAL U/S 4 OF THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL ACT, 1974 AGAINST THE ORDER
DATED 31.12.2010, WHEREBY THE APPELLANT HAS
BEEN TRANSFERRED/ADJUSTED AT GOVERNMENT
PLEADER OFFICE SWAT AGAINST WHICH IS
DEPARTMENTAL APPEAL DATED 07.01.2011 HAS NOT
BEEN RESPONDED DESPITE THE LAPSE ON NINETY
DAYS**

Mr. Ijaz Anwar
Advocate

for appellant

Mr. Tahir Iqbal
Addl. Government Pleader

For respondents

SYED MANZOOR ALI SHAH
MR. NOOR ALI KHAN

MEMBER
MEMBER

JUDGMENT

Syed Mansoor Ali shah, member, this appeal has been filed by Jamishid Khan, the appellant, U/S 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974, against the order dated 31.12.2010, whereby the appellant has been transferred/adjusted at Government pleader Swat. It has been prayed that on acceptance of the appeal, the impugned order may be varied set aside and the appellant being employee of litigation Cell of law Department be allowed to continue his duties as such.

2 Brief facts of the case as averred in the Memo of appeal are that the appellant was initially appointed as Junior clerk on 06.10.1988 in the then Solicitor

Office of Law Department. Vide notification dated 26.7.1995, the staff members of Solicitor and Deputy Solicitors offices were transferred to Law Department and the office of Solicitor was declared as separate wing in the Law Department, however, the employees were brought under the control of Law Department. During the course of his service, the appellant was promoted as Senior Clerk on 16.12.2003 and then as Assistant being the senior most in the Solicitor office Muffassil Establishment (Litigation Cell) Law Department, vide order dated 2.7.2007. Since there were certain reservation regarding the status of the staff of Law Department including Solicitor Wing, Hisba Wing and Government Pleaders staff hence a committee was constituted to decide the issue, it was however, concluded by the said committee that all these wings are separate cadre and promotion shall be made from the respective cadre/wing to the posts available in that cadre. Vide impugned order dated 31.12.2010, the appellant was transferred to Government Pleader office, Swat, despite the fact that the appellant belongs to Solicitor office Muffassil Establishment. Feeling aggrieved, he filed departmental appeal, which elicited no response within the statutory period, hence the present appeal.

3. After admission of the appeal, notices were issued to the respondents. They have filed their joint written reply and contested the appeal. The appellant also filed rejoinder in rebuttal.

4. Arguments heard and record perused.

5. The learned counsel for the appellant argued that the appellant is regular employee of Litigation Cell of the Law Department and his transfer to Hisba or Government Pleader office is illegal and unjustified. Employees of Litigation Cell and Government Pleaders staff have separate seniority and due to impugned transfer order, seniority of the appellant has been disturbed without any option on his behalf. He further argued that the impugned order has been passed on malafide intention and to accommodate/promote some juniors employees in the Litigation Cell to the detriments of the rights of the appellant. He requested that the appeal may be accepted as prayed.

6. The learned AGP, on the other hand, argued that the appellant was promoted as Assistant created in Hisba Wing (Zilla Mohtasib), therefore, he was rightly transferred to Government Pleader Office, which is part and parcel of Litigation Cell and the appellant is enjoying perks and privileges of the said post since, 2007. He further argued that under Section 10 of the Khyber Pakhtunkhwa Civil Servants Act, 1973 every civil servant shall serve anywhere in the province in the exigencies of service. He requested that the appeal may be dismissed.

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6. The learned AGP, on the other hand, argued that the Appellant was promoted as Assistant created in Hisba Wing (Zilla Mohtasib), therefore, he was rightly Transferred to Government Pleader Office, which is part and parcel of Litigation Cell and the Appellant is enjoying perks and privileges of the said post since, 2007. He further argued that under Section 10 of the Khyber Pakhtunkhwa Civil Servants Act 1973 every civil servant shall serve anywhere in the province in the exigencies of service. He requested that the appeal may be dismissed.

B2

7. The Tribunal observes that the appellant was initially appointed in the Solicitor office, which was later on ordered to be a part of the Law Department to work in collaboration of the existing Litigation Cell with separate entity in that Department. He was promoted as Senior Clerk in December, 2003 and later on promoted as Assistant and posted in Mufassil Establishment on 10.7.2007. Since seniority of the employees of Mufassil Establishment and Government Pleader Wing are maintained separately, therefore, permanent absorption/transfer of the appellant to Government Pleader staff without his option is illegal and unjustified. So far as the transfer is concerned every civil servant shall serve anywhere in the province in exigencies of service. The appellant could be transferred to other wings of the Law Department but due to transfer in other wings, could not be considered permanent employee of that wing. His status of being employee of Solicitor Wing will remain and he could be promoted in his own department i.e. Solicitor Wing and will retain his interse seniority in that Wing.

8. In view of the above, the appeal is disposed of accordingly, with no order as to costs. File be consigned to the record.

ANNOUNCED
23.1.2012.

(NOOR ALI KHAN)
MEMBER

(SYED MANZOOR ALI SHAID)
MEMBER

Certified to be a true copy

*Secretary
Government Pleader
District Court
Faisalabad*

23/1/2012
12/12
Government Pleader
Faisalabad

7. The Tribunal observes that the Appellant was initially appointed in the Solicitor office, which was later on ordered to be a part of the Law Department to work and collaboration of the existing Litigation Cell with separate entity in that department. He was promoted as Senior Clerk in December, 2003 and later on promoted as Assistant and posted in Muffassil Establishment on 10.07.2007. Since seniority of the employees of Mufassil Establishment and Government Pleader Wing are maintained separately, therefore, permanent absorption/transfer of the Appellant to Government pleader staff without his option is illegal and unjustified. So far as the transfer is concerned every civil servant shall serve anywhere in the province in exigencies of service. The Appellant could be transferred to other wings of the Law Department but due to transfer in other wings, could not be considered permanent employee of that wing. His status of being employee of Solicitor Wing will remain and he could be promoted in his own department i.e Solicitor Wing and will retain his interse seniority in that wing.

8. In view of the above, the appeal is disposed of accordingly, with no order as to costs. File be consigned to the record.

ANNOUNCED
23.01.2012

(NOOR ALI KHAN)

MEMBER

SYED MANZOOR ALI SHAH

MEMBER

7-6

Branch Name: _____

Remarks: _____

Signature: _____

Date: 6/1/2022 OC

To,

The Worthy Secretary,
Govt. of Khyber Pakhtunkhwa
Law, Parliamentary Affairs and Human Rights Department

Through

**DIRECTOR GENERAL OF LAW AND HUMAN RIGHTS
KHYBERPAKHTUNKHWA.**

Subject:

**DEPARTMENTAL REPRESENTATION AGAINST THE IMPUGNED FINAL
SENIORITY LIST OF ASSISTANT/SENIOR SCALE STENOGRAPHER
DATED 08.12.2021.**

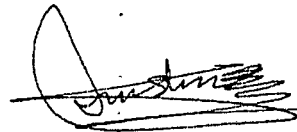
R/Sir,

The appellant humbly and respectfully submits as under:-

1. That the appellant already submitted an objection/application against the impugned tentative seniority list issued by Directorate General of Law and Human Rights Khyber Pakhtunkhwa vide letter No. DG/SLT/Ad/Seniority/2-17/2019/3857-65, dated 15.06.2020 (Annex-I).
2. That the Directorate General of Law & Human Rights issued impugned final Seniority List vide No. DG/SLT/Seniority/2-17/2019/92278-81, dated 8.12.2021 (Annex-II), which is against the Rules, Law, equity and justice on the ground that Mr. Jamshid Khan who has been reflected in the impugned final seniority list was promoted against the post of Hisba on 10.07.2007 and on abolition of his post in Hisba, he was adjusted in the office of Government Pleader, Swat against the newly created vacant post and the appellant remained senior in the seniority list as Mr. Jamshid Khan Assistant should have been claimed his seniority in the seniority list of the staff of Govt Pleader's offices on his adjustment vide Law Department order No.SLT-19(3)2009/10/20514-21, dated 31.12.2010 (Annex-III).
3. That the Law Department then issued a final seniority list of the officials of the Litigation Cell of the Law Department on 6.4.2011 where in the name of Mr. Jamshid Khan Assistant was not mentioned in the seniority list of the Litigation Cell of the Law Department on the above mentioned ground due to which he is not entitled to be reflected in the final seniority list as senior than the appellant (Annex-IV).
4. That on transfer from the office of Government Pleader Swat to the Litigation Cell of the Law Department against the vacant post on 22.6.2012, the name of Mr. Jamshid Khan Assistant was included in the seniority list with the staff of the Litigation Cell of the Law Department on the basis of malafide intention which is incorrect due to which appellant agitated against the said seniority list issued by the Law Department on 27.5.2013 vide (Annex-V&VI).

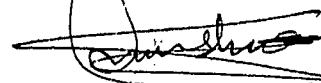
- 13
5. That according to para 7 of the Judgement of Khyber Pakhtunkhwa Service Tribunal the status of Mr. Jamshid Khan Assistant should remain and could be promoted in the Solicitor Wing and retain his interse seniority in that wing but Mr. Jamshid Kahn Assistant has not been opted to be promoted as assistant in Litigation Cell of Law Department on remaining his original status in that wing as per judgment so for and he is still working as assistant against the post he was adjusted as assistant in the then Government Pleader now District Attorney wing (**Annex-VII**) and therefore the appellatant is senior then Mr. Jamshid Khan Assistant.
 6. That the post of superintendent has been lying vacant since 2018.
 7. That in case the impugned final seniority list issued by the Directorate General of Law & Human Rights on 08.12.2021 (**Annex-VIII**) is not set asided the appellatant will be deprived of her due right of seniority and promotion to the post of Superintendent lying vacant in the Solicitor Wing since long because the appellatant will stand retired on 01.10.2022 and thus an irreparable loss may be caused to the appellatant.

It is therefore, requested that the impugned final seniority list issued by Directorate General of Law & Human Rights on 08.12.2021 may kindly be set asided and the appellatant be reflected at the top of the aforementioned Seniority list and the promotion of Mr. Jamshid Khan assistant to the post of Superintendent be stopped and oblige.



(SHAMSHAD NAZLI)
Sr. Scale Stenographer, Directorate General of
Law and Human Rights

Copy (in advance) forwarded to the Worthy Secretary Law, Parliamentary Affairs and Human Rights Department for information and necessary action please.



(SHAMSHAD NAZLI) 08/01/22
Sr. Scale Stenographer, Directorate General of
Law and Human Rights

VAKALATNAMA

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

APPEAL NO: _____ OF 2022

Shamshad Nazli

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

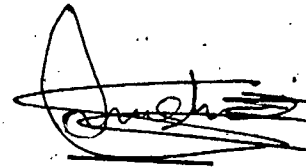
Law Department

(RESPONDENT)
(DEFENDANT)

I/We Shamshad Nazli

Do hereby appoint and constitute **NOOR MOHAMMAD KHATTAK, Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. ____/____/2022



CLIENT

ACCEPTED
NOOR MOHAMMAD KHATTAK

KAMRAN KHAN

UMAR FAROOQ

MUHAMMAD MAAZ MADNI

**HAIDER KHAN
ADVOCATES**

OFFICE:

Flat No.(TF) 291-292 3rd floor
Deans trade centre Peshawar cantt:
Mobile No. 0334-5277323