

23.11.2021

Nemo for the appellant. Notice for prosecution of the appeal be issued to the appellant as well as her counsel through registered post and to come up for preliminary hearing before the S.B on 25.01.2022 at Camp Court D.I.Khan.



(Salah-Ud-Din)
Member (J)
Camp Court D.I.Khan

25.01.2022

Tour to Camp Court D-I-Khan
has been cancelled to come up for
the same as before on 27/6/22



27th June 2022

1. None present for the appellant.
2. Called several times till last hours of the court but nobody turned up on behalf of the appellant. In view of the above, the instant appeal is dismissed for non-prosecution. Consign.
3. *Pronounced in open court in D.I.Khan and given under my hand and seal of the Tribunal on this 27th day of June, 2022.*



(Kalim Arshad Khan)
Chairman
Camp Court D.I.Khan

Service.Appeal No. 1488/2019

24.03.2021

Nemo for the appellant.

Today's date was posted on Note Reader, therefore, notice for prosecution of the appeal be issued to appellant as well as his counsel and to come up for preliminary hearing before S.B at Camp Court D.I.Khan on 26.05.2021.



(SALAH-UD-DIN)
MEMBER (JUDICIAL)
CAMP COURT D.I.KHAN

*Due to COVID-19 therefore to
come up for the same on 29/9/21*



29.09.2021

Nemo for the appellant.

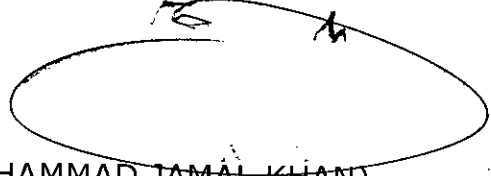
Previous date was changed on Reader Note, therefore, notice for prosecution of the appeal be issued to the appellant as well as her counsel and to come up for preliminary hearing before the S.B on 23.11.2021 at Camp Court D.I.Khan.



(SALAH-UD-DIN)
MEMBER (JUDICIAL)
CAMP COURT D.I.KHAN

28.10.2020

Since the Members of the High Court as well as of the District Bar Association, D.I.Khan, are observing strike today, therefore, learned counsel for appellant is not available today. Adjourned to 23.11.2020 on which date to come up for preliminary hearing before S.B at Camp Court, D.I.Khan.



(MUHAMMAD JAMAL KHAN)
MEMBER
CAMP COURT D.I.KHAN

23.11.2020

Nemo for appellant.

Due to general strike on the preceding date the case was adjourned, therefore, notice be issued to appellant and her counsel for 21.12.2020.

Adjourned for preliminary hearing before S.B at Camp Court, D.I. Khan.


(Rozina Rehman)
Member (J)
Camp Court, D.I. Khan

21.12.2020

Due to COVID 19, the case is adjourned to 25.3.2021 for the same.



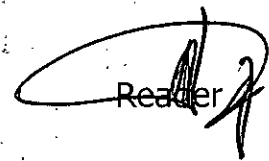
26/3/2020

Due to COVID-19 the case is adjourned. To come up for the same 22/4/2020 at Camp Court, D.I Khan


Reader

22/4/2020


Due to COVID-19 the case is adjourned. To come up for the same 23/9/2020 at Camp Court, D.I Khan


Reader

23.09.2020


Nemo for appellant.

Notice be issued to appellant and her counsel for 28.10.2020 for preliminary hearing, before S.B at Camp Court D.I Khan.


(Rozina Rehman)
Member (J)
Camp Court, D.I Khan


28.01.2020

Clerk to counsel for the appellant present and requested for adjournment on the ground that learned counsel for the appellant is not available today due general strike of Khyber Pakhtunkhwa Bar Council. Adjourned to 25.02.2020 for preliminary hearing before S.B at Camp Court D.I.Khan.


(M. Amin Khan Kundi)
Member
Camp Court D.I.Khan

25.02.2020

Counsel for the appellant present and requested for adjournment. Adjourned to 26.03.2020 for preliminary hearing before S.B at Camp Court D.I.Khan.



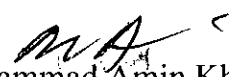

(M. Amin Khan Kundi)
Member
Camp Court D.I.Khan

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 1488/2019

S.No.	Date of order proceedings.	Order or other proceedings with signature of judge
1	2	3
1-	05/11/2019	<p>The appeal of Mst. Kiran Tasleem received today by post Mr. through Muhammad Mohsin Ali Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR 5/11/19</p>
2-	15-11-19	<p>This case is entrusted to touring S. Bench at D.I.Khan for preliminary hearing to be put up there on <u>26-11-2019</u></p> <p style="text-align: right;"> CHAIRMAN</p>
26.11.2019		<p>None present on behalf of the appellant. Notice be issued to appellant and his counsel for attendance and preliminary arguments for 28.01.2020 before S.B at Camp Court D.I.Khan.</p> <p style="text-align: right;"> (Muhammad Amin Khan Kundi) Member Camp Court D.I.Khan</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Appeal No. 1488 /2019

Kiran Tasleem

.....APPELLANT

VERSUS

Govt. of K.P.K and others.

.....RESPONDENTS

INDEX

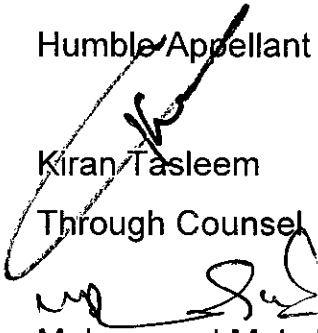
S #	Description of Documents	Annexure	Page #
1	Grounds of appeal	-----	1-5
2	Copy of Appointment order	A	6
3	Copy of Transfer order	B	7
4	Copy of application alongwith medical certificates	C	8-16
5	Copy of Departmental appeal	D	17-18
6	Vakalatnama	-----	19

Dated: 29/10/2019

Humble Appellant

Kiran Tasleem

Through Counsel


Muhammad Mohsin Ali
Advocate High Court,
District Courts, D.I.Khan.

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Appeal No. 1488 /2019

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 1564

Dated 05/11/2019

Kiran Tasleem daughter of Ghulam Siddique wife of Asmatullah resident of
Muhallah Shipshah, City Dera Ismail Khan.

.....APPELLANT

VERSUS

1. Govt. of Khyber Pakhtunkhwa through Secretary Education,
Khyber Pakhtunkhwa, Peshawar.
2. Secretary Education, Khyber Pakhtunkhwa, Peshawar.
3. Director, Education Department KPK, Peshawar.
4. District Officer (Female) Education, District D. I. Khan.

.....RESPONDENTS

APPEAL UNDER SECTION 4 OF KPK
SERVICE TRIBUNALS ACT, 1974

Filed to-day

Registrar

05/11/2019

PRAYER; On acceptance of this appeal this august
court may please be directed the respondents to transfer
the appellant from GGHS Shorkot Dera Ismail Khan to
GGHSS NO. 9 Dinpur Dera Ismail Khan;

OR

GRANT any other relief considered just and appropriate
under the given circumstances of the case.

Respectfully sheweth;

1. That the appellant was appointed as Qaria in Education Department vide order dated 09-10-2006 and initially posted at GGMS Lar Dera Ismail Khan, however, later-on transferred to Government Girls Higher Secondary School No. 9 Dinpur, Dera Ismail Khan, and served her duty with full of hard work and honestly.
2. That the present appellant was transferred vide office order dated 26-03-2016 from GGHS No. 9 Dinpur, D.I.Khan to GGHS Shorkot, D.I.Khan, thereafter, the appellant resumed the charged in GGHS Shorkot, D.I.Khan.
3. That the appellant is also permanent resident of opposite to GGHS No. 9, Dinpur Dera Ismail Khan while the GGHS Shorkot, D.I.Khan is situated at the distance of 30 kilometers from the residence of appellant, furthermore, no proper public transport is available for that place.
4. That the appellant is unable to travel 60 Kilometer on daily basis as the Doctor advised to the appellant to avoid the travelling on daily basis, and due to the travelling to GGHS, Shorkot Dera Ismail Khan three times pregnancy of the appellant was miscarriage.
5. That the appellant submitted the written applications to DEO (Female) Dera Ismail Khan to transfer the appellant to GGHS No. 9 Dinpur Dera Ismail Khan due to medical reasons, but the DEO (Female) totally failed to decide the application of the appellant,

3

thereafter, the present appellant filed the Departmental appeal before the Director Education, KPK, Peshawar on 22-07-2019 but till date he has not decided the same. Hence, the appellant is filling the instant appeal on the following grounds:

GROUND:

A. That the act of the respondents while they are not issuing the transfer order of the appellant from GGHS Shorkot to GGHS No. 9 Dinpur Dera Ismail Khan is totally against the law and natural justice.

B. That the appellant is also permanent resident of opposite to GGHS No. 9, Dinpur Dera Ismail Khan while the GGHS Shorkot, D.I.Khan is situated at the distance of 30 kilometers from the residence of appellant, furthermore, no proper public transport is available for that place. The appellant is unable to travel 60 Kilometer on daily basis as the Doctor advised to the appellant to avoid the travelling on daily basis. Furthermore, due to the travelling to GGHS, Shorkot Dera Ismail Khan, three times pregnancy of the appellant was miscarriage. Thereafter, the appellant submitted the written applications to DEO (Female) Dera Ismail Khan to transfer the appellant to GGHS No. 9 Dinpur Dera Ismail Khan due to medical reasons, but the DEO (Female) paid no heed. *Furthermore, due to regular Travelling, the doctor advised the appellant to avoid the pregnancy.*

(4)

- C. That the present appellant also completed the span of three years at GGHS Shorkot, therefore, on this score too the request of the appellant was liable to be accepted.
- D. That the appellant is entitled for transfer from GGHS Shorkot to GGHSS No. 9 Dinpur Dera Ismail Kahn on humanitarian grounds and for better performance.
- E. That the appeal is being filed within the statutory period prescribed in section 4 of The KPK Service Tribunals Act, 1974.
- F. Any other legal ground that may be raised at the time of hearing of this appeal.

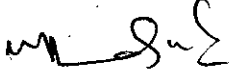
It is, therefore, prayed that on acceptance of this appeal this court may be pleased to pass orders as prayed for in the heading of this appeal.

Dated: 29/10/2019

Humble Appellant


Kiran Tasleem

Through Counsel


Muhammad Mohsin Ali
Advocate High Court,
District Courts, D.I.Khan.

4-A

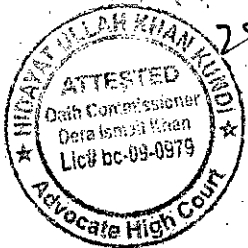
Affidavit

I, the appellant, do hereby solemnly affirm and declare on Oath that all the para-wise contents of appeal are true and correct to the best of my knowledge and belief and nothing has been deliberately concealed or kept secret from this Tribunal.

[Signature]

[Signature]

29/10/19,



Deponent

through counsel

[Signature]

5

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Appeal No. _____/2019

Kiran Tasleem

.....APPELLANT

VERSUS

Govt. of KPK and others

.....RESPONDENTS

ADDRESSES OF THE PARTIES

Kiran Tasleem daughter of Ghulam Siddique wife of Asmatullah resident of
Muhallah Shipshah, City Dera Ismail Khan

.....APPELLANT

-
1. Govt. of Khyber Pakhtunkhwa through Secretary Education,
Khyber Pakhtunkhwa, Peshawar.
 2. Secretary Education, Khyber Pakhtunkhwa, Peshawar.
 3. Director, Education Department KPK, Peshawar.
 4. District Officer (Female) Education, District *D.I. Khan*


.....RESPONDENTS

Dated: 29/10/2019

Humble Appellant


Kiran Tasleem

Through Counsel


Muhammad Mohsin Ali
Advocate High Court,
District Courts, D.I. Khan.

Approved
in Sd/-
Sd/-

ANNEX-1-A
Page-1- (8)

OFFICE OF THE EXECUTIVE DISTRICT OFFICER, (SCHOOLS & LIE.)
DIKHAN

APPOINTMENT ORDER:

Consequent upon the approval of Selection Committee and approved by the District Co-ordination Officer, D.I.Khan. The following Fresh (Female) candidate is hereby appointed against vacant post of Qaria in the school noted against their name in BPS 07 plus usual allowances being a qualified, fresh candidate as per existing policy in the interest of public service w/e from the date of taking over charge on the following terms and conditions.

<u>S.No.</u>	<u>Name of Candidate with Father's Name</u>	<u>Schools where posted.</u>
1).	Kiran Tasleem D/O Ghulam Siddique R/O Moh:Sheve Shah Distt:DIKhan	GGMS, Lar.

TERMS & CONDITIONS:

1. Charge reports should be submitted to all concerned.
2. No pensionary benefit will be available.
3. The services of the above named candidate is made purely on temporary basis & liable to terminate at any time without assigning any notice/ reasons.
4. The candidate will produce Health & Age certificate from the M/S concerned.
5. The original documents may be checked/ verified by concerned Board/ University through DDO concerned before handing over charge.
6. No TA/DA is allowed.

Sd/-
EXECUTIVE DISTRICT OFFICER,
SCHOOLS & LITERACY DIKHAN

Encls. No. 27522-26

Dated D.I.Khan the 9 / 10 / 2006

Copy to the:-

1. Director Schools & Literacy N.W.F.P. Peshawar.
2. District Co-ordination Officer, D.I.Khan.
3. District Accounts Officer, D.I.Khan.
4. Headmistress/ Headmaster concerned.
5. Candidate concerned.

Ma
EXECUTIVE DISTRICT OFFICER,
SCHOOLS & LITERACY DIKHAN



Affected
in Sult
M. Jamim
ANEXI-C
Page 1-8

**OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) DERA ISMAIL KHAN**

No _____/DEO/(F)

Dated the DIKhan _____/2016

TRANSFER ORDER:

In the light of enquiry report conducted vide this office No. 1483 dated 11.02.2016.

Mst: Kiran Tasleem, Qaria GGHS No9 Dinpur DIKhan is hereby transfer/adjustment at GGHS Shor kot DIKhan against vacant post with immediate effect.

Sd/-

DISTRICT EDUCATION OFFICER
(FEMALE) DERA ISMAIL KHAN

DATED 26-03-2016

ENDST NO: 4554-58

Copy To The :

1. District Accountant Officer DIKhan.
2. Accountant Local Office.
3. Principal GGHS NO 9 DIKHAN.
4. Headmistress GGHS Shorkot DIKHAN.
5. Official concerned.

H.
DISTRICT EDUCATION OFFICER
(FEMALE) DERA ISMAIL KHAN.

ANNEK-1-C
Page 1-8

میں نے اپنے سفر کے دوران میں کئی بار پاکستان کے مختلف شہروں اور علاقوں میں سفر کیا ہے۔

میں نے اپنے سفر کے دوران میں کئی بار پاکستان کے مختلف شہروں اور علاقوں میں سفر کیا ہے۔

میں نے اپنے سفر کے دوران میں کئی بار پاکستان کے مختلف شہروں اور علاقوں میں سفر کیا ہے۔

میں نے اپنے سفر کے دوران میں کئی بار پاکستان کے مختلف شہروں اور علاقوں میں سفر کیا ہے۔

میں نے اپنے سفر کے دوران میں کئی بار پاکستان کے مختلف شہروں اور علاقوں میں سفر کیا ہے۔

03193536001
Khan

Assessed
M. Sultan

پروفیسر ڈاکٹر نسیم صبا محسود

(9)

ایم بی بی ایس۔ ڈی جی او۔ ایم کر پی ایس۔ ایف سی پی ایس

پروفیسر گائنی ڈی ایچ کیو ہسپتال (نرمانہ) ڈی آئی خان

NAME Kiran Taseem w/o AGE _____

ADDRESS _____ DATE 20/3/2018

STH MIF=8y

PE

PI Nil
Alive

BS= ALLICUD
7y

SP

G. Amenorrh
- 311L

my 30

sa. Vit dmm

1-1-3

Syn Rongitor

Plv. bleeding
1st day

ANC

MP: 4-12-2017

DP: 11-9-2018

Dr. Princy 10/11
m (2)

C/S fetal
(9) week

PCA not

کلینک ماڈل ٹاؤن گلشن جمیڈ، ذریعہ اسماعیل خان

Clinic: +92-966-731022 Lab: +92-966-730997
Pharmacy: +92-966-730998 Res: +92-966-719622

Attended
M. S. L. S. D. R.

(10)

D.H.O. TEACHING HOSPITAL D.I. KHAN

© In Door Patient's Department

Date 29/10/2010

Yearly No 39283

Name

M. S. L. S. D. R.

Disease

G.P. 2
G.O.

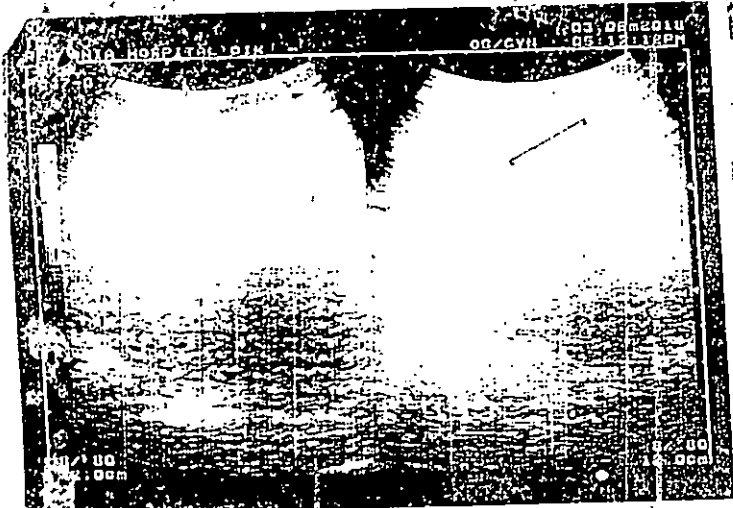
1st trimester

Abortion

Adv

No Repeated Abortion
Avoid Travelling.

Affected Sub



HOSPITAL

(Gate) Dr. Kian
42-1732672
"Coun"

فزیشن اینڈ سرجن
ڈاکٹر سہیل الرحمن خان
ایم بی بی ایس (پاک) - ایم ڈی (امریکہ)
ایم اے ایچ اے (یو ایس اے)
ایم اے آئی یو ایم (یو ایس اے)

Date: 3/6/17

Ref: by: _____

FINDINGS

(enlarged, shrunken)
(ed, decreased)

11

GALL BLADDER

- Size, Shape, Texture (normal, enlarged)
- Wall (normal, thick)
- Lumen (normal, calculi, sludge)

SPLEEN

- Size, Shape, (normal, enlarged)

PANCREAS

- Size, Shape, (normal, enlarged)

KIDNEY (Rt)

- Size, Shape, (normal, enlarged)
- Hydronephrosis (present / not present)
- Calculus (present not present)
- Ecogenisity (normal, increased, decreased)

(Lt)

- Size, Shape, (normal, enlarged)
- Hydronephrosis (present / not present)
- Calculus (present not present)
- Ecogenisity (normal, increased, decreased)

URETER

- Normal, Dilated

URINARY BLADDER

- Full, Not Full
- Wall (thick, normal)
- Calculus (present, not present)

Any Other

*Bumpy uterus wall & ligaments
endometrium could contain
Blood clots - Both Tubes*

Comments

*and ovaries are normal
Bumpy uterus (Blood clots)*

سی ٹی سکین، الٹراساؤنڈ، ایکس رے، ای سی جی اور لیبارٹری کی سہولت موجود ہے۔

Attested
[Signature]

12

REHMANIA HOSPITAL

Near Town Hall (Main Gate) D.L. Khan

Ph: #09966-7941642-32642

Not valid for court

اپڈیٹڈ ڈاکٹر صاحب رحمان

ایم بی بی ایس (جناب) - آر ایم سی - ڈی پی 11
 سیرالاسا ڈسٹریکٹ سوسائٹی آف پاکستان
 سابقہ رجسٹرار فاطمہ بیگم اور بی بی ہسپتال (لاہور)

ڈاکٹر ظہیر الرحمن خان (موجودہ)
 ایم بی بی ایس (جناب) ڈی پی 11
 نوٹ: ہسپتال 24 گھنٹے کھلا رہتا ہے



ڈاکٹر سہیل الرحمن خان

ایم بی بی ایس (پاک) - ایم ڈی (امریکہ)
 اے اے ایچ اے (یو ایس اے)
 ایچ اے آئی یو ایم (یو ایس اے)

Patient Name: سرن ۱۰ بے بی رحمان Date: 02/08/2018 Ref: by:

Clinical Record

Rx

MF 8y
B.P $\frac{110}{70}$

P. A. +1

H₂ LA 24 mos

① Cap Vency 4007
پیش رو 110 5 دن

② Tab Bisoprolol
100 100 (10)

③ H₂ blocker
2L (2)

P/A
- Amenorrhoea
- Irregular heavy
bleeding
Pv 8 day

Adus
- Bleeding
- Bleeding
- Dyspareunia

سی پی ٹی ٹیسٹین، الٹراساؤنڈ، ایکس رے، این سی ڈی اور لیبارٹری کی سہولت موجود ہے۔

Agitated
HOSPITAL

(Near Town Hall (Main Gate) D.I. Khan

Ph # 0966-731642 - 732642

Not valid for court

لیڈی ڈاکٹر صبار حمن

ایم بی بی ایس (پنجاب) - آرا ایم پی - ڈی جی او
ممبر انٹرنیشنل ایسوسی ایشن آف پاکستان
سابقہ رجسٹرار فاطمہ میموریل ہسپتال (لاہور)

ڈاکٹر فضل الرحمن خان (مرحوم)
ایم بی بی ایس (پنجاب) لیڈی ڈی جی او ہسپتال
نوٹ: ہسپتال 24 گھنٹے کھلا رہتا ہے



13

فزیشن اینڈ سرجن

ڈاکٹر سہیل الرحمن خان

ایم بی بی ایس (پاک) - ایم ڈی (امریکہ)
ایم اے ایچ اے (یو ایس اے)
ایم اے آئی یو ایم (یو ایس اے)

Patient Name: _____

کرن

Date: 26 3 18

Ref: by: _____

ULTRA SOUND FINDINGS

- LIVER**
- Size, Shape, Texture (normal, enlarged, shrunken)
 - Ecogenisity (normal, increased, decreased)
 - Ducts (dilated, not dilated)
- GALL BLADDER**
- Size, Shape, Texture (normal, enlarged)
 - Wall (normal, thick)
 - Lumen (normal, calculi, sludge)
- SPLEEN**
- Size, Shape, (normal, enlarged)
- PANCREAS**
- Size, Shape, (normal, enlarged)
- KIDNEY (Rt)**
- Size, Shape, (normal, enlarged)
 - Hydronephrosis (present / not present)
 - Calculus (present not present)
 - Ecogenisity (normal, increased, decreased)
- (Lt)**
- Size, Shape, (normal, enlarged)
 - Hydronephrosis (present / not present)
 - Calculus (present not present)
 - Ecogenisity (normal, increased, decreased)
- URETER**
- Normal, Dilated
- URINARY BLADDER**
- Full, Not Full
 - Wall (thick, normal)
 - Calculus (present, not present)

Any Other Bulky uterine wall is homogenous
endometrial canal contains
irregular G. sac fetal pole
Comments not seen both tubes and ovaries
are normal

△ Anembryonic pregnancy

سی ٹی سکین، انٹراساؤنڈ، ایس جی اور لیبارٹری کی سہولت موجود ہے۔

Signature: _____

Attested
 پروفیسر ڈاکٹر نسیم صبا محسود

(14)

ایم بی بی ایس۔ ڈی جی او۔ ایم سی پی ایس۔ ایف سی پی ایس
 پروفیسر گائمی، ڈی ایچ کیو ہسپتال (زنانہ) ڈی آئی خان

NAME Kiran Tasleem w/o _____ AGE _____

ADDRESS _____ DATE 20/3/2018

OB/GYN MIF=8y
 Pt Nil
 Alive
 BB= ALLICIOD
 -7y

Rx

Atve

G. Amenorrhoea
 - 311L
 Plv. bleeding
 1st day
 ANC
 LMP: 4-12-2017
 EDD: 11-9-2018

Rx Myfol
 1 - 1 (3)
 +a Vit dmin
 1 - 1 (3)
 Syn Rongitoni

- Lin Prucg son IV
 1 - 1 (3)

C/S e fetal
 (9) week / PCA not

Dr.

Abgeena Akhter

M.B.B.S, D.G.O

Gynaecologist. Sonologist

Hayat Medical Complex

TB Hospital Colony Zanana hospital

D.I.Khan

Attestation
هو الشان
[Signature]

0966-731155

0966-720413

0966-720411

(15)

ڈاکٹر آبگینہ اختر
ایم بی بی ایس ڈی جی او

گائنا کالوجسٹ

سونالوجسٹ

حیات میڈیکل کمپلیکس

بالتقابل ٹی بی ہسپتال ڈیرہ اسماعیل خان

NOT VALID FOR COURT

Pt: Name

[Handwritten Name]

Age

Sex

Date 07 APR 2018

Clinical Record



Pi

1st 2/2/2

Post

Ecc

10/10/24

Clo

[Handwritten Signature]

Tai Cipoxin

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- M

Mak

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C. ple 1)

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Wscri

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Dayn Dp

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Assessed

16

D.H.Q TEACHING HOSPITAL D.I.KHAN

Out Door Patients Department

Date / /20

yearly No

Name

56120

Disease

Rs 10/-

26/3/68

By Presage

1/m

ATD

to TMW

Refer

26/3/68

To

The Director
Education, Khyber Pakhtunkhawa,
Peshawar.

Appraisal
M. Subhan

ANNEX! D
Page: - (17)

Subject: **Departmental Appeal.**

Respected Sir:

1. That the appellant was working as Qaria Teacher at Government Girls High School Dinpur, Dera Ismail Khan, and served her duty with full of hard work and honestly.
2. That the present appellant was transferred vide office order dated 26-03-2016 from GGHS Dinpur, D.I.Khan to GGHS Shorkot, D.I.Khan, thereafter, the appellant resumed the charged in GGHS Shorkot, D.I.Khan.
3. That the appellant is also permanent resident of opposite to GGHS, Dinpur Dera Ismail Khan while the GGHS Shorkot, D.I.Khan is situated at the distance of 30 kilometers from the residence of appellant, furthermore, no proper public transport is available for that place.
4. That the appellant is unable to travel 60 Kilometer on daily basis as the Doctor advised to the appellant to avoid the

Arrested
in Jail

(18)

travelling on daily basis, and due to the travelling to GGHS, Shorkot Dera Ismail Khan three times pregnancy of the appellant was miscarriage.

5. That the appellant submitted the written applications to DEO (Female) Dera Ismail Khan to transfer the appellant to GGHS Dinpur Dera Ismail Khan due to medical reasons, but the DEO (Female) totally failed to decide the application of the appellant, hence, the instant appeal.

It is therefore, humbly prayed to issue the direction to DEO (Female) Dera Ismail Khan to transfer the appellant from GGHS Shorkot Dera Ismail Khan to GGHS Dinpur Dera Ismail Khan.

Your's Sincerely,


22/7/19
Kiran Tasleem

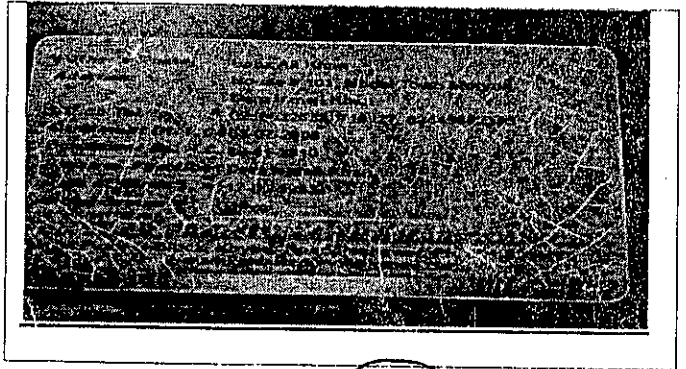
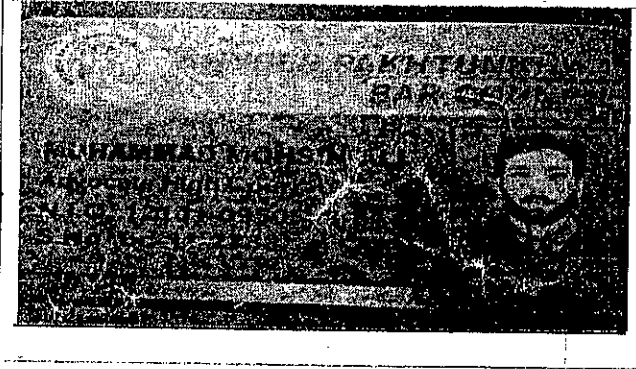
Qaria Teacher.

Cell No. 0349-3536001

Affidavit:

I, the appellant, do hereby, solemnly affirm and declare on Oath that all the para-wise contents of the appeal are correct.


Deponent



VAKALATNAMA

19

BEFORE THE HONOURABLE PESHAWAR HIGH COURT, BENCH DERA ISMAIL KHAN.

Mizan Tasleem Appellant /Petitioner/Complainant/ Accused

Govt of KPK and others **Vs**
..... Respondent / Complainant / Accused

KNOW ALL to whom these present shall come that I/We.....
do hereby appoint **Muhammad Mohsin Ali Advocate High Court** (herein after
called the advocate/s) to be my/our Advocate in the above noted case authorise him:-

1. To act, appear and plead in the above-noted case in this Court or in any other Court in which the same may be tried or heard and also in the appellate Court including High Court subject to payment of fees separately for each Court by me/us.
2. To sign, file, verify and present pleadings, appeals, cross-objections or petitions for executions review revision, withdrawal, compromise or other petitions or affidavits or other documents as may be deemed necessary or proper for the prosecution of the said case in all its stages subject to payment of fees for each stage.
3. To file and take back documents, to admit and/or deny the documents of opposite party.
4. To withdraw or compromise the said case or submit to arbitration any differences or disputes that may arise touching or in any manner relating to the said case.
5. To take execution proceedings.
6. To deposit, draw and receive monthly cheques, cash and grant receipts thereof and to do all other acts and things which may be necessary to be done for the progress and in the course of the prosecution of the said case.
7. To appoint and instruct any other Legal Practitioner authorising him to exercise the power and authority hereby conferred upon the Advocate whenever he may think fit to do so and to sign the power of attorney on our behalf.
8. And I/We the undersigned do hereby agree to rectify and confirm all acts done by the Advocate or his substitute in the matter as my/our own acts, as if done by me/us to all intents and proposes.
9. And I/We undertake that I/We or my/our duly authorised agent would appear in Court on all hearings and will inform the Advocate for appearance when the case is called.
10. And I/We the undersigned do hereby agree not to hold the advocate or his substitute responsible for the result of the said case.
11. The adjournment costs whenever ordered by the Court shall be of the Advocate which he shall receive and retain for himself.
12. And I/We the undersigned to hereby agree that in the event of the whole or part of the fee agreed by me/us to be paid to the advocate remaining unpaid he shall be entitled to withdraw from the prosecution of the said case until the same is paid up. The fee settled is only for the above case and above Court. I/we hereby agree that once fee is paid, I/We will not be entitled for the refund of the same in any case whatsoever and if the case prolongs for more than 3 years the original fee shall be paid again by me/us.

IN WITNESS WHEREOF I/We do hereunto set my/our hand to these presents the contents of which have been understood by me/us on this _____ day of _____ 20

Accepted

Muhammad Mohsin Ali
Muhammad Mohsin Ali
Advocate High Court
District Bar, Dera Ismail Khan.

Muhammad Mohsin Ali