

**Service Appeal No. 1482/2019**

1. Mr. Abdul Saboor Khan, Advocate for the appellant present.  
Mr. Kabir Ullah Khattak, Additional Advocate General for respondents present. Arguments heard and record perused.

2. Vide our detailed judgement containing 05 pages, placed in connected Service Appeal No. 1400/2019 titled "Sharafat-un-Nisa Vs. Director Elementary & Secondary Education Peshawar and one other", we arrived at the conclusion that the appeal in hand is allowed and the case is remitted back to the department for denovo inquiry with the direction that the appellant should be associated in the inquiry. A detailed, self contained inquiry, fulfilling all codal formalities should be completed within sixty days of the receipt of this judgment. The appellants are reinstated in the service for the purpose of denovo inquiry. The issue of back benefits shall be subject to the final outcome of the denovo inquiry. The respondents shall intimate the date of receipt of judgement to the Registrar of this Tribunal and also the result of the inquiry. Parties are left to bear their own costs. Consign.

3. *Pronounced in open court in Abbotabad and given under our hands and seal of the Tribunal on this 22<sup>nd</sup> day of September, 2022.*



**(FAREEHA PAUL)**  
**Member (E)**  
(Camp Court Abbottabad)



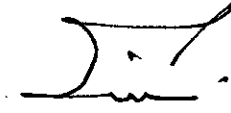
**(KALIM ARSHAD KHAN)**  
**Chairman**  
(Camp Court Abbottabad)

22.12.2021

Learned counsel for the appellant present and stated that security and process fee have not been deposited due to having no knowledge of the same and in this respect, he submitted an application for allowing him to deposit the same. The application is placed on file in connected Service Appeal No. 1483/2019, which is accepted and the appellant is directed to deposit security and process fee within seven working days from today. After the requisite deposit, notices be issued to the respondents for submission of written reply/comments on 17.02.2022 before the S.B at Camp Court Abbottabad.

Appellant Deposited  
Security & Process Fee

29/12/21



(Salah-Ud-Din)  
Member (J)

Camp Court Abbottabad

21<sup>st</sup> July 2022

Counsel for the appellant present. Mr. Kabirullah Khattak, Addl: AG and Mr. Noor Zaman Khattak, District Attorney alongwith Mr. Shah Wali Ullah, Computer Operator for the respondents present.

Written reply on behalf of the respondents not submitted. Representative of the respondents seeks time to submit written reply/comments. Last chance is given to the respondents to submit written reply/comments within fifteen days in office, failing which their right for submission of written reply shall be deemed as struck of. To come up for arguments on 22.09.2022 before D.B at camp court Abbottabad.

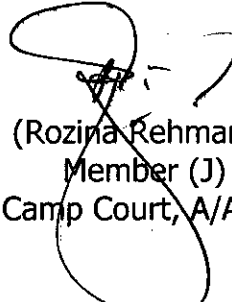


(Kalim Arshad Khan)  
Chairman  
Camp Court Abbottabad

17.03.2021

Appellant present through counsel. Preliminary arguments heard. File perused.

Points raised need consideration. Appeal is admitted to regular hearing subject to all legal objections. Appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to respondents for reply/comments. To come up for written reply/comments on 13.07.2021 before S.B at Camp Court, Abbottabad.

  
(Rozina Rehman)  
Member (J)  
Camp Court, A/Abad

13.07.2021

Due to cancellation of tour, Bench is not available. Therefore, case to come up for the same as before on 13.10.2021.

Reader

13.10.2021

None is present on behalf of the appellant.

Security and process fee have not been deposited, therefore, notices could not be issued to the respondents. Notice be issued to the appellant/counsel to deposit the security and process fee within 07 days. Thereafter, notices be issued to the respondents for submission of written reply/comments on next date positively, otherwise their right for submission of written reply/comments shall be deemed as struck off. Case to come up on 22.12.2021 before the S.B at at camp court, Abbottabad.

(Salah-ud-Din)  
Member (J)  
Camp Court, A/Abad


  
Chairman  
Camp Court, A/Abad

Due to covid ,19 case to come up for the same on / /  
at camp court abbottabad.

Reader

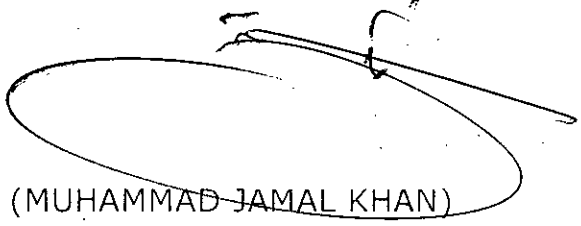
Due to summer vacation case to come up for the same on

18 19 20 at camp court abbottabad.

  
Reader

18.09.2020

Appellant has not forth come in person however, the clerk of the counsel did appear. According to him Mr. Abdul Saboor Khan learned counsel for the appellant has proceeded to District Kohistan for attending a case in the Model Court situated there, therefore, requested for adjournment. The appeal is adjourned to 14.12.2020 on which to come up for preliminary hearing before S.B at Camp Court, Abbottabad.

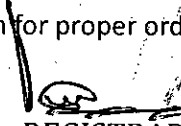


  
(MUHAMMAD JAMAL KHAN)  
MEMBER  
CAMP COURT ABBOTTABAD

Form- A

FORM OF ORDER SHEET

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

Case No.- 1482/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	04/11/2019	<p>The appeal of Mst. Shahnaz Bibi received today by post through Mr. Abdul Saboor Khan 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 4/11/19</p>
2-	24.01.2020	<p>This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put up there on <u>24-1-20</u></p> <p style="text-align: right;"> CHAIRMAN</p> <p>Clerk to counsel for the appellant present and seeks adjournment on the ground that learned counsel for the appellant is not in attendance. Adjourn. To come up for preliminary hearing on 20.03.2020 before S.B at Camp Court Abbottabad.</p> <p style="text-align: right;"> Member Camp Court, A/Abad</p>

**BEFORE THE SERVICE TRIBUNAL**  
**K.P.K PESHAWAR**

Service appeal No/482 of 2019

Mst. Gul Shanaz Bibi .....Appellant

**VERSUS**

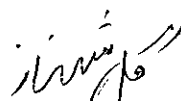
Director Elementary and Secondary  
Education Peshawar etc .....Respondents

**APPEAL**

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**Dated 29.10.2019**

  
GUL SHANAZ BIBI  
(Appellant)

Through:

  
ABDUL SABOOR KHAN  
Advocate High Court

**BEFORE THE SERVICE TRIBUNAL**  
**K.P.K PESHAWAR**

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 1553

Service appeal No 482 of 2019

Dated 04-11-2019

Mst, Gul Shanaz Bibi, Ex-Primary School  
Teacher at Government Girls Primary  
School, Nimraty Sosak, Tehsil Dassu,  
District Kohistan upper.....**Appellant**

**VERSUS**

- 1) Director Elementary and secondary  
Education Peshawar.
- 2) District Education officer (Female)  
Kohistan at Dassu.

.....**Respondents**

Filed to-day

Registrar

04/11/19

**APPEAL UNDER SECTION 4 OF KPK**  
**SERVICE TRIBUNAL, ACT, 1974**  
**AGAINST THE IMPUGNED ORDERS NO**  
**2781-88 DATED 11.06.2019 AND 6802**  
**DATED 08.10.2019, PASSED BY**  
**RESPONDENTS WHEREBY MAJOR**  
**PENALTY OF REMOVAL FROM**  
**SERVICE OF APPELLANT ON THE**  
**GROUND OF ALLEGED UNSPECIFIED**  
**ABSENCE FROM DUTY WAS IMPOSED**  
**AND UPHELD.**

**PRAYER:-**

On acceptance of the instant service appeal, the impugned orders bearing No 2781-88 dated 11.06.2019 and 6802 dated 08.10.2019, passed by respondents may kindly be set-aside declaring them illegal, void and against the law on the subject and appellant be re-instated into service with all back benefits.

**Respectfully Sheweth:-**

1. That, appellant was appointed in a prescribed manner by competent authority against the post of Primary school Teacher vide appointment order dated 07.08.2009.

**(Copy of appointment order dated 07.08.2009, is annexed as Annexure "A").**

2. That, all of a sudden, respondent No 02 without citing any reason and intimation straightaway, with a single stroke of pen imposed Major penalty of removal from service upon appellant w.e.f. 16.08.2016 on the ground of alleged unspecified absence from duty, vide impugned order No. 2781-88 dated 11.06.2019.

**(copy of impugned order dated 11.06.2019 is annexed as Annexure "B").**



3. That, appellant filed a Departmental appeal on dated 06.07.2019, with respondent No 02, which was rejected vide impugned combined order no 6802 dated 08.10.2019. Which too was rejected without hearing the appellant.

**(Copies of Departmental appeal dated 06.07.2019 and impugned order dated. 08.10.2019 are annexed as Annexure "C&D" respectively).**

4. That, felling aggrieved from the impugned orders dated 11.06.2019 and 08.10.2019, appellant having no other remedy files the present service appeal before this Honourable Tribunal for interference inter alia, on the following amongst other grounds.

### **GROUND:-**

- A) That, appellant never remained absent as alleged and the entire illegal proceedings were carried out fictitiously, while sitting in office by respondent No 02 out of mala-fide.
- B) That, before imposing the impugned penalty, no publication as required under rule 9 of E&D, Rules, 2011, was ever made in the leading newspapers, commonly available in the District of the appellant. The reference of news

papers publication in the impugned order are not commonly available in the area of the appellant, hence, the impugned order is wholly illegal, unlawful, without lawful authority and of having no legal effect.

- C) That, no show cause notice was ever issued and the entire proceedings were fictitiously conducted by respondent No 02 at the back of the appellant.
- D) That, no inquiry into the alleged allegations was ever conducted and the impugned penalty was imposed without having the allegations proved.
- E) That, appellant was never confronted with the alleged allegations at any point of time, condemning her unheard.
- F) That, before passing the impugned order, appellant was not put on notice to present his view point/explanation under the Doctrine of **AUDI AULTEM PARTEM**, hence, the impugned order is not sustainable and maintainable under the law on this very sole ground.
- G) That, no evidence worth name was attempted to collect by respondent No 02 against the appellant for alleged absence from duty and he has been


condemned on flimsy and perverse grounds with mala-fide intention.

- H) That, appellant had a long unblemished service record at her credit and she has been removed from service with a single stroke of pen without observing due process of law and having the allegations proved.
- I) That, no complaint was ever filed by any one against the appellant for her being absent from duty as alleged on any working day with any authority.
- J) That, the impugned order on its very face value, is illegal, unlawful, without lawful authority, without jurisdiction and of having no legal effect.

**PRAYER:-**

On acceptance of the instant service appeal, the impugned orders bearing No 2781-88 dated 11.06.2019 and 6802 dated 08.10.2019, passed by respondents may kindly be set-aside declaring them illegal, void and against the law on the subject and appellant be re-instated into service with all back benefits.

**Dated 29.10.2019**

  
GUL SHANAZ BIBI  
(Appellant)

Through:-

  
**ABDUL SABOOR KHAN  
ADVOCATE HIGH COURT**

**VERIFICATION :**

I, Mst. Gul Shanaz Bibi , Ex-Primary School Teacher at Government Girls Primary School, Nimraty Sosak, Tehsil Dassu, District Kohistan upper, do hereby solemnly affirm and declare that the contents of fore-going Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed or suppressed form this Honorable Tribunal.

  
GUL SHANAZ BIBI  
(DEPONENT)

7

**BEFORE THE SERVICE TRIBUNAL**  
**K.P.K PESHAWAR**

Service appeal No \_\_\_\_\_ of 2019

Mst. Gul Shanaz Bibi ..... **Appellant**

**VERSUS**

Director Elementary and Secondary  
Education Peshawar etc ..... **Respondents**

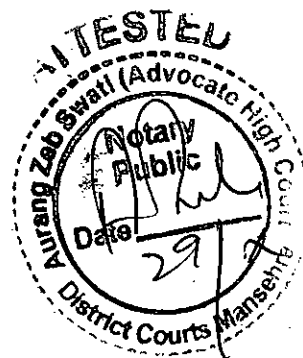
**APPEAL**

**AFFIDAVIT**

I, Mst. Gul Shanaz Bibi, Ex-Primary School Teacher at Government Girls Primary School, Nimraty Sosak, Tehsil Dassu, District Kohistan upper, do hereby solemnly affirm and declare on oath that the no such subject matter appeal has ever been filed before this honorable court nor pending nor decided. That the contents of foregoing affidavit are true and correct to the best of my knowledge and belief and nothing has been concealed or suppressed from this Honourable tribunal.

**Dated: 29.10.2019**

  
GUL SHANAZ BIBI  
(DEPONENT)



**BEFORE THE SERVICE TRIBUNAL**  
**K.P.K PESHAWAR**

Service appeal No \_\_\_\_\_ of 2019

Mst. Gul Shanaz Bibi .....**Appellant**

**VERSUS**

Director Elementary and Secondary  
Education Peshawar etc .....**Respondents**

**APPEAL**

**CORRECT ADDRESSES OF THE PARTIES**

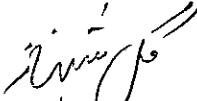
**APPELLANT:**

Mst, Gul Shanaz Bibi, Ex-Primary School  
Teacher at Government Girls Primary  
School, Nimraty Sosak, Tehsil Dassu,  
District Kohistan upper.

**RESPONDENTS:**

- 1) Director Elementary and secondary  
Education Peshawar.
- 2) District Education officer (Female)  
Kohistan at Dassu.

**Dated 29.10.2019**

  
GUL SHANAZ BIBI  
(Appellant)

Through:-

  
**ABDUL SABOOR KHAN**  
Advocate High Court

*Attested*  
*29/11/19*

*P* (9)  
*ANNX* (A)

**OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELEMENTARY & SECONDARY EDUCATION KOHISTAN**

**APPOINTMENT**

Consequent upon approval of District Departmental Selection Committee of Elementary & Secondary Education Department Kohistan the competent authority is pleased to appoint the following (Female) candidates against the post of PST in BPS-5( U/C Wise) in the schools noted against each according to the Policy issued by the Government of NWFP Elementary & Secondary Education Department in the interest of public service with immediate effect.

S.#.	Name of Candidate	Father Name	R/O	Name of School where appointed	Remarks
1	Bibi Fazeela	Alli Akbar	Goshali	GGPS Bar Bak	Agst V. Post
2	Shaheen	Aurang Zeb	Karang	GGPS Karang Belo	-do-
3	Khudija Bibi	Saif-ul Malook	Goshali	GGPS Shah Dar	-do-
4	Gulshahnaz Bibi	Mohd Saeed	Karang	GGPS Karang Belo	-do-
5	Anila Babar	Babar Khan	Komila	GGPS Kass Banda	-do-
6	Nazia Noreen	Majeed	Harban	GGPS Harban Kot	-do-
7	Rukhsana Khurshid	Khurshid Khan	Peach Bela	GGPS Pero Bela	-do-

**CONDITIONS**

1. No TA/ DA is allowed to any one
2. Charge report should be submitted to all concerned
3. Their appointment is purely on temporary basis and liable to termination at any time with out assigning any reason/ notice
4. They will be governed by such rules & regulation enforced and as prescribed by the Government from time to time for the category of the Government Servants to which they belong
5. In case the above candidates failed to assume the charge of his post with in fifteen days of the issuance of this Order their appointment will automatically stand cancelled.
6. They should produced Age & Health Certificate from EDO Health Kohistan
7. They should not be allowed to take over charge if their age is less than 18-years & above 35-years.
8. Their original certificates/ Degrees should be verified by Dy: District Officer (Female) E&SE Kohistan from the concerned board/ University/ Institution before drawl of their pay

Executive District Officer  
E&SE Kohistan

Endst: No. 44-49

Dated Kohistan the 7/11 /2009

Copy of the above is forwarded to the:-

1. PS to Secretary Elementary & Secondary Education Department NWFP Peshawar
2. PA to Director Elementary & Secondary Education NWFP Peshawar
3. District Coordination Officer Kohistan
4. District Accounts Officer Kohistan
5. Dy: DO (F) E&SE Kohistan
6. Candidates concerned

*[Signature]*  
Executive District Officer  
E&SE Kohistan

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE)  
DISTRICT UPPER KOHISTAN



NOTIFICATION

WHEREAS Mst. Gul Shehnaz PST, GGPS Nimraty, Sosak, District Upper Kohistan proceeded against under Khyber Pakhtunkhwa, Government Servants (Efficiency & Discipline) Rules, 2011 on account of her willful and unauthorized absence from duty.

2. AND WHEREAS as per report of ASDEO Circle as well as report of the DCMA's of IMU Kohistan the teacher concerned was reported remained absent from her duties 16/08/2016 to till date without any prior permission/leave sanctioned of the competent authority.

3. AND WHEREAS the District Education Officer Female constituted inquiry committee comprising on ADEO P&D (Male) and Sir Aman CT GMS Karang to conduct inquiry for further in to the matter.

4. AND WHEREAS the inquiry committee conducted inquiry and submitted recommendations on 26/04/2019 and observed that the teacher concerned is remained absent and not performing her duty and recommended that the teacher concerned may be proceeded under E&D Rules 2011 and absent period w.e.f 16/08/2016 to 26/04/2019 may be recovered.

4. AND WHEREAS Show Cause notice was served upon her vide this office letter No. 1359 dated 02/05/2019, she submitted her reply to the Show Cause notice on 15/05/2019 through SDEO Concerned with doubtful dates i.e 07/02/2019 as show cause was served on 02/05/2019.

5. AND WHEREAS reply to the Show Cause notice submitted by the teacher concerned was declared as non-convincing by the Competent authority, and directed the teacher to attend this office on 30/05/2019 before the District Education Officer Female Kohistan Upper for personal hearing vide this office letter No. 2671-74 Dated 28/05/2019, but she failed to avail opportunity of personal hearing.

5. AND WHEREAS the Competent Authority (District Education Officer 'F') after having considered the charges and evidence on record, report of the inquiry committee, response to the Show Cause Notice, is of the view that the charges against the accused teacher have been proved.

6. NOW, THEREFORE, in exercise of the powers conferred under the Khyber Pakhtunkhwa, Government Servants (Efficiency & Discipline) Rules, 2011, the Competent Authority (District Education Officer 'F') is pleased to impose major penalty of "REMOVAL FROM SERVICE" w.e.f 16/08/2016 upon Mst. Gul Shehnaz PST GGPS Nimraty Sosak District Upper Kohistan. Salary drawn by the teacher concerned during her absence period w.e.f 16/08/2016 to 30/04/2018 (20 Months and 15 Days) will be recovered.

-SD-

District Education Officer (F)  
Upper Kohistan

Endst: No 2781-88 dated 11.6.2019:

Copy forwarded for information and necessary action to the -

1. Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar
2. Deputy Commissioner District Kohistan
3. District Accounts Officer District Kohistan
4. District Monitoring Officer IMU Kohistan
5. Sub Divisional Education Officer (F) Kohistan with the directions to ensure recovery for absent period mentioned above within 15 days under intimation to this office
6. Teacher Concerned.
7. Office File.

District Education Officer (F)  
Upper Kohistan



Attested  
29/10/19

بخدمت جناب ڈائریکٹر صاحب E&SE خیبر پختونخواہ پشاور

P- (11)

ANNEX - (C)

عنوان: اپیل برخلاف Letter نمبری 88-2781 مورخہ 11.06.2019

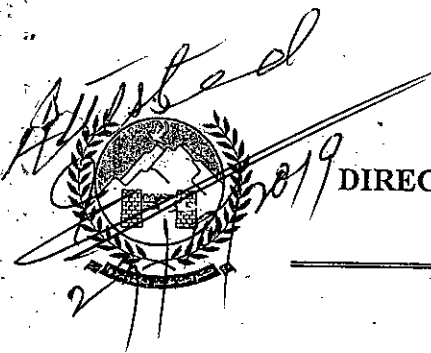
- جناب عالی! گزارشات حسب ذیل پیش ہیں۔
- (۱)۔ یہ کہ سالکہ 01.12.2009 سے محکمہ تعلیم میں اور تاحال GGPS نمبر 1 سساک تحصیل داسو ڈسٹرکٹ اپر کوہستان میں بطور PST گزشتہ 10 سالوں سے اپنے فرائض سرانجام دے رہی ہے سالکہ نے PTC کورس بھی کر رکھا ہے۔
  - (۲)۔ یہ کہ دوران سروس کبھی بھی سالکہ کو نہ غیر حاضر پایا گیا نہ اسکے خلاف کسی قسم کی کوئی محکمانہ شکایت آئی ہے۔
  - (۳)۔ یہ کہ غیر حاضری کے بارے میں سالکہ کو کوئی علم نہیں اور نہ بتایا گیا ہے کیونکہ سالکہ ریگولر اپنی ڈیوٹی سرانجام دے رہی ہے۔
  - (۴)۔ یہ کہ جب کبھی بھی محکمہ تعلیم سے کوئی شوکانہ نوٹس ہوا تو سالکہ نے بروقت اسکا جواب دیا ہے مگر محکمہ کے افسران نے اسے دیکھنے کی کوئی ضرورت محسوس نہ کی۔
  - (۵)۔ یہ کہ اچانک ایک Letter نمبر 88-2781 مورخہ 11.06.2019 موصول کر کے حیرت ہوئی کہ سالکہ کو ملازمت سے برطرف کر دیا گیا ہے۔
  - (۶)۔ یہ کہ دفتر سے یکطرفہ فیصلہ کر کے سالکہ کو سروس سے برخاست کیا گیا ہے اسی دوران نہ تو کوئی انکوائری ہوئی ہے اور نہ سالکہ کو پرسنل ہیئرنگ کیلئے بلایا گیا ہے۔
  - (۷)۔ یہ کہ سالکہ کے ساتھ نہایت زیادتی ہوئی ہے سالکہ کے چھوٹے چھوٹے بچے ہیں، نہایت ہی غریب خاندان سے اور پسماندہ علاقے سے تعلق رکھتی ہے۔

لہذا استدعا کی جاتی ہے کہ مندرجہ بالا عنوان کی روشنی میں سالکہ کا برخاستگی کا حکم نامہ ختم کر کے سالکہ کو اپنی پوسٹ پر بحال کرنے کا حکم صادر فرمایا جائے تو سالکہ تاحیات دعا گورے گی۔

ارض

گل شہنازی بی بی PST گورنمنٹ گریڈ پرائمری سکول نمبر 1 سساک داسو اپر کوہستان

مورخہ 6-7-2019



DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION  
KHYBER PAKHTUNKHWA PESHAWAR

No. 6802 /FNp.324/F/Appeal Kohistan

Dated Peshawar the 08/10/2019 /2019

To

The District Education Officer,  
(F) Kohistan

Subject:- APPEALS REGARDING REMOVAL FROM SERVICE

I am directed to refer to your letter No.5158 dated 02/09/2019 on the subject cited above and to state that the competent authority has rejected the appeals of the following teachers. Hence she may be informed accordingly.

S.No	Name and Designation	School Name
1.	Zarmina PST	GGPS Kemia Abad Kohistan
2.	Salma Bibi PTS	---do--
3.	Shakira Bibi PST	GGPS Mehran Abad
4.	Gul Bibi PST	GGPS Seral Shah
5.	Sadaf Zeb PST	GGPS Pashot
6.	Shaheen Zameer PST	GGPS Loohi Dader
7.	Raqiba PST	GGPS Ser Garhi
8.	Nagina Otail PST	GGPS Baja Lohi
9.	Asma PST	GGPS Ser Garhi Kandia
10.	Farzana Wali PST	GGPS Jhakh lohi
11.	Rehana Bibi PST	GGPS Seri Gabriel
12.	Gul Bibi PST	GGPS Baja Looni
13.	Johajra Bibi PST	GGPS Bar Bak
14.	Gul Shanaz Bibi PST	GGPS Nimraty Sosak Upper
15.	Bibi Rashida PST	GGPS Serto Kandia
16.	Shagufta Kiran PST	GGPS Dhoop Lehi
17.	Huree PST	GGPS Nimraty Sosak Upper
18.	Latifa PST	GGPS Ghee Harban
19.	Aisha Qurashi PST	GGPS Habib Abad Koli
20.	Aisha Sadiq	GGPS Soyal Jashoi
21.	Naheed Sartaj PST	GGPS Sanga Abad

Endst No. \_\_\_\_\_

Copy of the above is forwarded to the:

1. PA to Director E&SE KPK Peshawar.

Deputy Director (Female)  
E&SE Khyber Pakhtunkhwa

Deputy Director (Female)  
E&SE Khyber Pakhtunkhwa

# وکالت نامہ

13

بعدالت جناب سروس ٹریبونل KPK پشاور

گل شہنازی بی بی نام حکومت خیبر پختونخواہ وغیرہ

سروس اپیل

اپیلانٹ

باعث تحریر آئنگہ!

منجانب:

## عبدالصبور خان ایڈووکیٹ ہائی کورٹ

اندریں مقدمہ عنوان بالا اپنی طرف سے برائے پیروی و جواب دہی بمقام پشاور ہائی کورٹ

کو بدیں شرط وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختیار خاص رُوز و عدالت حاضر ہوتا رہوں گا اور بوقت پکارے جانے وکیل صاحب موصوف کو اطلاع دیکر حاضر کروں گا۔ اگر کسی پیشی پر مظہر حاضر نہ ہوا اور غیر حاضری کی وجہ سے کسی طور پر مقدمہ میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام پکھری کے علاوہ کسی اور جگہ پکھری کے مقررہ اوقات سے پہلے یا بروز تعطیل پیروی کرنے کے مجاز نہ ہونگے اگر مقدمہ مقام پکھری کے آگے یا پیچھے سماعت ہونے پر مظہر کو کوئی نقصان پہنچے تو صاحب موصوف ذمہ دار نہ ہوں گے اور صاحب موصوف کو عرضی دعویٰ اور درخواست اجراء کے ڈگری و نظر ثانی، اپیل نگرانی دائر کرنے نیز ہر قسم کی درخواست پر دستخط تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کے اجراء کرانے اور ہر قسم کا روپیہ وصول کرنے اور رسید دینے اور داخل کرنے کا، ہر قسم کا بیان دینے اور سپردگاشی و راضی نامہ و دستبرداری و اقبال دعویٰ کا اختیار ہوگا اور بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم امتناعی یا فیصلہ ڈگری و اجراء کے ڈگری بھی صاحب موصوف کو بشرط ادا ہوگی علیحدہ فیس کرنے کا مجاز ہوگا۔ بصورت ضرورت بدوران مقدمہ یا اپیل و نگرانی کسی دوسرے وکیل یا پیرسٹر کو بجائے خود یا اپنے ہمراہ مقرر کریں اور ایسے مشیر قانونی کو بھی اس امر میں وہی اختیارات حاصل ہوں گے جیسے صاحب موصوف کو، پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی پیروی نہ کریں اور ایسی حالت میں میرا مطالبہ صاحب موصوف کے برخلاف نہیں ہوگا۔ مجھے کل ساختہ پر داخستہ مثل ذات خود منظور و قبول ہوگا۔ لہذا وکالت نامہ لکھ دیا ہے تاکہ سند رہے۔ مضمون وکالت نامہ سن لیا اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

مورخہ 29.10.2019

گل شہنازی بی بی سابقہ پرائمری سکول ٹیچر گورنمنٹ گریڈ پرائمری سکول نمبر 1 سساک داسو ضلع کوہستان اپر

(اپیلانٹ)

Attested & Accepted  
Abdul Saboor Khan  
Advocate High Court