

27.06.2022

Learned Member (Executive), is on leave. Therefore, the case is adjourned to 03.08.2022 for the same as before.

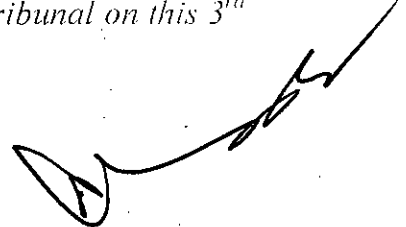

READER

3rd August, 2022

1. Nobody is present on behalf of the appellant. Mr. Kabiruallah Khattak, Addl: AG for respondents present.

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 in default.

3. *Pronounced in open court in Peshawar and given under my hand and seal of the Tribunal on this 3rd day of August, 2022.*


(Kalim Arshad Khan)
Chairman

08.12.2021

Counsel for the appellant present. Mr. Muhammad Adeel,
Addl: AG for respondents present.

Written reply/comments on pre-admission notice has not been submitted by the respondents. Notices be issued to them for submission of written reply/comments. To come up for written reply/comments as well as preliminary hearing on 02.02.2022 before S.B.



(MIAN MUHAMMAD)
MEMBER (E)

02.02.2022

Junior of learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Add: AG for respondents present. Preliminary arguments could not be heard due to learned Member (Executive) Mian Muhammad is on leave. To come up for preliminary hearing on 06.04.2022 before S.B.



Reader

06.04.2022

Clerk of learned counsel for the appellant present. Mr. Kabirullah Khattak, Addl; AG for respondents present.

Clerk of learned counsel for the appellant seeks adjournment on the ground that learned counsel is not available today due to general strike of the bar. Adjourned. To come up for preliminary hearing on 27.06.2022 before S.B.



(MIAN MUHAMMAD)
MEMBER(E)

21.10.2021

Counsel for the appellant present. Preliminary arguments heard.

Learned counsel for the appellant assailed/agitated the impugned order dated 01.07.2021 whereby private respondent No.4 has been transferred from GGMS Malakand Bala to GGMS Khazo Pula against the newly created post of PET (BS-15). The appellant has been serving as PET at GGHS Moranai since 14.03.2015 i.e from the date of her first appointment. After completion of normal tenure of posting, she has been requesting to the respondents to transfer her to the nearest place/station. Her applications dated 01.03.2021, 20.06.2021 and 13.08.2021 to this effect are available with the memorandum of appeal. However, without considering her requests, the respondent-department posted private respondent No.4 at GGMS Khazo Pula against the newly created post of PET. Similarly, private respondent No.5 (being surplus) was adjusted/posted at GGMS Malakand Bala and ignored the appellant. Let pre-admission notice be issued to the respondents for submission of written reply/comments. Adjourned. To come up for preliminary hearing before the S.B on 08.12.2021.




(MIAN MUHAMMAD)
MEMBER (E)

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 7579 7579/2021


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	12/10/2021	<p>The appeal of Mst. Riffat Munir resubmitted today by Mr. Mujeebullah 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> <p>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put there on <u>21/10/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
2-		

The appeal of Mst. Hfsa Ali PET GGHS Morni Lower Dir received today i.e. on 11.10.2021 is incomplete on the following score which is returned to the counsel for the appellat for completion and resubmission within-15 days.

1. Address of respondent no. 4 is incomplete which may be completed according to the Khyber Pakhtunkhwa Service Tribunal rule 1974.
2. Annexures of the appeal may be attested.

No. 2026 /S.T,

Dt. 11/10 /2021


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Mujeebullah Adv. Pesh.

*objections removed
complied
Jullah
12-10-2021*

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

CHECK LIST

Case Title: mst. Hafsa Ali

v/s

The Secretary

S#	CONTENTS	YES	NO
1	This Appeal has been presented by: _____	✓	
2	Whether Counsel/Appellant/Respondent/Deponent have signed the requisite documents?	✓	
3	Whether appeal is within time?	✓	
4	Whether the enactment under which the appeal is filed mentioned?	✓	
5	Whether the enactment under which the appeal is filed is correct?	✓	
6	Whether affidavit is appended?	✓	
7	Whether affidavit is duly attested by competent Oath Commissioner?	✓	
8	Whether appeal/annexures are properly paged?	✓	
9	Whether certificate regarding filing any earlier appeal on the subject, furnished?	x	✓
10	Whether annexures are legible?	✓	
11	Whether annexures are attested?	✓	
12	Whether copies of annexures are readable/clear?	✓	
13	Whether copy of appeal is delivered to AG/DAG?	✓	
14	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	✓	
15	Whether numbers of referred cases given are correct?	✓	
16	Whether appeal contains cutting/overwriting?	x	✓
17	Whether list of books has been provided at the end of the appeal?	✓	
18	Whether case relate to this court?	✓	
19	Whether requisite number of spare copies attached?	✓	
20	Whether complete spare copy is filed in separate file cover?	✓	
21	Whether addresses of parties given are complete?	✓	
22	Whether index filed?	✓	
23	Whether index is correct?	✓	
24	Whether Security and Process Fee deposited? On _____	✓	
25	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? On _____	✓	
26	Whether copies of comments/reply/rejoinder submitted? On _____	✓	
27	Whether copies of comments/reply/rejoinder provided to opposite party? On _____	✓	

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name: Muhibullah

Signature: [Signature]

Dated: 11-10-2021

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. 7579 /2021

Mst. Hafsa Ali PET (BPS-15)

.....Appellant

Versus

The Secretary, Elementary & Secondary Education, Khyber Pakhtunkhwa,
Peshawar. & Others


.....Respondents

INDEX OF DOCUMENTS

S.No	Description of Documents	Annexures	Pages
1	Service Appeal with Affidavit		1-7
2	Application for suspension of impugned orders along with affidavit		8-10
3	Application for condonation of delay		11-12
4	Address of Parties		13
5	Copies of appointment order dated 16-03-2015 and Regularization orders	A & B	14-21
6	Copy of Application of transfer dated 01-03-2021	C	22
7	Copy of Application dated 20-06-2021	D	23
8	Citizen portal feedback	E	24
9	Copy of impugned office order dated 01-07-2021	F	25
10	Copy of transfer order of Respondent No. 5 dated 01-07-2021	G	26
11	Copy of Departmental Appeal	H	27-29
12	Miscellaneous		30-31
13	Wakaltnama		32


Appellant

Through


MujeebUllah
Advocate High Court
Peshawar
Khalid & Law Associates
Office No 46 C, 2nd Floor
Cantonment Plaza, Peshawar
Cell No. 03018521721

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. 7579 /2021

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 7716

Dated 11-10-2021

Mst. Hafsa Ali PET (BPS-15)

Govt. Girls High School Morni Lower Dir.

-----Appellant

Versus

1. The Secretary
Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
 2. The Director,
Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
 3. The District Education officer (female) Dir Lower at Timergara.
 4. Mst. Sadaqat Begum PET GGMS Khazo Pula
 5. Mst. Afsheen Kanwal PET(NTS), *Timergara, Lower Dir*
GGMS Barkhane Maidan, presently posted at GGMS Malakand Bala. *Lower Dir*
- Respondents

SERVICE APPEAL UNDER SECTION 4 OF KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974, AGAINST
THE IMPUGNED ACTION OF RESPONDENTS BY ILLEGAL
AND UNLAWFUL TRANSFER ORDER DATED 01-07-2021
WHEREBY RESPONDENT NO.4 TRANSFERRED TO GGMS
KHAZO PULA AND AGAINST THE IMPUGNED ORDER
DATED 01-07-2021 WHEREBY RESPONDENT NO.5 NTS
SURPLUS ADHOC CANDIDATE WAS TRANSFERRED
FROM GGMS BARKHANE MAIDAN LOWER DIR TO GGMS
MALAKAND BALA. AND AGAINST THE INACTION OF THE
RESPONDENT WHEREBY DEPARTMENTAL APPEAL OF
APPELLANT HAS NOT BEEN RESPONDED WITHIN
STATUTORY PERIOD.

Filed to Registrar
11/10/21

Re-submitted to-day
and Reg.

Registrar
17/10/21

PRAYER:

On acceptance of this Appeal the impugned orders dated 01-07-2021 in respect of Respondent No.4 & 5 may graciously be set aside and appellant may kindly be transferred to GGMS khazo pula (newly created post).

In alternate

Appellant may kindly be adjusted to any other nearest vacant post/ at newly upgraded school at GGHSS Stanadar, Balambat Lower Dir

Respectfully Sheweth,

1. That the addresses of the parties has correctly been given in the heading of the Service Appeal, which is sufficient for services of summons and notices or any other process that might be issued by this Hon'ble Court from time to time.
2. That the Appellant is well qualified and law abiding citizen of Pakistan belongs to Lower Dir Khyber Pakhtunkhwa.
3. That the Appellant was appointed as PET (BPS-15) through National Testing Service after fulfilling all the codal formalities on 16-03-2015 and is serving Respondents Department till date. Appellant is performing her duty with zeal and zest at GGHS Mornai Lower Dir and Later on was regularized in the year 2018.
{Copies of appointment order dated 16-03-2015 and Regularization order are annexed as A & B}
4. That the appellant submitted an application for transfer to newly created post of PET (BPS-15) at newly upgraded Govt. Girls

Middle School Khazo Pula at Timergara Lower Dir on 01-03-2021. Worth mentioning that the present posting of the appellant is around 26 km from appellant's residence, where the appellant served for more than 5 years since appointment.

{Copy of Application of transfer dated 01-03-2021 is annexed as C}

5. That the Appellant visited Respondent No.3 office time and again and was shown their interest in transfer, in this respect submitted another Application dated 28-06-2021 for transfer to the said school, but they paid no heed to the request of the Appellant.

{Copy of Application dated 20-06-2021 is annexed as D}

6. That the Appellant also filed a complaint on citizen portal which was complied with remarks that Respondent No.4 is senior than the Appellant while considering seniority of Respondent No. 4 from the date of appointment i.e 12-03-2009 at GGMS Mandesh and later on was transferred to GGMS MalkandBala on 26-06-2015.

{Citizen portal feedback is annexed as E}

7. That in the mean while Respondent No. 3 while favoring their blue eyed person adjusted/transferred Respondent No.4 from GGMS MalakandBala to GGMS Khazo Pula without looking into the merit/policy, vide impugned office order dated 01-07-2021.

{Copy of impugned office order dated 01-07-2021 is annexed as F}

8. That subsequently another transfer order was issued on 01-07-2021 wherein NTS surplus candidate on Adhoc basis (Respondent No.5)

was adjusted at GGMS MalakandBala from GGMS BarkhaneMaidan.

{Copy of transfer order of Respondent No. 5 dated 01-07-2021 is annexed as G}

9. That Appellant field departmental Appeal against the inaction of Respondents which is still pending.

{Copy of Departmental Appeal is annexed as H}

10. That Appellant being aggrieved having no other remedy except to approach this Hon'ble Tribunal inters alia on the following grounds.

Grounds:

- A. That the act of the respondents is against law, equity and justice, unfounded untenable in the eye of law hence, the very impugned orders of transfer of Respondent No 4-5 are against the express provision of law hence liable to be struck down
- B. That Respondents are obliged to act and follow the criteria as laid down in Posting / Transfer Policy of provincial Government as envisaged under clause I which is reproduced as under

I:-“All the posting/Transfers shall be made strictly in public interest and shall not be abused misused to victimize the Government servants”

- C. That Respondents have violated the express provision of law laid down for the procedure for transfer of candidates. The Respondents have travelled beyond their authority hence; have violated the

provision of Article 4 & 25 of the Constitution of the Islamic Republic of Pakistan 1973.

D. That Respondent No 4 have been appointed on 12-03-2009 at GGMS Mandesh and was later on transferred to GMS MalakandBala on 26-06-2015 while appellant is working on the same station since 16-03-2015. It is worth to mention here that Appellant is senior than Respondent No.4 while considering Posting/ Transfer Policy of provincial Government as envisaged in clause XIII (b)

(XIII) "While considering posting and transfers proposals all the concerned authorities shall keep in mind the following:

(b) Tenure on present post shall also be taken into consideration and the posting transfers shall be in the best interest.

Hence, keeping in view the inaction of Respondent No. 3 while not considering the policy is against law, facts and on this score only the impugned order dated 01-07-2019 is liable to be set aside.

E. That the Appellant is posted 26 km away from her residence while Respondents No. 4 posted at GGMS MalakandBala was at radius of around 15 KM from her residence. As per posting transfer policy Appellant is entitled to newly upgraded school GMS Khazo Pula being remained throughout at hard station at a distance of 26 km from her residence and even staying there due to tough roads and hurdles in traffic.

F. That any other ground which is not specifically prayed may kind be argued during the stage of arguments with prior permission of this Hon'ble Court.

6


Prayer:

It is therefore, most humbly prayed that on acceptance of this appeal,

- a) The impugned orders dated 01-07-2021 in respect of Respondent No.4 & 5 may be recalled and Appellant may kindly be transferred to GGMS Khazo Pula for the ends of justice.
- b) In alternate Respondents may be directed to adjust Appellant in nearby newly created/any other Sanction vacant post.
- c) Any other Relief which this Hon'ble tribunal may deems fit may kindly be awarded in favour of the Appellant


Appellant

Through


Mujeeb Ullah

Advocate High Court

Peshawar

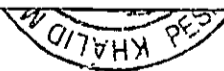
Khalid & Law Associates

Office No 46 C, 2nd Floor

Cantonment Plaza, Peshawar

Cell No. 03018521721

Peshawar



9

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. _____/2021

Mst. Hafsa Ali PET (BPS-15)

.....Appellant

Versus


The Secretary, Elementary & Secondary Education, Khyber Pakhtunkhwa,
Peshawar.& Others

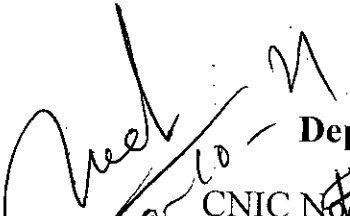
.....Respondents

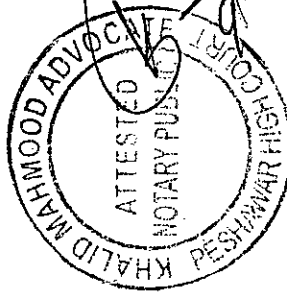
AFFIDAVIT

I, Hafsa Ali D/O Sher Dali Khan PET (BPS-15) presently posted at GGHS Morni do hereby solemnly declare and affirm that the contents of the application for condonation are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal

Identified by:


Mujeeb Ullah
Advocate High Court
Peshawar


Deponent
CNIC No. 15302-5628642-6



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. _____/2021

Mst. Hafsa Ali PET (BPS-15)Appellant

Versus

The Secretary, Elementary & Secondary Education, Khyber Pakhtunkhwa,
Peshawar.& OthersRespondents

APPLICATION FOR SUSPENSION OF THE OPERATION OF
IMPUGNED ORDERS DATED 01-07-2021 IN FAVOUR OF
RESPONDENT NO.4 & 5 RESPECTIVELY, TILL FINAL DECISION
OF THE APPEAL

Respectfully Sheweth,


1. That the above noted appeal has been filed before this Hon'ble Court which has not been fixed.
2. That the instant application may kindly considered as part and parcel of the main appeal.
3. That Appellant has got good prima facie case and balance of convenience also lies in favour of the Applicant/Appellant.
4. That the Appellant has already submitted an application for transfer from GGHS Morni to GGMS Khazo Pula , wherein the Respondents have not been consider the application of the Appellant while considered the application of the Respondent No.5 & 6 being junior in merit, Respondents have clearly violated the policy.If during pendency of the accompanied appeal, the Respondents were not restrained form illegal interference and operation of impugned order is not suspended, the Applicant would suffer irreparable loss.

9

It is, therefore, most humbly prayed that on acceptance of this application, interim relief as prayed for in heading of the application may kindly be granted in favour of Applicant against the Respondents till the final decision of the case.


Appellant

Through


Mujeeb Ullah
Advocate High Court

10

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. _____/2021

Mst. Hafsa Ali PET (BPS-15)

.....Appellant

Versus

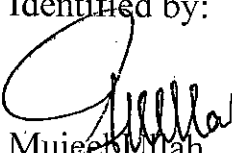
The Secretary, Elementary & Secondary Education, Khyber Pakhtunkhwa,
Peshawar. & Others

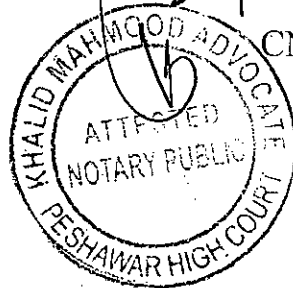
.....Respondents

AFFIDAVIT

I, Hafsa Ali D/O Sher Dali Khan PET (BPS-15) presently posted at GGHS Morni do hereby solemnly declare and affirm that the contents of the Service Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal

Identified by:


Mujeeb Ullah
Advocate High Court
Peshawar



Deponent

9-10-21
CNIC No. 15302-5628642-6



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. _____/2021

Mst. Hafsa Ali PET (BPS-15)Appellant

Versus

The Secretary, Elementary & Secondary Education, Khyber Pakhtunkhwa,
Peshawar.& OthersRespondents

APPLICATION FOR CONDONATION OF DELAY

Respectfully Submitted as under,

1. That the Applicant/Appellant has filed the above titled Appeal before this Hon'ble Court in which no date of hearing has yet been fixed.
2. That the instant application may kindly be read as integral part of the main appeal.
3. That the Applicant/Appellant seeks condonation of delay (if any) inter alia on the following grounds.

GROUND

A. That Applicant/Appellant came to know about the impugned order dated 01/07/2021 of the Respondents before filling departmental appeal and when it's come to the knowledge suddenly filed Departmental which is still pending and has not been decided within statutory period, hence, preferred the accompanied appeal before this Hon'ble Court without any delay.


(19)

- B. That the delay on the part of the appellant is not intentional or deliberate, but due to lack of knowledge. Even as exceptional case, this Hon'ble Tribunal has ample powers to condone the delay.
- C. That in plethora of judgment the Superior courts have held that in such like matters, cases are to be decided on merit rather than technicalities.
- D. That if the exemption is not granted the Applicant will suffer irreparable loss.
- E. That in Plethora of Judgments, superior Courts, held that no limitation runs against void order.

It is, therefore, humbly prayed that in the light of above stated grounds the instant application may be graciously accepted and the delay (if any) may kindly be condoned in the interest of justice


Appellant

Through


MujeebUllah
Advocate High Court
Peshawar
Khalid & Law Associates
Office No 46 C, 2nd Floor
Cantonment Plaza, Peshawar
Cell No. 03018521721

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. _____/2021

Mst. Hafsa Ali PET (BPS-15)

.....Appellant

Versus

The Secretary, Elementary & Secondary Education, Khyber Pakhtunkhwa,
Peshawar.& Others

.....Respondents

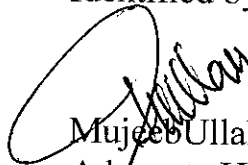
AFFIDAVIT

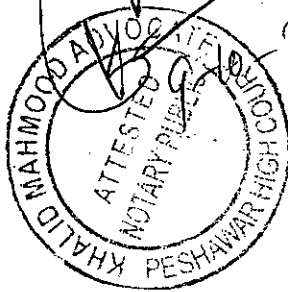
I, Hafsa Ali D/O Sher Dali Khan PET (BPS-15) presently posted at GGHS Morni do hereby solemnly declare and affirm that the contents of the application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal

Deponent

Identified by:

CNIC No. ~~11~~302-5628642-6


Mujeeb Ullah
Advocate High Court
Peshawar



13

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. _____/2021

Mst. Hafsa Ali PET (BPS-15)Appellant

Versus

The Secretary, Elementary & Secondary Education, Khyber Pakhtunkhwa,
Peshawar. & OthersRespondents

ADDRES OF PARTIES:

Appellant:

Mst. Hafsa Ali PET (BPS-15)


Govt. Girls High School Mornai Lower Dir.

Respondents:

1. The Secretary ‘
Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
2. The Director,
Elementary & Secondary Education, Khyber pakhtunkhwa, Peshawar.
3. The District Education officer (female) Dir Lower at Timergara.
4. Mst. Sadaqat Begum PET GGMS Khazo Pula
5. Mst. AfsheenKanwal PET(NTS) Timergara, Lower Dir
GGMS BarkhaneMaidan, presently posted at GGMS MalakandBala. Lower Dir


Appellant

Through


MujeebUllah
Advocate High Court
Peshawar
Khalid & Law Associates
Office No 46 C, 2nd Floor
Cantonment Plaza, Peshawar
Cell No. 03018521721

District Education Officer (F) Dir Lower

Annexure A

(14)



PH No. 0945-9250083,

E-mail emisdeofdirlower@yahoo.com

~~(F) 14~~

OFFICE ORDER:

Consequent upon the recommendation / approval of the District Selection Committee Dir Lower in its meeting held on 14/03/2015, the following PET (Female) (School based) are hereby appointed in BPS-15 (Rs.8500-700-29500) @ Rs. 8500/- fixed plus usual allowances as admissible to them under the rules on adhoc and contract basis under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below:

S#	RollNo	Name	Father's Name	Name of School	Score
1	891500040	SAFIA BIBI	INAYATULLAH	GGHS Beyari	109.9
2	891500061	FOUZIA BEGUM	GHANI RAHMAN	GGMS Banda Talash	107.1
3	771500005	SALMA RASHID	ABDUR RASHID	GGMS Beroo	106.6
4	891500038	SAIMA	FAZAL AHAD	GGMS Gaddar	106.4
5	771500071	BUSHRA BIBI	MUHAMMMAD MULK	GGMS Babagam	104.3
6	891500024	AISHA MANAN	ABDUL MANAN	GGMS Tiknai (P)	101.0
7	891500055	SADAQAT SHEHLA	MUHAMMAD WALI	GGMS MusaAbad	100.9
8	891500020	KASHRA BEGUM	SAEEDULLAH KHAN	GGMS Sangwalai	93.5
9	891500163	SALMA ALI	SHER DA ALI KHAN	GGMS Darmal Bala	93.4
10	891500014	KAUSAR BEGUM	ABDUL QAYUM KHAN	GGMS Barkhani	93.3
11	891500058	SABINA BIBI	MUHAMMAD IBRAHIM	GGMS Darmal Payeen	92.9
12	891500059	PARVEEN BEGUM	SHAH TAMAZ KHAN	GGMS Dehrai	92.5
13	771500022	SEEMA GUL	CHERAGH HUSSAIN	GGHS Kadh	91.4
14	891500010	LUBNAZ BEGUM	RASHID AHMAN	GGHSS Main Kalay	91.3
15	891500048	HAFSA ALI	SHER DA ALI KHAN	GGHS Morani	89.6
16	891500012	SADAQAT BIBI	MUHAMMAD ALI JAN	GGMS Dehri Kambat	83.0

TERMS AND CONDITIONS:

1. This order will commence from 16/03/2015 and shall continue till 15/03/2016 and will, however, not construe in any form, either express or implied, any assurance for future employment with the Elementary and Secondary Education Department.
2. They will be entitled to emoluments of Rs. Rs. 8500/- per month fixed plus usual allowances as admissible under the rules on adhoc and contract basis for one year and will be eligible for tax deduction (if any) as per prevailing government rules.
3. Their Pay will not be drawn until and unless a certificate to the effect by DDO (concerned) is issued that their certificates are verified.
4. They will produce Health and Age Certificate from the Medical Superintendent concerned before taking over charge.
5. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
6. Their services shall be terminated at any time, in case their performance is found unsatisfactory during their contract period. In case of misconduct, they shall be proceeded under the rules framed from time to time.

[Handwritten Signature]
ATTESTED

Intikhab Photo State
Near National Bank Colony,
Balambat Chowk, Timergara.
Ph: 0945-822994, Mob: 0300-9326707

- 7. Their appointments have been made on School based, they will have to serve at the place of posting, and their service is not transferable to any other station.
- 8. The appointment of the candidates mentioned above is subject to the condition that they are domiciled in District Dir Lower.
- 9. NO TA/DA will be paid to them on joining the post.
- 10. Their age may not exceed 35 years or below 18 years.
- 11. Charge reports should be submitted to all concerned,
- 12. Drawing & Disbursing Officers concerned are directed to collect photo copies of their testimonials along with verification fees and submit the same to the office of the undersigned for further verification from the institutions concerned.
- 13. This order is issued, errors and omissions accepted, as a notice only.
- 14. 80 % candidates have been initially recruited from amongst those candidates who have qualified NTS test for the purpose purely on merit.

(Zaibun Nisa)
District Education Officer (F)
District Dir Lower

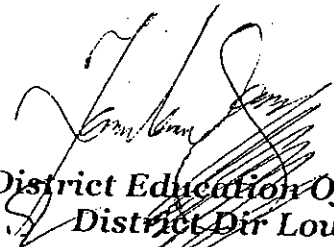
Endst. No. 1001-4

Dated Timergara the 14/03/2015.

Copy of the above is forwarded to:

- 1. The Director (E&SE) Khuber Pakhtun Khwa Peshawar.
- 2. The District Accounts Officer Dir Lower.
- 3. The Principals / Headmistress of the institute concernd.
- 4. The Officials concernd.

ATTESTED


District Education Officer (F)
District Dir Lower

Intikhab Photo State
 Near National Bank Colony,
 Balambat Chowk, Timergara.
 Ph: 9945-822994, Mob: 0300-9396707

first appointment order = 16/3/2015
= 2015

District Education Officer Female Dir Lower

PH No. 0945-9250083,

Fax : 0945-824083

E-mail emisdeofdirlower@gmail.com**Notification.**

Under the provision of The Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act, 2018 (Khyber Pakhtunkhwa Act No.1 of 2018), & Elementary and Secondary Education Govt: of Khyber pukhtonkhwa notification No.SO(S/F) E&SED/3-2/2018/SITT/Contract dated:16/02/2018, Services of the following Physical Education Teachers (PET's) appointed on adhoc basis on Contract, are hereby regularized in BPS-15, on the same posts in Teaching Cadre on the terms and condition given below with effect from the date of their appointment on the PET post :-

PET-2014

Sr	RollNo	Name	Address	Total Marks [out of 200]	School	Appointment order No and dated	Extension order No and dated if any
1.	2420164	Ghazala Bibi	Qilagai Siar Dir lower CNIC NO 15302-1343421-6	107.62	GGMS Shalkandai	1087-90 Date 03/05/2014	5476-79 dated: 18-08-2017
2.	2120111	Sadaqat Shehla	Chino Talash Dir lower CNIC NO15302-1628895-4	96.04	GGHS Badin	--do--	--do--
3.	2420157	Amna Khan	Kandaro Dir lower CNIC NO15306-0465560-2	94.04	GGMS Shuntala	--do--	--do--
4.	2420178	Mufiada	Khadagzai Dir lower CNIC NO.15307-1805225-0	91.77	GGMS Bagh Knadai	--do--	--do--
5.	2420118	Mudassir Hayat Begum	Chakdara Dir lower CNIC NO 1537-6705633-4	89.18	GGHS Inzaro	--do--	--do--
6.	2420173	Nusrat Bibi	Khungi Dir lower CNIC No 15302-5579387-0	83.41	GGHS Damtal	--do--	--do--
7.	2420122	Samina Jan	Munjai Dir lower CNIC no 15306-9935937-0	80.73	GGMS Markhani	--do--	--do--
8.	2420138	Sabahat Begum	Mandish Dir lower CNIC NO 15302-0847377-2	80.44	GGMS Galkor Luqman Banda	--do--	--do--

Distt. Education officer
(F) Distt. Dir (L)

6.	891500163	SALMA ALI	6487390-0 THRAI TEHSIL TIMERGARA DISTRICT LOWER DIR CNIC.15302-	93.4	GGMS Darmal Bala	--do--	--do--
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Distt. Education officer
(F) Distt. Dir (L)

Dir Lower Female Regularization Order PET Adhoc

2

(17)

9.	2420161	Nagina Bibi	Talash Dir lower CNIC NO.15302- 0611589-4	78.98	GGMS Bochakay	--do--	--do--
10.	2420128	Shazia Gul	Khngi Shah Dir lower CNic NO 15302-1117873-4	77.72	GGMS Banr Ouch	--do--	--do--

PET-2015

RollNo	Name	Address	Total Marks [out of 200]	School	Appointment order No and dated	Extension order No and dated if any
1.	891500040	SAFIA BIBI	109.9	GGHS Beyari	10001-4 dated: 14-03- 2015	2039-42 dated: 15-05- 2017
2.	891500061	FOUZIA BEGUM	107.1	GGMS Banda Talash	--do--	--do--
3.	771500005	SALMA RASHID	106.6	GGMS Beroo	--do--	--do--
4.	891500038	SAIMA	106.4	GGMS Gaddar	--do--	--do--
5.	891500020	KASHRA BEGUM	93.5	GGMS Sangwalai	--do--	--do--
6.	891500163	SALMA ALI	93.4	GGMS Darmal Bala	--do--	--do--

ATTESTED
3

Distt: Education officer
(F) Distt: Dir (L)

Dir Lower Female Regularization Order PET Adhoc

3

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			0851000-6				
7.	891500014	KAUSAR BEGUM	DADO OFFICE BEHIND DIR HOTEL UPPER DIR CNIC.15305- 7714599-8	93.3	GGMS Barkhani	--do--	--do--
8.	891500058	SABINA BIBI	VILLAGE ANDHERI TEHSIL BALMBAT P/O DEGREE COLLEGE TEHSIL TIMERGARA DISTRICT LOWER DIR CNIC.15302- 9810442-4	92.9	GGMS Darmal Payeen	--do--	--do--
9.	891500059	PARVEEN BEGUM	VILLAGE NARAI SHAH P/O ZIARAT TALASH TEHSIL TIMERGARA TEHSIL AND DISTRICT LOWER DIR CNIC.15302- 1683099-9	92.5	GGMS Dehrai	--do--	--do--
10.	891500010	LUBNAZ BEGUM	CHINO TALASH C/O RIZWAN MEDICAL STORE MAIN BAZAR ZIARAT TALASH DIR LOWER CNIC.15302- 9718200-4	91.3	GGHSS Main Kalay	--do--	--do--
11.	891500048	HAFSA ALI	THRAI TEHSIL TIMERGARA LOWER DIR CNIC.15302- 5628642-6	89.6	GGHS Morani	--do--	--do--
12.	891500012	SADAQAT BIBI	ZIARAT TALASH VILLAGE DEHRY TALASH DDISTRICT LOWER DIR CNIC.15302- 3002741-4	83.0	GGMS Dehri Kambat	--do--	--do--
13.	891500051	ULFAT BEGUM	VILLAGE BANRGAY TALASH POST OFFICE ZIARAT TALASH DIR LOWER, TEHSIL TIMARGARA LOWER DIR	85.7	GGHS KAD	1868-71 Date 24/04/2015	2104-7 dated: 17-05- 2017
14.	891500007	KHUSHNOOD	MAIDAN DIR LOWER	85.4	GGMS BABAGAM	--do--	--do--
15.	891500004	NAGINA BIBI	MAYAR DISTRICT LOWER DIR	80.3	GGMS MUSA ABAD	--do--	--do--

ATTESTED

[Signature]
Distt: Education officer
(F) Distt: Dir (L)

Dir Lower Female Regularization Order PET Adhoc

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19

16	891300080	MEHROON NISA	TINDODAG TEHSIL ADENZAI DISTRICT DIR LOWER C/O PROF MIAN FAZAL WALI CNIC.15307- 5484715-8	87.2	GGMS Tekni Payeen	2475-78 Date 18/05/2015	6495-68 dated: 16-10- 2017
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PET-2016

Sr	RollNo	Name	Address	Total Marks [out of 200]	School	Appointment order No and dated	Extension order No and dated any
1.	451500197	HUSNA RAZZAQ	MORANAI TEHSIL BALAMBAT DIR LOWER CNIC.16102- 7041633-2	102.03	GGMS Baroon	884-87 dated: 05- 03-2016	1239-42 dated: 11- 04-2017
2.	891500020	NAZIA SAIF	Malakand Teshil TIMERGARA LOWER DIR CNIC.15306- 6426816-8	100.29	GGMS Mandish	--do--	--do--
3.	891500057	REEMA GUL	SADDO TEHSIL TIMERGARA DISTRICT LOWER DIR CNIC.15302-2992318-4	91.02	GGMS Hanfia	--do--	--do--
4.	891500022	SAIMA	CHAKDARA TEHSIL ADENZAI DISTRICT LOWER DIR CNIC.15307-9679888-4	88.52	GGMS Bambolai	--do--	--do--
5.	891500049	NUSRAT BEGUM	SADO TEHSIL TIMERGARA LOWER DIR CNIC.15302- 1067712-4	86.85	GGHSS SamarBagh	--do--	--do--
6.	891500038	FAIZA	CHAKDARA TEHSIL ADENZAI DIR LOWER CNIC.15307-6862734-8	86.15	GGMS Mattor	--do--	--do--
7.	891500041	GULFAM	SADDO TEHSIL TIMERGARA DIR LOWER CNIC.15302- 2160455-2	86.01	GGMS Safary Maidan	--do--	--do--

PET-2017

Sr	RollNo	Name	Address	Total Marks [out of 200]	School	Appointment order No and dated	Extension order No and dated any
1.	8915000039	SAIMA AKHTAR	ZIARAT TALASH DISTRICT DIR LOWER	104.07	GGMS DALGRAM	939-45 dated: 28-03-2017	
2.	8915000027	HINA BIBI	ZIRAT TALASH TEHSIL TIMERGARA	100.27	GGMS AJABAY	--do--	
3.	7715000036	YASMEEN	CHAKDARA ,	99.53	GGMS KOWARO	--do--	

ADMITTED
R

Dir Lower Female Regularization Order
PET Adhoc

Dir Lower Female Regularization Order PET Adhoc

20
5

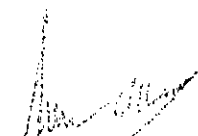
	HASAN	DISTRICT DIR (L)		MANAI			
4.	8915000028	NAZIA AKHTAR	TIMERGARA DISTRICT LOWER DIR	111.87	GGMS WARSAK	2812-18 dated: 13-06-2017	
5.	7715000111	NAUSHEEN	BADWAN TEHSIL ADENZAI LOWER DIR	97.19	GGMS KANDO MACHLA	--do--	
6.	8915000022	SAMEENA NAZ	KANDRO BALA DISTRICT TIMERGARA	96.57	GGMS GUMBAT BANDA	--do--	
7.	891500009	ANILA SARWAT	MAYAR DIR LOWER	93.61	GGMS KHALL	Endst: No. 01-07 dated: 01-01-2018	Court Case
8.	891500022	SAIMA GUL	ADENZAI DIR LOWER	88.51	GGMS LARAM	Endst: No. 01-07 dated: 01-01-2018	Court Case

TERMS & CONDITIONS:

1. The regularization will not be in favour of those, who have not taken over charge or has remained absent from duty or resign from service and also not for those who are under disciplinary proceedings.
2. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
3. The employees whose services are regularized under The Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act, 2018 (Khyber Pakhtunkhwa Act No.1 of 2018) or in the process of attaining service at the commencement of The Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act, 2018 (Khyber Pakhtunkhwa Act No.1 of 2018) shall rank junior to all civil servants belonging to the same service or cadre, as the case may be, who are in service on regular basis on the commencement of The Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act, 2018 (Khyber Pakhtunkhwa Act No.1 of 2018), and shall also rank junior to such other persons, if any, who, in pursuance of the recommendation of the Commission made before the commencement of this Act, are to be appointed to the respective service or cadre, irrespective of their actual date of appointment.

ATTESTED




Distt: Education officer
(F) Dist: Dir (L)

Dir Lower Female Regularization Order PET Adhoc

The seniority interse of the employees, whose services are regularized under this Act within the same service or cadre, shall be determined on the basis of their continuous officiation in such service or cadre:

(DR. HAFIZ MUHAMMAD IBRAHIM)
District Education Officer Female
Dir Lower

Endst: No. 587-92 /

Dated Timergara the 12 /03/2018.

Copy forwarded for information and necessary action to the: -

1. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
2. District Education Officers Concerned
3. District Accounts Officer Concerned
4. All Principals/Heamistress of GGHSS/GGHS/GGMS Concerned.
5. Official Concerned.
6. M/File

[Signature]
District Education Officer Female
Dir Lower

ATTESTED
[Signature]

گورنمنٹ فیما ب ڈی ای او سیکرٹریز زمانہ گورنمنٹ ڈیپارٹمنٹ

عنوان! درخواست برائے تبادلہ

Ref: 11

فما ب عالیہ

گورنمنٹ ڈیپارٹمنٹ

کہ فروری کو باوقوف ذرا بڑے ممبروں کو

کہ گورنمنٹ ٹرانزیشن سکول خیریت میں

پی ای ای کی پوسٹ خالی ٹرا پیس فروری

ذرا بڑے درخواست کنندہ ہے۔ اسی

پوسٹ پر میرا تبادلہ کیا جائے تو فروری

تاحیات دعاؤں سے

Signature

03/2021

Dist No 2357
Dist - 01.03-2021

ATTESTED

Signature

گورنمنٹ ڈیپارٹمنٹ

3
2021

گورنمنٹ

آئی ڈی ای او سیکرٹریز زمانہ گورنمنٹ ڈیپارٹمنٹ

Annexure

D

(23)

Alibor Muhammad

Suport Saib

28/6/21

28/06/2021

TO

DY No 3736

Date: 28-06-2021

The DEO (Female)

Dir lower lower

Subject : Transfer

R/Madam,

With due respect , it is stated that i am serving as PET at GHSS Moranai Since 16/03/2015. Now there is one vacant post at GGMS khazo-pula.

I have applied for transfer to above mentioned school . It is brought to your kind notice that the merit for transfer should be made on the rules of E- Transfer policy and obliged .

My merit is following .

ATTESTED

1) I have a spouse policy .

2) I have most tenure at current school more over other

teachers who applied for the same school and same post are not eligible as they are in radius less than 16 KM.

Note: Distance certificate here by attached for read / refrence .

Dated : 20/06/2021

Yours sincerely

HAFSA ALI

PET GGHS Moranai

(24)



Complaint History

JULY 19
2021

FROM

DO Education (F), Dir Lower

STATUS

Closed - Relief cannot be granted

REMARKS

تبصرہ

Dear Citizen.

The DEO Female Dir Lower has issued the transfer order of Sadaqat PET GGMS Malakand to functionalize the newly upgraded School i.e GGMS Khazo Pula. Further more the said Teacher was appointed on 12-03-2009 and remained out of her home stations for 12 years. The complainant Hafsa Ali was appointed on 16.03.2015 on contract basis. later on her services regularized in Feb 2018. Therefore, the said order has been issued according to the merit ,policy and seniority basis. DEO Female Dir Lower.

ATTESTED
JULY 17
2021

FROM

DO Education (F), Dir Lower

STATUS

Commented



FEEDBACK



Annexure F

25



OFFICE OF THE
DISTRICT EDUCATION OFFICER (FEMALE)
Dir Lower (Phone # 0945 9250083)

OFFICE ORDER.

Consequent upon the upgradation of GGPS Khazo Pula to Middle status, the following Mistress are hereby adjusted for the functionalization of school with immediate effect in the interest of public service.

S#	Name	Designation	From	To	Remarks
1	Sadaqat Begum	PET	GGMS Malakand Bala	GGMS Khazo Pula	Against Newly created Post

Note: 1. No TA/DA. is allowed.

2. Charge report should be submitted to all concerned.

(ASMAT ARA QURESHI)
Distt: Education Officer (F)
Dir Lower at Timergara

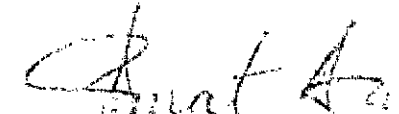
Ends: No. 15661-64 / Dated

Timergara the 01, 7 /2021

Copy of the above is forwarded for information to: -

1. The District Accounts Officer Dir lower at Timergara.
2. The Head Mistress/In-charge concerned.
3. The Teachers concerned.

ATTESTED


District Education Officer
Dir lower at Timergara



OFFICE OF THE
DISTRICT EDUCATION OFFICER (FEMALE)
Dir Lower (Phone # 0945 9250083)

OFFICE ORDER.

Mst: Afsheen Kanwal PET GGMS Barkhahal (bein Surplus) is hereby adjusted against vacant post of PET at GGMS Malakand Bala in the interest of public service with immediate effect.

Note:1. No TA/DA is allowed .

2. Charge report should be submitted to all concerned.

(ASMAT ARA QURESHI)
Distt: Education Officer (F)
Dir Lower at Timergara

Emst. No. 15665-68 / Dated Timergara the 01/17 /2021

Copy of the above is forwarded to:-

1. The District Accounts officer lower Dir at Timergara
2. The Principal/Head Mistress Concerned.
3. The Mistress Concerned
4. Accountant local office.

Asmat Ara Qureshi
District Education Officer Female
Dir Lower at Timergara

ATTESTED
[Signature]



OFFICE OF THE
DISTRICT EDUCATION OFFICER (FEMALE)
Dir Lower (Phone # 0945 9250083)

OFFICE ORDER.

Mst: Afsheen Kanwal PET GGMS Barkhanal (bein Surplus) is hereby adjusted against vacant post of PET at GGMS Malakand Bala In the Interest of public service with immediate effect.

- Note:1. No TA/DA is allowed .
- 2. Charge report should be submitted to all concerned.

(ASMAAT ARA GURESHI)
Distt Education Officer (F)
Dir Lower at Malakand Bala

Order No. 15665-68 / Dated

Transmitted to

Copy of the above is forwarded to

- 1 The District Accounts officer lower Dir at Malakand Bala
- 2 The Principal/Head Mistress Concerned.
- 3 The Mistress Concerned.
- 4 Accountant Local office.

District Education Officer (F)
Dir Lower at Malakand Bala

ATTACHED

Annexure H

27

To

1. The secretary Of Elementary and Secondary Education Khyber Pakhtunkhwa.
2. The Director Of Elementary and Secondary Education Khyber Pakhtunkhwa.
3. The Ombudsman Office Peshawar, Khyber Pakhtunkhwa.
4. The District Education Officer (Female) Dir Lower.

Subject: **APPEAL FOR TRANSFER FROM GGHS MORANAI TO GGMS KHAZO PULA AGAINST NEWLY SANCTION POST:**

Dear sir,

With great reverence it is stated that I'm serving as PET BPS-15 in education Department presently performing duty at GGHS MORANAI since 16-03-2015 which is about 26Km away from my residence.

I applied for transfer from GGHS MORANAI to GGMS KHAZO PULA against newly created PET Post to the District Education Office Female Dir Lower which my right is being senior most on the same station.

Meanwhile Mst. SADAQAT BEGUM (PET) GGMS MALAKAND also applied for transfer to GGMS KHAZO PULA but she is in radius and her station of duty is about 14KM of her residence. The distance certificate issued by C&W Department is hereby attached for ready reference

My Husband Mr. FAZAL SUBHAN (DM) also Government Servant in Education Department working at GMS KOTKAY PAIKHEL under the spouse policy the said station is my Due right.

Despite of the above reasons and merit the DEO (F) issued the transfer order of Mst. SADAQAT BEGUM which is injustice and against the education policy.

In the response latter to citizen portal on Dated 17-07-2021, the actual situation was kept hidden. Actually Mst SADAQAT BEGUM was appointed on 12-03-2009 at GGMS MANDESH and transferred to GGMS MALAKAND BALA on 26-06-2015, which is situated at 14 Km away from her residence and has been serving for the last six years as local station.

Demerit taken place due to entertain a NTS surplus (NTS SURPLUS???) person. Mst SADAQAT Begum transferred from GGMS MALAKAND BALA to GGMS KHAZO PULA and they adjusted that NTS surplus person at GGMS MALAKAND BALA They violate the law and rules of education policy.

It is therefore requested that the transfer of Mst. SADAQAT BEGUM (PET) may please be cancelled and I HAFSA ALI may very kindly be transferred to GGMS KHAZO PULA in the best interest of justice and to fulfill the rules of law. Otherwise I HAFSA ALI has the right to knock the door of court for justice.

(Attached documents).

- (1) Applications.
- (2) Spouse Service Certificate
- (3) Copy of transfer Order
- (4) Distance Certificate.

Yours Sincere
HAFSA ALI (PET GGHS MORANAI), DIR LOWER.
Cell no. 0346-8980003

ATTESTED


Dear customer, your shipment under CN

587616071 was delivered.

Receiver : JAMEEL

Date: 08/13/2021

Leopards Courier

UAN: 111-300-786<https://bit.ly/3nE3ckS>

Receiving

28

10:19 am

Dear customer, your shipment under CN
587616072 was delivered.

Receiver : AYAN

Date: 08/13/2021

Leopards Courier

UAN: 111-300-786<https://bit.ly/3nE3ckS>

10:20 am

1 Unread Message

Dear customer, your shipment under CN
587616073 was delivered.

Receiver : SHEHRAZ

Date: 08/13/2021

Leopards Courier

UAN: 111-300-786<https://bit.ly/3nE3ckS>

ATTESTED



10:20 am

Dispatch

29

Dear Customer, your shipment via
CN TM587616071 has been booked.
Amount Received: Rs. 200.00 Booking
Date: 11/08/21 Leopards Courier UAN:
111-300-786

8:15 am

Dear Customer, your shipment via
CN TM587616072 has been booked.
Amount Received: Rs. 200.00 Booking
Date: 11/08/21 Leopards Courier UAN:
111-300-786

8:15 am

Dear Customer, your shipment via
CN TM587616073 has been booked.
Amount Received: Rs. 200.00 Booking
Date: 11/08/21 Leopards Courier UAN:
111-300-786

8:16 am

 Message

ATTESTED



36

To: The Deputy Commissioner Dir Lower.

Subject: APPEAL FOR TRANSFER FROM GGHS MORANAI TO GGMS KHAZO PULA AGAINST NEWLY SANCTIONED POST.

Dear Sir,

With great reverence it is stated that I am serving as PET BPS-15 in Education Department. Presently performing duty at GGHS Moranai since 16-03-2015 which is about 26 Km away from my residence.

I was applied for transfer from GGHS Moranai to GGMS Khazo Pula against PET(Newly Created Post) to the District Education Office Female which is my right being senior most and on the bases of stay at the same station.

One Mst. Sadaqat Begum PET GGMS Malakand also applied for transfer to GGMS Khazo Pula but she is in radius and her station of duty is about 14Km of her residence. The distance certificate issued by C&W Department is hereby attached for ready reference.

My husband Mr. Fazal Subhan DM also Government servant in education department working at GMS Kotkai Paikhail under the spouse policy the said station is my right.

Despite of the above reason and merit the DEO (F) issued the transfer order of Mst. Sadaqat Begum who is in radius with 14Km of her residence which is injustice and against the policy.

It is therefore requested that the transfer of Mst. Sadaqat Begum PET may please be cancelled and I Hafsa Ali may very kindly transferred to GGMS Khazo Pula in the best of interest of justice.

Yours Sincere

Hafsa Ali PET GGHS Moranai,
Dir Lower.

Cell: 0346-8980003

ATTESTED

DEO(F)

As per law.

[Signature]
Deputy Commissioner
Dir Lower.

31

*Appl
M. L...*

The District Education Officer (D) D.E.S.S.

District Office

Amritsar

16/10/21

Subject: Substitution for Transfer

Sir,

Most respectfully it is stated that I have been working in Education Department as P.T. since 16/03/2015 at GGHS Morana. I am suffering great hardships during my son's journey to school. The traffic system of that area is not so good. As a result it is hard for me to reach the station in time.

Therefore it is requested to transfer me from GGHS Morana to GGHS Samba. I shall be thankful to you for any act of kindness.

Dated: 16/10/21

D. L...

16/10/21

Yours Obediently,

Hansa Ah P.T.

GGHS Morana

Infinix AI CAMERA

ATTESTED

[Signature]

بعدالت

حیدر حسین سرور ٹریبونل
حیدر نختوخوا، پشاور

Appellant

بنام ² منجانب
Hafsa Ali
EASE سہیلی
KP

موزعہ
مقدمہ
دعویٰ
پریم

باعث تحریر آنگہ

مقدمہ مندرجہ عن اللہ بالا میں اپنی طرف سے واسطے پیروی اور جواب دہی اور کل کارروائی متعلقہ
آپ کا مقام سہیلی کیلئے محمد اللہ ریڈ و کوئٹہ ہائی کورٹ
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو رضی نامہ کرنے سے تفریق حالت ہ فیصلہ برحلقہ دینے جو جواب دہی اور اقبال دعویٰ اور
باصورت ڈگری کرنے اجراء اور وصولی چیکب دروپیا عرضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری کی طرف یا اپیل کی برادگی اور منسوخی
نیز دائر کرنے اپیل نمرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تفریق کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساتھ
خواہ مشروط قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانبہ التوائے مقدمہ کے سبب سے ہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

Hafsa Ali

الرقوم 9 10 20

Attested & Accepted
Allah
Peshawar
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