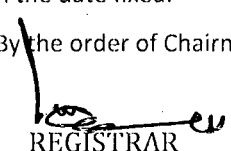


Form- A
FORM OF ORDER SHEET

Court of _____

Execution Petition No. 594/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	06.10.2022	<p>The execution petition of Mr. Muneer Ahmad submitted today by Mr. Noor Muhammad Khattak Advocate. It is fixed for implementation report before Single Bench at Peshawar on _____. Original file be requisitioned. AAG has noted the next date. The respondents be issued notices to submit compliance/implementation report on the date fixed.</p> <p style="text-align: right;">By the order of Chairman  REGISTRAR</p>

**SCANNED
KPST
Peshawar**

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

COC NO. 894 /2022

IN

SERVICE APPEAL NO. 1301/2022

SCANNED
KPST
Peshawar

MUNIR AHMAD

VS

HEALTH DEPARTMENT

INDEX

S NO	DESCRIPTION OF DOCUMENTS	ANNEXURE	PAGE
1	Memo of CoC Petition	-----	1-2
2	Order dated 09-09-2022	A	3
3	Vakalatnama	4



PETITIONER

Through:


NOOR MOHAMMAD KHATTAK,
ADVOCATE
SUPREME COURT OF PAKISTAN

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

COC NO. 594 /2022

IN

SERVICE APPEAL NO. 1301/2022

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 1532

Dated 6/10/2022

Mr. Muneer Ahmad, District Monitoring Officer (BPS-17),
District Karak.

..... **PETITIONER**

VERSUS

- 1- The Government of Khyber Pakhtunkhwa, through Secretary Health Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The Director General Health Services, Khyber Pakhtunkhwa, Peshawar.
- 3- The Director Independent Monitoring Unit (IMU) Health, Health Department, House No.3, 4 North Canal Road, Pawaka, Peshawar

..... **RESPONDENTS**

**APPLICATION UNDER ARTICLE- 204 OF THE
CONSTITUTION OF THE ISLAMIC REPUBLIC OF
PAKISTAN, 1973 READ WITH SECTION 3 & 4 OF THE
CONTEMPT OF COURT ORDINANCE, 2004 FOR
INITIATING CONTEMPT OF COURT PROCEEDINGS
AGAINST THE RESPONDENTS/CONTEMNORS**

RESPECTFULLY SHEWETH:

- 1- That the appellant is peaceful and law abiding citizen of Pakistan and is entitled for all the legal and fundamental rights guaranteed under the constitution of Islamic Republic of Pakistan, 1973.
- 2- That the appellant filed the Service Appeal No.1301/2022 before this Hon'ble Court alongwith an application for interim relief whereby the operation of impugned order dated 26.04.2022 was suspended with the following observation "***Annexed with the memorandum of appeal, is an application for interim relief. Notice of this application be issued to the respondents. In the mean while operation of the impugned order dated 26.04.2022 shall remain suspended, if not acted upon earlier.***" Copy of the order dated 09.09.2022 is attached as annexure.....**A.**

- 3- The applicant/appellant after obtaining the attested copy of the order dated 09.09.2022, submitted the said order before the respondents/contemnors which was not complied in its true spirit.
- 4- That the acts and actions of the Respondents/Contemnors squarely fall within the ambit of Section 3, 4 of **The Contempt of Court Act, 2003** and as such they are liable to be proceeded for the Contempt and for the punishment under the law.
- 5- That the petitioner time and again approached the respondents and produced order of Honorable Court, and requested for compliance, but they refused and in this way brought disregard to order of August court and thereby committed contempt of court.
- 6- That other grounds will be raised at the time of arguments with prior permission of this Hon'ble Court.

It is, therefore, respectfully prayed that by accepting this COC petition, proceeding under Section 3, 4 of the Contempt of Court Act, 1976 may be initiated against the respondents, they may be awarded exemplary punishment and the order of this august court may be implemented in letter and spirit OR any other order deemed proper in the matter may be passed.

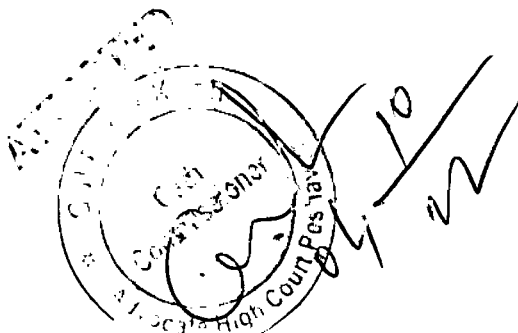

APPLICANT/ PETITIONER
MUNIR AHMAD

Through:


NOOR MUHAMMAD KHATTAK
ADVOCATE
SUPREME COURT OF PAKISTAN

AFFIDAVIT

I Munir Ahamd, District Monitoring Officer (BPS-17), District Karak do hereby solemnly affirm that the contents of this COC Petition are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.



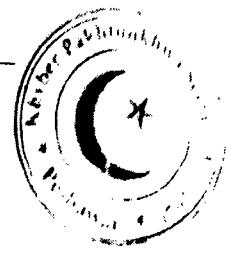

DEPONENT

"A" - 3 -

Form-A

FORM OF ORDER SHEET

Court of _____
Case No: 1301/2022



S.No.	Date of order proceedings
1	06/09/2022
1-	

Order or other proceedings with signature of judge

3

**SCANNED
KPST
Peshawar**

Noted
H. Khattak
Clerk 8/9/22

The appeal of Mr. Muneer Ahmad resubmitted today by Mr. Noor Muhammad Khattak Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 9.9.22. Notices be issued to appellant and his counsel for the date fixed.

By the order of Chairman

REGISTRAR

09.09.2022

Appellant present through counsel.

Preliminary arguments heard and record perused.

Points raised need consideration. The appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of reply/comments. To come up for reply/comments on 29.09.2022 before S.B.

Annexed with the memorandum of appeal, is an application for interim relief. Notice of this application be issued to the respondents. In the meanwhile operation of Impugned order dated 26.04.2022 shall remain suspended, if not acted upon earlier.

Certified to be true copy

CHAIRMAN
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

(Rozina Rehman)
Member (J)

Name of Applicant	
Date of Filing	13/8/22
Date of Delivery of Copy	13/8/22
Name of Presentation of Appeal	8/9/22
Number of Words	10/
Costing Fee	10/
Local	10/-
Total	10/-

**ATTESTED
to be true Copy**

- 4 -

VAKALATNAMA
BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO: _____ OF 20

Munir Ali

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Haris

(RESPONDENT)
(DEFENDANT)

I/We Munir Ali

Do hereby appoint and constitute **NOOR MOHAMMAD KHATTAK, Advocate, Supreme Court** 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. 03 / 10 / 202

CLIENT



ACCEPTED

NOOR MOHAMMAD KHATTAK
(BC-10-0853)
15401-0705985-5


UMAR FAROOQ


WALEED ADNAN

&


MUHAMMAD AYUB
ADVOCATES

OFFICE:

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