

04.07.2022

Junior to counsel for appellant present.

He made a request for adjournment as senior counsel is busy before Peshawar High Court Mingora Bench (Darul Qaza) Swat. Adjourned. To come up for preliminary hearing on 01.08.2022 before S.B at Camp Court, Swat.



(Rozina Rehman)
Member (J)
Camp Court, Swat

1-8-22

Due to summer vacation the case is adjourned to 3-10-22 for the same.



03.10.2022

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 through registered post and to come up for preliminary hearing on 07.11.2022 before the S.B at Camp Court Swat.





(Salah-Ud-Din)
Member (J)
Camp Court Swat

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 7918/2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	23/12/2021	<p>The appeal of Saifun Naz resubmitted today by Mr. Rahim Ullah 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</p>
2-		<p>This case is entrusted to touring S. Bench at Swat for preliminary hearing to be put there on <u>11.5.22</u></p> <p style="text-align: right;">CHAIRMAN</p>
9 th June, 2022		<p>None for the appellant present.</p> <p>Counsel are on strike. To come up for preliminary hearing on <u>04.07.2022</u> before the S.B at camp court Swat.</p> <p style="text-align: right;"> (Kalim Arshad Khan) Chairman Camp Court Swat</p>

The appeal of Saifun Naz received to-day i.e. on 22.12.2021 which is returned to the counsel for the appellant with the remarks to submit three more copies/sets of the appeal along with annexures i.e. complete in all respect within 15 days.

No. 2555 /S.T,

Dt. 22/12 /2021


Registrar

Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Rahim Ullah Adv. Pesh.

Note objection removed and
re-submitted by Counsel
for the petitioners.
Rahim Ullah Chitab
D. H.

**BEFORE THE HON'BLE CHAIRMAN SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA PESHAWAR**

Service Appeal No. 7918...../2021

Saifun Naz w/o Ubiad ur Rehman r/o Village Shot Joghour District Lower
ChitralAppellant

VERSUS

- 1 The Secretary to government Khyber Pakahumkhwa Health Department Peshawar.
- 2 The Director General Khyber Pakahumkhwa Health Department Peshawar.
- 3 The District Health Officer Lower Chitral..... Respondents

INDEX

S.No	Description of Documents	Annex	Pages
1.	Grounds of service appeal		1-3
2.	Affidavit		4
3.	Addresses of parties		5
4	copies of notification dated 24-9-2014,office order 1-3-2019,pay slip, medical certificate ,notification dated 22-5-2019, and application	A to F	6-13
5	Copies of the order dated 19-11-2019, COC application , and order dated 14-9-2021	G to I	14-23
6	Copies of order 25-10-2021 ,27-10-201 and letter dated 10-11-2021	J to L	24-26
7	Special power of attorney	K	27-29
8	Wakalatnama		30


Appellant

Through


RAHIMJULLAH

Advocate High Court

Office: Rahim & Qazi Law

Associates, 2nd floor continental

Plaza Swat

Cell No. 0334-3251883-03439540004

**BEFORE THE HON'BLE CHAIRMAN SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA PESHAWAR**

Service Appeal No...../2021

Saifun Naz w/o Ubiad ur Rehman r/o Village Shot Joghour District
Lower ChitralAppellant

VERSUS

- 1 The Secretary to government Khyber Pakahumkhwa Health Department Peshawar.
- 2 The Director General Khyber Pakahumkhwa Health Department Peshawar.
- 3 The District Health Officer Lower Chitral..... Respondents

SERVICE APPEAL UNDER SECTION 4, OF THE KPK SERVICE TRIBUNAL ACT, 1974, REGARDING NON SANCTIONING AFTER RETIREMENT BENEFIT I-E PENSION AND GRATUITY OF THE APPELLANT, AGAINST THE ILLEGAL ACTION OF THE RESPONDENTS THE APPELLANT FINALLY APPROACHED TO THE HON,ABLE PESHAWAR HIGH COURT MINGORA BENCH SWAT WHERE WRIT PETITION AND COC, OF THE APPELLANT TREATED AS DEPARTMENTAL APPEAL ON 19-11-2019/14-9-2021 ,AND FURTHER DIRECTED TO DECIDED THE SAME ACCORDING LAW , IN LIGHT OF THE JUDGMENT DATED 22-6-2017 RENDERED BY HON,ABLE BENCH PESHAWAR HIGH COURT IN W.P.NO. 2246 OF 2016, BUT THE SAME WAS REJECTED on 25-10-2021 AND COMMUNICATED TO THE APPELLANT ON 26-11-2021, HENCE THE INSTANT APPEAL.

Prayer in Appeal:

ON ACCEPTANCE OF THE INSTANT APPEAL THE IMPUGNED ORDER DATED 25-10-2021 PASSED BY RESPONDENT NO. 3 MAY GRACIOUSLY BE SET-ASIDE AND RESPONDENTS MAY KINDLY BE DIRECTED TO GRANT AFTER RETIREMENT BENEFIT TO THE APPELLANT IN SHAPE OF PENSION AND OTHERS RETIREMENT BENEFIT FOR WHICH THE APPELLANT DESERVE.
ANY OTHER REMEDY WHICH DEEMS FIT BY HIS HON'BLE TRIBUNAL IN THE INTEREST OF JUSTICE, MAY ALSO BE GRANTED IN FEVER OF APPELLANT.

2

Respectfully Sheweth:

1. That the appellant is law abiding citizen of Pakistan and permanently residing at the address given in the title of this appeal and is entitled to all the privilege under the existing law.
2. That the appellant was initially appointed as Leady Health Worker in village Joghoor Shout Chitral vide appointment letter no 19-7-1996 .
3. That the appellant served as Health Worker in village Joghoor Shout Chitral, and lastly retired from Government service on attaining the age of superannuation. **(copies of notification dated 24-9-2014, office order 1-3-2019, pay slip, medical certificate ,notification dated 22-5-2019, and application are attached A to F)**
4. That the appellant keeping in view of above circumstance was hopeful to get pension benefit after her retirement and as such waited for the same.
5. That the appellant thereafter submitted applications for pension or other benefit to the respondents.
6. That the appellant keeping in view of the above circulation was hopeful to get pension benefits after her retirement and as such waited for the same he was taken by surprise when the respondents informed the appellant that according the existing rule the appellant is not entitled because her regular service was less than 10 years. which was not considered ,which act of the respondents was challenged by the appellant through writ petition No 826/2019 / contempt of court petition and which was *treated as departmental appeals with direction to decided the same according law and rule in light of the judgment dated 22-6-2017 rendered by Hon,able bench peshawar high court in w.p.no.3394-p & 2246 of 2016..* **Copies of the order dated 19-11-2019, COC application , and order dated 14-9-2021 are attached as annexure G to I).**
7. *That the appellant keeping in view of the above circulation was hopeful to get pension benefits etc after her retirement and as such wait for the same when they were taken by surprise when respondent no 3 and 4 informed the appellant that he is not qualifying for pension benefit after retirement . (Copies of order 25-10-2021 ,27-10-201 and letter dated 10-11-2021 are attached as marked annexed as J to L)*
8. *That the judgments were communicated to the respondents in shape of departmental appeal through letter dated but the same was rejected on 25-10-2021 and communicated to the appellant on 23-11-2021, hence the instant appeal ,on the following amongst other grounds*

GROUND

- I) *That the acts, commissions and omissions of respondent No 2 (hereinafter impugned) are patently illegal, un-lawful, without lawful authority, of no legal effect hence having no value in the eyes of law thus be set aside and the appellant may be given pension with all back benefits.*
- II) *The appellant has a poor financial background and served the department for long considerable period with the hope of the future benefit after*

3

retirement but the respondents did not observed the prescribe rule regulation and denied the benefit in shape of pension to the appellant
III) That the issues in hands have now already been decided by this august court through a similar nature cases hence the appellant deserve for the same treatment.

it is therefore most humbly prayed that on acceptance of the instant appeal the impugned order dated 25-10-2021 passed by respondent no. 2 may graciously be set-aside and respondents may kindly be directed to grant after retirement benefit to the appellant in shape of pension and others retirement benefit for which the appellant deserve.

any other remedy which deems fit by his Hon'ble tribunal in the interest of justice, may also be granted in fever of appellant.

Saif Un Naz
Through Special attorney

RAHIM ULLAH
Advocate High Court
Office: Rahim & Qazi Law
Associates, 3rd floor
continental Plaza-Makan
Bagh Swat
Cell No. 0334-3251883-
0343954004

Certificate:-

It is certified that no such appeal is pending or decided by this Hon, able Court
Rahim Ullah
Advocate Hig Court

List of Books:-

- a. Service Laws
- b. Case law according to need


Rahim Ullah
Advocate High Court

(9)

**BEFORE THE HON'BLE CHAIRMAN SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA PESHAWAR**

Service Appeal No...../2021

Saifun Naz w/o Ubiad ur Rehman r/o Village Shot Joghaur District Lower
ChitralAppellant

VERSUS

- 1 The Secretary to government Khyber Pakahumkhwa Health Department Peshawar.
- 2 The Director General Khyber Pakahumkhwa Health Department Peshawar.
- 3 The District Health Officer Lower Chitral..... Respondents

AFFIDAVIT

I, Maqsood Ahmad son of Muhammad Zahir Khan (special Attorney for Appellant), do hereby affirm and declare that the contents of appeal are true and correct to the best of knowledge and belief and nothing has been concealed from this honorable Court.


Deponent

Identified by

Muti Ur Rehman

Advocate, High Court

8

**BEFORE THE HON'BLE CHAIRMAN SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA PESHAWAR**

Service Appeal No...../2021

Saifun Naz w/o Ubiad ur Rehman r/o Village Shot Joghour District
Lower ChitralAppellant

VERSUS

- 1 The Secretary to government Khyber Pakahumkhwa Health Department Peshawar.
- 2 The Director General Khyber Pakahumkhwa Health Department Peshawar.
- 3 The District Health Officer Lower Chitral..... Respondents

ADDRESSES OF PARTIES

APPELLANT

Saifun Naz w/o Ubiad ur Rehman r/o Village Shot Joghour District
Lower Chital

RESPONDENTS

- 1 The Secretary to government Khyber Pakahumkhwa Health Department Peshawar.
- 2 The Director General Khyber Pakahumkhwa Health Department Peshawar.
- 3 The District Health Officer Lower Chital.


Appellant

Through


RAHIM ULLAH
Advocate High Court
Office: Rahim & Qazi Law
Associates, 2nd floor continental
Plaza Swat
Cell No. 0334-3251883

6

A

OFFICE TO THE DISTRICT HEALTH OFFICER CHITRAL

NOTIFICATION

In terms of section 4 (1) read with 1st Proviso thereunder, of the Khyber Pakhtunkhwa Regulation of Lady Health Workers Programme and Employees (Regularization and Standardization) Act 2014, services of the following Lady Health Workers program employee of District Chitral Khyber Pakhtunkhwa are hereby regularized w.e.f 1st July 2012. Their terms and condition of services will be governed under the Khyber Pakhtunkhwa Regulation of Lady Health Workers Program and Employees (Regularization and Standardization) Act, 2014 and rules to be made thereunder.

Sr. No	Name of Community Embedded Employee	Father Name	Husband Name	Date of Appointment	Designation	FLCF	Name of Catchment Area
1	Zahida Muzzafar	Hayat Baig	Muhammad Muzzafar	1-8-1996	LHS	MCH Center	MCH Center
2	Rani Tabasum	Muhammad Fazil	Jang Baz Khan	16-11-2002	LHS	-do-	-do-
3	Bibi Malika	Muhammad Afzal	Muhammad Nadir	1-7-1995	LHW	-do-	Vill: Mukhtoon abad
4	Bibi Sharifa	Faiz Muhammad	Saidullah	4-6-1995	LHW	-do-	Vill: Faizabad
5	Gulshahzadi	Shamshad Hakeem	Ghulam Khalil	1-7-1995	LHW	-do-	Vill: Zargarandeh
6	Bibi Shaiba	Mir Sahib Khan		1-7-1995	LHW	-do-	Vill: Mughlandeh
7	Bibi Ashraf	Gulab Khan	Ahsanullah	1-7-1995	LHW	-do-	Vill: Shaliden
8	Zahida Perveen	Mir Gulab Shah	Nizar Wali Shah	2-7-1995	LHW	-do-	Vill: Bakarabad
9	Miraj Bibi	Jana Gul	Aziz Muhammad	30-11-1995	LHW	-do-	Vill: Sein Lasht
10	Zaitoon Bibi	Momin Shah	Rehmat Qadir	4-7-1995	LHW	-do-	Vill: Danin Gazandeh
11	Jahan Parwaz	Fateh ur Rehman		1-7-1995	LHW	-do-	Vill: Rihankhot
12	Khurshid Bano	Rehmat Khan	Tajuddin	4-7-1995	LHW	-do-	Vill: Shaliden
13	Bibi Halima Gul	Islam Muhammad	Sher Muhammad Khan	1-12-1995	LHW	-do-	Vill: Danin Lasht
14	Shahida Sultana	Sahibuddin Shah	Habib ur rehman	4-6-1995	LHW	-do-	Vill: Gughoor Shout
15	Bushra Tabassum	Sher Ahmad	Muhammad Younus Khan	15-12-1995	LHW	-do-	Vill: Rizandeh Jaghoor
16	Shamim Akhtar	Haji Akbar Khan	Noorullah	16-4-1996	LHW	-do-	Vill: Khurkasandeh
17	Karima Bibi	Amir Gul	Shah Murad Biag	7-4-1996	LHW	-do-	Vill: Faiz Abad
18	Jamila Akhtar	Saidul Azam	Zakiruddin	1-10-1996	LHW	-do-	Vill: Shamirandeh Singoor
19	Shamshad Bibi	Chiraghuddin	Muhammad Tariq	1-1-1996	LHW	-do-	Vill: Bakar abad
20	Shamshad Begum	Zar Ghulam		1-1-1996	LHW	-do-	Vill: Goldoor
21	Gul Nasrin	Abdur Razaq	Habib Nawaz	1-8-1996	LHW	-do-	Vill: Khurkasandeh
22	Saifun Naz	Muhammad Zahir Khan	Abdur rehman	19-7-1996	LHW	-do-	Vill: Jaghoor Shout
23	Naqool Bibi	Wazir Khan	Nizar Ali	1-8-1996	LHW	-do-	Vill: Shadok Danin
24	Sirajul Millad	Sher nabi	Syed Azam	1-8-1996	LHW	-do-	Vill: Mughlandeh
25	Zarena Bibi	Suhrab Khan	Faizul Islam	1-8-1996	LHW	-do-	Vill: Pujikoti
26	Safid Gul	Ali Pahan	Ayub Khan	1-8-1996	LHW	-do-	Vill: Sein Lasht
27	Mahjabeen	Saif Ali	Altaf Ali shah	1-9-1998	LHW	-do-	Vill: Balach Bala

CR
A

28	Nasreen Akhtar	Izatman Shan	Mir Haider	1-9-1998	LHW	-do-	Vill:Balach pa
29	Sahira Bibi	Muhammad Nabi	Syed Azam	2-5-2002	LHW	-do-	Vill:Sein
30	Saadia Bano	Aziz Khan	Dinar Khan	2-5-2002	LHW	-do-	Vill:Sein Lash
31	Musarat Jabeen	Fazal e rahim	Dinar wali khan	2-5-2002	LHW	-do-	Vill:Singoor
32	Shahzadi Bibi	Muhammad Ayub	Mir Samad	2-5-2002	LHW	-do-	Vill:Chewdok
33	Zahida	Sardar Murad		1-5-2002	LHW	-do-	Vill:Jang Bazar
34	Bibi Halima	Momin Shah	Noor Akbar	2-5-2002	LHW	-do-	Vill:Zargarndeh
35	Zuhra Jabeen	Nasiruddin	Salahuddin	2-5-2002	LHW	-do-	Vill:Mustajapan
36	Jabeen Akhtar	Buzurg Khan	Muhammad Sharif	2-5-2002	LHW	-do-	Vill:Uchust
37	Bibi Zairafa	Wali Muhammad		2-5-2002	LHW	-do-	Vill:Shiaqotak
38	Bibi Razia	Muhammad Khan		2-5-2002	LHW	-do-	Vill:Aryan
39	Sidratul Muntaha	Wazir Hussain		2-5-2002	LHW	-do-	Vill:Muldeh
40	Fazal Nama	Khosh Bati	Ali Muhammad	2-5-2002	LHW	-do-	Vill:Golugh Dan
41	Kusar Perveen	Muhammad Sardar	Zakhirddin	2-5-2002	LHW	-do-	Vill:Goldoor Jaghoor
42	Khunza Gul	Purdom Khan		2-5-2002	LHW	-do-	Vill:Jang Bazar
43	Nazira Bibi	Abdul Razaq	Amanullah	1-12-2004	LHW	-do-	Vill:Mashangote Danin
44	Nazira Bibi	Sahib nawaz	Fazili Aziz	1-12-2004	LHW	-do-	Vill:Singoor Lotdeh
45	Nasrin Jamal	Faramoze Khan	Maqbool Alam	2-5-2006	LHW	-do-	Vill:Hinjigol Jaghoor
46	Fasila Bibi	Tabarak Shah	Syeed Muhammad	1-7-2009	LHW	-do-	Vill:Muldeh
47	Hamida Bibi	Afsar Ali	Muhammad Liyas	1-7-2009	LHW	-do-	Vill:Shali
48	Benazir Jahan	Laghal Khan	Muhammad Ashraf	1-7-2009	LHW	-do-	Vill:Mugholandeh
49	Naila Bashir	Muhammad issa	Allaudin	1-7-2009	LHW	-do-	Vill:Danin Gahtak
50	Rashida Bibi	Hazrat Gul	Ghulam Rasool	1-7-2009	LHW	-do-	Vill:Bakar Abad
51	Mohammad Nasir	Mohammad Ali		1-7-2005	Driver	-do-	MCH Center

In exercise of powers conferred under sub section (2) of the Section ibid, the above community Embedded Employees are placed in the following pay scales as mentioned against the respective designation.

Name of Post	Basic Pay Scale
Lady Health Supervisor	7
Lady Health Worker	5
Driers	4

No. 1862-1915 NP/CTL

Copy forwarded to the:-

1. Director General Health Services Khyber Pakhtunkhwa
2. Provincial Coordinator PPIU Peshawar
3. Incharge FLCF
4. All Official Concerned

Sd/xxxxx

DISTRICT HEALTH OFFICER
CHITRAL

Dated: 24/8/2014

DISTRICT HEALTH OFFICER
CHITRAL



Ann B

OFFICE OF THE DISTRICT HEALTH OFFICER CHITRAL

Address: DC Office Road Jang Bazaar Chitral

Phone & Fax No. 0943-412734-412754

Email: dhochitral@yahoo.com

No. _____ /A.24

Dated Chitral the 13/2019

OFFICE ORDER:-

Mrs. Saifun Naz W/o Ubaid ur Rehman Resident of village Jughoor Shot Tehsil & District Chitral attached to MCH Center Chitral working as Lady Health Worker is hereby relieved from service with effect from 03/03/2019 (AN) due to attending the age 60 years on Superannuation basis.

She is directed:

To hand over all the assets of Lady Health Workers Programme, in his custody to concerned LHS.

Sd/xxxxxx
DISTRICT HEALTH OFFICER
CHITRAL

No. 1117-23 /A.24

Copy forwarded for information to:-

1. Provincial Coordinator Lady Health Workers Programme Khyber Pakhtunkhwa Peshawar.
2. Dr. Saleem Saifullah Coordinator LHWS Programme Chitral.
3. Field Programme Officer
4. Account Section of this office
5. Facility Incharge MCH Center Chitral
6. Concerned LHS
7. Mrs. Saifun Naz W/o Habib ur Rehman Resident of village Jughoor Shot

CR

DISTRICT HEALTH OFFICER
CHITRAL

Ann C
9

Sr: 1 Chitral
Pers #: 00791209 Buckle:
Name: SAIF UD NAZ
LADY HEALTH WORKER
CNIC No. 1520156329162
GPF Interest Applied
05 Active Permanent

P. Sec: 001 Month: December 2018
CL6020 - District Health Officer Ch
DISTRICT HEALTH OFFICER C
NTN:
GPF #:
Old #:

PAYS AND ALLOWANCES:		CL6020
0001-Basic Pay		11,760.00
1000-House Rent Allowance		1,503.00
1210-Convey Allowance -2005		1,932.00
1300-Medical Allowance		1,500.00
1914-UAA-CHITRAL 50%(1-15)		1,700.00
2148-15% Adhoc Relief All-2013		270.00
2199-Adhoc Relief Allow @10%		174.00
2211-Adhoc Relief All 2016 10%		901.00
2224-Adhoc Relief All 2017 10%		1,176.00
Gross Pay and Allowances		29,562.00
DEDUCTIONS:		
GPF Balance	26,605.00	
3501-Benevolent Fund		890.00
4004-R. Benefits & Death Comp:		600.00
		690.00

Total Deductions 2,180.00
27,382.00

D.O.B
01.01.1969
06 Years 06 Months 001 Days

LFP Quota:
HABIB BANK LIMITED CHITRAL
0009750009669501

CR
★

MEDICAL CERTIFICATE

Ann D

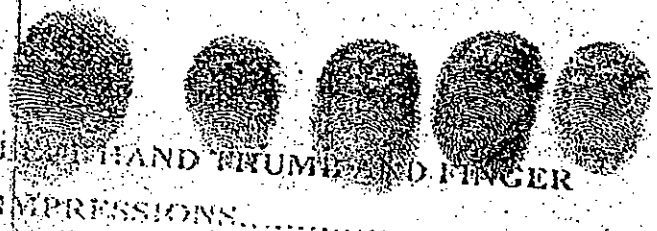
10

Name of Official Mrs. Sai-fun Naz
 Caste or Race Hattam Bagaj
 Father's Name Mr. Mahamoud Zahir Khan H.N. Ubaidur
 Residence W. Lags. Jajhooor Light P/O Teksol and
District Central
 Date of birth 1959-
 Exact height by measurement 5-3
 Personal marks of identification A. Mole on the Forehead
 Signature of head of office
 Signature of the official S. Naz

Seat of Office

I do hereby certify that I have examined Mrs. Sai-fun Naz
 candidate for employment in the Office of the DHO, office Central
 and cannot discover any disease communicable or other constitutional effect or
 bodily infirmity except Nil

I do not consider this as disqualification for employment in the office of the
DHO, office Central His age to his
 was statement 54 years and by appearance about Fifty Four years.



RIGHT HAND THUMB AND FINGER
 IMPRESSIONS

[Signature]
 Medical Superintendent
 Civil Hospital
28/1/13
 MEDICAL SUPERINTENDENT
 DHO HOSPITAL CENTRAL

CR
[Signature]

TO BE SUBSTITUTED BEARING SAME NO. & DATE.



GOVERNMENT OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT
(REGULATION WING)

Dated Peshawar the 22-05-2019

Ann E

NOTIFICATION

No.FD(SOSR-II)4-36/2017. In pursuance of the judgement of Peshawar High Court Abbottabad Bench in Writ Petition No. 627-A/2018 dated: 18.12.2018 and Judgements of various Lower Courts as well as supersession of Finance Department policy letter No.BO-I/1-22/2007-08/FD dated: 29.01.2008, the Competent Authority has been pleased to accord sanction of regularization of Fixed Pay Class-IV employees appointed on the basis of policies issued vide Finance Department notifications No. B-I/2-1/92-93/I dated: 04.11.1992 and No.B-I/1-22/94-95/FD Vol-II dated: 24.07.1999 by extending them the status of civil servant as per Civil Servant Act 1973 from the date of their first appointments instead of the date of their regularization w.e.f 01.07.2008 in their respective entities in the best of public interest.

[Handwritten signature]

SECRETARY TO GOVERNMENT
OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT

Endst: No & date even

Copy for information and necessary action is forwarded to the.

1. The Additional Chief Secretary (P&D), Khyber Pakhtunkhwa.
2. The Provincial Police Officer, Khyber Pakhtunkhwa.
3. The Accountant General Khyber Pakhtunkhwa.
4. The Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
5. The Principal Secretary to Governor, Khyber Pakhtunkhwa.
6. All Administrative Secretaries Government of Khyber Pakhtunkhwa.
7. All Deputy Commissioners in Khyber Pakhtunkhwa.
8. All Heads of Attached Departments in Khyber Pakhtunkhwa.
9. The Director Treasuries & Accounts Khyber Pakhtunkhwa.
10. The Director, Local Fund Audit, Khyber Pakhtunkhwa.
11. Director, FMIU, Finance Department.
12. Budget Officer-XI, Finance Department.
13. Budget Officer-I, Finance Department with reference to their letters quoted above.
14. All District Controller of Accounts Khyber Pakhtunkhwa.
15. All District Account Officers in Khyber Pakhtunkhwa.
16. PS to Chief Secretary, Khyber Pakhtunkhwa.
17. PS to Secretary Finance, Khyber Pakhtunkhwa.
18. PS to Special Secretary Finance Department, Khyber Pakhtunkhwa.
19. PA to Additional Secretary (Regulation), Finance Department.

C-T-C

[Handwritten signature]

(MOAZZAM KHAN)
Section Officer (SR-II)

خدمتِ خطاب ۵.۱۱.۰۵ سے پہلے صدر ال

Ann P

13

رزولوشن / اپیل میراٹیشن و دیگر فرمائش

12

خا۔ عالی! - کمزوری بحیثیت سپلی و ڈار (LHW) دورکار ٹواریسٹ -

۱۹۷۷ سے ریٹائرمنٹ میں عمر ۴۴ تقریباً ۲۳ سال تک اپنی ڈیوٹی کیا۔

۱۹۹۶ میں ریٹائرمنٹ پر ریٹائرمنٹ پر ریٹائرمنٹ کیا گیا۔

۲۰۱۸ میں ۳۱ جولائی کو ریٹائرمنٹ پر ریٹائرمنٹ کیا گیا۔

۲۰۱۹ میں ۹ سال سے ریٹائرمنٹ پر ریٹائرمنٹ کیا گیا۔

ریٹائرمنٹ پر ریٹائرمنٹ کیا گیا۔

۱۹۷۷ سے ریٹائرمنٹ میں عمر ۴۴ تقریباً ۲۳ سال تک اپنی ڈیوٹی کیا۔

۱۹۹۶ میں ریٹائرمنٹ پر ریٹائرمنٹ پر ریٹائرمنٹ کیا گیا۔

۲۰۱۸ میں ۳۱ جولائی کو ریٹائرمنٹ پر ریٹائرمنٹ کیا گیا۔

۲۰۱۹ میں ۹ سال سے ریٹائرمنٹ پر ریٹائرمنٹ کیا گیا۔

Singh

Saifun Naz aka Ubaid UR Rehman 15.11.2019

Handwritten signature

14' (5) Am 6

**BEFORE THE PESHAWAR HIGH COURT AT MINGORA BENCH
(DARUL QAZA) SWAT**

Writ Petition No. 826 M of 2019

Saifun Naz W/O of Ubaid Ur Rehman, residence of village Shot Tehsil
& District Chitral.....Petitioner

Versus



1. Govt of Khyber Pakhtunkhwa through its Secretary Finance, Civil Secretariat, Peshawar.
2. Govt of Khyber Pakhtunkhwa through its Secretary Health, Civil Secretariat, Peshawar.
3. Director Health, Khyber Pakhtunkhwa, Peshawar
4. District Health Officer Chital.
5. District Account Officer District ChitalRespondents.

Writ Petition under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973,

Respectfully Sheweth:-

1. That the petitioner is law abiding citizen of Pakistan and permanently residing at the address given in the title of this petition and are entitled to all the privilege under the existing law
2. That the petitioner was initially appointed on 19-7-1996 as Leady Health Worker against the vacant post in Village Jaghoor Shout district Chital
3. That the petitioner served as Leady Health Worker in Village Jaghoor Shout District Chital and lastly retired from Government service on attaining the age of superannuation.
4. That during the service of the petitioner the Govt of KPK regularized the service of the petitioner in the year 2014 through Leady Health Worker Program and Employee (Regularization and Standardization) Act 2014 and in compliance of the said Act, the respondent No.4 also issued regularization order in favour petitioner vide office order dated 24-9-2014 (copies of office order dated 24-9-2014, retirement order and relevant documents are attached as marked annexure A)
5. That the petitioner keeping in view of above circumstance was hopeful to get pension benefit after her retirement and as such waited for the same.

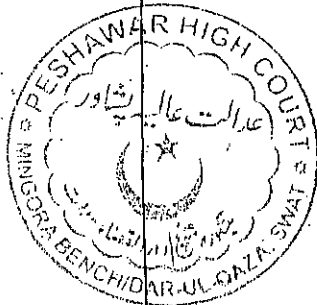
ATTESTED

Examiner
Peshawar High Court Bench
Mingora, Dar-ul-Qaza, Swat.

FILED TODAY

24 JUL 2019

Additional Registrar



appointment letter dated 19.07.1996. On promulgation of the Khyber Pakhtunkhwa Regulation of Lady Health Workers Programme and Employees (Regularization and Standardization) Act, 2014 (hereinafter referred to as 'the Act'), her services were regularized. On 01.03.2019, she retired from government service on attaining the age of superannuation and on 15.04.2019, she filed an application to the District Health Officer, Chitral (hereinafter referred to as 'DHO') for payment of monthly pension as well as arrears but same was not entertained. Therefore, she approached this Court through the instant constitutional petition.

3. Comments were called from respondents No. 3 to 5, out of whom respondent No. 5 filed his comments and contended that the petitioner lacked sufficient service which was 10 years for pension benefits as per pension rule.

4. Learned counsel for petitioner relied upon the case of Hairman, Pakistan Railway, Government Of Pakistan, Islamabad and others vs Shah Jehan Shuh reported as *PLD 2016 Supreme Court 534* and the case of Sher Afzal Khan vs Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Khyber Pakhtunkhwa,

ATTESTED

Examiner
Peshawar High Court Bench
Mingora Dar-ul-Qaza, Swat.

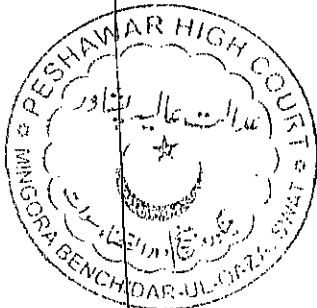
Peshawar and 2 others reported as 2019 PLC (C.S)

1065 and contended that when officiating services are followed by permanent service, same is required to be counted for the purpose of pension but in the case in hand, same has not been so counted by the respondents. He also referred to the judgment of this Court dated 22.06.2017 given in W.P No. 2246-P/201 and said that petitioner shall feel satisfied, if the case is treated in the same manner as cases of the petitioners have been treated by a larger Bench of this Court therein. Paras-9 & 10 of the said judgment are relevant herein, same are therefore reproduced hereunder for ready reference;

"9. In view of the above, it is held that all these writ petitions are not maintainable, however, in the interest of justice, we instead of dismissing the same, transmit to the concerned Secretaries to the Government of Khyber Pakhtunkhwa to treat them as departmental appeals and decide strictly in accordance with Civil Servants Pension Rules, 1963.

10. Before parting with the judgment, we deem it appropriate to mention here that the concerned Secretaries while deciding the departmental appeals, may take guidance from the judgment of this Court rendered in Writ Petition No. 3394-P/2016, titled, "Amir Zeb vs District Account Officer Nowshera etc" dated 22.06.2017, wherein guideline has been provided for eligibility of a civil servant for the pension who had served on adhoc/contract and fixed pay basis."

5. In the circumstances of the case, we would also like the departmental authority to deal with the matter at the first instance and therefore, the case in hand



ATTESTED

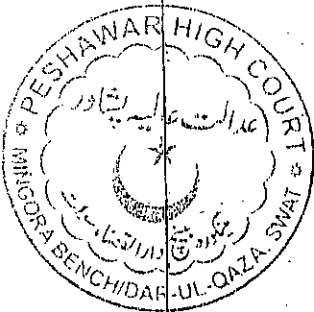
Examiner
Peshawar High Court Bench
Mingora Dar-ul-Qaza, Swat

Aidul Sabah*

(D.B)

HON'BLE. MR. JUSTICE IYER ABUJIAQ AN
HON'BLE. MR. JUSTICE WIGAR AHMAD

(9)
1
18



is ordered to be sent to the Departmental Authority for disposal according to law. The concerned authority i.e. DHO shall pass a written order giving reasons in detail thereof in respect of grievance of the petitioner agitated through the instant petition. The petitioner shall be at liberty to have recourse to the appropriate forum thereafter. If the DHO felt any handicap in disposal of the instant petition, he shall record his own decision, and shall thereafter submit the case to the Director General Health Services Government of Khyber Pakhtunkhwa, Peshawar who shall pass a speaking order for disposal of the instant petition. The DHO shall pass the order within one month and if the matter is sent to Director General Health Services Government of Khyber Pakhtunkhwa, Peshawar, he shall also pass the final order in the matter within one month.

6. The petition in hand is disposed of accordingly.

Announced
Di: 19.11.2019


JUDGE

Certified to be true copy


20-12-19
EXAMINER

Peshawar High Court, Mingora/Dar-ul-Qaza, Swat
Authorized Under Article 87 of Quanoon-e-Shahadat Order

S.No. 11/21
Name of Applicant Abbas Pk Shuh
Date of Presentation of Applicant 20-11-19
Date of Completion of Copies 20-12-19
No of Copies 05
Urgent Fee 10/-
Fee Charged 10/-
Date of Delivery of Copies 20-12-19


JUDGE

Office
14/12/2019

17-1-2020

①

Am H

BEFORE THE PESHAWAR HIGH COURT AT MINGORA BENCH
(DARUL QAZA) SWAT

COC No 45-m-2020

19

Writ Petition No 826 M of /2019

Saifun Naz w/o Ubiad ur Rehman r/o Village Shot Joghour District Lower
Chitral Petitioner

Versus

- 1) Dr M Niaz , Director General Health Servise Govement of Khyber Pakhtunkhwa ,Peshawar.
- 2) Dr Hyder UI Mulk ,District Health Officer District Lower Chitral.

..... CONTEMNORS/RESPONDENTS

CONTEMPT OF COURT PETITON UNDER ARTICLE 204 OF THE CONSTITUTION OF ISLAMIC REPUBLIC OF PAKISTAN READ WITH ENABLING SECTION OF CONTEMPT OF COURT ORDINANCE FOR INITIATING CONTEMPT OF COURT PROCEEDING AGAINST THE RESPONDENTS FOR THEIR VIOLATION OF THIS HONOURABLE COURT DATED 19-11-2019 IN WRIT PETITION NO 826 M M /2019.



FILED TODAY

07 JUL 2020

Additional Registrar

Respectfully Sheweth:

1. That the petitioner is law abiding citizen of Pakistan and permanently residing at the address given in the title of this petition and are entitled to all the privilege under the existing law.
2. That the petitioner was initially appointed as Leady Health Worker in village Joghoor Shout Chitral vide appointment letter no 19-7-1996 .
3. That the petitioner served as Health Worker in village Joghoor Shout Chitral, and lastly retired from Government service on attaining the age of superannuation.
4. That the petitioner keeping in view of above circumstance was hopeful to get pension benefit after her retirement and as such waited for the same.
5. That the petitioner thereafter submitted applications for pension or other benefit to the District Account officer.
6. That the petitioner keeping in view of the above circulation was hopeful to get pension benefits after her retirement and as such waited for the same he was taken by surprise when the respondents informed the petitioner that according the existing rule the petitioner is not entitled because her regular service was less than 10 years. which was not considered ,which act of the respondents was challenged by the petitioner through writ

ATTESTED

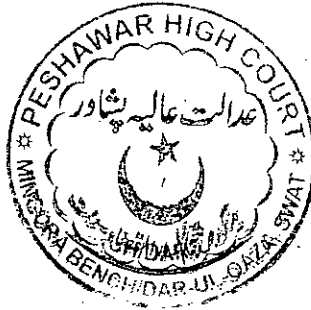
Examiner
Peshawar High Court Bench
Mingora Dar-ul-Qaza, Swat.

petition No 826/2019 and this Honable Court was pleased to disposed of the same .. Copy of the order dated 19-11-2019 is attached as annexure A).

7. That though the aforesaid order was passed in the presence of learned counsel for the respondent but even then the petitioner by herself, as well as office of this Honorable Court conveyed and supplied the attested order of this Honorable court but till dated the same has not been implemented.
8. That petitioner approached the Respondents by showing them the order of this Hon'ble Court, but the words of the respondents were harsh and unbelievable contemptuous.
9. That respondents are intentionally and willfully disobeying the order of this honorable court which fact has caused to lower the authority of this Honorable court in the public at large, therefore this Honorable court needs to initiate contempt of court proceeding against them.

PRAYER

It is therefore most humbly prayed that on acceptance of the present petition, the respondents may very graciously be directed to comply with the order/judgment dated 19-11-2019 without any further delay, and, furthermore, Contempt of Court proceedings may kindly be initiated against the respondents and may be dealt in accordance with law in the best interest of justice.



Applicant/ petitioner
Through
RAHIMULLAH
Advocate High Court
03452928648

Dated: 7-7-2019.

CERTIFICATE:

It is certified that no such like other contempt of Court petition has been filed before this Honorable Court or before any other Court.

RAHIMULLAH
Advocate High Court

FILED TODAY

07 JUL 2020

Additional Registrar

ATTESTED

Examiner

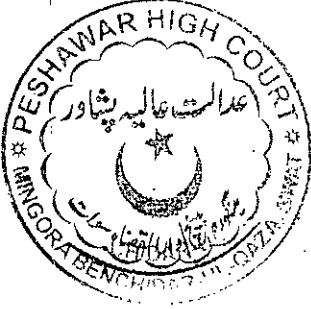
Peshawar High Court Bench
Mingora Dar-ul-Qaza, Swat.

Am. J
21**JUDGMENT SHEET****PESHAWAR HIGH COURT, MINGORA
BENCH (DAR-UL-QAZA), SWAT
(Judicial Department)****COC No. 45-M/2020
In W.P. No. 826-M/2019****JUDGMENT**Date of hearing: **14.09.2021****Petitioner: - (Saif-un-Naz) by Mr. Rahim Ullah
Chitrali, Advocate.****Respondents: - (Dr. M.Riaz, D.G Health &
another) by Mr. Alam Khan Adenzai,
Asth: A.G.**

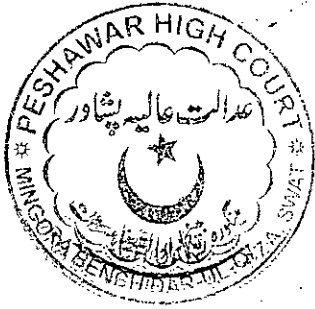
WIQAR AHMAD, J.- This order is directed to dispose of the petition filed by petitioner under Article 204 of the Constitution of Islamic Republic of Pakistan 1973, read with enabling sections of the Contempt of Court Ordinance for initiation of contempt of Court proceedings against respondents in view of non-compliance of this Court order dated 19.11.2019 passed in W.P. No. 826-M of 2019.

2. We have heard arguments of learned counsel for petitioner, learned Astt: A.G. for official respondents and perused the record.

3. Perusal of record reveals that writ petition filed by the petitioner had earlier been disposed of with the following observations;

**ATTESTED**Examiner
Peshawar High Court Bench
Mingora Dar-ul-Qaza, Swat.

"In the circumstances of the case, we would also like the departmental authority to deal with the matter at the first instance and therefore, the case in hand is ordered to be sent to the Departmental Authority for disposal according to law. The concerned authority i.e. DHO shall pass a written order giving reasons in detail thereof in respect of grievance of the petitioner agitated through the instant petition. The petitioner shall be at liberty to have recourse to the appropriate forum thereafter. If the DHO felt any handicap in disposal of the instant petition, he shall record his own decision, and shall thereafter submit the case to the Director General Health Services Government of Khyber Pakhtunkhwa, Peshawar who shall pass a speaking order for disposal of the instant petition. The DHO shall pass the order within one month and if the matter is sent to Director General Health Services Government of Khyber Pakhtunkhwa, Peshawar, he shall also pass the final order in the matter within one month."



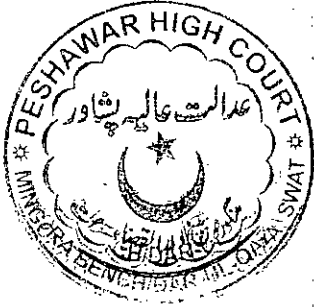
ATTESTED

Examiner
Peshawar High Court Bench
Mingora Dar-ul-Qaza, Swat.

Now the District Health Officer, Lower Chitral has filed the reply and he has stated that case of the petitioner had been sent to the Director General Health Services vide letter No. 202/C-file dated 20.01.2020 and that the needful is required at his end. A letter No. 1356-61/DHS/IHP/2018-19 dated 02.04.2020 of the office of Provincial Coordinator Lady Health Workers Program Khyber Pakhtunkhwa has also been annexed with the comments showing that the matter has *inter-alia* been pending with the concerned department and under their consideration. We, in the circumstances, direct the Worthy Director General Health Services, Khyber Pakhtunkhwa to make an order one way or the other in accordance with original judgment of

this Court rendered in W.P. No. 826-M of 2019 within 30 days of receipt of this order. The instant COC petition is accordingly disposed of.

Announced
Dt: 14.09.2021



[Handwritten signature]

2

JUDGE

Certified to be true copy

[Handwritten signature]
03-11-2021

EXAMINER

Peshawar High Court, Mingora/Dar-ul-Qaza, Swat
Authorized Under Article 87 of Qanoon-e-Shahadat Order, 1984

[Large handwritten signature]

JUDGE

S.No. 20
 Name of Applicant Abdus M. Ghub
 Date of Presentation of Applicant 03-11-2021
 Date of Completion of Copies 4/11
 No of Copies 25
 Urgent Fee -/-
 Fee Charged 20/-
 Date of Delivery of Copies 03-11-2021

Office
16/09/2021
W/R



Ann. J
24

DIRECTOR GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR

No. 2715-19/1HP-LHW

Dated: 25/10/2021

OFFICE ORDER:

Whereas you, Mst. Saifun Naz, was initially appointed as Lady Health Worker (LHW) in Lady Health Workers Program (LHWs Program) vide appointment letter dated 19-07-1996.

And whereas on promulgation of the Khyber Pakhtunkhwa Regulation of Lady Health Workers Program and Employees (Regulation and Standardization) Act 2014, your service was regularized w.e.f 1st July 2012.

And whereas you were retired on 01-03-2019 on attaining the age of superannuation.

And whereas Section-8 of the Khyber Pakhtunkhwa Provincial Assembly Act No. XXVI of 2014 provides that: *"The Program employees shall be dealt in accordance with the provision of this Act and rules: provided that if no specific rules are available on any matter, the Govt. rules shall be applicable to such Program Employees"*

And whereas Rule-17 of the "The Khyber Pakhtunkhwa Regulation of Lady Health Workers Program Employees Service Rules, 2015" provides that: *"Rules made by Government, regulating Pension, General Provident Fund, Benevolent Fund and Group Insurance shall apply for regulating the matters of Pension, General Provident Fund, Benevolent Fund and Group Insurance for those employees of Program whose services have been regularized under this Act"*

And whereas the above facts provide that the rules made by Govt. regulating the pension of Govt. servants, may apply to the Program employees.

And whereas, as per pension rules, a Govt. servant can only be entitled for pension, if he/she retires after rendering ten years regular service and may entitle for gratuity, if he/she renders five years regular services.

And whereas Rule 2.2-Beginning of Service, of West Pakistan Civil Services Pension Rules provides that: *"Subject to any special rules the service of Government servant begins to qualify for pension when he takes over charge of the post to which he is first appointed."*

And whereas it is pertinent to mention that as per Judgment of the Supreme Court of Pakistan in Crl Original Petition NO. 15/12 and Crl Original Petition No. 73/12, the services of the Program employees have been regularized w-e-f 01-07-2012 as initial appointment.

And whereas, in this connection, you have rendered regular service for 06 years and 08 months (w.e.f 01-07-2012 to 01-03-2019).

Therefore, as you have not completed the qualifying service for pension, hence your request for pension cannot be accorded to under the prevailing rules and therefore disposed of accordingly.


DIRECTOR GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA

CC:

1. Project Director, Integrated Health Project.
2. Provincial Coordinator LHWs Program, Khyber Pakhtunkhwa.
3. Add: Registrar Peshawar High Court, Mingora Branch (w.r to the letter No.2877/Writ Petition Branch dated 23-09-2021).
4. District Health Officer, district Lower Chitral.
5. Saifun Naz w/o Ubaid ur Rehman (through DPIU Lower Chitral)
6. Office Copy.



DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR

All communications should be addressed to the Director General Health Services
Peshawar and not to any official by name
Office # 091-9210269 Fax # 091-9210230

Am K

25

No. 2748-53 (Lit) Dated: 27/10 /2021

MOST IMPORTANT

COURT MATTER

MOST IMMEDIATE

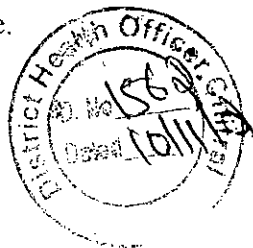
District Health Officer,
Chitral Lower

Subject: COC NO. 45-M/2020 IN WRIT PETITION NO. 826-M/2019 – Mrs.
SAIFUN NAZ VERSUS GOVERNMENT OF KHYBER
PAKHTUNKHWA

Please refer to the subject COC & enclosed herewith please find Office Order dated 25/10/2021 (in original) duly signed by the undersigned.

You are requested to please send the same to the petitioner (Saifun Naz) under intimation to this Directorate.

Encl: (01)



Director General Health Services,
Khyber Pakhtunkhwa, Peshawar

C.C. to:

1. Addl: Registrar Peshawar High Court, Mingora Bench/Dar-ul-Qaza, Swat w/r/t his letter No. 2877/Writ Petition Branch dated 23/09/2021 & enclosed herewith please find copy of Office Order dated 25/10/2021.
2. Legal Officer / Deputy Secretary (Lit) Health Department Khyber Pakhtunkhwa Peshawar.
3. Project Director Integrated Health Project Khyber Pakhtunkhwa Peshawar.
4. Provincial Coordinator LHWs Program Khyber Pakhtunkhwa Peshawar.
5. Saifun Naz (The-Petitioner) W/o Ubaid ur Rehman (through office of DHO Chitral Lower).

AZAN
[Handwritten signature]

No. 18074 /A-24 Dated Chitral the 10 /11/2021

Ann L
26

From-

The District Health Officer
Lower Chitral.

To

Mst.Saifun Naz w/o Ubiad ur Rehman
R/o Village Shot Joghour District Chitral Lower

Subject:

**COC NO.45-/2020 IN WRIT PETITION NO.826-M/2019 – Mrs. SAIFUN NAZ
VERSUS GOVERNMENT OF KHYBER PAKHTUNKHWA**

Sir

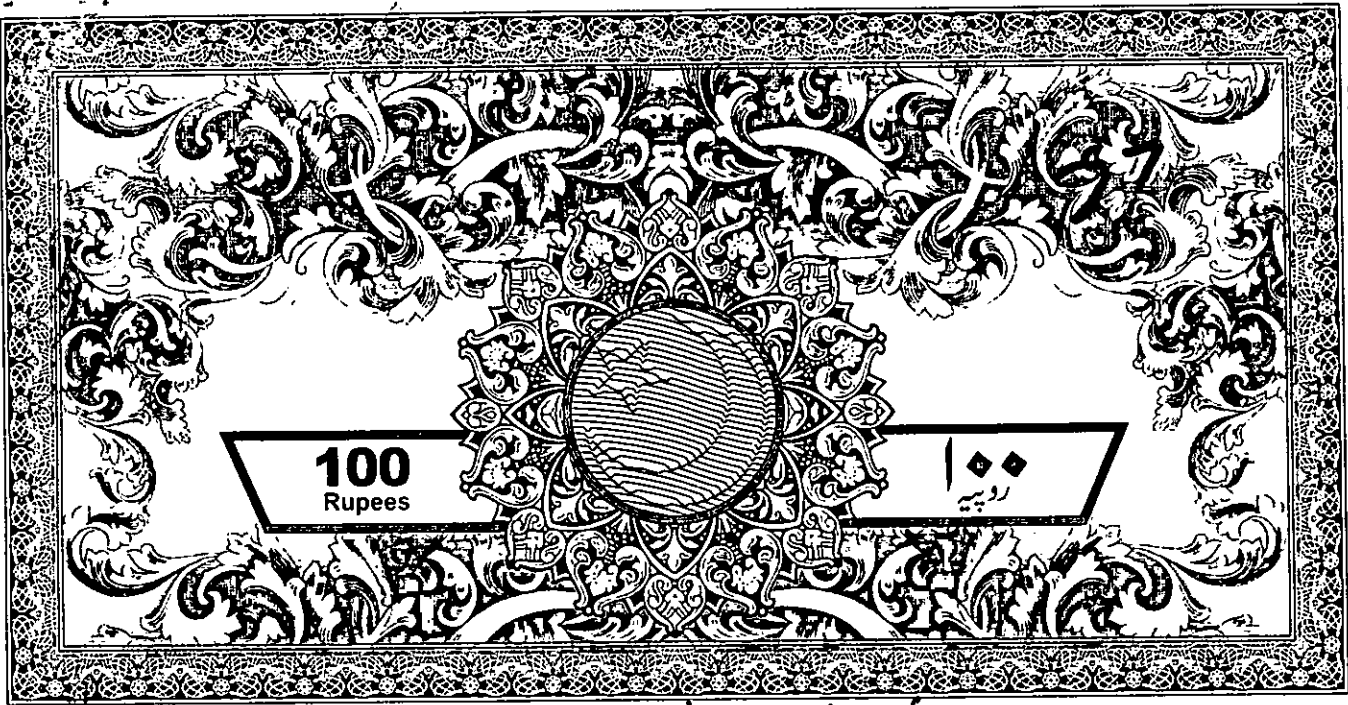
Enclosed please find herewith Director General Health Services KP Peshawar Office Order No.2715-19/IHP-LHW dated 25/10/2021 (in original) received this office vide letter No.2748-53/Lit dated 27/10/2021, is hereby conveyed to you for information.

No. _____ /A-24

Copy forwarded to the Director General Health Services KP Peshawar for information.


District Health Officer
Lower Chitral

District Health Officer
Lower Chitral



100 Rupees

روپیہ ۱۰۰

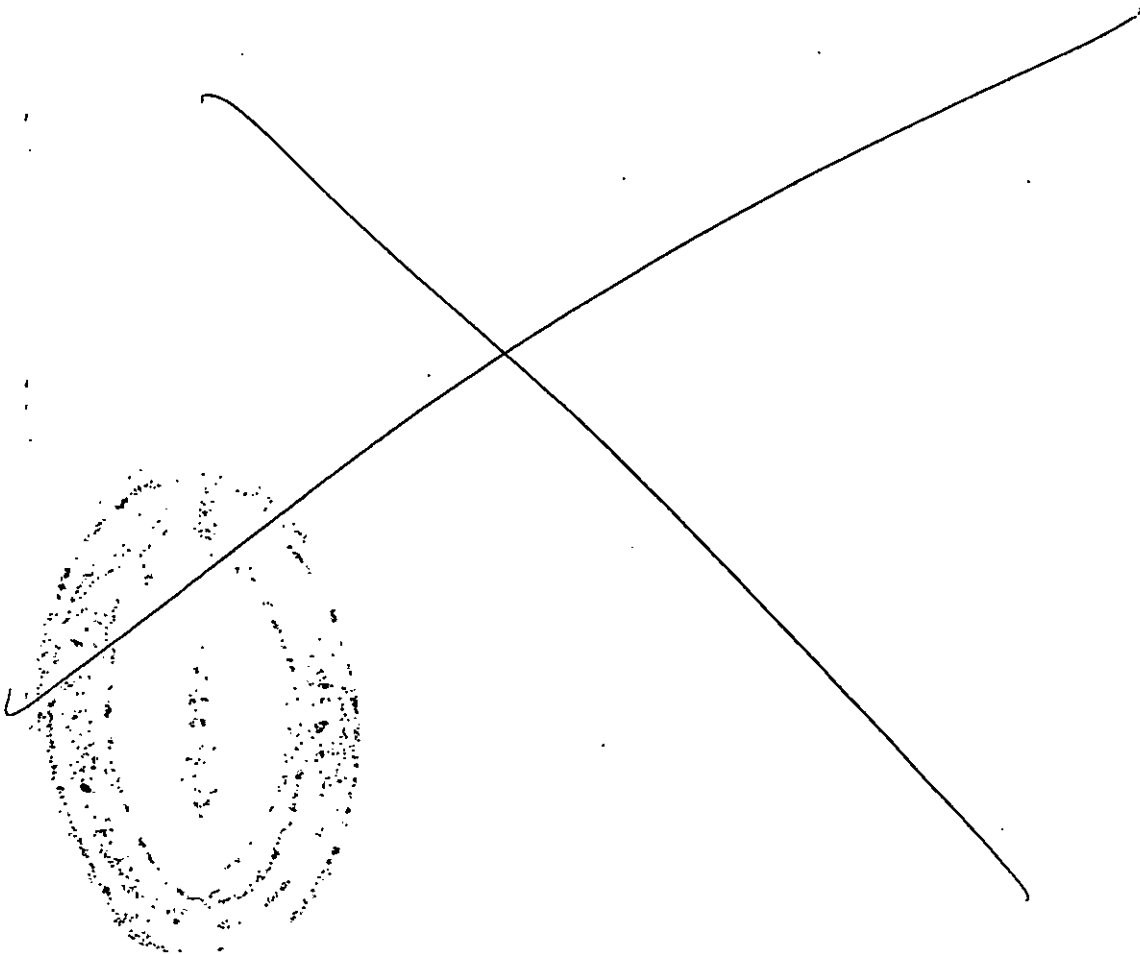
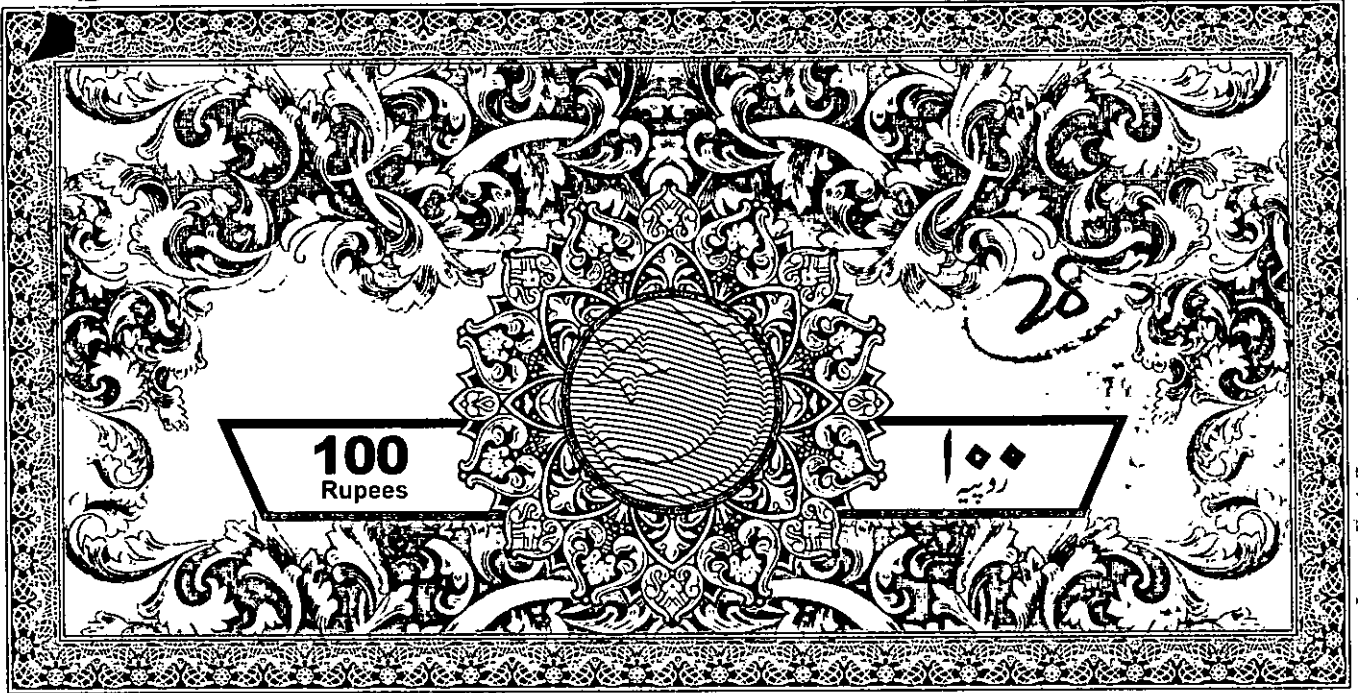
مقدم عنوان: مسیخہ انوار
نام: حکومت پاکستان دکنہ
دختار نام: ۱۰۰

مذکورہ اختصار دعتوہ صحتہ مسیخہ انوار ذوم عبد الرحمان (دعویٰ) سکنہ شہوت صفور گھم وقلہ نوپہ صحران
وہ وقت نزلہ مکر ہذا میں مگر ہوش و فوریں و ولد صید در کر کہ یہ رقرار کہ نگہی سیکر
مہر علی ایک قدم از پیل حضرت عبدالقادر بابہ سرورین ٹری بیونیل صہم صید و حقو خزوہ شہادہ میں
دائیر کر رہی ہیں۔ میں نوپہ لہرہ کیشن خاتون دزدانی صہر و ضیانت کہ ارمالقا کا مکر عدالت صہر بابہ
میر کر قدم از پیل بابہ کی دیندہ مکر نہ تمام ہو۔ غدا بر غا میں رہی طرف سے صحیح مقصود احمد
دلہ محمد ظاہر خاں سکنہ ایون ٹھیلہ وقلہ نوپہ صحران کو رہتا مختار خاصا مقرر کر کہ اختصار دعتوہ صحتہ مسیخہ
کہ صہر مکر طرف سے حاضر عدالت صہر بابہ میر کہ قدم از پیل بابہ کی دیندہ مکر۔ پیل انگریزی انظر تہ
در شہادت۔ مختار نام ہذا تا حضرت عدالت عظمیٰ سرورین کوٹ آف پاکستان تک کار ہدیگی۔
مختار خاصا و صوف حضرت عدالت کیر پیل ٹری بیونیل میں پیل دیندہ مکر۔ در غور است اجور در طرف سے
دیندہ مکر۔ صلح اور جانان دت۔ پیل عین فقیر کہ۔ منقطع فرودہ و تمام غور است میں دخط
تحت کو۔ بیانات حلفیہ دیندہ۔ شہادت نکتہ کہ۔ الغرض جو شہادت یا تو یا حق فقوہ
کو حاصل ہیں میں نہ تمام مگر اختصار دعتوہ صحتہ مسیخہ انوار بابہ مختار خاصا و صوف کو مقولہ میں کہتے
مختار خاصا و صوف کا یہ مقرر مساحتہ دیندہ مکر و صلح دیندہ مکر فقوہ کو منظور و قبول مکر
گنیز روپوں کو اس میں مختار نام خاص ہذا نگہی مگر کہ یہ وقت وقت کا مکر اور مقرر۔

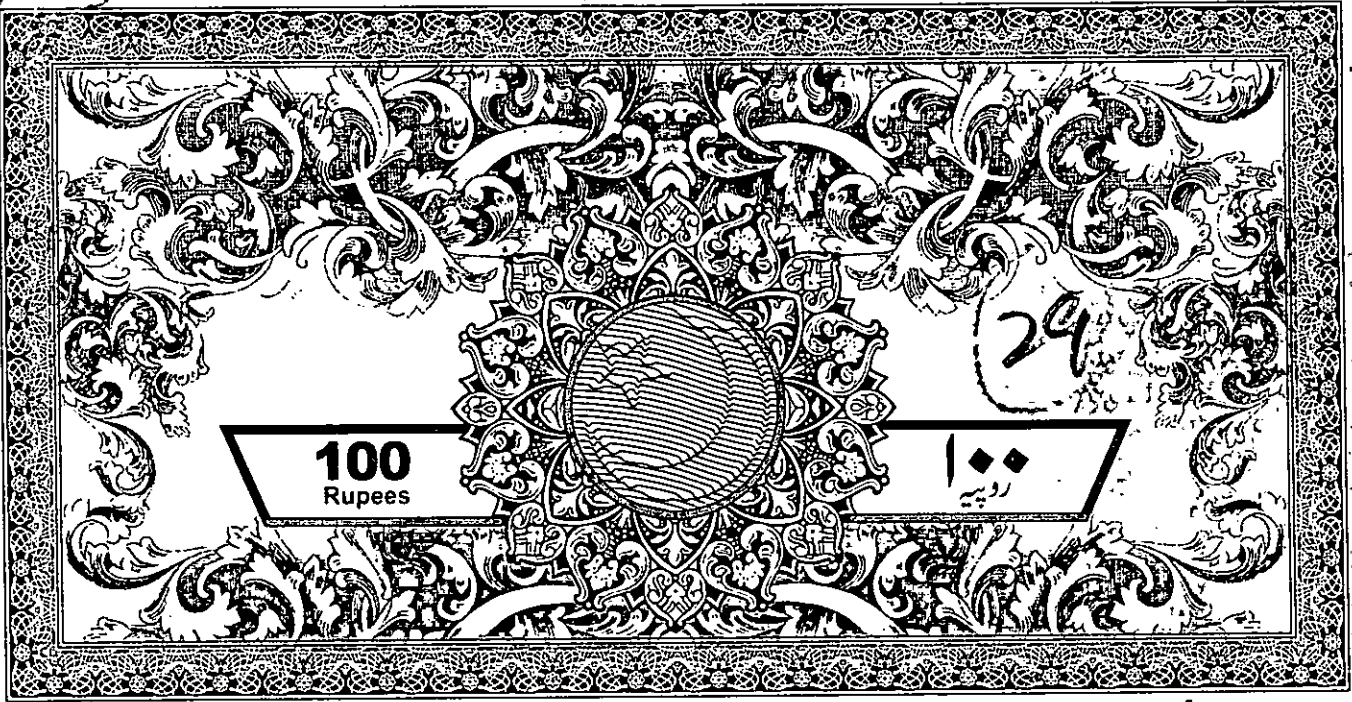
Notary Public
Chitral
12-12-2022

گورہ ستر۔ ایک سید
مظفر احمد سید و دیگر مقررین
سکنہ کامک صحران
NIC No 15201-5632916-2
گورہ ستر۔ مارون الہ رحمان و بریدہ رحمان
NIC 15201-0606825-7
اختصار دعتوہ
مسیخہ انوار
SINGH
مختار نام عدالت کے مقصود سے
حقوہ اجہ دلہ محمد ظاہر خاں سکنہ ایون ٹھیلہ
مکمل وقلہ نوپہ صحران
۱۱۰

H651313



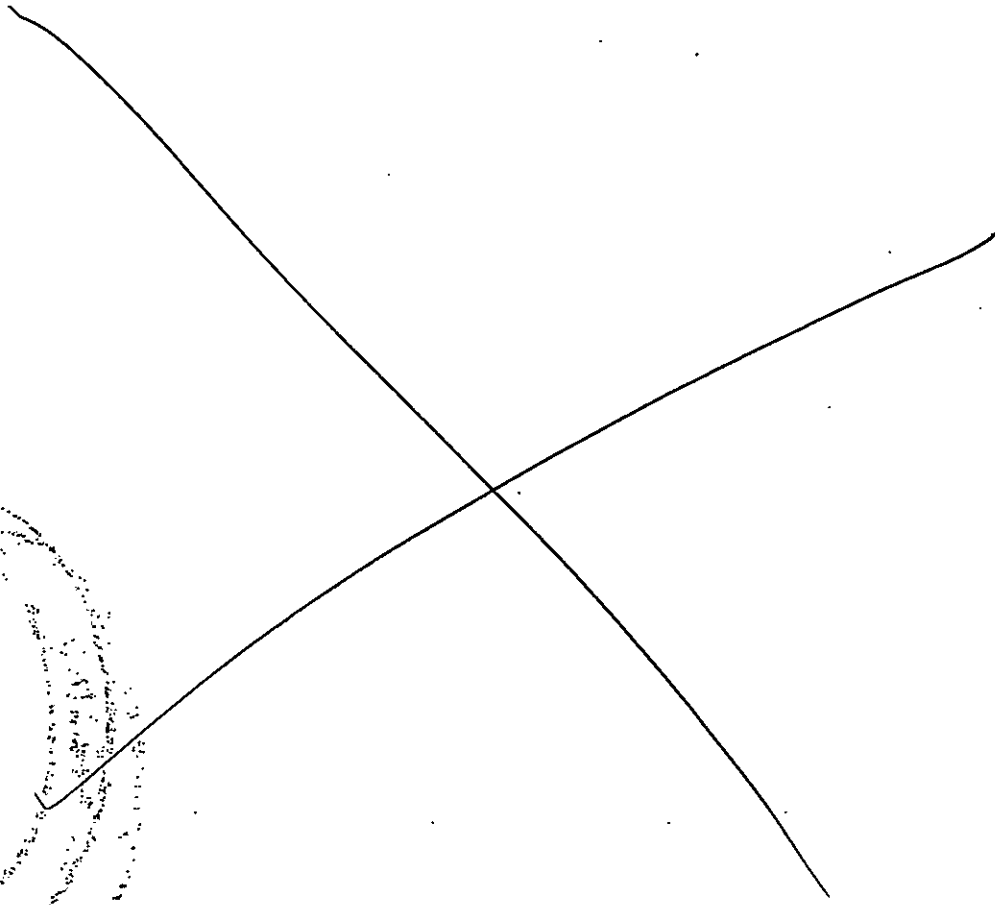
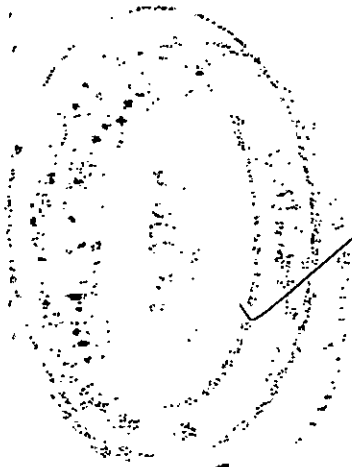
H651314



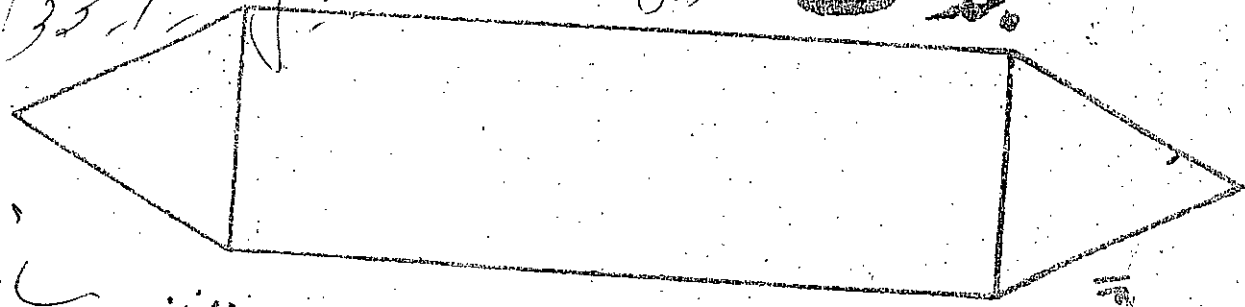
100
Rupees

۱ روپے

29



بجالت لکھنؤ سروسز کمپنی پرائیویٹ لمیٹڈ
لکھنؤ



مقدمہ
مقدمہ
دعویٰ
جزم
حرفاً
بنام حکومت لکھنؤ

باعت پر اہلیہ

ایس ڈی

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی اور جواب دہی وکل
کارتروانی متعلقہ آن مقام کے لئے راجہ اللہ رائے سنگھ علی اہلیہ
مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کمال اختیار ہوگا نیز
وکیل صاحب کو کرنے لاضی نامہ و تقررات و فیصلہ برحلاف دینے جواب دہی اور قبولی دعویٰ اور
تعمیر و ترمیم اور دوسری چھک و روپیہ اور رضی و رضی اور درخواست پر قسم کی تعمیری
نہا میں پر دستخط کرنے کا اختیار ہوگا نیز بصورت عدم پیروی یا کوئی یک طرفہ یا اپنی یا کسی اور شخص
نیز دائر کرنے اپنی نگرانی و نظارت پیروی کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ وند کو
کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنی سب سے تقرر کا اختیار
ہوگا اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساتھ
معاذت سفار و قبول ہوگا دوران مقدمہ میں جو خرچہ و ہرجا تہا لے مقدمہ کے سبب سے ہوگا
اس کے مستحق وکیل صاحب موصوف ہوں گے نیز بقایا خرچہ کی ذمہ داری کا بھی اختیار ہوگا اگر
کوئی تاخیر پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی
مذکورہ کریں۔ لہذا ذاکالت نامہ لکھ دیا کہ مستند رہے۔

۲۱۲
المترجم
دکرا

Verijkel
Rahim illint
0343-9540004
بیتام

Call No: 0346-9980971
Cell No: 0346-9980971