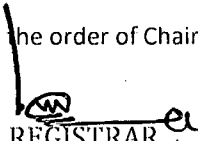


Form- A  
FORM OF ORDER SHEET

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

Execution Petition No. 590/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	04.10.2022	<p style="text-align: center;">The execution petition of Mst. Safia Bibi submitted today by Mr. Hamayumn Khan Advocate. It is fixed for implementation report before touring Single Bench at A.Abad 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>

AA 9

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

E.P No. 590 /2022  
IN  
Appeal No. 916/2018

Mst. Safia Bibi wife of Muhammad Anwar, (EX LHV/PHCT) BHU Teloos,  
resident of Jabba Feroz Tehsil & District Battagram.

...PETITIONER

VERSUS

Govt. of Khyber Pakhtunkhwa through Secretary Health Peshawar & others.

...RESPONDENTS

**APPLICATION FOR IMPLEMENTATION**

**INDEX**

<i>S. #</i>	<i>Description</i>	<i>Page #</i>	<i>Annexures</i>
1.	Application	1 to 3	
2.	Copy of appeal	4 - 11	"A"
3.	Copy of judgment	12 - 16	"B"
4.	Copy of application	17 - 21	"C"

  
...PETITIONER

Dated: 1/10 /2022

Through

  
(HAMAYUN KHAN)

&

  
(FAZLULLAH KHAN)

Advocates High Court, Abbottabad

/

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

E.P No. \_\_\_\_\_/2022

IN

Appeal No. 916/2018

Mst. Safia Bibi wife of Muhammad Anwar, (EX LHV/PHCT) BHU Teloos,  
resident of Jabba Feroz Tehsil & District Battagram.

**...PETITIONER**

**VERSUS**

1. Govt. of Khyber Pakhtunkhwa through Secretary Health Peshawar.
2. Director General Health Services Khyber Pakhtunkhwa, Peshawar.
3. District Health Officer Battagram.

**...RESPONDENTS**

**APPLICATION** FOR IMPLEMENTATION OF  
JUDGMENT DATED 16/11/2021 PASSED BY THIS  
HONOURABLE TRIBUNAL IN APPEAL NO.  
916/2018 AND ORDER DATED 20/07/2022 TITLED  
"MST. SAFIA BIBI V/S GOVT. OF KHYBER  
PAKHTUNKHWA & OTHERS.

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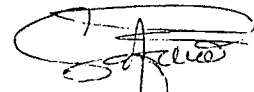
Respectfully Sheweth:-

1. That petitioner filed service appeal No. 916/2018 against the impugned order dated 10/04/2018 passed by respondent No. 3. Copy of appeal is attached as Annexure "A".
2. That on 17/11/2021 after hearing of arguments this Honourable tribunal accepted appeal with all back benefits of the petitioner and set aside impugned order dated 10/04/2018. Copy of judgment is attached as annexure "B".
3. That, thereafter departments/respondents refused implementation of judgment dated 16/11/2021 petitioner filed implementation No.279/2022 titled "Mst. Safia Bibi V/s Govt. of KPK & others". Copy of application is annexed as Annexure "C"
4. That, on 21/07/2022 this Honourable Tribunal again disposed of implementation petition with direction to respondents for grant of back benefits and arrears of salaries to the petitioner within two months.
5. That, since 21/07/2022 after laps of 02 months respondents had not implemented judgment dated

16/11/2021 and order dated 21/07/2022 of this Honourable tribunal till date.

6. That respondent No. 3 instead of complying with the direction of this Honourable Tribunal, straightaway refused to comply with the direction of this Honourable Tribunal.
7. That other point would be raised at the time of arguments kind permission of this Honourable Tribunal.

It is therefore, humbly prayed that on acceptance of instant application respondents be kindly be directed forth with comply with the direction of this Honourable Tribunal contained in judgment dated 16/11/2021 and order dated 21/07/2022 in it true letter and spirit



...PETITIONER

Through

Dated: 11/10 /2022



(HAMAYUN KHAN)  
&

(FAZLULLAH KHAN)  
Advocates High Court, Abbottabad

ANNEXURE "A"

ANNEXURE "A" 4

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL PESHAWAR



Khyber Pakhtunkhwa  
Government

Case No. 1182

Appeal No. 916 /2018

Dated: 19/07/2018

Mst. Safia Bibi wife of Muhammad Anwar, (EX LHV/ PHCT) BHU Teloos,  
resident of Jabba Feroz Tehsil and District, Battagram.

...APPELLANT

VERSUS

1. Govt. of Khyber Pakhtunkhwa through Secretary Health Peshawar.
2. Director General Health Services Khyber Pakhtunkhwa, Peshawar.
3. District Health officer Battagram.

...RESPONDENTS

*Attested*  
*[Signature]*

Filed on  
Monday  
19/7/18  
Registrar

*Muhammad*  
*[Signature]*

APPEAL UNDER ARTICLE 212 OF THE  
CONSTITUTION OF ISLAMIC REPUBLIC OF  
PAKISTAN 1973 READ WITH SECTION 4 OF  
KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
1974, AGAINST THE IMPUGNED ORDER DATED  
10/04/2018 PASSED BY THE RESPONDENT NO. 3  
WHEREBY RESPONDENT NO. 3 IMPOSED MAJOR  
PENALTY OF REMOVAL FROM SERVICE WHICH  
IS ILLEGAL, UNLAWFUL, AGAINST THE LAW,

ATTESTED

*[Signature]*  
Registrar  
Peshawar

FACTS AND NATURAL JUSTICE AND LIABLE TO BE SET ASIDE.

PRAYER: ON ACCEPTANCE OF INSTANT APPEAL IMPUGNED ORDER DATED 10/04/2018 PASSED BY RESPONDENT NO. 3 MAY KINDLY BE DECLARED VOID ABI-INITIO, UNLAWFUL AND APPELLANT BE REINSTATED IN SERVICE ALONGWITH ALL BACK BENEFITS.

Respectfully Sheweth:-

Appellant beg to solicit through instant appeal on the following legal and factual back grounds:-

1. That initially appellant was appointed as PHCT/LHV in BPS-12 on 20/07/2016.

2. That thereafter appellant submitted arrival report and joined duty and was posted at BHU Telcos All:.

Attested  
H. S. S. S.

Attested  
H. S. S. S.

ATTESTED  
[Signature]  
[Stamp]  
[Text]

- 3. That appellant performed her duty with full devotion and liability, upto the satisfaction of her high-ups and local inhabitants.
- 4. That on 21/03/2018 at 12:00 O'clock appellant applied for half duty leave due to illness of son after obtaining permission from in charge appellant went to home.
- 5. That on the same day respondent No.3 visited BHU Tailoos Allai and marked the appellant absent from duty.
- 6. That, on 22/03/2018, respondent No.3 issued transfer order of appellant from BHU Tailoos Allai to DHO office Battagram (i.e office of respondent No.3).
- 7. That, it is worth to mention that albeit the appellant is a civil servant under the administrative control of respondents, but at no way is their private servant. As the respondent No. 3 had harrassed her for his unlawful/ immoral pleasure, which was

*Handwritten signature*

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RECEIVED  
OFFICE OF THE  
DIRECTOR  
BATTAGRAM  
21/03/2018



refused bluntly by the appellant, resultantly respondent No. 3 had make a final attempt on 22/03/2018 to obtain his immoral pleasures and objects and he had transferred the appellant from BHU Tailoos Allai to DHO office of respondent No. 3. This act clearly reveals the intentions of respondent No. 3, because there are no duties to be assigned to appellant in DHO Office as she is a LHV/PHCT.

8. That, on 26/03/2018 respondent No.3 issued show cause notice to appellant, the above said transfer order and show cause notice was received to the appellant on 02/04/2018. Copies of order & show cause notice are attached as Annexure "A".

9. That, the appellant has submitted the reply of show cause notice in the office of respondent No.3 on 04/04/2018.. Copy of reply of show cause notice dated 04/04/2018 is annexed as Annexure "B".

10. That, the appellant also submitted an application regarding the harassment before the provincial

*Attas*  
*H. [Signature]*

*Attas*  
*H. [Signature]*

ATTACHED  
[Signature]  
EX-GRATIAS  
SERVICE TRIBUNAL  
PUNJAB

ombudsman. Copy of application is annexed as Annexure "C"

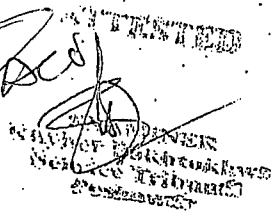
11. That, finally the respondent No.3 on 10/04/2018 issued the impugned order, whereby the appellant was removed from service. Copy of order dated 10/04/2018 is annexed as Annexure "D".
12. That, the appellant filed departmental appeal against order dated 10/04/2018, before respondent No.2 but till date respondent No.2 not passed any order on the same. Annexure "E"
13. That, being aggrieved from the order dated 10/04/2018 of respondent No.3 appellant is before this August Tribunal with the appeal in hand inter-alia on the following amongst other grounds:-

*W. K. S. S.*  
*H. S. S.*

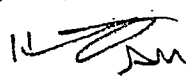
GROUNDS:-

- a. That, the impugned order is illegal, against the law & facts, hence is liable to be set aside.

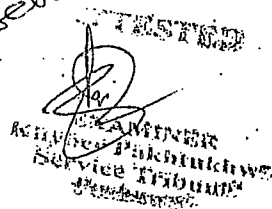
*W. K. S. S.*  
*H. S. S.*



- b. That job description of appellant is only and only treatment and look after of the females Childs and new born babies, and such duties can be performed in CD, RHC, BHU, DHQ etc and could not be performed in the office room of the DHO/respondent No.3.
- c. That, impugned order is based on personal grudges and interests which is not sustainable.
- d. That, impugned order is against the rules, no regular inquiry was conducted nor the opportunity of defence and hearing was given to the appellant.
- e. That, all the proceeding conducted by respondent No.3 is clear violation of E&D rules and issued impugned order for obtaining his immoral goals, in this respect appellant filed complaint before learned

Attested  


Attested  
  
 BSW



ombudsman for protection of her honor and dignity.

f. That, the act of respondent is against guaranteed constitutional rights of the appellant, which are also against the norms and dictates of Islam.

g. That, office of DHO/respondent No.3 is an administrative and establishment / management office and the appellant has no concern with the administration work under the control of respondent No.3.

h. That, impugned order is issued in a hasty manner, which did not fulfill the codal requirement, hence having no legal value, is liable to be struck down.

i. That other points would be argued at the time of argument with the kind permission of this Honourable Court.

*Uttara*  
*H. S. Khan*

*Uttara*  
*H. S. Khan*  
**RECEIVED**  
CHIEF JUSTICE  
PUNJAB  
LAW COURTS  
LAHORE

11

It is, therefore humbly prayed that on acceptance of instant appeal impugned order dated 10/04/2018 passed by respondent no. 3 may kindly be declare null and void, abi-initio, unlawful and appellant be reinstated in service alongwith all back benefits.

Dated: 7-7 /2018

Through

*Sajda*  
...APPELLANT

*(HAMAYUN KHAN)*  
Advocate High Court, Abbottabad

VERIFICATION;-

Verified on oath that the contents of forgoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.

*Sajda*  
...APPELLANT

Certified to be true copy

*(Signature)*  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

*MAJID*  
*(Signature)*

Date of Presentation of Application 07/04/22  
Number of Words 3200  
Copying Fee 34/-  
Urgent 47/-  
Total 387/-  
Name of Copiers ---  
Date of Completion of Copy 07/04/22  
Date of Delivery of Copy 07/04/22

*Attested*  
*(Signature)*

AN

ANNEXURE - B - 12

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,  
(CAMP COURT, ABBOTTABAD)

Appeal No. 916/2018

Date of Institution ... 19.07.2018

Date of Decision ... 17.11.2021



Mst. Safia Bibi wife of Muhammad Anwar (Ex-LHV/PHCT) BHU Teloos, Resident  
Of Jabba Feroz Tehsil and District, Battagram. ... (Appellant)

VERSUS.

Government of Khyber Pakhtunkhwa through Secretary, Health Peshawar and  
two others. ... (Respondents)

Present.

Mr. Hamayun Khan,  
Advocate.

... For appellant.

Mr. Muhammad Rasheed,  
Deputy District Attorney

... For respondents.

MR. AHMAD SULTAN TAREEN  
MRS. ROZINA REHMAN,

... CHAIRMAN  
... MEMBER(J)

JUDGEMENT

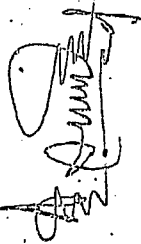
AHMAD SULTAN TAREEN, CHAIRMAN:- Through the above titled appeal  
described in the heading, the jurisdiction of this Tribunal has been invoked by  
the appellant with the prayer as copied below:-

"On acceptance of instant appeal impugned order dated  
10.04.2018 passed by respondent No. 3 may kindly be declared  
void ab-initio, unlawful and appellant be reinstated in service  
alongwith all back benefits."

ATTESTED

SECRETARY  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

2. The factual account as given in the Memo of Appeal and deducible from copies of the supporting documents annexed therewith is precisely that the appellant was initially appointed as PHCT/LHV in BPS-12 on 20.07.2016 and was posted at BHU Teloos Allai. The appellant performed her duty with full devotion and liability upto the satisfaction of her high-ups and local inhabitants. On 21.03.2018 at 12.00 O'clock she applied for half duty leave due to illness of her son and after obtaining permission from incharge, appellant went to home. On the same day respondent No. 3 visited BHU Tailoos Allai and marked the appellant absent from duty. On 22.03.2018, respondent No. 3 issued transfer order of appellant from BHU Tailoos Allai to DHO office Battagram (i.e. office of respondent No. 3). On 26.03.2018 respondent No. 3 issued show cause notice to the appellant. The above said transfer order and show cause notice was received to the appellant on 02.04.2018. The appellant submitted reply to show cause notice on 04.04.2018. Finally the respondent No. 3 issued the impugned order dated 10.04.2018, whereby the appellant was removed from service. Feeling aggrieved, the appellant filed departmental appeal before respondent No. 4 but till date no order has been passed on the same, hence the present appeal on 19.07.2018.



*Attest*

*H. S. An*

3. The appeal was admitted for regular hearing on 05.07.2021. The respondents have submitted written reply/comments 30.08.2021, refuting the claim of the appellant with several factual and legal objections and asserted for dismissal of appeal.

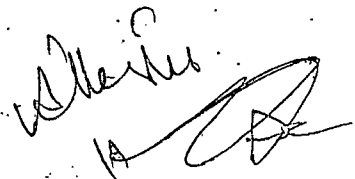
4. We have heard the arguments and perused the record.

5. Learned counsel for the appellant argued that the job description of appellant was only treatment and look-after of the female, children and new born babies and such duties can be performed only in CD, RHC, BHU and DHQs

ATTESTED



NOT A MEMBER  
of the Service Tribunal  
Battagram



etc. and could not be performed in the office of DHO (respondent No. 3). He further argued that no regular enquiry was conducted nor she has been afforded opportunity of hearing and cross-examination, which were mandatory under the law. All the proceedings conducted by respondent No. 3 is clear violation of Khyber Pakhtunkhwa Government Servants (E&D) Rules, 2011. That the impugned order dated 10.04.2018 is illegal, against the law & facts and requested that the appeal may be accepted as prayed for.

6. While rebutting the arguments of learned counsel for the appellant, learned Deputy District Attorney argued that during surprise visit of DHO Battagram the appellant was found absence on the relevant day and her performance was found unsatisfactory as per her job descriptions. He further argued that the transfer of the appellant was made to DHO office for the purpose of departmental proceedings against her. He requested that the appeal may be dismissed with costs.

7. The appellant is aggrieved from the order dated 10.04.2018 of her removal from service which as annexed with the appeal is available on file. The said order by its context reveals that the appellant was attached to the office of DHO Battagram i.e. respondent No. 3, was proceeded against under Government Servants (E&D) Rules, 2011 for the charges including absence from official duty on 21.03.2018 at 11.00 AM, not obeying transfer order dated 22.03.2018, alteration, wrong entry/tempering in attendance register, no entry in birth and family planning register since 08.02.2018 and of her usual sitting at Al-Syed Hospital Banna during official duty hours. The reference of the show cause notice dated 26.03.2018 proposing the major penalty has also been given in the impugned order. The copy of the show cause notice as annexed with the appeal is also available on record. The charges as enumerated herein before

*[Handwritten signature]*

*[Handwritten signature]*

*[Handwritten signature]*

*[Handwritten signature]*

EXAMINER  
Khyber Pakhtunkhwa  
Government Servants



with reference to the impugned order are there in the show cause notice besides another charge that she was previously terminated on her chronic absenteeism. The concluding parts of the show cause notice reveals that the competent authority on the said charge sheet directly issued show cause notice to the appellant directing her to explain her position and submit reply within seven days under Government Servants (E&D) Rules, 2011. There is no reason in show cause notice that why formal enquiry was dispensed with. Copy of the reply to the show cause notice purportedly given by the appellant is also annexed with the appeal. She explained with sufficient causes her absence referred in the show cause notice. She refused any cutting in the attendance register and termed the same as baseless allegation. She also gave plausible explanation of her previous termination reflected in the show cause notice and in proof of the allegation being wrong, she was reinstated by the Director General Health Services. Apart from the reply to the show cause notice, a copy of an application sent to the Provincial Ombudsman for legal action against Muhammad Khan Afridi DHO Battagram has also been annexed. She therein levelled certain allegations about harassment at the workplace and misuse of authority by the District Health Officer in relation to her for certain ulterior motives. According to copy of the departmental appeal against the impugned order, allegation of her harassment has also been reiterated therein and reference of the application made to the Provincial Ombudsman has also been given by its annexation with the departmental appeal. She categorically mentioned in the departmental appeal that she was subjected to disciplinary action and removal from service on account of undue exercise of authority by District Health Officer, Battagram.

*[Handwritten signature]*

*[Handwritten signature]*

ATTESTED

*[Handwritten signature]*  
 District Health Officer  
 Battagram

8. In view of the overall defence revealed by the appellant against the show cause notice and by her other applications/appeal, there was a need of full

*[Handwritten signature]*

fledge enquiry and if it was not got conducted by the DHO because of direct allegation against him, the appellate authority was supposed to reinstate the appellant and remand the case for full-fledged enquiry by an impartial enquiry committee to be constituted by the appellate authority i.e. respondent No. 2. However, he also omitted to order any such enquiry and no reason has been advanced in reply of the respondents that why such enquiry was not got conducted. Mere denial of the facts and grounds of appeal by respondents is not sufficient in particular circumstances of the case. Rather it is deemed as evasive reply, when the respondents could not hold the impartial enquiry into the charges against the appellant and for rebuttal of her counter allegations. In the given circumstances, the disciplinary proceedings and consequent imposition of major penalty upon her by the impugned order is held as malicious and revengeful not conforming to the rules on the subject to disciplinary proceedings.

9. For what has gone above, the appeal is accepted as prayed for. The impugned order is set aside. The appellant is reinstated into service with all back benefits including the arrears of salary. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED  
17.11.2021

*Affirm*  
*[Signature]*

*[Signature]*  
(ROZINA REHMAN)  
MEMBER(J)  
(Camp Court, A/Abad)

*[Signature]*  
(AHMAD SULTAN TAREEN)  
CHAIRMAN.  
(Camp Court, A/Abad)

Certified to be true copy  
*[Signature]*  
[Stamp]

*[Signature]*  
*[Signature]*

Date of Presentation of Application 07-04-22  
Number of Words 2400  
Copying Fee 26/-  
Urgent 4/-  
Total 30/-  
Name of Copyist \_\_\_\_\_  
Date of Completion of Copy 07-04-22  
Method of Delivery of Copy 07-04-22

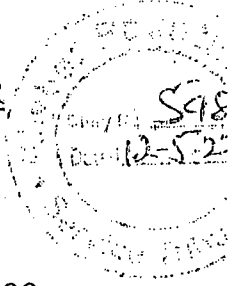
ANNEXURE 2

17

BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER  
PAKHTUNKHWA PESHAWAR



E.P No. 279 /2022  
IN  
Appeal No. 916/2018



Mst. Safia Bibi wife of Muhammad Anwar, (EX LHV/PHCT) BHU Teloos,  
resident of Jabba Feroz Tehsil & District Battagram.

...PETITIONER

VERSUS

1. Govt. of Khyber Pakhtunkhwa through Secretary Health Peshawar.
2. Director General Health Services Khyber Pakhtunkhwa, Peshawar.
3. District Health Officer Battagram.

...RESPONDENTS

APPLICATION FOR IMPLEMENTATION OF  
JUDGMENT DATED 16/11/2021 PASSED BY THIS  
HONOURABLE TRIBUNAL IN APPEAL NO.  
916/2018 TITLED "MST. SAFIA BIBI V/S GOVT. OF  
KHYBER PAKHTUNKHWA & OTHERS.

Respectfully Sheweth:-

ATTESTED

  
EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

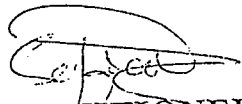
7 18

1. That petitioner filed service appeal No. 916/2018 against the impugned order dated 10/04/2018 passed by respondent No. 3. Copy of appeal is attached as Annexure "A".
2. That on 17/11/2021 after hearing of arguments this Honourable tribunal accepted appeal with all back benefits of the petitioner and set aside impugned order dated 10/04/2018. Copy of judgment is attached as annexure "B".
3. That thereafter on 15/04/2022 petitioner appeared before respondent No.3 for implementation of judgment dated 17/11/2021 and submit application. Copy of application is annexed as Annexure "C".
4. That after laps of 05 months respondents not implemented judgment of this Honourable tribunal and similarly they have not filed any appeal before August Supreme Court of Pakistan against the judgment dated 17/11/2021 of Honourable Tribunal.

ATTESTED  
EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

5. That respondent No. 3 instead of complying with the direction of this Honourable Tribunal, straightaway refused to comply with the direction of this Honourable Tribunal.
6. That other point would be raised at the time of arguments kind permission of this Honourable Tribunal.

It is therefore, humbly prayed that on acceptance of instant application respondents be kindly be directed forth with comply with the direction of this Honourable Tribunal contained in judgment dated 17/11/2021 in it true letter and spirit

  
...PETITIONER

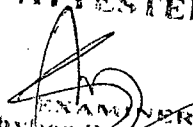
Through

Dated: 5/10/2022

  
(HAMAYUN KHAN)  
&

  
(FAZLULLAH KHAN)  
Advocates High Court, Abbottabad

ATTESTED

  
EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

20<sup>th</sup> July 2022

1. None for the petitioner present. Mr. Noor Zaman Khattak, District Attorney alongwith Dr. Yasir Bangash, Litigation Officer for respondents present.

2. On 18.07.2022 Dr. Yasir Bangash, Litigation Officer put appearance and sought some time to implement the judgment of the Tribunal passed in this matter. The matter was accordingly adjourned to 22.07.2022 on his request but today an office order was produced by the said Dr. Yasir Bangash showing compliance of the judgment of the Tribunal in appeal No. 916/2018 titled "Safia Bibi-vs-Government of Khyber Pakhtunkhwa and others" reinstating the petitioner in service subject to the decision of the CPLA filed before the august Supreme Court of Pakistan. The judgment passed in favour of the Petitioner has been perused, which shows that the petitioner was reinstated in service alongwith back benefits including the arrears of the salaries whereas the order produced does not contain anything regarding the grant of back benefits including the arrears of salary. As the petitioner has not come to the Tribunal, therefore, the respondents are directed to grant back benefits including the arrears of salary as per directions of the Tribunal contained in the judgment within two months. The petitioner may again come to the Tribunal and make an application in case the back

ATTESTED

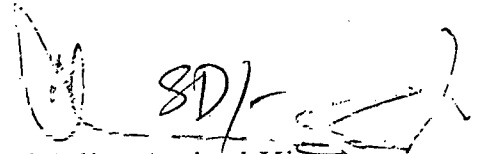
EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

21

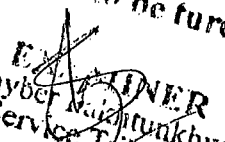
benefits including the arrears of salary are not released/granted within two months. Copy of this order sheet alongwith order of reinstatement be sent to the petitioner through registered post. Similarly, copy of this order sheet be also sent to the District Health Officer, Battagram for grant of back benefits and arrears of salary to the petitioner within two months. This application is disposed of in the above terms. Consign.

3. Pronounced in open court in Camp Court Abbottabad and given under my hand and seal of the Tribunal on this 20<sup>th</sup> day of July, 2022.



  
(Kalim Arshad Khan)  
Chairman  
Camp Court Abbottabad

Certified to be true copy

  
EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

Date of Presentation of Application 03/8/22  
Number of Words 2000  
Copying Fee 22/-  
Urgent 9/-  
Total 26/-  
Name of Copyist \_\_\_\_\_  
Date of Submission of Copy 03/8/22  
Date of Delivery of Copy 03/8/21

کورٹ فیس

# وکالت نامہ

BEFORE THE KHYBER PUKHTUN KHAWA SERVICIAL TRIBUNAL

عنوان: Mst SAFIA BIBI بنام Court of K.P.K.

منجانب: Petition

نوعیت مقدمہ: Implementation Petition

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کاروائی متعلقہ آل مقام

Hamayun Khan vs Farzullah Khan Adalat

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا نیز وکیل

صاحب موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری

کرانے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت

ضرورت مقدمہ مذکور کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی

بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا

ساختہ پر داختم مجھ کو منظور و قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے

مستحق وکیل صاحب ہوں گے۔ نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہویا

حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں

کوئی جزو بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراد

استجارت نالاش بصیغہ مفلسی کے دائر کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کیا تا کہ سند رہے۔

بمقام: Attd.

المرقوم:

30/09/22

Attd.