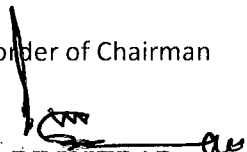


Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- _____ 1329/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	07/09/2022	<p>The appeal of Mst. Rishma Hassan presented today by Mr. Kabeer Imam Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____. Notices be issued to appellant and his counsel for the date fixed.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

BEFORE THE HONOURABLE SERVICES TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR

Appeal No. 1329 /2022

Rishma Hassan Versus Govt of Khyber Pakhtunkhwa & Others

INDEX

S #	Description of Documents	Annexure	Page#
1	Grounds of Appeal		1-8
2.	Affidavit		9
3.	Temporary injunction with affidavit & addresses of parties		10-13
4.	Copy of CNIC and appointment order	"A"	14-15
5.	Copy of impugned order dated 2-2-2022	"B"	16
6.	Copy of departmental appeal/application	"C"	17
7.	Copy of application for the cancellation of transfer order dated 21-5-2022	E	18
8.	Letter #945/MS/SHB DATED 21-5-2022 NOC	F	19
9	Application dated 6-6-2022 and 6-7-2022	G	20-21
10	Wakalat Nama		22

DATED: 7-7-2022

Appellant

Through


(KABEER IMAM.)

Advocate, High Court,
Peshawar

①

BEFORE THE HON'BLE SERVICES TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR

Appeal No. 1329 /2022

Rishma Hassan D/o Muhammad Nabi Charge Nurse Bps-16 , type
-c Shabqadar hospital , Charsadda

-----*(petitioner)*

VERSUS

1. Government of KP through its Chief Secretary Khyber Pakhtunkhwa at Civil Secretariat Peshawar.
2. Secretary Health Khyber Pakhtunkhwa at Civil Secretariat Peshawar
3. Director General Health, Khyber Pakhtunkhwa Peshawar.
4. Medical Superintendent ,THQ Shabqadar, Charsadda
5. Medical Superintendent, DHQ, Hangu

SERVICE APPEAL U/S 04 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974
AGAINST THE IMPUGNED OFFICE ORDER
BEARING endst No 856-64/EII DATED 02-02-
2022 OF THE RESPONDENT NO. 3 WHEREBY
THE PETITIONER IS TRANSFERRED FROM
(CATEGORY)TYPE -C HOSPITAL SHABQADAR
(CHARSADDA) TO DHQ,HANGU ILLEGAL AND
UNLAWFULLY BY THE RESPONDENT#3
WITHOUT ANY REM OR REASON IN A
CLASSICALLY & ARBITRARY MANNER.

RESPECTFULLY SHEWETH,

2

1. That appellant is the law abiding citizen of Pakistan and is performing her duty as Female charge Nurse BPS-16 at type-c Hospital Shabqadar (Charsadda) (copy of Appointment letter is annexed herewith)
2. That the appellant is performing her duty at Category "C" Hospital Shabqadar Charsadda since 3rd January 2017 with full zest and zeal.
3. That the respondent#3 has transferred the appellant vide office order#859-64 dated 2-2-2022 from TYPE-C Hospital Shabqadar (Charsadda) to DHQ Hospital ,Hangu.(copy of order is annexed herewith)
4. That the appellant and her family members are permanent resident of hungu but due to some serious issues/problems/Blood enmity the whole family migrates to Peshawar since then are residing at Peshawar.
5. That the appellant from the last 2 months started training in specialized Neo-Natal ICU care at Type "C" Hospital Shabqadar (charsadda) which is still in process/continue.
6. That against the said order the appellant has submitted application/appeal for cancellation of the

3

said order before the Respondent#2 on dated 24-2-2022 but still date the said appeal is also not decided by the respondent#2.(copy of the said application is annex)

7. That the appellant is being a female, and it is impossible for her to travel from Peshawar to hungu on daily basis and further pertinent to mentioned here that although the appellant belongs from District Hungu but due to blood enmity with their family members due to said reason the appellant and his family migrated to Peshawar in such circumstances it will be difficult for the appellant to work whole heartedly with full zeal and zest as it also endanger her life too.
8. That against the transfer order ,the appellant file an appeal to the Respondent#3 for cancelling the order of the transfer on humanitarian ground .(copy of the transferred order and application is annex)
9. That the respondent#4 has also give NOC vide letter #945/M.S/SHB dated 21-05-2022 to retain the appellant on humanitarian basis as well as in the best interest of public.(copy of the said is annex herewith)
10. That the appellant again submitted application for the request for cancellation of transfer order on 21-05-2022 before the Respondent#3 which was being

(4)

forwarded but still date the said application is not decided.(Copy of the application is annex herewith)

11. That the appellant is being subject to persistent acts of discrimination, the Appellant is transferred to Hangu on political Mal Practice and personal grudges of the Respondents.

12. That feeling aggrieved the appellant prefers the instant appeal on the following grounds inter alia

GROUNDS:

A. That the appellant is a naturally born bonafide citizens of the Islamic Republic of Pakistan and is fully and equally, on equality basis, entitled to all basic and fundamental rights as enshrined in the fundamental law of the land, interpreted, guaranteed and enforced by the laws of the land and discrimination along with unfettered exercise of discriminatory powers by an authority or office is always been deplored, deprecated and depreciated by superior Courts of the land.

B. That persistent orders of transfer and posting of any Civil Servant/Government servant is always hazardous and injurious to the Potential and capabilities of the such civil servant /Government servant and has always been depreciated and discouraged by the Superior Courts,

(5)

being always held as violation to fundamental rights and not solely to the service rights.

C. That the impugned transfer and posting orders is highly discriminatory ones and the appellant although is the permanent resident of district Hangu but due to blood enmity whole family migrates from Hangu to Peshawar and in such circumstances it will create hurdles in performing her duties at Hangu and also endangers her life too.

D. That retaining the blue eyed one and favorite on their favorite places and transferring the Petitioner unfettered discrimination and even only on this score the impugned office orders is void and illegal.

E. That the normal tenure of transfer and posting can only be allowed to be left in rare and exceptional cases and that to in a defined public interest, appellant was retained by the Respondent#4 and provide NOC on humanitarian ground as well as in public interest and the order of the Respondent#3 is illegal and unlawful and needs to be cancelled and declare void.

F. That the transferred order of the appellant is an illegal, discriminatory, void, and unwarranted manner and is liable to be set-aside.

6

G. That the respondent has also violated the policy of the government and on this score alone the impugned office order needs to be cancelled and declare void.

H. That posting and transferring any Civil Servant/Government Servant is a defined mechanism of service laws and a procedure is detailed in Esta Code while the accrued rights, accrued thereupon, is fully protected under the same code whose details is provided under rule 9 of Transfer, Promotion and Appointment Rules of 1989. But here the situation is volte-face and the appellant is transferred from Category "C" Hospital Shabqdar Charsadda without any justification and the same tantamount to violation of not only service laws but as well as fundamental law.

I. That no one can be condemned unheard, nor anyone can be condemned for no wrong.

J. That salary of the appellant has been stopped plausible reason and without any justification and without and fault on part of the appellant.

K. That from every angle and perspective the impugned transfer and posting order is illegal, discriminatory, void, unwarranted, vexatious, and unlawful and is liable to be cancelled and set aside.

7

L. That any other ground no raised here may graciously be allowed to be raised at the time of arguments before this Honble tribunal.

PRAYER:-

It is, therefore, most humbly prayed that on acceptance of the instant appeal the impugned office order bearing endst No 859-64 Dated 2-2-2022 may kindly be set-aside and the appellant may kindly be retain.

or

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

INTERIM RELIEF

To foster the ends of Justice, the petitioner has a good prima facie case and there is every hope of its success, therefore, by way of interim relief the petitioner may kindly be retain at, (type-C) Category-C (THQ) Shabqadar Hospital (Charsadda) or be restrain from any adverse action till the final decision of the instant petition, so as to enable her to defend his valuable rights in accordance with law. Otherwise the appeal would become infructuous.

DATED:20/08/2022

Appellant

Through



KABEER IMAM

Advocate High Court, Peshawar

8

Note : No such like appeal for the same appellant has earlier been filed by me, upon the subject matter, prior to the instant one, before this Hon'ble Tribunal.

ADVOCATE

List of Books Referred:

1. Civil Servant Act- 1973
2. Case Laws
3. Any other book as per need.

ADVOCATE

9

BEFORE THE HONOURABLE SERVICES TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR

Appeal No. _____

Rishma Hassan

Versus

Govt of Khyber Pakhtunkhwa & Others

AFFIDAVIT

I, kabeer Imam Advocate Counsel for appellant do hereby solemnly affirm and declare on oath that as per information furnished by my client, all the contents of the Instant appeal are true and correct to the best my knowledge and belief and nothing has been concealed from this honorable Tribunal.

Rishma
DEPONENT
ATTESTED 14/01-4472866-0
GHANFAR ALI ADVOCATE
Oath Commissioner
Muzaffargarh
29/1/22
★

(10)

BEFORE THE HONBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR

C.M No# _____ / 2022

In S.A _____ / 2022

Rishma Hassan VERSUS Govt of Khyber Pakhtunkhwa & Others

APPLICATION FOR TEMPORARY INJUNCTION

RESPECTFULLY SHEWETH,

1. That the appellant is filing the accompanying appeal, the contents of which may graciously be considered as integral part and parcel of the instant petition.
2. That prima facie case exists in favour of the Petitioner.
3. That balance of convenience is also lies in favor of Petitioner and his quite sanguine of his success.
4. That if the instant application is not allowed the petitioner shall suffer irreparable loss.

It is, therefore, most humbly prayed that on acceptance of the instant appeal the

(11)

respondents be directed to retain the appellant
Category "C" Hospital Shabqadar Charsadda till
the final disposal of the accompanying appeal.

OR

Any other relief not specifically asked for
may also graciously be extended in favor of the
petitioner in the circumstances of the case.

Dated: 28/08/2022

Appellant

Through



KABEER IMAM

Advocates High Court Peshawar

12

BEFORE THE HONBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR

In Re S.A _____/2022

Rishma Hassan **VERSUS** Govt of Khyber Pakhtunkhwa & Others

AFFIDAVIT

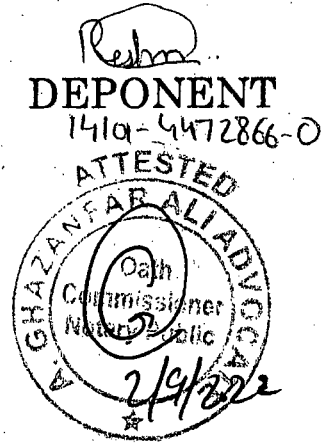
I, Rishma Hassan D/o Muhammad Nabi Charge Nurse Bps-16 , Shabqadar, Charsadda do hereby solemnly affirm and declare that the contents of the Instant application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

Identified By:

KABEER MAM

Advocate High Court

Peshawar



13

BEFORE THE HONOURABLE SERVICES TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR

Appeal No. _____

Rishma Hassan

Versus

Govt of Khyber Pakhtunkhwa & Others

ADDRESSES OF PARTIES

ADDRESS OF APPELLANT

Rishma Hassan D/o Muhammad Nabi Charge Nurse Bps-16 ,THQ
Shabqadar, Charsadda.

ADDRESSES OF RESPONDENTS

1. Government of KP through its Chief Secretary Khyber Pakhtunkhwa at Civil Secretariat Peshawar.
2. Secretary Health Khyber Pakhtunkhwa at Civil Secretariat Peshawar
3. Director General Health, Warsak Road Khyber Pakhtunkhwa Peshawar.
4. Medical Superintendent ,THQ,Shabqadar,charsadda
5. Medical Superintendent, DHQ, Hangu

DATED: -20-08-2022

Appellant




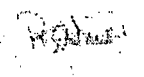
Through



(KABEER IMAM)

Advocate, High Court,
Peshawar

Area (A) 14

 PAKISTAN National Identity Card ISLAMIC REPUBLIC OF PAKISTAN		14101-4472866-0	
Name Rishma Hassan رشما حسن			
Father Name Muhammad Nabi محمد نبی		101631207971	
Gender F	Country of Stay Pakistan		
Identity Number 14101-4472866-0	Date of Birth 04.03.1990	Registrar General of Pakistan	
Date of Issue 07.07.2020	Date of Expiry 07.07.2030	گمشدہ کارڈ ملنے پر قریبی لیٹر بکس میں ڈال دیں	
Holder's Signature 		Scanned with CamScanner	
Scanned with CamScanner		Scanned with CamScanner	

Arlex (B) 15



**DIRECTORATE
GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR**

All communications should be addressed to the Director General Health Services
E-Mail Address: info@dghs.gov.pk Office Fax: 0301-3517289 Cell: 999-999-9999

OFFICE ORDER.

In partial modification of this Directorate office order bearing Encls: No. 7425-55/E.II, dated 16.12.2016 and No. 7116-52/E.II, dated 23.12.2016, No. 7153-68/E.II, dated 23.12.2016 the following amendment of newly appointed Charge Nurses (BPS-16) on regular basis are hereby ordered with with immediate effect.

S.No.	Name with Father's Name	Under posting	New place of posting	Remarks
01	Tahira Bibi D/O Hakim	THQ Hospital Samar Bagh Lower Dir	THQ Hospital Drosh, Chitral	Against the vacant post
02	Razia Bibi D/O Sher Khan	THQ Hospital Drosh Chitral	THQ Hospital Booni Chitral	Against the vacant post
03	Jamila Bibi D/O Sahib Jan	Civil Hospital Lahore Swabi	Bacha Khan Medical Complex, Swabi	Against the vacant post.
04	Tayyaba Manzoor Ellahi D/O Manzoor Ellahi	DHQ Hospital Battagram	Bacha Khan Medical Complex, Swabi	Against the vacant post
05	Shamim Akhtar D/O Bakht Raj	Civil Hospital Lahore Swabi	THQ Hospital Pacha Khell, Buner	Against the vacant post
06	Ruqqayya Ashraf D/O Muhammad Ashraf	Civil Hospital Balakot Manshra	BBS Teaching Hospital Abbottabad	Against the vacant post.
07	Hassina Bibi D/O Mahar Bani	DHQ Hospital Timergara	THQ Hospital Garam Chishma, Chitral	Against the vacant Post
08	Anita Banu D/O Sher Hamzareen	THQ Hospital Drosh Chitral	DHQ Hospital Nowshera	Against the vacant Post
09	Rishma Hassan D/O Muhammad Nabi	DHQ Hospital Hangu	Category "C" Hospital Shabqadar, Charsadda	Against the vacant Post
10	Khalida Guln D/O Nowrooz Khan	Nawaz Sharif Kidney Hospital Swat	THQ Hospital Drosh Chitral	Against the vacant post
11	Sumaira Sadiq D/O Sadiq Masih	Civil Hospital Lahore Swabi	DHQ Hospital Nowshera	Against the vacant post
12	Fatima Khurshid D/O Khurshid Ahmad	DHQ Hospital Timergara	Bacha Khan Medical Complex, Swabi	Against the vacant

Aneer (C) 16



**DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR**

All communications should be addressed to The Director General Health Services Peshawar and sent to any official by name.
Phone Nos: 02192211111, 02192211112, 02192211113, 02192211114, 02192211115, 02192211116, 02192211117, 02192211118, 02192211119, 02192211120, 02192211121, 02192211122, 02192211123, 02192211124, 02192211125, 02192211126, 02192211127, 02192211128, 02192211129, 02192211130, 02192211131, 02192211132, 02192211133, 02192211134, 02192211135, 02192211136, 02192211137, 02192211138, 02192211139, 02192211140, 02192211141, 02192211142, 02192211143, 02192211144, 02192211145, 02192211146, 02192211147, 02192211148, 02192211149, 02192211150, 02192211151, 02192211152, 02192211153, 02192211154, 02192211155, 02192211156, 02192211157, 02192211158, 02192211159, 02192211160, 02192211161, 02192211162, 02192211163, 02192211164, 02192211165, 02192211166, 02192211167, 02192211168, 02192211169, 02192211170, 02192211171, 02192211172, 02192211173, 02192211174, 02192211175, 02192211176, 02192211177, 02192211178, 02192211179, 02192211180, 02192211181, 02192211182, 02192211183, 02192211184, 02192211185, 02192211186, 02192211187, 02192211188, 02192211189, 02192211190, 02192211191, 02192211192, 02192211193, 02192211194, 02192211195, 02192211196, 02192211197, 02192211198, 02192211199, 02192211200.

OFFICE ORDER

Mrs. Rishma Hassan D/O Muhammad Nabi, Charge Nurse BPS-16 Type-C Hospital Shabqadar (Charsadda) is hereby transferred and posted in DHQ Hospital, Hangu against the vacant post with immediate effect in the public interest.

NB: - Arrival/Departure report should please be submitted to this Directorate for records.

Sd/-
DIRECTOR GENERAL HEALTH
SERVICES KP, PESHAWAR

No 857-64

/E II.

Dated Pesh. The

02/02/2022.

Copy forwarded to the:-

- 01 Medical Superintendent, DHQ Hospital, Hangu.
- 02 Medical Superintendent, Type-C Hospital, Shabqadar (Charsadda).
- 03 District Accounts Officer, Hangu
- 04 District Accounts Officer, Charsadda
05. Charge Nurse concerned.
- 06 DA-concerned, DGHS KPK Peshawar.

For information and necessary action.

DIRECTOR GENERAL HEALTH
SERVICES, K.P PESHAWAR

7/2/22

Handwritten notes and signatures in the bottom left corner, including the name "Muhammad Nabi" and dates like "18/2/22".

Anex (D) (17)

To,

The Secretary Health Department
Govt of Khyber Pakhtunkhwa

Subject: Conciliation of Transfer order.

R/Sir


This is in reference to DG Health office order
NO 557-64/E dated. 02-Feb-2022 I have been transferred to
DHQ Hospital Hangu.

my family is residing in Peshawar for a very long time,
our family has got some personal issues here at Hangu. moreover
I have done 02 months training in specialized neonatal ICU care
which has been started at category "C" Hospital. Due to which
I may not be able to perform duty at DHQ Hangu.

It is therefore kindly requested in your honor
to cancel my transfer order. And retain me at my present
place of posting i.e Category "C" Hospital Shabqadar.

I shall remain obliged of you for

the favor.

Kind Regards
Rishma Hassan
D/o Muhammad Nabi
Date: 21/Feb/2022
e/n 

Anex "E" (18)

OFFICE OF THE MEDICAL SUPERINTENDENT CATEGORY "C" HOSPITAL SHABQADAR

To

The Director General Health Services
Govt. of Khyber Pakhtunkhwa
Peshawar

Through Proper Channel

Subject: REQUEST FOR CANCELLATION OF TRANSFER.

Respected Sir

With due respect I beg to state that I have been transferred from Cat C Hospital Shabqadar to DHQ Hospital Hangu. My whole family residing here in Peshawar.

It is very difficult for me to travel being a female from Peshawar to Hangu.

Therefore, it is kindly requested to retain me in Category C Hospital Shabqadar.

I will be very thankful to you for this act of kindness.

Yours Sincerely,

Miss. Reshma Hassan

Charge Nurse BPS-16

Cat C Hospital Shabqadar

(Signature)
0336-9838293

Jawwanded
N/A
21/5/2022

Anex "E" (19)

**OFFICE OF THE MEDICAL SUPERINTENDENT,
CATEGORY "C" HOSPITAL, SHABQADAR.**
Phone no: 091-6953111

Ref No: 945 M.S. S/10

Date: 21-05-2022

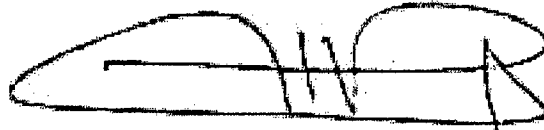
To,
✓ Director General Health Services,
Khyber Pakhtunkhwa Peshawar

Subject: Possible Transfer of Charge Nurses.

Reference to Your Letter No.2589-90/E II dated 27.04.2022 and consequent No.982-83/E-II dated 10.02.2022.

In this connection a self-explanatory application in respect of Miss. Reshma Hassan Charge Nurse (BPS-16) attached to Cat 'C' Hospital Shabqadar may kindly be retain in this hospital on humanitarian basis as well as in best interest of public.

(Incl.Orig)



Medical Superintendent,
Category "C" Hospital Shabqadar

Anex "G" (20)

The Director General
Health Services,
Khyber Pakhtunkhwa,

Subject:- Application for Cancellation of Transfer Order

Sir.

With grate respect, It is stated that I have been working as Charge Nurse (BPS-16) in Category C Hospital Shabqadar since 3rd January 2017. During this period,

Now, I have been transferred to DHQ Hospital Hangu vide DGHS Kpk notification No. 859-64/E-II, Dated 22-02-2022.

Sir, I have some serious family issues over there at Hangu and my whole family is also residing in Peshawar. Therefore, it will be impossible for me to perform my duties with easy mind at DHQ Hangu. And due to this issue I am yet to join my duties at DHQ Hangu.

It is kindly requested in your honor to withdraw my transfer order and allow me to work against my existing post of Charge Nurse BPS-16 at Category C Hospital Shabqadar. I shall remain obliged of you for the favor.

Kind Regards



Mst: Rishma Hassan

Charge Nurse BPS-16

Attached to Category C Hospital Shabqadar

Recommended
Shah Faisal Khan

MPA PK-83 Chairman
DDAC District Hangu

06-06-2022

Area "H" (21)

To

The Director General
Health Services,
Khyber Pakhtunkhwa

Subject:- Application for Cancellation of Transfer Order

Sir,

With grate respect, It is stated that I have been working as Charge Nurse (BPS-16) in Category C Hospital Shabqadar since 3rd January 2017. During this period,

Now, I have been transferred to DHQ Hospital Hangu vide DGHS Kpk notification No. 859-64/E-II, Dated 22-02-2022.

Sir, I have some serious family issues over there at Hangu and my whole family is also residing in Peshawar. Therefore, it will be impossible for me to perform my duties with easy mind at DHQ Hangu. And due to this issue I am yet to join my duties at DHQ Hangu.

It is kindly requested in your honor to withdraw my transfer ordder and allow me to work against my existing post of Charge Nurse BPS-16 at Category C Hospital Shabqadar. I shall remain obliged of you for the favor.

Kind Regards






Mst: Rishma Hassan

Charge Nurse BPS-16

Attached to Category C Hospital Shabqadar

Recommended
and forwarded for
Action

6/7/22
Advisor to CM
For Mines & Mineral Dev. Dept.
Khyber Pakhtunkhwa

قیمت 50 روپے	10002	  
ایڈوکیٹ: کبیر احمد	بار کونسل/ایسوسی ایشن نمبر: RC-14-4780	
رابطہ نمبر: 0346-9085949	پشاور بار ایسوسی ایشن، خیبر پختونخواہ	

بعدالت جناب: سر جسٹس نرسونل K.P. بیگ

مخانب: صدعیہ / Appellant	دعویٰ: Appeal
لے لیسٹر حسن	علت نمبر:
بنام	مورخہ:
حکومت بربرہ	جرم:
	تھانہ:

باعت تحریر آنگہ

لے لیسٹر حسن لیسٹر محمد علی
پشاور ہائی کورٹ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ
آن مقام چارج کیلئے کبیر احمد ایڈوکیٹ سید امانت اللہ کو وکیل مقرر جلیل الہدی ایڈوکیٹ
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 ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق
زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز
دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ 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 وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ پرداختہ منظور و قبول ہوگا
دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے
باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المرقوم: 7-09-2022

العواہ شد العواہ شد

مقام پشاور کے لیے منظور ہے۔

نوٹ: اس کا اصل وکیل کو قابل قبول ہوگی۔
امان اللہ

پشاور